



COMMUNITY FINANCIAL SERVICES BANK

COMMUNITY REINVESTMENT ACT

PUBLIC FILE

PUBLISHED DATE: 04/01/2024

2024

S T I N E T H N I C O C

01.

ABOUT CFSB'S CRA
PROGRAM

02.

FINANCIAL SERVICES &
PRODUCTS

03.

BANKING CENTER
INFORMATION

04.

ATM/ITM INFORMATION
BANKING CENTER ACTIVITY

05.

CFSB FEE SCHEDULE

06.

CFSB LOAN TO DEPOSIT RATIO

07.

CFSB ASSESMENT AREA

08.

FRB PERFORMANCE
EVALUATION - 2022

09.

WRITTEN COMMENTS &
RESPONSES

ABOUT CFSB'S CRA PROGRAM

The Community Reinvestment Act, or CRA, provides financial institutions with a framework to meet the credit needs of the communities in which they serve.

Our Public File includes information about the communities we serve, the products and services we provide, as well as important information about how we are committed to meeting our community's needs through our products and services.

CFSB's assessment area includes the Kentucky counties of Calloway, Graves, Livingston, Marshall and McCracken.

WRITTEN COMMENTS AND RESPONSES

Written comments received from the public that specifically address the Bank's record of assessing and providing credit for the needs of our local communities are located in Section 9 of this Public File.

CRA PERFORMANCE ASSESSMENT

A copy of the public section of CFSB's most recent CRA Performance Evaluation is located in Section 8 of this Public File. This evaluation is written and published by The Federal Reserve Bank of St. Louis, CFSB's primary regulator.

REQUESTS FOR ADDITIONAL INFORMATION

For further information concerning CFSB's ability to meet the credit needs of Calloway, Graves, Livingston, Marshall and McCracken Counties, please write to:

Community Financial Services Bank
Attn: Compliance Officer
P.O. Box 467
Benton, KY 42025

FINANCIAL SERVICES & PRODUCTS

CFSB offers a variety of loan and deposit products and available services to our clients.

All services are offered at all CFSB locations with no material difference in costs. Fees associated with deposit products and other services are disclosed in this Public File.

1. REAL ESTATE LOANS

- Residential 1-4 Family Dwelling Purchase and Refinance
- Construction
- Home Improvement
- Secondary Market (Freddie Mac)
- Farmland
- Home Equity Lines of Credit

2. COMMUNITY DEVELOPMENT LOANS

3. COMMERCIAL & INDUSTRIAL LOANS

- Revolving Lines of Credit
- Crop Production
- Equipment Purchases

4. CONSUMER LOANS

- Revolving Credit Plans
- Overdraft Protection
- Automobiles
- Recreational Vehicles

5. DEPOSIT ACCOUNTS

- Checking
- Savings
- Certificates of Deposit
- IRAs

6. OTHER ACCOUNTS/SERVICES

- CDAR's Deposit System
- Financial Planning - LPL Financial
- Government Check Cashing
- ACH Bill Payment
- Wire Transfers
- Notary Service
- Fax Service
- Internet Banking
- Non-Deposit Investment Products*

*All non-deposit investment products are provided through CFSB Investments, our licensed brokerage operated by LPL Financial, and are not insured or guaranteed by the FDIC. Investments are not guaranteed and may lose value.

BANKING CENTER LOCATIONS & HOURS

Benton Banking Center

221 W 5th Ave

Benton, KY 42025

[Census Tract 9504]

Lobby: 8:30am - 4:30pm M-F

Drive-Thru: 8:00am - 4:30pm M-Th | 8:00am - 6:00pm Fri.

Drive-Thru: 9:00am - 12:00pm Sat.

Calvert City Banking Center

456 5th Ave

Calvert City, KY 42029

[Census Tract 9501]

Lobby: 8:30am - 4:30pm M-F

Drive-Thru: 8:00am - 4:30pm M-Th | 8:00am - 6:00pm Fri.

Drive-Thru: CLOSED Sat.

Draffenville Banking Center

23 US Hwy 68 W

Benton, KY 42025

[Census Tract 9502]

Lobby: 8:30am - 4:30pm M-F

Drive-Thru: 8:00am - 4:30pm M-Th | 8:00am - 6:00pm Fri.

Drive-Thru: 9:00am - 12:00pm Sat.

Calloway County Banking Center

1721 N 12th Street

Murray, KY 42071

[Census Tract 103]

Lobby: 8:30am - 4:30pm M-F

Drive-Thru: 8:00am - 4:30pm M-Th | 8:00am - 6:00pm Fri.

Drive-Thru: 9:00am - 12:00pm Sat.

Calloway County - Sycamore Banking Center (Opened March 2020)

414 S. 12th Street

Murray, KY 42071

[Census Tract 106]

Lobby: 8:30am - 4:30pm M-F

Drive-Thru: 8:00am - 4:30pm M-Th | 8:00am - 6:00pm Fri.

Drive-Thru: CLOSED Sat.

McCracken County - Park Ave Banking Center

3390 Park Ave

Paducah, KY 42001

[Census Tract 314]

Lobby: 8:30am - 4:30pm M-F

Drive-Thru: 8:00am - 4:30pm M-Th | 8:00am - 6:00pm Fri.

Drive-Thru: CLOSED Sat.

McCracken County - Southside Banking Center

2550 Irvin Cobb Drive

Paducah, KY 42003

[Census Tract 301]

Lobby: 8:30am - 4:30pm M-F

Drive-Thru: 8:00am - 4:30pm M-Th | 8:00am - 6:00pm Fri.

Drive-Thru: 9:00am - 12:00pm Sat.

Graves County Banking Center

100 Dick Castleman Bypass

Mayfield, KY 42066

[Census Tract 201]

Lobby: 8:30am - 4:30pm M-F

Drive-Thru: 8:00am - 4:30pm M-Th | 8:00am - 6:00pm Fri.

Drive-Thru: 9:00am - 12:00pm Sat.

ATM/ITM LOCATIONS

Automated Teller Machine (ATM) Locations

Benton Banking Center
221 W 5th St
Benton, KY 42025
[Census Tract 9504]

Aurora
15695 Hwy 68 E
Hardin, KY 42048
[Census Tract 9506]

Murray State University Curris Center
Curris Center, Cs-1075
Murray, KY 42071
[Census Tract 103]

Calloway County Banking Center
1721 N 12th St
Murray, KY 42071
[Census Tract 103]

Hardin
US Hwy 402
Hardin, KY 42048
[Census Tract 9505]

CFSB Center
1401 State Rt 121 N
Murray, KY 42071
[Census Tract 103]

Calvert City Banking Center
456 5th Ave
Calvert City, KY 42029
[Census Tract 9501]

Draffenville Banking Center
23 US Hwy 68W
Benton, KY 42025
[Census Tract 9502]

Interactive Teller Machine (ITM) Locations

Ash Street
Ash St & 5th St Ave
Benton, KY 42025
[Census Tract 9504]

Calloway County Banking Center
1721 N 12th St
Murray, KY 42071
[Census Tract 103]

