



## PUBLIC DISCLOSURE

September 12, 2016

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

United Community Bank  
Charter Number 703767

92 Walnut Street  
Lawrenceburg, IN 47025

Office of the Comptroller of the Currency  
West Lake Center  
4555 Lake Forest Drive, Suite 520  
Blue Ash, OH 45242-3760

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

**INSTITUTION'S CRA RATING: This institution is rated Outstanding.**

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

**The Community Development Test is rated: Satisfactory.**

- United Community Bank (UCB or the thrift) makes a substantial majority of their loans inside their assessment areas (AAs).
- Lending to borrowers of different incomes and businesses of different sizes reflects excellent distribution and supports outstanding performance.
- UCB's geographic distribution of loans reflects excellent distribution to the moderate-income census tracts within the AA and supports outstanding performance.
- Responsiveness to community development (CD) needs of the AAs through CD lending, investments, and services is adequate.

## **Scope of Evaluation**

Our office conducted a full scope Community Reinvestment Act (CRA) evaluation to assess the thrift's record of meeting the credit needs of its entire community, including low- and moderate-income areas. We used intermediate small savings association evaluation procedures to evaluate the thrift's performance under the Lending Test and CD Test. The Lending Test included loans originated from January 1, 2014 to December 31, 2015. In July 2016, we performed a data integrity examination of the thrift's home mortgage loans, as reported via the Home Mortgage Disclosure Act (HMDA) Loan Application Registers to determine the accuracy of the thrift's data. We found the data was accurate and reliable. The thrift's performance in residential real estate and business lending (commercial and commercial real estate loans) was considered foremost in this CRA evaluation as these were their primary lending products. For each AA, we conducted separate analyses. To analyze the thrift's performance under the lending test, we used the HMDA data for the residential real estate loans and a loan sample for the business loans. The business loan sample included 20 loans for lending in the AA and 20 loans per AA for lending to businesses of different sizes and geographic distribution. In addition, we used the 2010 U.S. Census data to analyze performance. The evaluation under the CD Test considered CD loans, investments, and services from February 19, 2013 to September 12, 2016 (evaluation period).

UCB has designated two AAs, as detailed under the ***Description of Assessment Areas*** section. The Cincinnati, OH-KY-IN Metropolitan Statistical Area (MSA) 17140 AA (Cincinnati MSA) is the thrift's primary AA, with the majority of the thrift's lending and deposit activity occurring in Dearborn County within this AA. Approximately 80 percent of the HMDA loan originations in 2014 and 2015 were in this AA and 83 percent of total deposits as of June 30, 2015 (Federal Deposit Insurance Corporation Deposit Market Share Report) were in this AA. We conducted full scope reviews for each AA.

## Description of Institution

UCB is a federally chartered stock savings institution with total assets of \$523 million as of June 30, 2016. The main office is located in Lawrenceburg, Indiana. UCB is a wholly owned subsidiary of United Community Bancorp, a one-institution financial services holding company, also based in Lawrenceburg. UCB has eight office locations. Each location has an automatic teller machine (ATM) and a drive-thru facility. In addition, the thrift has five stand-alone ATMs. The main office, four branches, and four stand-alone ATMs are located in Dearborn County. The thrift has three branches in Ripley County. One stand-alone ATM is located outside the thrift's AA. None of the ATMs accept deposits. Three of the offices are located in moderate-income census tracts (CTs), with the remaining in middle-income tracts.

UCB continues to operate a community-oriented financial institution. UCB's current business strategy includes offering a full range of standard lending and deposit products to accommodate the needs of customers within its AAs. As of June 30, 2016, the thrift held \$59 million in Tier 1 Capital and the loan portfolio totaled \$268 million, with net loans representing 51 percent of total assets. During the lending evaluation period, the thrift's business strategy included residential real estate and business loans (commercial and commercial real estate) as primary products, as illustrated in Table 1 below.

