



PUBLIC DISCLOSURE

February 5, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First FSB of Champaign-Urbana
Charter Number 701611

1311 S. Neil St, Champaign, IL 61820-6558

Office of the Comptroller of the Currency

Harris Center, 3001 Research Rd, Champaign, IL 61822-1661

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, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

Table of Contents

OVERALL CRA RATING	3
DEFINITIONS AND COMMON ABBREVIATIONS	4
DESCRIPTION OF INSTITUTION	8
SCOPE OF THE EVALUATION.....	9
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	10
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....	11
LENDING TEST	11
APPENDIX A: SCOPE OF EXAMINATION.....	A-1
APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS.....	B-1

Overall CRA Rating

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

The major factors that support the rating for First Federal Savings Bank of Champaign-Urbana (First Federal) include:

- First Federal's lending to borrowers of different incomes and businesses of different sizes is reasonable. Our analysis placed the most weight on this criterion in the lending test.
- First Federal's loan-to-deposit ratio is reasonable based on the size, financial condition, AA credit needs, and local competition.

Definitions and Common Abbreviations

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

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

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 MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

Limited 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 MA/assessment area.

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

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

Description of Institution

First Federal is a \$174 million intrastate financial bank headquartered in Champaign, Illinois. The federal savings association (FSA) is a stock institution wholly owned subsidiary of Great American Bancorp, Inc. The stock is traded on the Over-the-Counter Bulletin Board (OTCBB) stock exchange under the symbol of "GTPS".

First Federal is a full-service banking institution and operates two banking offices in Champaign and Urbana, Illinois. First Federal has seven automated teller machines (ATMs) within the AA, which do not accept deposits. Based on the branch locations, First Federal established one AA: Champaign County AA.

First Federal offers conventional mortgage products, consumer, commercial real estate, and commercial business loans. The bank offers a full line of deposit products, including savings accounts, money market accounts, NOW accounts, certificates of deposit, individual retirement accounts, and health savings accounts. Furthermore, First Federal offers Internet, mobile, and telephone banking. Online banking includes bill pay services. The FSA has an operating subsidiary, Park Avenue Services Corporation, which does business as GTPS Insurance Agency. This subsidiary offers a full line of insurance products, including personal, life, health, disability, business, and worker's compensation insurance. The FSA also offers investment products through a division known as First Federal Investments and Planning.

No affiliate data was utilized in this analysis. There have been no mergers or acquisitions affecting the FSA's CRA performance since the last evaluation. The FSA closed one branch in Champaign on November 1, 2014.

As of December 31, 2017, First Federal's gross loan portfolio totaled \$103.5 million, or 59.6 percent of total assets. Tier 1 capital is \$16.3 million. The FSA services an additional \$90.1 million in mortgage loans sold into the secondary market. First Federal's strategy is to concentrate on small business lending and to increase personal banking relationships. The following table represents the loan portfolio mix:

Loan Portfolio Summary by Loan Product	
Loan Category	% of Outstanding Dollars
Home loans, including multi-family	67.2%
Business loans, including commercial real estate	28.8%
Farm loans, including farm land	1.5%
Consumer loans	2.0%
Other loans & leases	0.5%

Source: December 31, 2017 Uniform Bank Performance Report (UBPR)

There are no known impediments limiting First Federal's ability to help meet the credit needs of its local community, including those of low- and moderate-income (LMI) families and neighborhoods. First Federal's business strategy during the evaluation period focused on serving its local community through the origination of residential mortgage and small business loans and to provide deposit-related banking services to its customers. First Federal's deposit market share in the Champaign County AA, at 3.0 percent, ranks seventh out of 29 banks in the AA. At the previous CRA examination dated August 28, 2012 First Federal received a rating of "Satisfactory."

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated First Federal's CRA performance using Small Bank examination procedures, which reviewed the FSA's record of meeting the credit needs of its AA through lending activities. The evaluation period for this review is from August 28, 2012 to February 5, 2018. As the FSA's business strategy and lending products have not significantly changed since the prior examination, the lending test primarily used data from January 1, 2014, to December 31, 2016.

