PUBLIC DISCLOSURE

August 15, 2016

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Field & Main Bank
RSSD# 618740

140 North Main Street
Henderson, Kentucky 42420

Federal Reserve Bank of St. Louis

P.O. Box 442
St. Louis, Missouri 63166-0442

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 the 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: This institution is rated SATISFACTORY.

Field & Main Bank meets the criteria for a Satisfactory rating based on the evaluation of the bank's lending activity. The major factors supporting the institution's rating include:

- The borrower's profile analysis reveals reasonable penetration among individuals of different income levels, including low- and moderate-income (LMI) levels and businesses of different sizes.

- The geographic distribution of loans analysis reflects excellent dispersion throughout the bank's assessment areas.

- The bank's loan-to-deposit (LTD) ratio is more than reasonable given the bank's size, financial condition, and assessment areas' credit needs.

- A majority of the bank's loans and other lending-related activities are in the bank's assessment areas.

- No CRA-related complaints were filed against the bank for this review period.

SCOPE OF EXAMINATION

The bank's CRA performance was reviewed using the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency CRA Procedures for Small Institutions*. The period of review spanned from the date of the bank's previous CRA evaluation on July 30, 2012 to August 15, 2016. The small bank procedures entail one performance test, the Lending Test, and bank performance under this test is rated at the institution level and at the state and multistate MSA (metropolitan statistical area) level, including Kentucky and the Evansville, Indiana-Kentucky MSA (Evansville multistate MSA). In light of these characteristics, the bank received three sets of ratings: an overall institution rating, a rating for the Evansville multistate MSA, and a rating for the state of Kentucky. The following table details the number of branch offices and the CRA review procedures applicable to each rated area completed as part of this evaluation.

State or Multistate MSA	Offices		Assessment Area Review		
	#	%	Full Scope	Limited Scope	TOTAL
Evansville Multistate MSA	4	66.7%	1	0	**1**
State of Kentucky	2	33.3%	1	0	**1**
OVERALL	**6**	**100%**	**2**	**0**	**2**

The bank's institution rating is a blend of state and multistate MSA ratings, which are considered when making overall rating decisions. In light of branch structure, loan and deposit activity, and the bank's CRA evaluation history, CRA performance in the Evansville multistate MSA assessment area was given primary consideration. The following table displays these concentrations.

State/Multistate	Loans		Deposits, as of June 30, 2015 ($000s)[1]	
	#	%	$	%
Evansville Multistate MSA	345	96.4%	$272,316	86.9%
Kentucky	13	3.6%	$41,073	13.1%
TOTAL	**358**	**100%**	**$313,389**	**100%**

Lending performance was based on the loan products and the corresponding time periods displayed in the following table:

Loan Product	Time Period
Small Business	January 1, 2015 – December 31, 2015
Home Mortgage Disclosure Act (HMDA)	
Consumer Motor Vehicle	

These loan categories are considered the bank's primary lines of business, based on lending volume by number and dollar amounts and in light of the bank's stated business strategy. Therefore, loan activity represented by these credit products is deemed indicative of the bank's overall lending performance. However, as the bank has a particular emphasis on commercial lending, performance based on the small business loan product carried the most significance toward the bank's overall performance conclusions.

Performance conclusions are based on an evaluation of lending activity in the bank's two delineated assessment areas. The Evansville multistate MSA (Evansville) assessment area consists of Henderson County, Kentucky, and Vanderburgh County, Indiana, in their entireties. The second assessment area, located in Kentucky, is comprised of the entirety of Harrison County, a nonmetropolitan (nonMSA) county. Harrison County, in north central Kentucky, is located over 200 miles east and is, therefore, not contiguous with the Evansville assessment area, which is located in northwestern Kentucky and southwestern Indiana. Both assessment areas were analyzed using full-scope review procedures.

Under the small bank CRA performance criteria, analyses often entail comparisons of bank performance to assessment area demographics and the performance of other lenders, based on HMDA and CRA aggregate lending data. Unless otherwise noted, assessment area demographics are based on 2010 U.S. Census data; certain business geodemographics are based on Dun & Bradstreet data, which are applicable to the year 2015. When analyzing bank performance by

[1] Deposits here are under the name Ohio Valley Financial Group, as this was the bank's name prior to its name change in early 2015. See *Description of Institution* discussion later in this evaluation for more details.

comparing lending activity to both demographic data and aggregate lending data, greater emphasis is generally placed on the aggregate lending data, because it is expected to describe many factors impacting lenders within an assessment area. Aggregate lending datasets are also updated annually and are, therefore, expected to predict more relevant comparisons. In addition, the bank's lending levels were evaluated in relation to those of comparable financial institutions operating within the same general region. Three other banks were identified as similarly situated peers, with asset sizes ranging from $128.7 million to $598.9 million.

To augment this evaluation, four community contact interviews were conducted with members of the local community. These community contact interviews were used to ascertain specific credit needs, opportunities, and local market conditions within the bank's assessment areas. Key details from these interviews are included in the *Description of Assessment Area* section, as applicable to the assessment areas in which the interviews were conducted.

DESCRIPTION OF INSTITUTION

Field & Main Bank (formerly Ohio Valley Financial Group) is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is wholly owned by Ohio Valley Bancorp, Inc., a one-bank holding company, which is wholly owned by Field & Main Bancorp, Inc. All three institutions are headquartered in Henderson, Kentucky.

Since the previous evaluation, the bank experienced significant growth as a result of a merger with another financial institution. On January 24, 2015, Ohio Valley Financial Group merged with BankTrust Financial Corporation, both from Henderson, Kentucky. Upon the consummation of the merger, the combined organization was renamed from Ohio Valley Financial Group to Field & Main Bank. Field & Main Bank closed one of the acquired branches in Henderson, Kentucky, that was located a half mile from an existing branch. The bank has not opened any new branches since the last examination.