Draffenville Banking Center
23 US Hwy 68W
Benton, KY 42025
[Census Tract 9502]

Calvert City Banking Center
456 5th Ave
Calvert City, KY 42029
[Census Tract 9501]

McCracken County - Park Ave Banking Center
3390 Park Ave
Paducah, KY 42001
[Census Tract 314]

McCracken County - Southside Banking Center
2550 Irvin Cobb Dr
Paducah, KY 42003
[Census Tract 301]

Graves County
100 Dick Castleman Bypass
Mayfield, KY 42066
[Census Tract 201]

Calloway County - Sycamore Banking Center
414 S. 12th Street
Murray, KY 42071
[Census Tract 106]

McCracken County - Lone Oak
2470 Lone Oak Rd
Paducah, KY 42003
[Census Tract 313]

**Interactive Teller Machines (ITM) are able to perform basic teller functions (deposits, check cashing, loan payments, transfers, and withdrawals) 24 hours a day, 7 days a week. If a client attempts to perform a transaction outside of the set accepted limits or if the client needs help using the machine, they will be connected to a live banker (live bankers are available Monday - Saturday 7:00 a.m. - 7:00 p.m. and Sunday 2:00 p.m. - 7:00 p.m.).*

BANKING CENTER ACTIVITY

Banking Center Activity

Opened 2020:

Calloway County - Sycamore Banking Center
414 S. 12th Street
Murray, KY 42071
[Census Tract 106]

Opened 2021:

McCracken County - Lone Oak LTM
2470 Lone Oak Rd
Paducah, KY 42003
[Census Tract 313]

Relocated 2021:

Aurora ATM
15695 US Hwy 68 E
Hardin, KY 42048
[Census Tract 9506]
*Relocated in January 2021

Closed 2021:

Walmart Super Center ATM
310 West 5th St
Benton, KY
[Census Tract 9504]

Closing effective 1/2/2024:

Hardin - Night Drop ONLY*
US Hwy 402
Hardin, KY 42048
[Census Tract 9505]

CFSB Fee Schedule

Effective November 1, 2023

Deposit Account Fees:

ACH (Automated Clearing House) Transfer Fee- \$5 per transaction

Account Alert- \$35 per month

Account Research- \$35 per hour/one hour minimum

Chargeback- \$10 per item (applies to commercial clients only)

Foreign ATM Fee- \$3 per transaction at any non-CFSB ATM

Overdraft- \$35 per item on consumer checking/savings, \$45 per item on commercial checking/savings & \$6 per day after the fifth business day

Reconciliation of Statements- No charge for current month, older statements \$35 per hour

Statement Copies- No charge for temporary statement, \$5 a month for previous ones **Research fees may also apply.*

Stop Payment- \$35 per request

Additional Services:

Cash Reserve Annual Fee- \$35 per year (applies to consumer clients only)

CD (Certificate of Deposit) Early Withdrawal Fee- \$35 per transaction

Certified Mail Fee- \$10 per item

Christmas Club Check Fee- \$3 per check issued

Collection Items- Incoming and Outgoing \$50

Debit Card Re-Issue Fee- \$5

Expedited Debit Card Fee- \$50

Foreign Currency Conversion Fee to USD- \$25 per transaction

International Check Processing Fee- \$25 if check is \$10,000 or less and \$75 if check is over \$10,000 or a collection item

Loan Payment- \$5 ACH to another FI (Financial Institution)

Lockbox Drill Fee- \$175 for drilling of box due to lost or stolen key(s)

Lockbox Replacement Key- \$75 for lost or stolen key

Medallion Stamp- \$25 per individual Medallion stamp

Night Deposit Bags- Locking Bag \$25, Medium non-lock bags \$6, Small non-lock bags \$5

Official Check- \$6 per transaction

Process Levy/Garnishment- \$100 or balance

Safe Deposit Box Late Fee- \$10 for any safe deposit box that is 30 days past due