Based on both the number and dollar volume of loan origination data supplied by the FSA, First Federal's primary lending products are home mortgages and business loans. Mortgage loans represent 47.0 percent of the number and 57.0 percent of the dollar volume of loan originations from 2014 to 2016, and business loans represent 17.0 percent of the number and 33.0 percent of the dollar volume. We analyzed home purchase, home refinance, and home improvement loans reported in the FSA's Home Mortgage Disclosure Act (HMDA) loan application registers (LAR), after we verified the reports' reliability. We also sampled business loans for this evaluation.

For analysis purposes, we compared First Federal's lending performance with 2016 aggregate peer data, 2016 Business Geodemographic data, and the 2010 United States Census data. Refer to the table in Appendix A for more information on the scope of review.

Data Integrity

As part of our ongoing supervision of First Federal, we tested the accuracy of the FSA's 2014, 2015, and 2016 HMDA-LAR reports. Our testing found no substantive inaccuracies in the data. Therefore, we concluded that the home mortgage loan activity data could be relied upon for this evaluation.

Selection of Areas for Full-Scope Review

First Federal has one AA (Champaign County AA). We completed a full-scope review of this AA. A community profile for the full scope review AA is in Appendix B.

Ratings

The First Federal's overall rating is based on the full scope review of the Champaign County AA. Our analysis placed more weight on performance for home mortgage lending. Home mortgage lending made up the highest percentage of the number and dollar amount of loans originated at First Federal during this evaluation period. As the percentage of LMI families (38.9 percent) in the Champaign County AA is higher than the percentage of families in LMI geographies (18.0 percent), our analysis placed more weight on the borrower distribution criterion.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

Conclusions with Respect to Performance Tests

LENDING TEST

First Federal's performance under the lending test is satisfactory. Lending to borrowers of different incomes and businesses of different sizes is reasonable. Geographic distribution of loans among different income geographies is excellent. The FSA originated a substantial majority of their primary loan products within the AA and the loan-to-deposit ratio is reasonable. We placed the most weight on the borrower distribution criterion in the lending test.

Loan-to-Deposit Ratio

First Federal's loan-to-deposit ratio is reasonable based on its size, financial condition, AA credit needs, and local competition. The loan-to-deposit ratio averaged 64.0 percent over the past 21 quarters. The timeframe used for this calculation represents the first quarter-end after the start of the last CRA evaluation through September 30, 2017. September 30, 2017 data was the most recent data available when this evaluation began.

Over the past 21 quarters, the FSA's highest loan-to-deposit ratio was 70.0 percent and the lowest was 60.0 percent. The FSA's loan-to-deposit ratio is below the average of similarly situated banks headquartered within its AA. We reviewed the loan-to-deposit ratio for all banks in Champaign County with total assets between \$90 million and \$230 million. This group of five similarly situated banks averaged a loan-to-deposit ratio of 78.4 percent. First Federal's loan-to-deposit ratio average was in the lower range of this comparison group.

It is also important to note that First Federal's loan-to-deposit ratio does not include loans the institution originated and sold, but still service. As of November 30, 2017, First Federal serviced 811 loans totaling \$90.1 million sold into the secondary market. This further supports that this criterion is reasonable.

Lending in Assessment Area

First Federal originated a substantial majority of their primary loan products within the AA. Our sample showed 94.6 percent of the total number and 95.4 percent of the total dollar volume of these loans were originated within the AA.