The bank's current branch network consists of six offices. Four offices, including the main office, are located in the Evansville assessment area, and two branches (including a limited service facility) are located in the nonMSA Kentucky (Harrison County) assessment area. In addition to being full-service facilities, the main office in Henderson, Kentucky, and all three branches in the Evansville assessment area (two branches in Henderson County, Kentucky, and one branch in Vanderburgh County, Indiana) have drive-up accessibility. The bank's branch network within the Evansville assessment area is clustered in the city of Henderson, Kentucky, and in the eastern portion of Vanderburgh County, Indiana. The bank also has two branches in the Harrison County, Kentucky, assessment area, located in the southern portion of the county. While the bank does not have a physical branch presence throughout all of its assessment areas, it is positioned to deliver financial services to the entireties of its assessment areas because of other service delivery systems, such as extended banking hours of operation and full-service online banking capabilities. The bank's assessment areas are detailed below.

Evansville Multistate MSA

- Evansville assessment area – all of Henderson County, Kentucky, and all of Vanderburgh County, Indiana.

State of Kentucky

- Harrison County assessment area (nonMSA) – all of Harrison County, Kentucky.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its customers, and the bank appeared capable of meeting assessment area credit needs based on its available resources and financial products. At June 30, 2016, the bank reported total assets of $403.3 million. On the same date, loans and leases outstanding were $325.0 million (80.6 percent of total assets), and deposits totaled $323.0 million. The bank's loan portfolio composition by credit category is displayed in the following table:

Distribution of Total Loans (June 30, 2016)		
Credit Category	**Amount ($000s)**	**Percentage of Total Loans**
Construction and Development	$16,309	5.0%
Commercial Real Estate	$101,607	31.3%
Multifamily Residential	$6,540	2.0%
1–4 Family Residential	$114,869	35.3%
Farmland	$11,664	3.6%
Farm Loans	$8,060	2.5%
Commercial and Industrial	$57,144	17.6%
Loans to Individuals	$7,284	2.2%
Total Other Loans	$1,625	0.5%
Less: Unearned Income	($83)	(0.0%)
TOTAL LOANS	**$325,019**	**100%**

As indicated in the table above, a significant portion of the bank's lending resources is directed to commercial real estate loans, loans secured by 1–4 family residential properties, and commercial and industrial loans. Also worth noting is that, by number of loans originated, loans to individuals (such as consumer motor vehicle loans) represent a significant product offering of the bank. As consumer loans not related to residential real estate are typically made in smaller dollar amounts relative to other credit products, consumer loans may represent a significant product line by number of loans made but are not reflected as such by dollar amount outstanding.

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on July 30, 2012.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

Field & Main Bank meets the standards for a Satisfactory rating under the small bank procedures, which evaluate bank performance under five criteria as applicable. The borrower's profile analysis reveals reasonable penetration among individuals of different income levels, including LMI levels and businesses of different sizes. The geographic distribution of loans analysis reflects excellent dispersion throughout the bank's assessment areas. The bank's LTD ratio is more than reasonable given the bank's size, financial condition, and assessment areas' credit needs. In addition, the majority of the bank's loans originated are within its assessment areas. Lastly, no CRA-related complaints were filed against the bank for this review period.

Rated Area	Lending Test Rating
Evansville Multistate MSA	Satisfactory
State of Kentucky	Satisfactory
OVERALL	**Satisfactory**

Loan Distribution by Borrower's Profile

This performance criterion focuses on the bank's lending penetration among borrowers of different income levels, with specific emphasis on lending to LMI borrowers. As displayed in the following table, the bank's overall loan distribution by borrower's profile reflects reasonable performance throughout the bank's assessment areas.

Assessment Area	Loan Distribution by Borrower's Profile
Evansville MSA	Reasonable
Harrison County, Kentucky	Reasonable
OVERALL	**Reasonable**

Additional details regarding the loan distribution by borrower's profile are included later in this evaluation under the sections applicable to individual assessment area analysis.

Geographic Distribution of Loans

As displayed in the following table, the bank's overall distribution of lending by income level of census tracts reflects excellent penetration throughout the bank's assessment areas.

Assessment Area	Loan Distribution by Geography
Evansville MSA	Excellent
Harrison County, Kentucky	Reasonable
OVERALL	**Excellent**

This performance criterion focuses on the bank's lending penetration among geographies of different income levels, with specific emphasis placed on lending in LMI geographies. The Harrison County, Kentucky, assessment area contains no LMI geographies and, therefore, a detailed geographic distribution of loans analysis was not performed for that assessment area as part of this evaluation.

Additional details regarding the loan distribution by geography are included later in this evaluation under the sections applicable to individual assessment area analysis.

Loan-to-Deposit (LTD) Ratio

One indication of the bank's overall level of lending activity is its LTD ratio. The following table displays the bank's average LTD ratio compared to those of regional peers. The average LTD ratio represents a 16-quarter average, dating back to the bank's last CRA evaluation.

LTD Ratio Analysis			
Name	**Asset Size ($000s) on June 30, 2016**	**Headquarters**	**Average LTD Ratio**
Field & Main Bank	$403,285	Henderson, Kentucky	98.5%
Regional Banks	$598,890	Owensboro, Kentucky	96.5%
	$397,507	Evansville, Indiana	86.2%
	$128,657	Cynthiana, Kentucky	50.5%

Based on data from the previous table, the bank's level of lending is higher than that of other banks in the region. During the review period, the bank's LTD ratio ranged from a low of 85.3 percent to a high of 106.5 percent. There is no consistent upward or downward trend across the review period, and performance was stable. Field & Main Bank's peer regional banks within the Evansville assessment area showed generally upward trends in LTD (although still a lower LTD overall throughout the review period). The single Harrison County, Kentucky, assessment area regional peer showed a downward trend in LTD. In comparison, the average LTD ratios for regional peers ranged from 50.5 to 96.5 percent. Therefore, compared to trend data from regional banks and information displayed in the table above, the bank's LTD ratio is more than reasonable given the bank's size, financial condition, and assessment areas' credit needs.

Assessment Area Concentration

For the loan activity reviewed as a part of this evaluation, the following table displays the number and dollar volume of loans inside and outside the bank's assessment areas.