Wire Tracing Fee- Domestic-\$25 and International-\$75

Wire Transfer Fees- Incoming Domestic \$20, Outgoing Domestic \$35, Foreign \$65



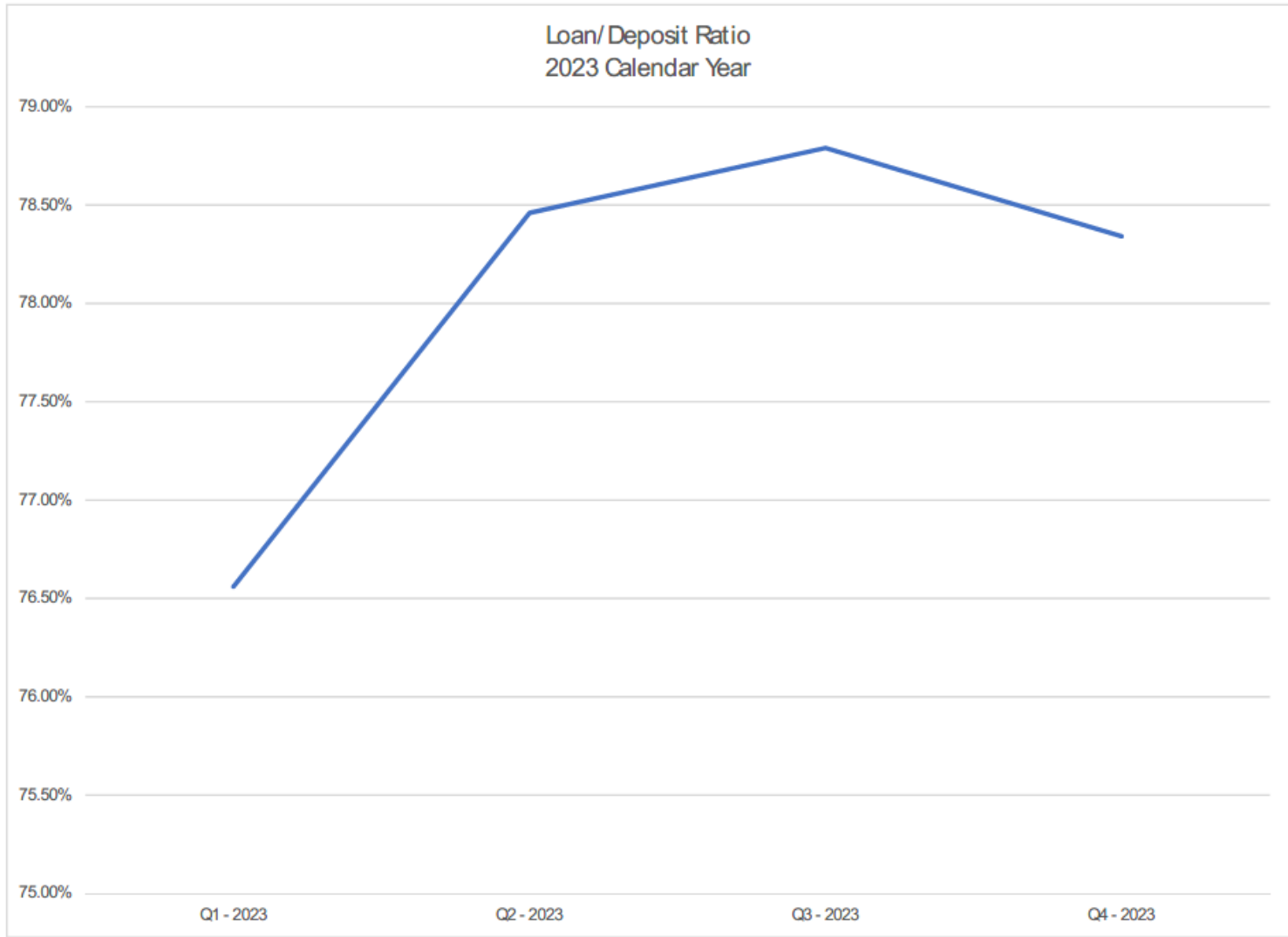
CFSB
COMMUNITY FINANCIAL SERVICES BANK



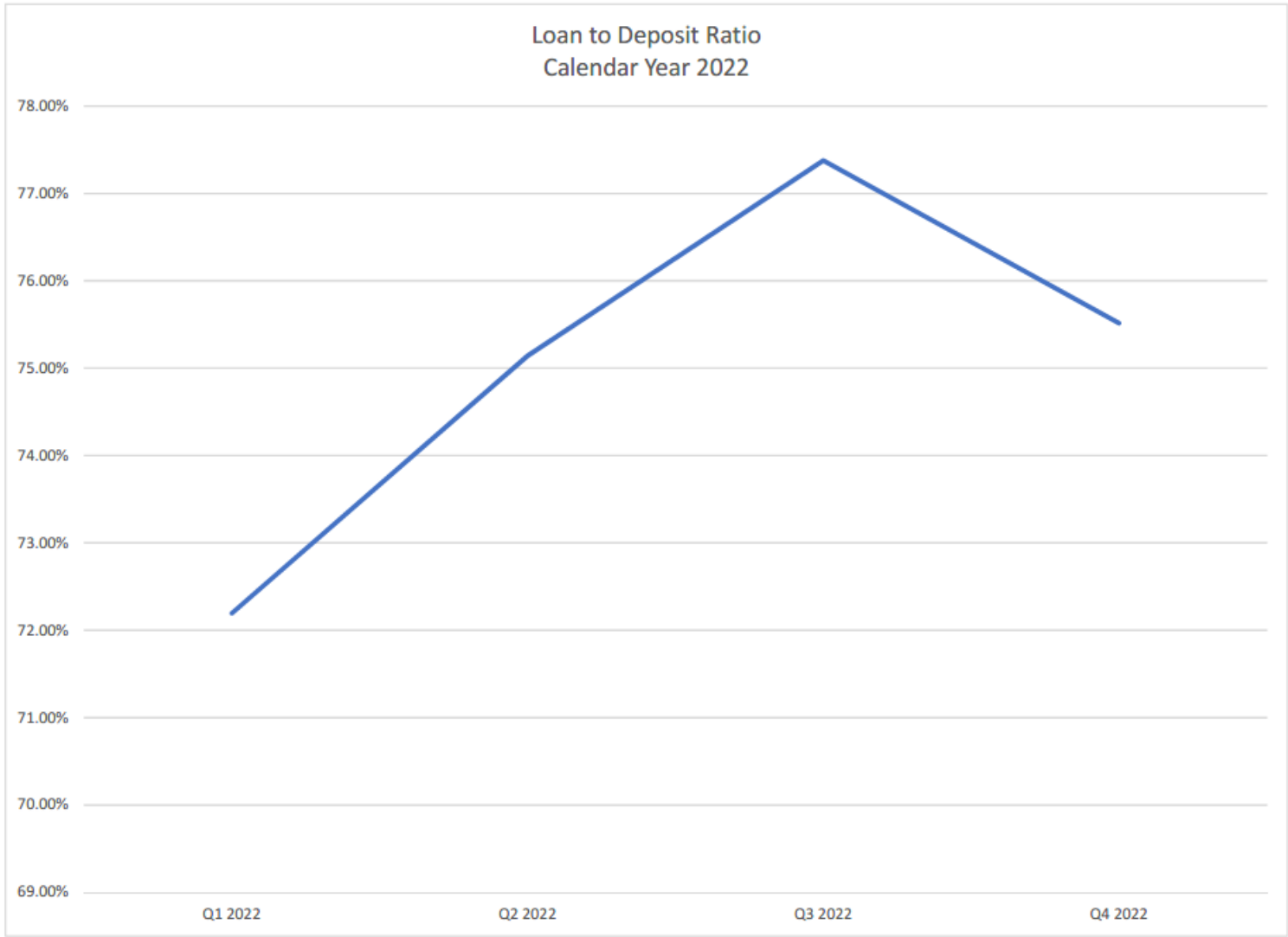
Q1 2024 - LOAN TO DEPOSIT RATIO

Final figures for the Loan-to-Deposit Ratio for Quarter 1 of 2024 are pending final reconciliation and will be published when available.

2023 - LOAN TO DEPOSIT RATIO



2022 - LOAN TO DEPOSIT RATIO



CFSB'S ASSESSMENT AREA

Calloway

Tract Code	Tract Income Level	Distressed or Underserved	Tract Median Family Income %	2023 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
101	Upper	No	127.41	\$64,900	\$82,689	\$69,219	4303	7.97	343	1556	2289
102	Upper	No	134.52	\$64,900	\$87,303	\$73,083	4516	9.19	415	1402	1844
103.01	Middle	No	109.86	\$64,900	\$71,299	\$59,688	2492	20.51	511	46	141
103.03	Low	No	47.6	\$64,900	\$30,892	\$25,861	2930	20.27	594	259	1255
103.04	Upper	No	122.2	\$64,900	\$79,308	\$66,393	3617	15.15	548	710	1550
104	Moderate	No	58.65	\$64,900	\$38,064	\$31,866	2424	23.6	572	314	1098
105	Middle	No	107.61	\$64,900	\$69,839	\$58,462	3263	17.84	582	830	1695
106.01	Upper	No	133.58	\$64,900	\$86,693	\$72,572	3029	14.16	429	860	1385
106.02	Upper	No	173.62	\$64,900	\$112,679	\$94,327	4063	9.45	384	1506	1744
107	Upper	No	126.08	\$64,900	\$81,826	\$68,500	3209	8.01	257	1027	1418
108	Middle	No	110.44	\$64,900	\$71,676	\$60,000	3257	7.15	233	1220	2247