Lending in the Champaign County AA										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	217	93.9%	14	6.1%	231	\$32,142	96.1%	\$1,309	3.9%	\$33,451
Home Refinance	370	95.1%	19	4.9%	389	\$43,429	94.9%	\$2,326	5.1%	\$45,755
Home Improvement	68	97.1%	2	2.9%	70	\$2,850	95.2%	\$143	4.8%	\$2,993
Business	17	85.0%	3	15.0%	20	\$3,348	94.8%	\$182	5.2%	\$3,530
Totals	672	94.6%	38	5.4 %	710	\$81,769	95.4%	\$3,960	4.6%	\$85,729

Source: 2014, 2015, and 2016 HMDA LARs and sample of 20 business loans originated from 1/1/2014 to 12/31/2016.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

First Federal's lending to borrowers of different incomes and businesses of different sizes is reasonable. The borrower distribution of home loans reflects reasonable penetration in the Champaign County AA. Lending to businesses of different sizes reflects excellent penetration in the Champaign County AA. Our analysis placed more weight on home mortgage lending, due to the volume of home loan originations during the loan evaluation period.

Home Loans

The overall borrower distribution of home mortgage loans in the Champaign County AA is reasonable. The distribution of home purchase, refinance, and home improvement loans is reasonable. Our analysis gave more weight to performance for refinance loans, which made up 56.7 percent of the home loans originated within the Champaign County AA.

In evaluating the borrower distribution of home loans in the Champaign County AA, we noted the number of families with incomes below the poverty level was 9.7 percent. People living in poverty have a difficult time qualifying for traditional mortgages. We also considered the average age of the housing stock, which was 37 years. Older housing often costs more to maintain, frequently requires significant repairs to bring dwellings up to code requirements, and often is less energy efficient, resulting in higher

heating and cooling costs. All of these factors add to the overall cost of homeownership, which can affect the ability of LMI individuals to qualify for mortgage loans.

The overall borrower distribution of home purchase loans is reasonable. The percentage of loans made to low-income borrowers exceeded the comparator for aggregate peer data. The percentage of loans made to moderate-income borrowers was near the comparator for aggregate peer data. Home purchase loans made up 32.8 percent of the originations.

The overall borrower distribution of home refinance loans is reasonable. The percentage of loans to low-income borrowers was significantly lower than the comparator for aggregate peer data. The percentage of loans to moderate-income borrowers significantly exceeded the comparator for aggregate peer data.

The overall borrower distribution of home improvement loans is reasonable. The percentage of loans to low-income borrowers was significantly higher than the comparator for aggregate peer data. The percentage of loans to moderate-income borrowers was significantly lower than the comparator for aggregate peer data. Home improvement loans made up 10.5 percent of home loan originations.

Borrower Distribution of Residential Real Estate Loans in the Champaign County AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Peer Loans	% of Number of Loans	% of Aggregate Peer Loans	% of Number of Loans	% of Aggregate Peer Loans	% of Number of Loans	% of Aggregate Peer Loans	% of Number of Loans
Home Purchase	9.7	12.0	22.7	19.4	24.1	31.4	43.5	37.1
Home Refinance	6.3	4.8	15.9	23.5	23.9	23.1	53.9	48.6
Home Improvement	7.0	19.7	22.6	9.1	25.2	28.8	45.2	42.4

Source: 2014, 2015, and 2016 HMDA LARs and 2016 Peer Mortgage Data. Not in above table, but also reviewed is 2010 U.S. Census data.

Business Loans

The borrower distribution of business loans in the Champaign County AA is excellent. The percentage of loans to small businesses (businesses with gross annual revenues of \$1 million or less) was 70.0 percent. This is significantly better than the aggregate peer data, where 44.0 percent of loans were originated to small businesses. The FSA's originations are near the demographic data that shows 75.6 percent of the businesses in the AA are small businesses.

Borrower Distribution of Loans to Businesses in the Champaign County AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of Aggregate Peer Loans #	44.0	56.0	0.00	100%
% of Bank Loans in AA by #	70.0	25.0	5.0	100%
% of Bank Loans in AA by \$	83.3	8.4	8.3	100%

Source: Sample of 20 business loans originated between 1/1/2014 and 12/31/2016 made within the AA and 2016 Peer Small Business Data. Gross annual revenue information was not available for one loan in the sample.