Lending Inside and Outside of Assessment Areas January 1, 2015 through December 31, 2015						
Loan Type	**Inside Assessment Areas**		**Outside Assessment Areas**		**TOTAL**	
Small Business	73	75.3%	24	24.7%	**97**	**100%**
	$10,024	67.1%	$4,915	32.9%	**$14,939**	**100%**
HMDA	197	77.3%	58	22.7%	**255**	**100%**
	$24,041	65.4%	$12,740	34.6%	**$36,781**	**100%**
Consumer Motor Vehicle	88	85.4%	15	14.6%	**103**	**100%**
	$1,406	87.9%	$193	12.1%	**$1,599**	**100%**
TOTAL LOANS	**358**	**78.7%**	**97**	**21.3%**	**455**	**100%**
	$35,471	**66.5%**	**$17,848**	**33.5%**	**$53,319**	**100%**

As shown above, a majority of loans originated were extended to businesses and borrowers who operate or reside in the bank's assessment areas. In total, 78.7 percent of the bank's loans were made inside the assessment areas, accounting for 66.5 percent of dollar volume of total loans.

Review of Complaints

No CRA-related complaints were filed against the bank during this review period (July 30, 2012 to August 15, 2016).

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Based on findings in the Consumer Affairs examination (including a fair lending analysis performed under Regulation B – Equal Credit Opportunity and the Fair Housing Act requirements) conducted concurrently with this CRA evaluation, no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

EVANSVILLE, INDIANA-KENTUCKY MULTISTATE MSA
(Full-Scope Review)

CRA RATING FOR EVANSVILLE, INDIANA-KENTUCKY MSA: Satisfactory

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Evansville assessment area are consistent with the overall CRA examination. One year of loan data from 2015 was used in the analysis, since there was sufficient loan volume in this time frame to conduct a meaningful analysis. Field & Main Bank has one assessment area inside the Evansville multistate MSA; therefore, the bank's performance in this assessment area was evaluated using full-scope review procedures. This analysis focused on the distribution of loans by borrowers' income and business revenues and the geographic distribution of loans.

To augment the evaluation of the full-scope review in the Evansville assessment area, two community contact interviews were conducted to ascertain specific community credit needs, community development opportunities, and local economic conditions. The interviews were with representatives of an economic development group and a community development corporation. Details from these interviews are included in the *Description of Institution's Operations* section of this evaluation for the Evansville assessment area.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN EVANSVILLE MULTISTATE MSA

Bank Structure

The bank operates four of its six offices in this assessment area, which is considered to be the hub of the bank's core operations. The bank maintains three of its four offices (including its main office) inside Henderson County, with a single branch located on the far eastern side of the city of Evansville within Vanderburgh County, Indiana. As previously noted, during the review period, the bank merged with BankTrust Financial Corporation and acquired branches in Henderson County, Kentucky. A single branch in Henderson was closed and consolidated with a branch located a half mile to its west immediately following the merger in January 2015. Of the bank's facilities in this assessment area, one office (the main office) is located in a low-income census tract, two branches are located in moderate-income census tracts, and one branch is located in a middle-income census tract.

According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report as of June 30, 2015, the bank ranked fourth out of the 18 FDIC-insured depository institutions with a branch presence in this assessment area, encompassing 6.3 percent of the total assessment area deposit dollars.

General Demographics

The bank's Evansville assessment area, which had a population of 225,953 as of the 2010 U.S Census, is located in southwestern Indiana and northwestern Kentucky and includes two of the four counties that make up the Evansville multistate MSA (Henderson County, Kentucky, and Vanderburgh County, Indiana). The two excluded MSA counties are in Indiana: Posey and Warrick. This assessment area's most urban and densely populated portions are located in Vanderburgh County, Indiana, which contains the city of Evansville (with a population of 117,429 as of 2010) and some of its suburbs. Henderson County, Kentucky, contains the city of Henderson (with a population of 28,757) in its north central portion closest to the Ohio River, with more rural areas located to the south, west, and east. Vanderburgh County, Indiana, is the larger county of the two in the assessment area, with a population of 179,703 compared to a population of 46,250 in Henderson County, Kentucky).

As the demographics of this assessment area cover a wide area and the population is diverse, credit needs in the area are also varied and include a standard blend of consumer and business loan products. Additionally, a community contact indicated a need for greater support for community development activities, job training, and affordable housing, especially in the majority-minority portions of the city of Evansville. The contact further noted the need for home improvement loans for the central portion of the city of Evansville, as the age of the housing stock presented maintenance challenges to LMI homeowners.

Income and Wealth Demographics

The Evansville assessment area consists of 60 census tracts across Henderson County, Kentucky, and Vanderburgh County, Indiana. The following table reflects the number and population of the census tracts within the assessment area in each income category.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown**	**TOTAL**
Census Tracts	10	20	19	10	1	**60**
	16.7%	33.3%	31.7%	16.7%	1.7%	**100%**
Family Population	4,583	16,652	21,054	15,810	0	**58,099**
	7.9%	28.7%	36.2%	27.2%	0.0%	**100%**

The previous table reveals that the bank's assessment area contains 10 low-income census tracts that account for 16.7 percent of the total census tracts but only 7.9 percent of the family population. Moderate-income census tracts number 20 (33.3 percent) and account for 28.7 percent of the family population.

Based on 2010 U.S. Census data, the median family income for the assessment area was $56,129, which is below the Indiana statewide figure of $58,944 but above the Kentucky statewide figure of $52,046. The following table displays population percentages of assessment area families by income level compared to the state of Indiana and the state of Kentucky.

Family Population by Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Evansville Assessment Area	14,145	10,533	12,616	20,805	**58,099**
	24.3%	18.1%	21.7%	35.8%	**100%**
State of Indiana	330,690	302,919	364,716	659,481	**1,657,806**
	19.9%	18.3%	22.0%	39.8%	**100%**
State of Kentucky	252,407	192,028	224,709	459,025	**1,128,169**
	22.4%	17.0%	19.9%	40.7%	**100%**

Based on the data in the preceding table, the assessment area is slightly less affluent than the states of Indiana or Kentucky as a whole. The assessment area contains more low-income families than either state and has more moderate-income families than Kentucky. Although the first table in the section indicated that a plurality of families live in middle-income geographies within the assessment area, this table reveals that upper-income families are most prevalent (35.8 percent), followed by low-income families (24.3 percent). Lastly, the level of assessment area families living below the poverty level (10.9 percent) is above that of the state of Indiana (9.6 percent) but below the state of Kentucky (13.5 percent).