<b>Table 1 – Loan Portfolio Mix by Loans Originated</b>				
Loan Product	# of Loans Originated	% of Loans by #	\$ of Loans Originated (in 000's)	% of Loans By \$
Residential Real Estate Loans	571	36.65%	\$75,277	54.98%
Home Equity Lines of Credit Loans	239	15.34%	\$9,562	6.98%
Business Loans	102	6.55%	\$42,169	30.80%
Farm Loans	28	1.80%	\$3,532	2.58%
Consumer Loans	618	39.66%	\$6,377	4.66%
<b>TOTAL</b>	<b>1,558</b>	<b>100.00%</b>	<b>\$136,917</b>	<b>100.00%</b>

Source: Thrift's record of loans originated from January 1, 2014 to December 31, 2015.

Presently, no legal or financial impediments exist that could restrict UCB's ability to help meet the credit needs of the AAs. The thrift's last CRA evaluation was as of February 19, 2013, and resulted in an 'Outstanding' rating.

## Description of Assessment Areas

UCB has two AAs consisting of all of Dearborn and Ripley Counties in Indiana. The AAs are contiguous, meet the requirements of the CRA, and do not arbitrarily exclude any low- or moderate-income CTs. Dearborn County is located in the Cincinnati MSA AA. Ripley County is located in a Non-MSA (Ripley County Non-MSA AA).

Competition in the AA is strong and consists of national banks, branches of larger financial institutions, and savings and loan institutions. According to the Federal Deposit Insurance Corporation's June 30, 2015 Deposit Market Share Report, the thrift held first place out of eight financial institutions, or 41.44 percent, of the market share for Dearborn County and fifth place out of 10 financial institutions, or 10.56 percent, of the deposit market share in Ripley County.

Community contacts and thrift management indicate that the AA's economic conditions are improving. The credit needs of the AA include small business loans. According to the contacts, local financial institutions are adequately meeting the credit and CD needs of the AA, but more financial institution involvement with small business lending would benefit the community.

#### Cincinnati MSA AA

As of the 2010 U.S. census data, 10 CTs comprise the Cincinnati MSA AA, two of which are moderate-income (20 percent), six are middle-income (60 percent), and two are upper-income (20 percent). The population of this AA is 50,047, with 18 percent of the population living in moderate-income, 62 percent in middle-income, and 20 percent in upper-income geographies. Seventy-one percent of the housing units in the AA are owner-occupied, with 14 percent in moderate-income, 63 percent in middle-income, and 23 percent in upper-income geographies. Eight percent of the households in the AA live below the poverty level, 29 percent receive social security benefits, and 2 percent receive public assistance. The median housing value is \$156,520; the average median age of housing is 39 years. The weighted average monthly gross rent is \$637.

According to the 2010 U.S. census data and Federal Financial Institutions Examination Council's (FFIEC) updated estimates, the Cincinnati, OH-KY-IN MSA median family income is \$67,016. The FFIEC estimate of the Cincinnati, OH-KY-IN MSA median family income was \$72,400 for 2015 and \$71,100 for 2014. Approximately 17 percent of the families in the AA are low-income and 19 percent are moderate-income.

The local economy is improving. According to the Indiana Department of Workforce Development as of August 2016, the non-seasonally adjusted unemployment rate for the state of Indiana was 4.6 percent and 5.0 percent nationally. The unemployment rate for Dearborn County was 4.7 percent for the same time period, which is in line with the state and national rates.

Dearborn County's main employment is service-providing industries. The largest employer is the Hollywood Casino located in Lawrenceburg. Other large employers include the Dearborn County Hospital, Aurora Casket Company, and the Doubletree-Lawrenceburg.

### Ripley County Non-MSA AA

As of the 2010 U.S. census data, six CTs comprise the Ripley County Non-MSA AA, five of which are middle-income (83 percent) and one is upper-income (17 percent). The population of this AA is 28,818, with 75 percent of the population living in middle-income and 25 percent in upper-income geographies. Seventy percent of the housing units in the AA are owner-occupied, with 74 percent in middle-income and 26 percent in upper-income geographies. Ten percent of the households in the AA live below the poverty level, 32 percent receive social security benefits, and 2 percent receive public assistance. The median housing value is \$139,227; the average median age of housing is 42 years. The weighted average monthly gross rent is \$650.