Geographic Distribution of Loans

First Federal's overall geographic distribution of home and business loans reflects excellent dispersion among different income tracts throughout the AA. The geographic distribution of both home and business loans reflects excellent dispersion in the Champaign County AA. Our analysis placed more weight on home mortgage lending due to the volume of loan originations during the loan evaluation period.

We reviewed summary reports and maps, and analyzed First Federal's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in the areas receiving full-scope reviews.

Home Loans

The overall geographic distribution of home loans in the Champaign County AA is excellent. The percentage of loans made in both the low- and moderate income CTs significantly exceeds the comparators for aggregate peer data for home purchase, refinance, and home improvement loans.

Our analysis considered that only 29 percent of total housing units are in LMI geographies. In addition, families residing in the low-income CTs that live below the poverty level total 32.5 percent, and 18.1 percent in the moderate-income CTs. The low-income CTs account for 14.0 percent and moderate-income CTs account for 18.6 percent of CTs in the AA.

Geographic Distribution of Residential Real Estate Loans in the Champaign County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of Aggregate Peer Loans #	% of Number of Loans	% of Aggregate Peer Loans #	% of Number of Loans	% of Aggregate Peer Loans #	% of Number of Loans	% of Aggregate Peer Loans #	% of Number of Loans
Home Purchase	1.8	2.4	9.5	12.0	61.6	48.3	27.1	37.3
Home Refinance	2.8	12.5	7.8	18.8	61.4	47.4	28.0	21.3
Home Improvement	3.6	5.9	7.1	19.4	68.7	50.7	20.6	24.0

Source: 2014, 2015, and 2016 HMDA LARs and 2016 Peer Mortgage Data. Not in above table, but also reviewed is 2010 U.S. Census data.

Business Loans

The geographic distribution of business loans in the Champaign County AA is excellent. The percentage of loans made in both the low- and moderate-income CTs significantly exceed the comparators for aggregate peer data. The FSA's originations also exceed the demographic data that shows 11.5 percent of businesses in the AA are located in the low-income CTs and 18.6 percent are located in the moderate-income CTs.

Geographic Distribution of Loans to Businesses in the Champaign County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Peer Loans #	% of Number of Loans	% of Aggregate Peer Loans #	% of Number of Loans	% of Aggregate Peer Loans #	% of Number of Loans	% of Aggregate Peer Loans #	% of Number of Loans
% of Total	10.2	25.0	15.9	25.0	46.0	35.0	27.1	15.0

Source: Loan sample of 20 loans originated between January 1, 2014 and December 31, 2016 and 2016 Peer Small Business Data. (There are two census tracts that list NA as the income category. The percent of Aggregate Peer Loans # with NA CT income level information = 0.8%. No loans in our sample were located within the NA CTs.)

Responses to Complaints

First Federal did not receive any complaints regarding its CRA performance during the assessment period.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD loans): (01/01/2014 to 12/31/2016) Investment and Service Tests and CD Loans: N/A	
Financial Institution	Products Reviewed	
First Federal Savings Bank of Champaign-Urbana Champaign, IL	Commercial and residential mortgage loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Champaign County AA	Full- Scope	

Appendix B: Community Profiles for Full-Scope Areas

Champaign County AA

Demographic Information for Full-Scope Area: Champaign County							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts/BNAs)	43	14.0	18.6	41.9	20.9	4.6	
Population by Geography	201,081	11.7	15.4	48.6	19.9	4.4	
Owner-Occupied Housing by Geography	43,527	2.4	11.4	61.6	24.6	0.00	
Businesses by Geography	9,400	11.5	18.6	45.4	23.5	01.0	
Farms by Geography	600	2.2	5.3	82.3	10.2	0.00	
Family Distribution by Income Level	43,123	21.5	17.4	21.1	40.0	0.00	
Distribution of Low- and Moderate-Income Families throughout AA Geographies	16804	9.6	21.6	56.6	12.0	0.2	
Median Family Income	= \$67,936					Median Housing Value	= \$151,400
FFIEC Adjusted Median Family Income for 2016	= \$69,900					Unemployment Rate	= 4.2%
Households Below the Poverty Level	= 19.2%						