Graves

Tract Code	Tract Income Level	Distressed or Underserved	Tract Median Family Income %	2023 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
201	Middle	No	85.65	\$64,900	\$55,587	\$46,534	4050	28.49	1154	948	1805
202	Middle	No	107.11	\$64,900	\$69,514	\$58,194	4391	25.73	1130	1197	1789
203.01	Middle	No	81.68	\$64,900	\$53,010	\$44,375	4721	26.86	1268	1019	1962
203.02	Moderate	No	67.01	\$64,900	\$43,489	\$36,406	1857	39.74	738	404	704
204	Upper	No	124.75	\$64,900	\$80,963	\$67,778	2709	8.01	217	957	1333
205	Middle	No	96.23	\$64,900	\$62,453	\$52,282	3708	9.55	354	1181	1667
206	Upper	No	126.04	\$64,900	\$81,800	\$68,477	2307	4.77	110	719	963
207	Upper	No	133.76	\$64,900	\$86,810	\$72,673	4969	10.24	509	1684	2282
208	Middle	No	116.96	\$64,900	\$75,907	\$63,542	4915	7.22	355	1544	2237
209	Middle	No	114.49	\$64,900	\$74,304	\$62,200	3022	9.5	287	1037	1547

Livingston

Tract Code	Tract Income Level	Distressed or Underserved	Tract Median Family Income %	2023 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
401	Middle	No	85.82	\$64,900	\$55,697	\$46,625	2665	6.6	176	933	1477
402.01	Upper	No	139.38	\$64,900	\$90,458	\$75,724	3351	8.62	289	1192	1633
402.02	Upper	No	122.38	\$64,900	\$79,425	\$66,488	2872	6.65	191	1093	1721
9999.99x	Middle	No	109.93	\$64,900	\$71,345	\$59,725	8888	7.38	656	3218	4831

McCracken

Tract Code	Tract Income Level	Distressed or Underserved	Tract Median Family Income %	2023 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
301	Moderate	No	56.28	\$64,900	\$36,526	\$30,577	1129	35.08	396	202	571
302	Moderate	No	57.34	\$64,900	\$37,214	\$31,156	1732	57.22	991	322	1056
303	Upper	No	185.22	\$64,900	\$120,208	\$100,625	1556	25.45	396	231	436
304	Moderate	No	73.35	\$64,900	\$47,604	\$39,853	1596	68.92	1100	252	838
305	Moderate	No	61.45	\$64,900	\$39,881	\$33,385	2346	42.37	994	322	740
306	Moderate	No	78.11	\$64,900	\$50,693	\$42,440	3571	36.91	1318	912	1676
307	Upper	No	138.38	\$64,900	\$89,809	\$75,181	4398	38.79	1706	953	1734
308	Upper	No	168.06	\$64,900	\$109,071	\$91,303	4937	12.94	639	1754	2301
309	Upper	No	122.57	\$64,900	\$79,548	\$66,591	3398	31.43	1068	670	1419
310	Middle	No	105.26	\$64,900	\$68,314	\$57,188	4250	14.33	609	1325	1924
311	Upper	No	131.04	\$64,900	\$85,045	\$71,194	5891	11.08	653	1748	2301
312	Upper	No	124.12	\$64,900	\$80,554	\$67,432	4482	9.77	438	1343	2069
313.01	Middle	No	83.86	\$64,900	\$54,425	\$45,564	5307	20.54	1090	983	2256
313.02	Upper	No	142.65	\$64,900	\$92,580	\$77,500	6186	10.17	629	2117	2456
314.01	Unknown	No	0	\$64,900	\$0	\$0	1759	15.97	281	255	602
314.02	Upper	No	157.17	\$64,900	\$102,003	\$85,389	5963	14.51	865	1416	1915
315.01	Middle	No	109.61	\$64,900	\$71,137	\$59,549	2213	10.21	226	697	1092
315.02	Upper	No	154.84	\$64,900	\$100,491	\$84,125	4147	10.1	419	1425	1947
316	Upper	No	171.79	\$64,900	\$111,492	\$93,333	3014	8.49	256	1003	1330

Marshall

Tract Code	Tract Income Level	Distressed or Underserved	Tract Median Family Income %	2023 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
9501.01	Middle	No	105.26	\$64,900	\$68,314	\$57,188	2691	6.84	184	852	1276
9501.02	Middle	No	111.82	\$64,900	\$72,571	\$60,750	2442	6.1	149	651	1158
9502	Upper	No	185.45	\$64,900	\$120,357	\$100,750	4792	7.47	358	1738	2145
9503	Upper	No	146.21	\$64,900	\$94,890	\$79,434	4109	6.35	261	1452	2129
9504	Upper	No	139.19	\$64,900	\$90,334	\$75,619	5562	7.61	423	1941	2432
9505.01	Upper	No	180.9	\$64,900	\$117,404	\$98,278	2707	3.66	99	974	1100
9505.02	Upper	No	123.09	\$64,900	\$79,885	\$66,875	2936	6.64	195	918	1268
9506.01	Middle	No	107.22	\$64,900	\$69,586	\$58,250	2873	4.25	122	1074	2014
9506.02	Middle	No	90.21	\$64,900	\$58,546	\$49,013	2583	4.84	125	889	1318
9506.03	Unknown	No	0	\$64,900	\$0	\$0	964	4.77	46	437	767



© 1996 by Cambridge University Press. Printed in the United Kingdom. This journal is registered with the Copyright Clearance Center, 222 Rosewood Drive, Danvers, MA 01923. Organizations in the USA who are also registered with the C.C.C. may therefore copy material (beyond the limits permitted by sections 107 and 108 of US copyright law) subject to payment to C.C.C. of the per copy fee of \$05.00. This consent does not extend to multiple copying for promotional or commercial purposes. *ISI Tear Sheet Service*, 3501 Market Street, Philadelphia, PA 19104, USA, is authorized to supply single copies of separate articles for private use only. Organizations authorized by the Copyright Licensing Agency may also copy material subject to the usual conditions. For all other use, permission should be sought from Cambridge or the American Branch of Cambridge University Press.

Project: Name:
 Address:
 City: State: Zip:
 Country:
 Phone: Fax:
 E-mail:

[illegible]Census
2020

[illegible]



4

Sheet 1 of 1 PdfDWT sheets
 United Sheets: 2 (Sheet 0, Sheet 1) (Sheet 0)
 NANO Livingston County (TX)
 04/11/2011 10:00 AM - 10:00 AM - 10:00 AM - 10:00 AM
 01/10/2011 10:00 AM - 10:00 AM - 10:00 AM - 10:00 AM

5000

2020

2020 CENSUS - CENSUS TRACT REFERENCE MAP: McCracken County, KY

Legend:

- 001
- 002
- 003
- 004
- 005
- 006
- 007
- 008
- 009
- 010
- 011
- 012
- 013
- 014
- 015
- 016
- 017
- 018
- 019
- 020
- 021
- 022
- 023
- 024
- 025
- 026
- 027
- 028
- 029
- 030
- 031
- 032
- 033
- 034
- 035
- 036
- 037
- 038
- 039
- 040
- 041
- 042
- 043
- 044
- 045
- 046
- 047
- 048
- 049
- 050
- 051
- 052
- 053
- 054
- 055
- 056
- 057
- 058
- 059
- 060
- 061
- 062
- 063
- 064
- 065
- 066
- 067
- 068
- 069
- 070
- 071
- 072
- 073
- 074
- 075
- 076
- 077
- 078
- 079
- 080
- 081
- 082
- 083
- 084
- 085
- 086
- 087
- 088
- 089
- 090
- 091
- 092
- 093
- 094
- 095
- 096
- 097
- 098
- 099
- 100

[illegible]

Figure 1 shows a horizontal number line from 0 to 100. There are tick marks at 0, 25, 50, 75, and 100. Below the line, the numbers 0, 25, 50, 75, and 100 are written. Above the line, the percentages 0%, 25%, 50%, 75%, and 100% are written. Above the line, the fractions 0, 1/4, 1/2, 3/4, and 1 are written.