According to the 2010 U.S. census data and FFIEC's updated estimates, the Indiana statewide non-MSA median family income is \$53,037. The FFIEC estimate of the Indiana statewide non-MSA median family income was \$56,700 for 2015 and \$56,100 for 2014. Approximately 15 percent of the families in the AA are low-income and 18 percent are moderate-income.

The local economy is improving. According to the Indiana Department of Workforce Development as of August 2016, the non-seasonally adjusted unemployment rate for Ripley County was 4.5 percent, which is better than the state and national rates. Ripley County's large employers include Hillenbrand Inc., Batesville Services Inc., and Mary Margaret Community Hospital.

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

UCB's lending performance is outstanding.

#### **Loan-to-Deposit Ratio**

UCB's loan-to-deposit (LTD) ratio is reasonable given their size, financial condition, and AA credit needs. The LTD ratio averaged 58.7 percent over the 14 quarters since the last CRA evaluation. A review of five financial institutions of similar size located within UCB's AAs revealed a range of average LTD ratios from 58 percent to 95 percent, with an overall average of 76 percent. UCB's average LTD ratio ranked fourth out of the five financial institutions in the AA. Since the prior evaluation, the thrift's LTD ratio ranged from a low of 55 percent and a high of 62 percent. The LTD ratio is influenced by the institution's high volume of public funds.

#### **Lending in Assessment Area**

A substantial majority of UCB's lending activity occurs inside their AAs. Our analysis of the thrift's lending included residential real estate loans and business loans. Table 2 details the thrift's lending activity during the evaluation period by number and dollar volume.

Table 2 – Lending in the AAs										
Loan Type	Number of Loans					Dollars of Loans (in 000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	177	73.44	64	26.56	241	\$23,406	69.02	\$10,505	30.98	\$33,911
Home Improvement	9	75.00	3	25.00	12	\$780	50.23	\$773	49.77	\$1,553
Home Refinance	285	84.57	52	15.43	337	\$36,398	79.80	\$9,215	20.20	\$45,613
Business Loans	15	75.00	5	25.00	20	\$1,481	43.80	\$1,900	56.20	\$3,381
Totals	486	79.67	124	20.33	610	\$62,065	73.49	\$22,393	26.51	\$84,458

Source: HMDA loans originated from January 1, 2014 through December 31, 2015, and a sample of Business Loans from the same time period.

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

UCB's lending to borrowers of different incomes and to businesses of different sizes reflects excellent distribution and supports outstanding performance.

#### Cincinnati MSA AA

UCB's distribution of lending to borrowers of different incomes and to businesses of different sizes within the Cincinnati MSA AA is excellent and reflects outstanding performance. UCB originated 80 percent of their HMDA loans in 2014 and 2015 in the Cincinnati MSA AA. This is the thrift's primary AA and more weight was given to this AA during the analysis of lending to borrowers of different incomes.

The thrift's distribution of residential real estate loans in the Cincinnati MSA AA exceeds the satisfactory performance standards for lending to borrowers of different income levels. As shown in Table 3 below, UCB's distribution of lending to low- and moderate-income borrowers during the evaluation period is excellent when compared to AA lenders and the percentage of AA families. Home improvement loans are not a primary product for this institution; however, UCB does make home equity lines of credit to borrowers for home improvement purposes. UCB only originated seven home improvement loans in this AA during the evaluation period.

UCB's distribution of lending to low-income borrowers for home purchase and refinance loans exceeds the percentages of loans originated by AA lenders, and is nearly equivalent to the percentages for moderate-income borrowers. For moderate-income borrowers, the thrift's percentage of originated loans exceeds the percentage of AA families. This is excellent considering 8.46 percent of the households in the AA live below poverty and these households may experience difficulty meeting the credit underwriting standards for home mortgage loans.