Housing Demographics

Based on housing values, income levels, and rental costs, housing in the assessment area appears to be slightly more affordable than Indiana and Kentucky as a whole, with some caveats. The median housing value for the assessment area is $109,669, which is below the figure for Indiana ($123,000) and Kentucky ($116,800). The affordability ratio of the assessment area (38.4) is virtually the same as Indiana’s (38.8) but above Kentucky’s (35.6), indicating a relatively affordable housing market compared to the two statewide benchmarks. Nevertheless, the percentage of renters who pay more than 30 percent of income on rental costs is higher in the assessment area (48.1 percent) than in both Indiana (44.6 percent) and Kentucky (41.1 percent). Median gross rent in the assessment area ($631) is more affordable than Indiana ($683) but more expensive than Kentucky ($601).

Considering that Kentucky is a more rural state (with just four cities having over 50,000 people as of the 2010 U.S. Census) and Indiana more urban (15 cities over 50,000), the higher-cost housing stock associated with urbanized areas contributes, in part, to Indiana having more expensive housing stock than Kentucky. The concentration of both older housing stock and poverty in the central portions of both the cities of Evansville and Henderson suggest that homeownership may be out of reach or difficult for certain families in the assessment area.

Industry and Employment Demographics

The assessment area economy is diverse and is supported by a mixture of manufacturing and service-oriented sectors. According to the U.S. Census Bureau 2014 County Business Patterns, the number of paid employees in the assessment area is 118,212. The largest sector of employment is healthcare and social assistance (18.6 percent), followed by manufacturing (13.7 percent), and retail trade (12.7 percent). Furthermore, business demographic estimates indicate that 88.6 percent of assessment area businesses have gross annual revenues of $1 million or less.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for each county of the assessment area compared to the state of Indiana and the state of Kentucky.

Unemployment Data				
Time Period (Annual Average)	**Indiana**	**Vanderburgh County, Indiana**	**Kentucky**	**Henderson County, Kentucky**
2012	8.3%	7.7%	8.2%	7.5%
2013	7.7%	7.1%	8.1%	7.5%
2014	6.0%	5.4%	6.5%	6.1%
2015	4.8%	4.3%	5.4%	5.0%

As shown in the table above, unemployment levels for each county, as well as the states of Indiana and Kentucky, have shown a decreasing trend since 2012. Additionally, unemployment levels in each of these counties are below statewide levels.

Community Contact Information

Information from two community contact interviews was used to help shape the performance context in which the bank’s activities in this assessment area were evaluated. Of these interviews, one was conducted with an individual specializing in community development and affordable housing, and the other was conducted with an individual working in an economic development role. The community contact interviewees categorized the economy of the assessment area as slow-growing but improving, particularly on the Indiana side of the MSA, where recent improvements to the downtown Evansville area have created new jobs and housing and spurred further investment. However, one contact stated that there was a shortage of affordable housing in the city of Evansville, as well as a need for microloans to small business owners and consumers who might otherwise seek out high-interest payday lenders. Another contact noted that development on the Kentucky side of the MSA lagged the Indiana portion, but that interest in industrial sites in Henderson County was increasing.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN EVANSVILLE MULTISTATE MSA

Loan Distribution by Borrower's Profile

Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure as estimated by the FFIEC ($64,800 for the Evansville MSA as of 2015). The bank's overall borrower's profile performance, based on analyses of all three loan categories, is reasonable.

The following table reflects the bank's distribution of small business loans by gross annual business revenue and loan amount compared to Dun & Bradstreet and aggregate data.

Distribution of Loans Inside Assessment Area by Business Revenue January 1, 2015 through December 31, 2015								
Gross Revenue	**Loan Amounts in $000s**						**TOTAL**	
	≤$100		**>$100 and ≤$250**		**>$250 and ≤$1,000**			
$1 Million or Less	27	39.1%	11	15.9%	5	7.2%	**43**	**62.3%**
Greater than $1 Million/Unknown	11	15.9%	12	17.4%	3	4.3%	**26**	**37.7%**
TOTAL	**38**	**55.1%**	**23**	**33.3%**	**8**	**11.6%**	**69**	**100%**
Small Business Institutions							**88.6%**	
2015 CRA Aggregate Data							**40.8%**	

Based on the analysis of small business loans, the bank is doing a reasonable job of meeting the credit needs of small businesses. The table above demonstrates that 43 loans out of the 69 loans reviewed (62.3 percent) were made to businesses with gross annual revenues of $1 million or less, which far exceeds CRA aggregate data for the assessment area. In comparison, the bank's performance is significantly less than the business geodemographic data, which indicates that 88.6 percent of small businesses inside the assessment area are small businesses. Lastly, the fact that 62.8 percent (27 of 43) of loans to small businesses reviewed were in amounts of $100,000 or less further indicates the bank's willingness to meet the credit needs of small businesses, a need specifically addressed by the community contacts.

The bank's distribution of HMDA lending to borrowers by income level was reviewed. The following table reflects the bank's distribution of HMDA loans by borrower income level compared to family population income characteristics and aggregate performance for the assessment area.

Distribution of Loans Inside Assessment Area by Borrower Income January 1, 2015 through December 31, 2015												
Dataset	**Borrower Income Level**										**TOTAL**	
	Low-		**Moderate-**		**Middle-**		**Upper-**		**Unknown**			
Home Purchase	8	7.4%	10	9.3%	26	24.1%	46	42.6%	18	16.7%	**108**	**100%**
Refinance	8	12.9%	10	16.1%	9	14.5%	28	45.2%	7	11.3%	**62**	**100%**
Home Improvement	0	0.0%	1	6.3%	0	0.0%	3	18.8%	12	75.0%	**16**	**100%**
Multifamily	0	0.0%	0	0.0%	0	0.0%	0	0.0%	3	100.0%	**3**	**100%**
TOTAL HMDA	**16**	**8.5%**	**21**	**11.1%**	**35**	**18.5%**	**77**	**40.7%**	**40**	**21.2%**	**189**	**100%**
Family Population	24.3%		18.1%		21.7%		35.8%		0.0%		**100%**	
2015 HMDA Aggregate Data	10.8%		21.2%		20.7%		26.2%		21.2%		**100%**	

The bank's total percentage of lending to low-income borrowers (8.5 percent) is well below the percentage of low-income families in the assessment area (24.3 percent) and below the 2015 aggregate data (10.8 percent), representing poor performance. Lending to moderate-income borrowers (11.1 percent) is significantly less than both the percentage of moderate-income families (18.1 percent) and the 2015 aggregate (21.2 percent), representing poor performance. Overall, the bank's borrower distribution of HMDA lending to LMI borrowers is poor.