Engineering & Technology
Faculty of Engineering
University of Cambridge
Cambridge CB2 3RA
United Kingdom
Tel: +44 (0)1223 333000
Fax: +44 (0)1223 333001
Email: enr@cam.ac.uk

Sheet 1 of 3 FGDST sheets
Local Sheets: 1 (John D. Palford 1); Sheet R)

Sheriff McCracken County (MS)
 06/07/1988 - Group in substantially complete and early
 ST. Barnaby 0/0.

[illegible]

PUBLIC DISCLOSURE

October 11, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Community Financial Services Bank
RSSD #698144**

**221 West Fifth Street
Benton, Kentucky 42025**

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.

TABLE OF CONTENTS

Institution's CRA Rating19

Scope of Examination19

Description of Institution21

Description of Assessment Area.....22

Conclusions with Respect to Performance Criter.....26

Appendix A: Assessment Area Detail32

Appendix B: Glossary33

INSTITUTION’S CRA RATING: This institution is rated SATISFACTORY.

The Lending Test is rated: Satisfactory
The Community Development Test is rated: Satisfactory

Community Financial Services Bank meets the criteria for a Satisfactory rating based on the evaluation of the bank’s lending and community development activities. The factors supporting the institution’s rating areas follows:

- The loan-to-deposit (LTD) ratio is reasonable given the institution’s size, financial condition, and assessment area credit needs.
- A substantial majority of loans and other lending-related activities are in the assessment area.
- The borrower’s profile analysis reveals reasonable penetration among businesses of different revenue sizes and individuals of different income levels, including low- and moderate-income (LMI).
- The geographic distribution of loans reflects a reasonable dispersion throughout the assessment area.
- There were no CRA-related complaints filed against the bank since the previous CRA evaluation.
- The bank’s overall community development performance demonstrates adequate responsiveness to the community development needs of its assessment area, considering the bank’s capacity and the need and availability of such opportunities for community development in its assessment area. The bank has responded to these needs through community development loans, qualified investments, and community development services.

SCOPE OF EXAMINATION

The bank’s CRA performance was evaluated using the Federal Financial Institutions Examination Council’s (FFIEC’s) intermediate small bank procedures. The intermediate small bank examination procedures entail two performance tests: the Lending Test and the Community Development Test. Small business and residential real estate loans were used to evaluate the bank’s lending performance, as these loan categories are considered the bank’s core business lines based on lending volume and the bank’s stated business strategy.¹ Therefore, the 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 small business lending, performance based on the small business loan category carried the most significance toward the bank’s overall performance conclusions. The following table details the performance criterion and the corresponding time periods used in each analysis.

¹Small business and 1–4 family residential real estate loans were sampled for this review according to CA Letter 01-8, “CRA Sampling Procedures.”

Performance Criterion	Time Period
LTD Ratio	December 31, 2019 – June 30, 2022
Assessment Area Concentration	January 1, 2020 – December 31, 2020
Geographic Distribution of Loans	
Loan Distribution by Borrower's Profile	
Response to Written CRA Complaints	October 7, 2019 – October 10, 2022
Community Development Activities	

Lending Test analyses often entail comparisons of bank performance to assessment area demographics and the performance of other lenders, based on Home Mortgage Disclosure Act (HMDA) and CRA aggregate lending data. Unless otherwise noted, assessment area demographics are based on 015 American Community Survey data, and certain business demographics are based on 2020 Dun & Bradstreet data. When analyzing bank performance by 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 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 in the same general region. Three other banks were identified as similarly situated peers, with asset sizes ranging from \$549.5 million to \$835.0 million as of June 30, 2022.

As part of the Community Development Test, the bank's performance was evaluated using the following criteria, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

- The number and dollar amount of community development loans.
- The number and dollar amount of qualified investments and grants.
- The extent to which the bank provides community development services.

The review included community development activities initiated from the date of the bank's previous CRA evaluation to this review date. In addition, investments made prior to the date of the previous CRA evaluation, but still outstanding as of this review date, were considered.

To augment this evaluation, one community contact interview was conducted with members of the local community to ascertain specific credit needs, opportunities, and local market conditions within the bank's assessment area. Information from this interview also assisted in evaluating the bank's responsiveness to identified community credit needs and community development opportunities. Key details from this community contact interview are included in the Description of Assessment Area section.

DESCRIPTION OF INSTITUTION

Community Financial Services Bank is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is wholly owned by Community Financial Services, Inc., a one-bank holding company headquartered in Benton, Kentucky. The bank's branch network consists of eight offices (including the main office). All branch locations provide drive-through services and have interactive teller machines, while four branches also have cash-dispensing-only automated teller machines (ATMs) on site. In addition, the bank operates four stand-alone, cash-dispensing-only ATMs in the assessment area. In March 2020, the bank opened a second full-service branch in Murray, Kentucky. Based on this branch network and other service delivery systems, such as extended banking hours of operation and full-service online banking capabilities, the bank is well positioned to deliver financial services to its entire assessment area.

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. As of June 30, 2022, the bank reported total assets of \$1.4 billion. As of the same date, loans and leases outstanding were \$981.4 million (68.7 percent of total assets), and deposits totaled \$1.3 billion. The bank's loan portfolio composition by credit category is displayed in the following table.

Distribution of Total Loans as of June 30, 2022		
Credit Category	Amount (\$000s)	Percentage of Total Loans
Construction and Development	\$38,778	4.0%
Commercial Real Estate	\$223,229	22.7%
Multifamily Residential	\$26,790	2.7%
1-4 Family Residential	\$237,012	24.1%
Farmland	\$30,696	3.1%
Farm Loans	\$4,492	0.5%
Commercial and Industrial	\$86,056	8.8%
Loans to Individuals	\$289,045	29.5%
Total Other Loans	\$45,341	4.6%
TOTAL	\$981,439	100%

As indicated by the table above, a significant portion of the bank's lending resources is directed to loans to individuals, loans secured by 1-4 family residential properties, and commercial real estate loans. While representing a significant product offering for the bank by dollar amount, loans to individuals are primarily comprised of lending to finance the purchase of recreation vehicles, a product that is not a credit need for LMI individuals or geographies. As such, this product was not included in the analysis. The bank also originates and subsequently sells a significant volume of

loans related to residential real estate. As these loans are sold on the secondary market shortly after origination, this activity would not be captured in the table.

The bank received a Satisfactory rating at its previous CRA evaluation conducted on October 7, 2019, by this Reserve Bank.