<b>Table 3 – Borrower Distribution of Residential Real Estate Loans in the Cincinnati MSA AA</b>							
Borrower Income Level	% Total Thrift Loans			% of Loans by AA Lenders			% of AA Families by Income Level
	Loan Type	Purchases	Home Improvement	Refinances	Purchases	Home Improvement	
Low	21.23	14.29	14.02	14.51	14.85	12.09	17.37
Moderate	30.14	28.57	25.70	30.97	37.62	28.84	18.68
Middle	23.97	57.14	31.78	26.19	28.71	30.00	24.39
Upper	24.66	0.00	28.50	28.33	18.82	29.07	39.56

Source: HMDA loans originated from January 1, 2014 through December 31, 2015; 2010 U.S. Census data, updated as of 2015. The Aggregate Lending Data (loans by AA lenders) is based on the 2014 Peer Mortgage Data. The above numbers are as a percentage of loans with borrower income information available.

UCB’s distribution of loans to businesses in the Cincinnati MSA AA is excellent and reflects outstanding performance. Approximately 82 percent of the businesses in the AA have revenues less than \$1 million, and the thrift exceeds the standards by originating 90 percent of its loans in our sample to businesses with revenues less than \$1 million. Refer to Table 4 below for details.

<b>Table 4 – Borrower Distribution of Loans to Businesses in the Cincinnati MSA AA</b>				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	81.58	3.70	14.72	100.00
% of Thrift Loans in AA by #	90.00	10.00	0.00	100.00
% of Thrift Loans in AA by \$	75.28	24.72	0.00	100.00

Source: Business loan sample and 2015 Business Geodemographic Data.

**Ripley County Non-MSA AA**

UCB’s distribution of lending to borrowers of different incomes and to businesses of different sizes within the Ripley County Non-MSA AA is excellent.

The thrift’s distribution of residential real estate loans in the Ripley County Non-MSA AA reflects reasonable distribution among borrowers of different income levels. The thrift originated only 20 percent of their HMDA loans in 2014 and 2015 in the Ripley County Non-MSA AA. Of the 20 percent of loans originated in this AA, 70 percent are refinance loans and are given more weight in this analysis. As shown in Table 5 below, UCB’s distribution of lending during the evaluation period exceeds the standards for satisfactory performance when compared to AA lenders for home refinance loans to moderate-income borrowers. In addition, the thrift originated a comparable percentage of refinance loans to low-income borrowers as the AA lenders. UCB’s distribution of lending to low-income borrowers for home purchase and refinance loans was reasonable, considering that 9.62 percent of the households in the AA live below poverty; these households may experience difficulty meeting the credit underwriting standards for home mortgage loans.

Table 5 – Borrower Distribution of Residential Real Estate Loans in the Ripley County Non-MSA AA							
Borrower Income Level	% Total Thrift Loans			% of Loans by AA Lenders			% of AA Families by Income Level
	Loan Type	Purchases	Home Improvement	Refinances	Purchases	Home Improvement	
Low	7.69	0.00	9.52	10.92	15.48	9.96	14.95
Moderate	23.08	0.00	22.22	27.31	28.57	19.05	18.24
Middle	26.92	50.00	26.98	22.27	27.38	29.44	21.95
Upper	42.31	50.00	41.28	39.50	28.57	41.55	44.86

Source: HMDA loans originated from January 1, 2014 through December 31, 2015; 2010 U.S. Census data, updated as of 2015. The Aggregate Lending Data (loans by AA lenders) is based on the 2014 Peer Mortgage Data. The above numbers are as of a percentage of loans with borrower income information available.

UCB’s distribution of loans to businesses in the Ripley County Non-MSA AA is excellent and reflects outstanding performance. Approximately 79 percent of the businesses in the AA have revenues less than \$1 million, and the thrift exceeds the standards by originating 95 percent of its loans in our sample to businesses with revenues less than \$1 million. Refer to Table 6 below for details.

Table 6 – Borrower Distribution of Loans to Businesses in the Ripley County Non-MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	79.31	4.56	16.13	100.00
% of Thrift Loans in AA by #	95.00	5.00	0.00	100.00
% of Thrift Loans in AA by \$	94.57	5.43	0.00	100.00

Source: Business loan sample and 2015 Business Geodemographic Data.