Lastly, as with the previous loan categories, the borrower distribution of consumer motor vehicle loans was analyzed by borrower's income profile. The following table shows the distribution of consumer motor vehicle loans by income level of the borrower compared to household population characteristics.

Distribution of Bank Loans Inside Assessment Area by Income Level of Borrower January 1, 2015 through December 31, 2015												
Dataset	**Borrower Income Level**										**TOTAL**	
	Low-		**Moderate-**		**Middle-**		**Upper-**		**Unknown**			
Motor Vehicle Loans	25	28.7%	21	24.1%	18	20.7%	22	25.3%	1	1.1%	**87**	**100%**
Household Population	27.2%		17.5%		17.1%		38.2%		0.0%		**100%**	

The bank's performance by number of motor vehicle loans made to low-income borrowers (28.7 percent) is higher than the low-income household population figure of 27.2 percent, which is considered excellent. Likewise, moderate-income borrowers, representing 24.1 percent of consumer motor vehicle loans, exceed the household population of 17.5 percent, indicating excellent performance. Based on this data, the distribution of the bank's consumer motor vehicle loans reflects excellent penetration among individuals of different income levels.

Geographic Distribution of Loans

As noted previously, the bank's assessment area contains 10 low-income census tracts, 20 moderate-income census tracts, 19 middle-income census tracts, 10 upper-income census tracts, and 1 unknown-income census tract. The analysis in this section illustrates the distribution of the bank's loan activity across these geographies. Overall, the bank's geographic distribution of loans reflects excellent dispersion throughout the assessment area, based on activity analyzed from the three loan categories (small business, HMDA, and consumer motor vehicle).

The following table displays the geographic distribution of small business loans compared to business institutions and 2015 aggregate lending data for the assessment area.

Distribution of Loans Inside Assessment Area by Income Level of Geography
January 1, 2015 through December 31, 2015

Dataset	Geography Income Level										TOTAL	
	Low-		Moderate-		Middle-		Upper-		Unknown			
Small Business Loans	10	14.5%	24	34.8%	26	37.7%	9	13.0%	0	0.0%	**69**	**100%**
Business Institutions	9.8%		30.5%		38.1%		21.6%		0.0%		**100%**	
2015 Small Business Aggregate	9.8%		31.6%		35.2%		22.5%		0.9%		**100%**	

The analysis of small business loans reveals lending performance is excellent when compared to business geodemographics and 2015 aggregate lending data. Small business loans made in low-income census tracts represented 14.5 percent of total loans, compared with 9.8 percent of businesses that are located in these geographies and 9.8 percent aggregate lending performance, representing excellent performance. Small business loans made within moderate-income geographies (34.8 percent) also outperform the geodemographic benchmark (30.5 percent) and the 2015 aggregate (31.6 percent), representing excellent performance.

The following table displays the geographic distribution of HMDA loans compared to owner-occupied housing demographics and 2015 HMDA aggregate lending data for the assessment area.

Distribution of Loans Inside Assessment Area by Income Level of Geography January 1, 2015 through December 31, 2015												
Dataset	**Geography Income Level**										**TOTAL**	
	Low-		**Moderate-**		**Middle-**		**Upper-**		**Unknown**			
Home Purchase	11	10.2%	31	28.7%	47	43.5%	19	17.6%	0	0.0%	**108**	**100%**
Refinance	7	11.3%	11	17.7%	28	45.2%	16	25.8%	0	0.0%	**62**	**100%**
Home Improvement	1	6.3%	5	31.3%	5	31.3%	5	31.3%	0	0.0%	**16**	**100%**
Multifamily	0	0.0%	1	33.3%	2	66.7%	0	0.0%	0	0.0%	**3**	**100%**
TOTAL HMDA	**19**	**10.1%**	**48**	**25.4%**	**82**	**43.4%**	**40**	**21.2%**	**0**	**0.0%**	**189**	**100%**
Owner Occupied Housing	6.2%		26.0%		38.6%		29.2%		0.0%		**100%**	
2015 HMDA Aggregate	2.7%		22.2%		35.5%		39.6%		0.0%		**100%**	

The analysis of HMDA loans reveals excellent lending performance. The bank's total penetration of low-income census tracts (10.1 percent) is significantly higher than both the figure for owner-occupied housing occupied by low-income families (6.2 percent) and the 2015 HMDA aggregate figure (2.7 percent), representing excellent performance. The bank's total penetration of moderate-income census tracts (25.4 percent) is in line with the figure for owner-occupied housing (26.0 percent) but is still higher than the 2015 aggregate figure (22.2 percent), representing reasonable performance. Therefore, the bank's overall geographic distribution of HMDA loans to LMI geographies (35.5 percent) is excellent when compared to the 32.2 percent of owner-occupied housing and aggregate performance of 24.9 percent.

The bank's geographic distribution of consumer motor vehicle loans was also reviewed. The following table displays the geographic distribution of consumer motor vehicle loans compared to household population demographics.