DESCRIPTION OF ASSESSMENT AREA

General Demographics

The bank’s assessment area, which has a population of 181,591, is located in a nonmetropolitan portion of western Kentucky and is comprised of the entireties of Calloway, Graves, Livingston, Marshall, and McCracken Counties. Forty-three census tracts comprise the five counties, including 1 low-, 6 moderate-, 19 middle-, and 17 upper-income census tracts. According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2022, there are 16 FDIC-insured depository institutions in the assessment area that operate 67 offices. Community Financial Services Bank (operating eight of the offices in the assessment area (11.9 percent)) ranked first in terms of deposit market share, with 25.4 percent of the total assessment area deposit dollars. Commercial lending products represent a credit need in the assessment area, along with the need for a standard blend of consumer loan products. More specifically, information gathered from the community contacts revealed a need for access to capital for business owners and affordable housing stock.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	1	6	19	17	0	43
	2.3%	14.0%	44.2%	39.5%	0.0%	100%
Family Population	419	4,166	20,713	21,865	0	47,163
	0.9%	8.8%	43.9%	46.4%	0.0%	100%

As shown above, 16.3 percent of the census tracts in the assessment area are LMI geographies, but only 9.7 percent of the family population resides in these tracts. These LMI areas are primarily concentrated in and around the cities of Mayfield, Murray, and Paducah. While middle-income geographies constitute 44.2 percent of the census tracts, with 43.9 percent of families in the

assessment area residing in these tracts, 7 of the 19 middle-income census tracts are designated as distressed due to poverty or unemployment and are located in Calloway and Livingston Counties. Based on 2015 U.S. Census data, the median family income for the assessment area was \$54,793. At the same time, the median family income for nonmetropolitan statistical area (nonMSA) Kentucky was \$45,986. More recently, the FFIEC estimates the 2020 median family income for nonMSA Kentucky to be \$51,500. The following table displays population percentages of assessment area families by income level compared to the nonMSA family population as a whole.

Family Population by Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Assessment Area	7,925	6,646	8,987	23,605	0	47,163
	16.8%	14.1%	19.1%	50.0%	0.0%	100%
NonMSA Kentucky	115,103	77,548	89,036	200,284	0	481,971
	23.9%	16.1%	18.5%	41.6%	0.0%	100%

As shown in the table above, 30.9 percent of families within the assessment area were considered LMI, which is lower than LMI family percentages of 40.0 percent in nonMSA Kentucky. The assessment area has a slightly larger middle-income (19.1 percent) and upper-income family population (50.0 percent) compared to nonMSA Kentucky (18.5 percent and 41.6 percent, respectively). Furthermore, the percentage of families living below the poverty threshold in the assessment area (12.2 percent) is below the 18.2 percent level in nonMSA Kentucky. Considering these factors, the assessment area appears more affluent than nonMSA Kentucky as a whole.

Housing Demographics

The median housing value for the assessment area is \$111,710, which is above the figure for nonMSA Kentucky of \$90,748. In addition, the assessment area housing affordability ratio of 37.4 percent is slightly below the nonMSA Kentucky figure of 39.0 percent. Finally, the median gross rent for the assessment area of \$593 per month is slightly higher than the nonMSA Kentucky figure of \$578 per month. Therefore, based on housing values, income levels, and rental costs, housing in the assessment area appears to be less affordable than in nonMSA Kentucky as a whole.

Industry and Employment Demographics

According to the community contact, the assessment area economy is focused primarily on manufacturing, education, healthcare, and transportation. As of September 30, 2021, county business patterns indicate that there are 77,684 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are retail trade (14.1 percent), followed by government (14.0 percent), and healthcare and social assistance (12.7 percent).

The table below 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 as a whole.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	Assessment Area	NonMSA Kentucky
2019	4.4%	4.8%
2020	6.3%	7.0%
2021	4.8%	5.1%

As shown in the table above, unemployment levels for the assessment area have been slightly lower than nonMSA Kentucky. Both the assessment area and nonMSA Kentucky experienced increases in unemployment in 2020 due to the economic disruption resulting from the COVID-19 pandemic; however, it appears that each have recovered to near pre-pandemic levels of unemployment with the assessment area unemployment rate remaining lower than nonMSA Kentucky.

Community Contact Information

Information from one community contact roundtable interview was used to help shape the performance context in which the bank’s activities in this assessment area were evaluated. The community contact interview was conducted with individuals specializing in business and economic development and a community nonprofit organization providing funds to improve education, income, and health conditions in the area. The community contact interviewees shared similar economic characteristics of the counties they serve, although the counties vary in size. The population in McCracken County has remained steady, while Calloway County has experienced slight population growth, due in part to recruitment efforts by a local university. Economic challenges noted by the contacts included the need for skilled workers and higher living wages. Food insecurity and lack of adequate transitional, supportive, and affordable housing were also identified as challenges in the area.

The community contact interviewees indicated that during the COVID-19 pandemic, the small business sectors in McCracken and Calloway Counties fared well, with a limited number of small businesses permanently closing. Businesses adapted delivery of services to continue serving their customers, improved their company culture, and increased wages to attract and retain employees. One community contact stated that some new businesses that opened during the pandemic are flourishing while others have experienced instability. It was noted that existing businesses have encountered similar patterns to those of new businesses. Minority-owned businesses were most affected during the pandemic, due to the lack of access to capital, resources, and technical assistance. Additionally, the community contact interviewees indicated that businesses continue to face labor shortages.

Regarding housing, the contacts indicated the area is affected by a housing shortage, specifically with regard to affordable housing. The current housing prices in Calloway County make finding affordable housing difficult. In McCracken County, there is a shortage of safe and affordable housing and rental units.

Finally, the contacts characterized the banking environment in the area as largely composed of community banks and noted a reduction in the number of larger banks. Community contact interviewees stated that community banks in the area are more accessible in meeting the needs of LMI individuals and small businesses. The contacts indicated that a majority of banks in the area engage in various sponsorships and are involved in community projects. Financial literacy training, credit recovery classes, small business loan assistance, and community outreach were noted as community development opportunities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

Loan-to-Deposit (LTD) Ratio

One indication of the bank’s overall level of lending activity is its LTD ratio. The chart below displays the bank’s average LTD ratio in comparison to those of regional peers. The average LTD ratio represents an 11-quarter average, dating back to the bank’s last CRA evaluation.

LTD Ratio Analysis			
Name	Headquarters	Asset Size (\$000s) as of June 30, 2022	Average LTD Ratio
Community Financial Services Bank	Benton, Kentucky	\$1,429,153	76.3%
Regional Banks	Paducah, Kentucky	\$834,980	93.4%
	Mayfield, Kentucky	\$694,764	77.6%
	Mayfield, Kentucky	\$549,531	72.7%

Based on data from the previous table, the bank’s level of lending is in line with similar banks in the region. During the review period, the LTD ratio experienced a generally decreasing trend with a high of 87.0 percent in the first quarter of 2020 and a low of 68.9 percent in the fourth quarter of 2021. Most recently, the LTD ratio has increased to 74.0 in the second quarter of 2022. Overall, the bank has an 11-quarter average of 76.3 percent. In comparison, two regional bank peers’ average LTD ratios were higher, while the other was lower; however, all three generally evidenced a similar decreasing trend during the review period. Therefore, compared to data from regional banks, the bank’s average LTD ratio is reasonable given the bank’s size, financial condition, and assessment area credit needs.