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 U.S. Census, and 2016 HUD updated MFI. Unemployment Data from November, 2017 Bureau of Labor Statistics

The AA consists of the entire county of Champaign in Illinois. Champaign County is a portion of MSA #16580 Champaign-Urbana, IL and the AA is located in east central Illinois. This MSA consists of three counties and it would be difficult for the FSA to service the entire MSA with only two branches. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. Champaign County is the fifth largest county in the State of Illinois by square miles and the tenth largest county by population. There are six low-income and eight moderate-income CTs in the Champaign County AA.

According to the 2010 U.S. Census, the total population of the AA was 201,081. Competition in the AA comes from 29 FDIC-insured depository institutions. Competition also includes ten credit unions. As of June 30, 2017, First Federal's deposits in the AA totaled \$156 million, which is 3.0 percent of the total deposits within the market. First Federal's deposit market share ranks seventh out of 29 depository institutions. The top two depository institutions account for 55.4 percent of total deposits in the AA. The depository institution with the highest deposit market share is Busey Bank.

Employment and Economic Factors

According to the Bureau of Labor Statistics, unemployment in the Champaign County AA was 4.2 percent in November 2017, which is decreased from a peak of 8.4 percent in June 2013 during this evaluation period. The county unemployment rate is consistent with the state and national unemployment rates of 4.7 and 4.1 percent, respectively, in November 2017. Similarly, the state unemployment rate dropped from a peak of 10.4 percent in January 2013, and the national unemployment rate dropped from a peak of 8.1 percent in August 2012 for the evaluation period.

The percentage of families in the AA living below the poverty level is 9.7 percent. Families residing in low-income CTs that live below the poverty level total 32.5 percent. Families residing in the moderate-income CTs that live below the poverty level total 18.1 percent. Low-income geographies account for 14.0 percent and moderate-income geographies account for 18.6 percent of the CTs in the AA based on the 2010 U.S. Census.

Per Moody's Analytics, Champaign/Urbana's economy lags the nation, region, and state in key economic gauges. The economy is dependent upon state and local government payrolls to offset losses in private sector jobs. The labor force participation rate has fallen to a new low near the bottom of the state. Industries driving the local economy include educational services, healthcare and social services, and retail trade. The largest employers in the AA are the University of Illinois, Carle Foundation Hospital, Champaign Unit 4 School District, Kraft Heinz, and county government. Businesses in the AA are 75.5 percent small businesses with gross annual revenues of \$1 million or less, 6.2 percent businesses with gross annual revenues over \$1 million, and 18.3 percent where businesses did not report revenue information. Businesses in the AA are located 11.5 percent in low-income CTs and 18.6 percent in moderate-income CTs based on the 2016 Business Geodemographic data.

Housing

Only 29 percent of total housing units in the AA are in the LMI geographies. According to the 2010 U.S. Census, housing units in the low-income CTs were 10.2 percent owner occupied (1,045 units), 73.1 percent rentals (7,472 units), and 16.7 percent vacant (1,704 units). Housing units in the moderate-income CT were 35.3 percent owner occupied (4,985 units), 53.3 percent rentals (7,532 units), and 11.4 percent vacant (1,604 units). The weighted average monthly gross rent in the AA was \$747. The median age of housing units in the low-income CTs is 39 years and is 53 years in moderate-income CTs. The median housing value in the AA is \$151,400, according to 2016 U.S. Census American Community Survey data.

Community Contact

We performed one community contact with an affordable housing organization in the AA, and reviewed another recent community contact with an economic development organization in the AA. Identified credit needs include affordable housing for LMI individuals and families, down payment and closing cost assistance programs, home ownership education and credit counseling services, and support for organizations developing affordable housing. Other identified credit needs included small business loans, especially start-up business financing and technical assistance/education financing. One contact expressed opportunities for bank employees to serve on revolving loan program committees provided by economic development organizations.