### Geographic Distribution of Loans

UCB’s geographic distribution of loans reflects excellent distribution to the moderate-income CTs within the AA, which supports outstanding performance. There are no low-income geographies in the thrift’s AAs. The analysis reflected lending in all CTs.

### Cincinnati MSA AA

Lending to geographies of different income levels in the Cincinnati MSA AA reflects excellent distribution. When comparing the percentage of residential real estate loans made by AA lenders and owner occupied housing units in the AA to the thrift’s loan volume, UCB exceeds the standards for satisfactory performance. The majority of the thrift’s lending and deposit activity occurs in this AA. Refer to Table 7 below for more details.

Table 7 – Geographic Distribution of Residential Real Estate Loans in the Cincinnati MSA AA							
Census Tract Income Level	% Total Thrift Loans			% of Loans by AA Lenders			% of AA Owner Occupied Housing
	Loan Type	Purchases	Home Improvement	Refinances	Purchases	Home Improvement	
Moderate	20.67	28.57	12.33	12.12	11.76	9.63	14.38
Middle	66.00	71.43	64.84	60.45	77.45	67.78	62.99
Upper	13.33	0.00	22.83	27.43	10.79	22.59	22.63

Source: HMDA loans originated from January 1, 2014 to December 31, 2015; 2010 U.S. Census data, updated as of 2015. The Aggregate Lending Data (loans by AA lenders) is based on the 2014 Peer Mortgage Data. Data shown includes only one to four-family and manufacturing housing.

UCB’s geographic distribution of loans to businesses within the Cincinnati MSA AA reflects excellent distribution. UCB originated 35 percent of the business loans in our sample to businesses located in moderate-income CTs, which exceeds the standards for satisfactory performance. Refer to Table 8 below for more details.

Table 8 – Geographic Distribution of Loans to Businesses in the Cincinnati MSA AA						
Census Tract Income Level	Moderate		Middle		Upper	
	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business Loans	31.56	35.00	56.31	50.00	12.13	15.00

Source: Business loan sample and 2015 Business Geodemographic Data.

**Ripley County Non-MSA AA**

Given there are no low- or moderate-income census tracts within the Ripley County Non-MSA AA, analysis of the thrift’s geographic distribution of lending in this AA is not meaningful. Five of the census tracts in this AA are middle-income and one is an upper-income CT. HMDA data and our loan samples revealed reasonable distribution throughout the AA as loans were made in all geographies in the thrift’s AA.

**Responses to Complaints**

UCB has not received any complaints about its performance in helping to meet the AA credit needs during the evaluation period.

**COMMUNITY DEVELOPMENT TEST**

UCB’s community development performance demonstrates adequate responsiveness to the CD needs of the AAs through CD lending, investments, and services, which is reflective of satisfactory performance. Performance in the Cincinnati MSA AA and Ripley County Non-MSA AA is adequate.

## **Number and Amount of Community Development Loans**

UCB's responsiveness to CD lending is adequate and reflects satisfactory performance. During this evaluation period, the thrift originated three CD loans to different organizations in their AAs.

### Cincinnati MSA AA

UCB's responsiveness to CD lending in the Cincinnati MSA AA is adequate. Dearborn County has two moderate-income CTs. UCB made two loans to businesses that are located in a moderate-income CT; these businesses promote economic development by providing permanent job creation in a moderate-income CT. In addition, UCB made one loan to a business that provides affordable housing in a moderate-income CT. The loans totaled \$494,000.

### Ripley County Non-MSA AA

UCB's responsiveness to CD lending in the Ripley County Non-MSA AA is poor. UCB did not originate any CD loans in this AA during the evaluation period. Since opening three branches in Ripley County in 2010, management continues to seek opportunities for CD lending within the area.