Distribution of Bank Loans Inside Assessment Area by Income Level of Geography January 1, 2015 through December 31, 2015												
Dataset	**Geography Income Level**										**TOTAL**	
	Low-		**Moderate-**		**Middle-**		**Upper-**		**Unknown**			
Motor Vehicle Loans	9	10.3%	17	19.5%	53	60.9%	8	9.2%	0	0.0%	**87**	**100%**
Household Population	9.0%		32.1%		35.0%		24.0%		0.0%		**100%**	

As displayed in the preceding table, by number of loans, the bank originated 10.3 percent of its consumer motor vehicle loans to borrowers in low-income census tracts, which is above the percentage of households in low-income census tracts (9.0 percent), representing excellent performance. The bank originated 19.5 percent of loans to moderate-income census tracts, significantly underperforming the household figure of 32.1 percent, representing poor performance. Consequently, the bank's performance under the geography's profile category for consumer motor vehicle loans is reasonable.

STATE OF KENTUCKY
(Full-Scope Review)

CRA RATING FOR KENTUCKY: Satisfactory

SCOPE OF EXAMINATION

Field & Main Bank has one assessment area inside the state of Kentucky; therefore, the bank's performance in this assessment area was evaluated using full-scope review procedures. Scoping considerations applicable to the review of the state of Kentucky's assessment area are consistent with the overall CRA examination. One year of loan data from 2015 was used in the analysis. Field & Main Bank's presence in this assessment area dates to January 2015, following its merger with BankTrust Financial Corporation. Only 13 loans were available for analysis inside the Kentucky assessment area in 2015. Despite low loan volumes, a review of lending activity in years prior to the merger would not be appropriate to the analysis of the performance of Field & Main Bank, which maintained no branches or lending presence in the Kentucky assessment area until the merger. This analysis focused on the distribution of loans by borrower's income and business revenues.

To augment the evaluation of the full-scope review assessment area in the state of Kentucky, two community contact interviews were conducted to ascertain specific community credit needs, community development opportunities, and local economic conditions. The interviews were with representatives of an economic development group and a housing agency. Details from these interviews are included in the *Description of Institution's Operations* section of this evaluation for the state of Kentucky assessment area.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN KENTUCKY

Bank Structure

The bank operates two of its six offices in the Harrison County assessment area, one of which is a limited-service facility located a few blocks from the full-service branch in Cynthiana, Kentucky, the county seat of Harrison County. As previously noted, during the review period, the bank merged with BankTrust Financial Corporation and, as a result, acquired the two Cynthiana facilities. Both branches are located in an upper-income census tract. According to the FDIC Deposit Market Share Report, as of June 30, 2015, the bank ranked last out of the four FDIC-insured depository institutions with a branch presence in this assessment area, encompassing 17.9 percent of the total assessment area deposit dollars.

General Demographics

The assessment area, which is comprised of Harrison County in its entirety, is located in north central Kentucky. The assessment area contains three middle-income census tracts and two upper-income census tracts. According to 2010 U.S. Census data, the total population of the assessment area is 18,846. Credit needs in the area are varied and include a blend of consumer and small business products. Information gathered from community contacts suggests that growth in Harrison County is stagnant and that many workers tend to locate in adjacent counties (nearly all of which are located in adjacent MSAs such as Cincinnati to the north or Lexington to the south). The community contacts believed that economic growth would remain limited unless the county could attract major employers inside its boundaries.

Income and Wealth Demographics

The following table reflects the number and population of the census tracts within the assessment area in each income category.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown**	**TOTAL**
Census Tracts	0	0	3	2	0	**5**
	0.0%	0.0%	60.0%	40.0%	0.0%	**100%**
Family Population	0	0	2,088	2,690	0	**4,778**
	0.0%	0.0%	43.7%	56.3%	0.0%	**100%**

The table reveals that, while the highest concentration of census tracts is middle-income (60.0 percent), upper-income census tracts contain more of the family population (56.3 percent, compared to 43.7 percent of families living in middle-income census tracts). There are no LMI census tracts in Harrison County, Kentucky. Furthermore, no middle-income census tracts are either distressed or underserved, based on FFIEC definitions.

Based on 2010 U.S. Census data, the median family income for the assessment area is $51,715. This figure is substantially higher than nonMSA Kentucky ($43,402). More recently, the FFIEC estimated that the 2015 median family income for nonMSA Kentucky was 46,900. The following table displays population percentages of assessment area families by income levels, compared to all nonMSA Kentucky families.

Family Population by Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Assessment Area	775	799	785	2,419	**4,778**
	16.2%	16.7%	16.4%	50.6%	**100%**
NonMSA Kentucky	113,894	81,702	92,223	203,383	**491,202**
	23.2%	16.6%	18.8%	41.4%	**100%**

Based on the data in the preceding table, the assessment area is considerably more affluent than the state of Kentucky's nonmetropolitan portions as a whole, with 50.6 percent of families falling within the upper-income category compared to the nonMSA percentage of 41.4 percent. A total of 32.9 percent of the assessment area is comprised of LMI families compared to 39.8 percent for nonMSA Kentucky. Lastly, the level of assessment area families living below the poverty level (14.1 percent) is less than the figure for nonMSA Kentucky (16.9 percent).

Housing Demographics

Based on housing values and rental costs, housing in the assessment area appears to be less affordable than nonMSA Kentucky as a whole. The median housing value for the assessment area was $112,800, which is well above the figure for nonMSA Kentucky of $84,511. However, median rent in the assessment area ($494) is lower than that of nonMSA Kentucky ($513). The housing affordability ratio of the assessment area is 36.0, less than the nonMSA Kentucky figure of 40.0. Finally, renters paying more than 30 percent of their income on rental costs constitute 39.1 percent of the assessment area, almost on par with the nonMSA Kentucky figure (39.2 percent).

Industry and Employment Demographics

The local economy leans toward manufacturing, which accounts for nearly half of its total employment. Per 2014 County Business Patterns data from the U.S. Census Bureau, the number of paid employees in the assessment area is 3,813. Of that amount, 45.9 percent are employed in the manufacturing industry. The assessment area and its surrounding counties have significant employment concentrations in automobile manufacturing and related industries. Healthcare and social assistance is the second largest industry in the assessment area (21.5 percent). Retail trade is third (15.1 percent).

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to nonMSA Kentucky.