Assessment Area Concentration

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

Lending Inside and Outside of Assessment Area January 1, 2020 through December 31, 2020						
Loan Type	Inside Assessment Area		Outside Assessment Area		TOTAL	
Small Business	95	91.3%	9	8.7%	104	100%
	\$15,717	92.7%	\$1,245	7.3%	\$16,962	100%
1-4 Family Residential Real Estate	166	92.7%	13	7.3%	179	100%
	\$29,060	88.8%	\$3,664	11.2%	\$32,724	100%
TOTAL LOANS	261	92.2%	22	7.8%	283	100%
	\$44,777	90.1%	\$4,909	9.9%	\$49,686	100%

A substantial majority of loans and other lending-related activities were made in the bank's assessment area. As shown above, 92.2 percent of the total loans were made inside the assessment area, accounting for 90.1 percent of the dollar volume of total loans.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is reasonable, based on performance from both the small business and 1-4 family residential real estate loan categories reviewed. Both loan categories reflect reasonable penetration. The following table shows the distribution of 2020 small business loans by loan amount and business revenue size compared to Dun & Bradstreet and aggregate data.

Small Business Loans by Revenue and Loan Size Assessment Area: Western Kentucky								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	52	54.7%	44.6%	\$8,559	54.5%	31.6%	90.8%
	Over \$1 Million/ Unknown	43	45.3%	55.4%	\$7,158	45.5%	68.4%	9.2%
	TOTAL	95	100.0%	100.0%	\$15,717	100.0%	100.0%	100.0%
	\$100,000 or Less	53	55.8%	86.3%	\$2,244	14.3%	25.4%	
	\$100,001 – \$250,000	25	26.3%	6.6%	\$4,436	28.2%	16.5%	
	\$250,001 – \$1 Million	17	17.9%	7.1%	\$9,037	57.5%	58.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	95	100.0%	100.0%	\$15,717	100.0%	100.0%	
Revenue \$1 Million or Less	\$100,000 or Less	27	51.9%		\$1,187	13.9%		
	\$100,001 – \$250,000	17	32.7%		\$3,093	36.1%		
	\$250,001 – \$1 Million	8	15.4%		\$4,279	50.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	52	100.0%		\$8,559	100.0%		

The bank’s level of lending to small businesses is reasonable. The bank originated the majority of its small business loans (54.7 percent) to businesses with revenues of \$1 million or less. In comparison, the aggregate lending level for the assessment area was 44.6 percent, and Dun & Bradstreet data estimates that 90.8 percent of businesses inside the assessment area had annual revenues of \$1 million or less. Moreover, the bank originated 51.9 percent of its small business loans in amounts of \$100,000 or less, further evidencing the bank’s willingness to meet the credit needs of small businesses.

Next, 1–4 family residential real estate loans were reviewed to determine the bank’s lending performance to borrowers of different income levels. 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 (\$51,500 for nonMSA Kentucky as of 2020). The following table shows the distribution of 1–4 family residential real estate loans by borrower income level in comparison to family population income demographics for the assessment area. Additionally, 2020 HMDA aggregate data for the assessment area is displayed.

Borrower Distribution of 1–4 Family Residential Real Estate Loans Assessment Area: Western Kentucky							
Borrower Income Levels	2020						
	Count			Dollar			Families
	Bank		HMDA Aggregate	Bank		HMDA Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	
Low	2	1.2%	3.0%	\$54	0.2%	1.2%	16.8%
Moderate	19	11.4%	12.0%	\$2,021	7.0%	7.1%	14.1%
Middle	32	19.3%	17.0%	\$4,113	14.2%	12.4%	19.1%
Upper	99	59.6%	51.0%	\$21,043	72.4%	59.8%	50.0%
Unknown	14	8.4%	16.9%	\$1,829	6.3%	19.4%	0.0%
TOTAL	166	100.0%	100.0%	\$29,060	100.0%	100.0%	100.0%

As displayed in the preceding table, the bank’s percentage of lending to low-income borrowers (1.2 percent) is below the low-income family population figure (16.8 percent) and below the aggregate lending level to low-income borrowers (3.0 percent), reflecting poor performance. The bank’s level of lending to moderate-income borrowers (11.4 percent) is slightly below the moderate-income family population percentage (14.1 percent) but similar to the aggregate lending level to moderate-income borrowers (12.0 percent), reflecting reasonable performance. When considering performance in both income categories, the bank’s overall distribution of loans by borrower’s profile is reasonable.

Geographic Distribution of Loans

As noted previously, the assessment area includes one low-income and six moderate-income census tracts, representing 16.3 percent of all assessment area census tracts. Overall, the bank’s geographic distribution of loans in this assessment area reflects reasonable penetration throughout these LMI census tracts, based on the small business and 1–4 family residential real estate loan categories reviewed during this evaluation. The following table displays 2020 small business loan activity by geography income level compared to the location of businesses throughout the bank’s assessment area and 2020 small business aggregate data.

Geographic Distribution of Small Business Loans Assessment Area: Western Kentucky							
Tract Income Levels	2020						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	
Low	0	0.0%	1.7%	\$0	0.0%	4.3%	1.0%
Moderate	13	13.7%	14.4%	\$3,527	22.4%	18.6%	13.5%
Middle	38	40.0%	37.8%	\$6,594	42.0%	31.9%	40.8%
Upper	44	46.3%	45.4%	\$5,596	35.6%	44.9%	44.6%
Unknown	0	0.0%	0.7%	\$0	0.0%	0.2%	0.0%
TOTAL	95	100.0%	100.0%	\$15,717	100.0%	100.0%	100.0%

While none of the small business loans in the sample were made to borrowers residing in a low-income census tract, this is considered reasonable given the minimal small business lending opportunities within the assessment area's only low-income census tract. As evidence of this fact, only 1.0 percent of small businesses in the assessment area are located in the low-income geography, and aggregate lending in the low-income geography equaled just 1.7 percent.

As displayed in the preceding table, the bank's percentage of loans in moderate-income census tracts (13.7 percent) is in line with the aggregate lending level (14.4 percent) and percentage of small businesses operating in moderate-income census tracts (13.5 percent), representing reasonable performance. Therefore, the bank's overall geographic distribution of small business loans is reasonable.

Second, the bank's geographic distribution of 1-4 family residential real estate loans was reviewed. The following table displays the geographic distribution of 2020 1-4 family residential real estate loans compared to owner-occupied housing demographics and aggregate performance for the assessment area.