## **Number and Amount of Qualified Investments**

UCB's qualified investment activity demonstrates adequate responsiveness to the CD needs of its AAs. UCB and its affiliate, The UCB Foundation, respond to the CD needs of its community through donations. The thrift and its affiliate's fiscal year starts July 1 and ends June 30. The donations from both entities to UCB's AAs totaled \$71,000 during the evaluation period. UCB donated to many CD organizations that provide CD services to low- and moderate-income individuals. Of the \$71,000, almost \$35,000 was donated to organizations that serve both counties. For example, UCB donated approximately \$20,000 to United Way and \$8,000 to the Children's Advocacy Center of Southeastern Indiana. Each organization serves both AAs. In addition to the donations totaling \$71,000, the thrift funds the EverFi Financial Literacy programs at the public schools located in their AAs, with an annual cost of \$19,000.

### Cincinnati MSA AA

UCB's responsiveness to CD investments in the Cincinnati MSA AA is adequate. UCB donated to 22 qualified community development organizations, totaling approximately \$28,000 during the evaluation period. The largest recipients of donations are the Dearborn County Clearing House for Emergency Aid, which is a food pantry and a Christmas gift distributor for low- and moderate-income individuals, and the North Dearborn Pantry.

### Ripley County Non-MSA AA

UCB's responsiveness to CD investments in the Ripley County Non-MSA AA is adequate. UCB donated to 10 qualified community development organizations, totaling \$8,000 during the evaluation period. Two of the organizations that are recipients of the

donations include the Batesville Area Resource Center and the Milan Community Emergency Relief organization, both which provide CD services to low- and moderate-income individuals.

### **Extent to Which the Thrift Provides Community Development Services**

CD services provided by the thrift represent excellent responsiveness to CD needs of the AAs and demonstrate outstanding performance.

UCB offers various services to meet the needs of low- and moderate-income families through its retail products. The thrift offers free checking accounts, and through a partnership with another financial institution, customers can access a large network of ATMs without charge. The thrift also offers second chance checking accounts. UCB allows individuals with charge-offs, either paid or unpaid as reported by Chexsystems, to open a checking account. The accounts require a monthly fee, but allow those who may not be able to open an account elsewhere to receive banking services.

UCB also offers loans which benefit low- and moderate-income families. UCB continues to participate in mobile home lending and 100 percent financing through the United States Department of Agriculture's Rural Home Lending product.

#### Cincinnati MSA AA

UCB provides excellent responsiveness to the CD needs of the Cincinnati MSA AA through CD services.

UCB has three offices located in moderate-income CTs in Dearborn County. In one of the moderate-income CTs, thrift employees volunteer their time and financial expertise for the EverFi Financial Literacy Program at Lawrenceburg High School. The EverFi Program combines classroom instruction with online tools to improve students' understanding of personal financial concepts including banking products and services.

Director Jerry Hacker spends a significant amount of time representing UCB as the President and Chairman of the Dearborn County Clearing House food pantry. The food pantry is a non-profit organization that provides food, clothing, rent, and utilities to low- and moderate-income families in Dearborn County.

UCB's President and Chief Executive Officer, E.G. McLaughlin, represents the thrift at four different organizations serving the CD needs of Dearborn County. Chairman of the Board of Directors, Bill Ritzmann, represents UCB at three organizations in Dearborn County. Director Robert Ewbank represents UCB at one CD-related organization in Dearborn County. Both Chairman Ritzmann and President McLaughlin serve as committee members for the United Way of Greater Cincinnati which includes Dearborn County, Indiana. President McLaughlin is also the Finance Committee Chairman for the YES Home organization, which provides a place to live and full services for children removed from their homes.

Ripley County Non-MSA AA

UCB provides adequate responsiveness to the CD needs of the Ripley County Non-MSA AA through CD services.

The employees of UCB participate in the EverFi Financial Literacy program for the public schools in Ripley County. While the schools are not in low- and moderate-income tracts, the schools serve many low- to moderate-income families. The branch managers in this AA volunteer their time and financial expertise in conjunction with the program in the schools.

**Responsiveness to Community Development Needs**

UCB demonstrates adequate responsiveness to the CD needs of the communities it serves through CD lending, investments, and services. This is driven by the thrift's involvement in CD services and level of CD donations.

**Fair Lending or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. 195.28(c) in determining a Federal Savings Association's (FSA's) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the FSA, or in any assessment area by an affiliate whose loans have been considered as part of the FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.