Unemployment Data		
Time Period (Annual Average)	**NonMSA Kentucky**	**Harrison County, Kentucky**
2012	9.4%	7.9%
2013	9.5%	7.6%
2014	7.7%	6.0%
2015	6.6%	4.7%

As shown in the table above, unemployment levels for the assessment area, as well as nonMSA Kentucky, have shown a decreasing trend since 2012, with Harrison County performing better overall in unemployment levels throughout the review period.

Community Contact Information

Information from two community contact interviews was used to help shape the performance context in which the bank's activities in this assessment area were evaluated. Of these interviews, one was with an individual working in an economic development role and the other was with an individual working in a housing role. Both contacts characterized Harrison County as performing better economically than the state of Kentucky as a whole, though competition over automobile manufacturing jobs and related activities was fierce. The contacts stated that adjacent counties were performing better overall. They identified the need for affordable housing development financing, and the need to improve and expand existing apprenticeship programs and workforce development in the county in order to develop and retain high-skilled workers. One community contact also noted a shortage of affordable housing and said that the application wait list for public housing and vouchers was closed for the year.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN KENTUCKY

Loan Distribution by Borrower's Profile

Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure as estimated by the FFIEC ($46,900 for nonMSA Kentucky as of 2015). The bank's overall borrower's profile performance, based on analyses of all three loan categories, is reasonable.

The following table reflects the bank's distribution of small business loans by gross annual business revenue and loan amount compared to Dun & Bradstreet and aggregate data.

Distribution of Loans Inside Assessment Area by Business Revenue
January 1, 2015 through December 31, 2015

Gross Revenue	Loan Amounts in $000s						TOTAL	
	≤$100		>$100 and ≤$250		>$250 and ≤$1,000			
$1 Million or Less	3	75.0%	0	0.0%	0	0.0%	**3**	**75.0%**
Greater than $1 Million/Unknown	1	25.0%	0	0.0%	0	0.0%	**1**	**25.0%**
TOTAL	**4**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**	**4**	**100%**
Small Business Institutions							**93.7%**	
2015 CRA Aggregate							**37.9%**	

Based on the analysis of the small number of small business loans, the bank is doing a reasonable job of meeting the needs of small businesses. The table above demonstrates that 75.0 percent of loans (3 out of 4) were made to businesses with gross annual revenues of $1 million or less, which exceeds CRA aggregate data for the assessment area. In comparison, business geodemographic data indicate that 93.7 percent of small business institutions inside the assessment area are small businesses. Lastly, all three of the loans were in amounts of $100,000 or less, further indicating the bank's willingness to meet the credit needs of small businesses.

The bank's distribution of HMDA lending to borrowers by income level was reviewed. The following table reflects the bank's distribution of HMDA loans by income level of borrower compared to the family population by income level and the 2015 HMDA aggregate data.

Distribution of Loans Inside Assessment Area by Borrower Income

January 1, 2015 through December 31, 2015

Dataset	Borrower Income Level										TOTAL	
	Low-		Moderate-		Middle-		Upper-		Unknown			
Home Purchase	1	33.3%	0	0.0%	1	33.3%	1	33.3%	0	0.0%	**3**	**100%**
Refinance	0	0.0%	1	20.0%	0	0.0%	4	80.0%	0	0.0%	**5**	**100%**
Home Improvement	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	**0**	**100%**
Multifamily	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	**0**	**100%**
TOTAL HMDA	**1**	**12.5%**	**1**	**12.5%**	**1**	**12.5%**	**5**	**62.5%**	**0**	**0.0%**	**8**	**100%**
Family Population	16.2%		16.7%		16.4%		50.6%		0.0%		**100%**	
2015 HMDA Aggregate	4.8%		14.4%		21.2%		39.3%		20.4%		**100%**	

The bank's total percentage of lending to low-income borrowers (12.5 percent) is well above the 2015 HMDA aggregate (4.8 percent) and below the low-income family population figure (16.2 percent), which typically represents reasonable performance. The bank's total percentage of lending to moderate-income borrowers (12.5 percent) is less than the moderate-income family population figure (16.7 percent) and in line with the 2015 HMDA aggregate figure (14.4 percent), representing reasonable performance. When combining lending numbers to LMI borrowers (25.0 percent) and comparing to the 2015 aggregate figure of 19.2 percent and 32.9 percent population figure, the bank's overall borrower distribution of HMDA loans is reasonable.

The bank's distribution of consumer motor vehicle loans was also reviewed. The following table reflects the bank's distribution of consumer motor vehicle loans by borrower income level compared to the household population.

Distribution of Bank Loans Inside Assessment Area by Income Level of Borrower

January 1, 2015 through December 31, 2015

Dataset	Borrower Income Level										TOTAL	
	Low-		Moderate-		Middle-		Upper-		Unknown			
Motor Vehicle Loans	0	0.0%	0	0.0%	1	100.0%	0	0.0%	0	0.0%	**1**	**100%**
Household Population	23.2%		14.5%		12.6%		49.7%		0.0%		**100%**	