Geographic Distribution of 1-4 Family Residential Real Estate Loans Assessment Area: Western Kentucky							
Tract Income Levels	2020						
	Count			Dollar			Owner-Occupied Units
	Bank		HMDA Aggregate	Bank		HMDA Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	
Low	1	0.6%	0.3%	\$30	0.1%	0.2%	0.4%
Moderate	10	6.0%	5.3%	\$1,649	5.7%	5.1%	6.1%
Middle	61	36.7%	37.6%	\$10,799	37.2%	36.2%	43.8%
Upper	94	56.6%	56.7%	\$16,582	57.1%	58.6%	49.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	166	100.0%	100.0%	\$29,060	100.0%	100.0%	100.0%

The analysis of 1–4 family residential real estate loans revealed reasonable lending performance to borrowers residing in the only low-income geography. The bank's total penetration of the low-income census tract by number of loans (0.6 percent) is similar to the percentage of owner-occupied housing units in the low-income census tract (0.4 percent). Additionally, the bank's performance in the low-income census tract is similar to other lenders in the assessment area, which indicates that 0.3 percent of aggregate loans inside this assessment area were made to borrowers residing in the assessment area's single low-income census tract.

As displayed in the previous table, the bank's lending levels in moderate-income census tracts are in line with comparison data, reflecting reasonable performance. The bank's total penetration of moderate-income census tracts by number of loans (6.0 percent) is similar to the percentage of owner-occupied housing units in moderate-income census tracts (6.1 percent). Furthermore, the bank's performance in moderate-income census tracts is similar to that of other lenders, which indicates that 5.3 percent of aggregate loans inside this assessment area were made to borrowers residing in moderate-income census tracts. Considering performance in the LMI geographies, the bank's overall geographic distribution of 1–4 family residential real estate loans is reasonable.

Lastly, based on reviews from both loan categories, the bank had loan activity in 95.3 percent of all assessment area census tracts. Additionally, there were no conspicuous lending gaps noted in LMI areas. This information supports the conclusion that the bank's overall geographic distribution of loans is reasonable.

Responses to Complaints

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

COMMUNITY DEVELOPMENT TEST

The bank's overall community development performance demonstrates adequate responsiveness to the community development needs of the assessment area, considering the bank's capacity and the need and availability of such opportunities for community development in the assessment area. The bank has addressed the community development needs of the assessment area through community development loans, qualified investments, and community development services.

During the review period, the bank made 92 qualifying loans totaling approximately \$41.9 million.

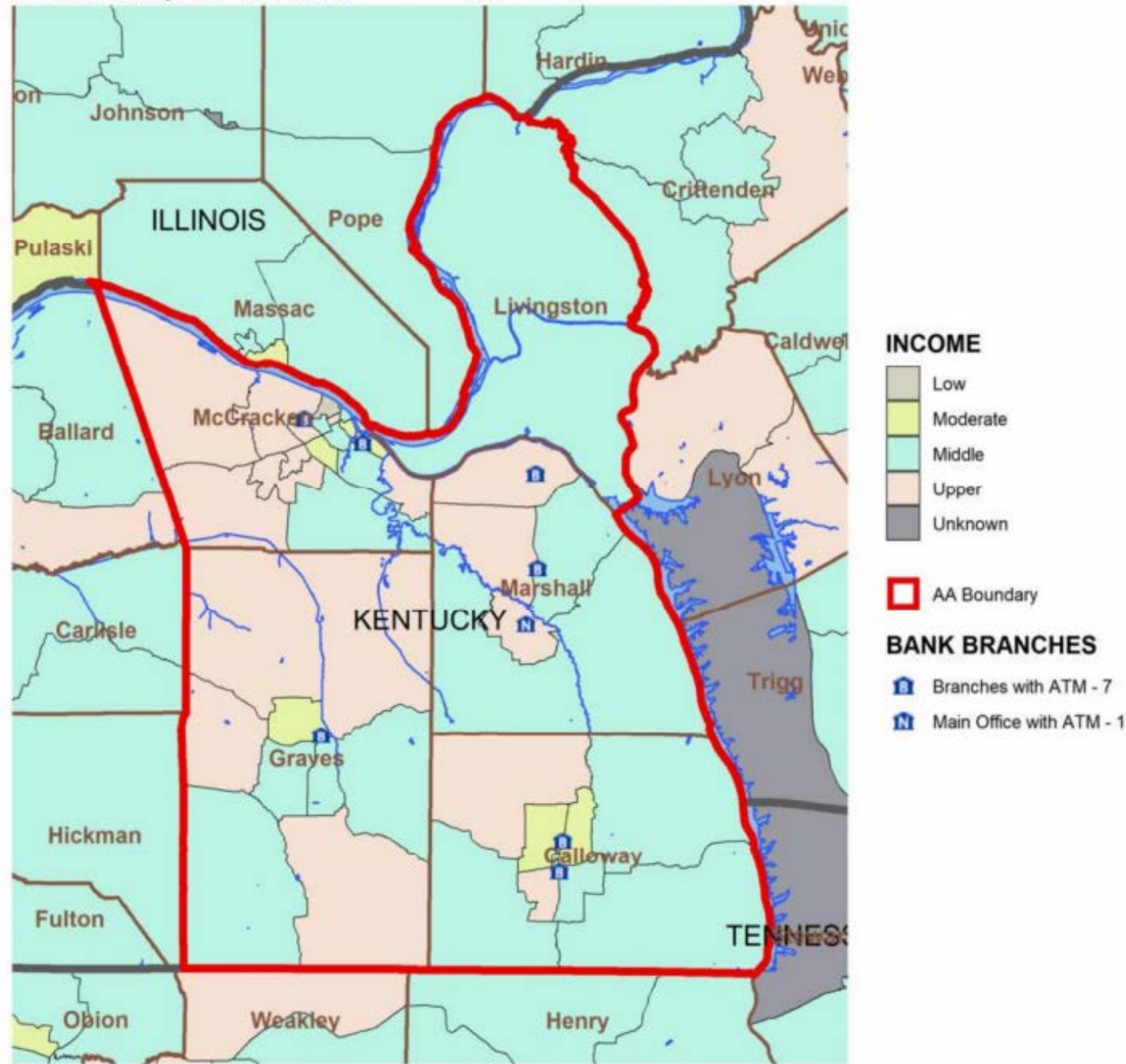
Of those loans, several were particularly responsive to the assessment area community development needs, including the following items:

- A \$5.4 million loan providing permanent financing of renovation of a historic office building located in a distressed, middle-income census tract. The development will provide commercial office space as well as new loft apartments to attract new businesses and residents.
- A \$2.5 million loan to construct a new fiber optic hub in a moderate-income area.

Appendix A

ASSESSMENT AREA DETAIL

Community Financial Services Bank, Benton, Kentucky
Western Kentucky Assessment Area



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- or moderate-income individuals; (2) community services targeted to low- or moderate-income 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 low- or moderate-income 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 (e.g., age, race, sex, and income) 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 income of applicants; 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: 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.

WRITTEN COMMENTS & RESPONSES

As of the Public File publish date of 04/01/2024, CFSB has not received any written comments concerning the Bank's CRA Program.