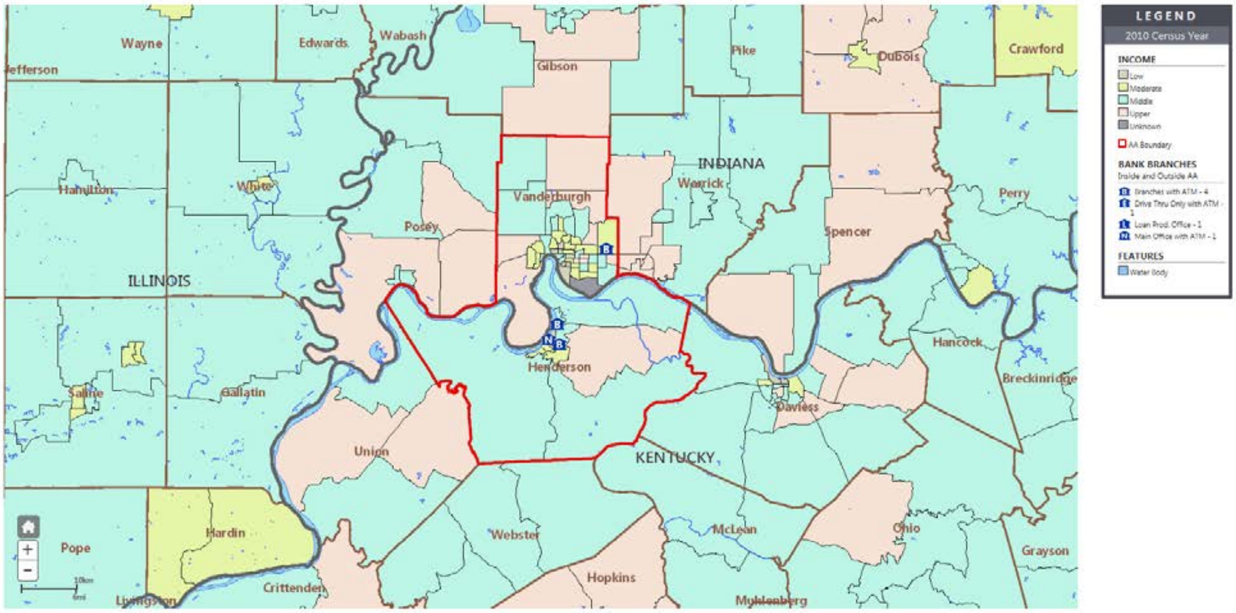
A single consumer motor vehicle loan was originated in the assessment area to a middle-income borrower. This means that no lending went to either low- or moderate-income borrowers compared to the low-income household figure of 23.2 percent and the moderate-income household figure of 14.5 percent. Due to the lack of loan volume, no meaningful conclusion can be made with regard to the bank's borrower performance for consumer motor vehicle loans.

Geographic Distribution of Loans

Under the geographic distribution of loans analysis, emphasis is normally placed on the bank's performance in LMI geographies. However, this assessment area does not include any LMI census tracts. Therefore, a detailed geographic distribution of loans analysis would not prove meaningful and was not performed as a part of this evaluation. Nevertheless, the bank's loan dispersion within each census tract of this assessment area was reviewed. The analysis indicated that the bank's loan activity for all credit products reviewed was adequately dispersed throughout the assessment area consistent with demographic and bank structure.

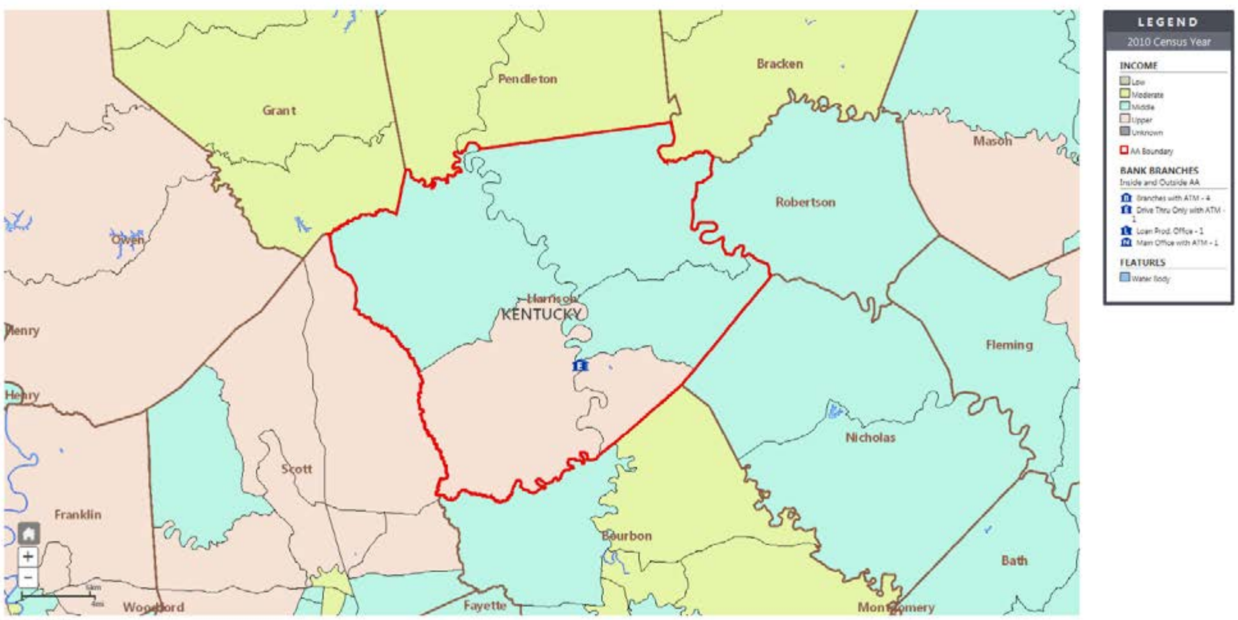
ASSESSMENT AREA DETAIL

Field and Main Bank - Henderson, Kentucky
Evansville, IN-KY Partial MSA Assessment Area



Tract Income Map

Field and Main Bank - Henderson, Kentucky
Harrison County NonMSA Kentucky Assessment Area



Tract Income Map

GLOSSARY

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

Assessment area: One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

Census tract: A small subdivision of metropolitan and nonmetropolitan 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 on 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 contact: Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

Community development: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- and moderate-income (LMI) individuals; (2) community services targeted to LMI individuals; (3) activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of $1 million or less; (4) activities that revitalize or stabilize LMI geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and 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 loans, other secured consumer loans, and other unsecured consumer loans.

Demographics: The statistical characteristics of human populations (such as age, race, sex, income, etc.) used especially to identify markets.

Distressed nonmetropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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 nonrelatives 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 who 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 (e.g., 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 refinancing of home improvement and home purchase loans.

Household: One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Housing affordability ratio: Is calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

Median family income: The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An 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. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

Nonmetropolitan statistical area (nonMSA): Not part of a metropolitan area. (See metropolitan area.)

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.

Performance context: The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

Performance criteria: These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

Performance evaluation (PE): A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

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 businesses/small farms: A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were $1 million or less.

Small loan(s) to business(es): That is, "small business loans" are included in "loans to small businesses" as defined in the Consolidated Reports of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of $1 million or less and typically are secured by either 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): That is, "small farm loans" are 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.

Underserved middle-income geography: A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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