



## **PUBLIC DISCLOSURE**

June 5, 2018

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

The First National Bank of Manchester  
Charter Number 7605  
120 Town Square  
Manchester, Kentucky 40962

Office of the Comptroller of the Currency  
10200 Forest Green Boulevard, Suite 501  
Louisville, Kentucky 40223

**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.

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## Overall CRA Rating

The Institution is rated: **Satisfactory**.

The First National Bank of Manchester (FNB) has a **satisfactory** record of meeting the credit needs of its community. This conclusion is based on the following.

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

The major factors supporting the rating for FNB include the following:

- FNB's loan-to-deposit (LTD) ratio is reasonable.
- FNB originates a substantial majority of loans within its delineated assessment area (AA).
- FNB's distribution of loans to low- and moderate-income individuals and small businesses reflects reasonable penetration.
- The geographic distribution of loans reflects excellent dispersion in low- and moderate-income census tracts.

## 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**

FNB is an intrastate bank headquartered in Manchester, Kentucky. FNB is wholly-owned by First National Financial Corporation, a one-bank holding company. As of March 31, 2018, FNB reported \$140.2 million in total assets with \$53.2 million in total loans. Tier 1 capital totaled \$18.3 million with a tier 1 leverage ratio of 13.0 percent.

FNB has four full-service offices in middle-income census tracts which are accessible to all segments of the community. Three branches are located in Clay County, within the city of Manchester, Kentucky, and one branch is in Laurel County, within the city of London, Kentucky. On July 31, 2016, FNB closed one branch in Manchester. This did not negatively impact low- and moderate-income (LMI) geographies or individuals, as another FNB location is less than four miles away. Two locations offer full-service Automated Teller Machines (ATM), accessible 24 hours a day, and Saturday hours.

FNB offers traditional banking products and services. Loan products include residential and commercial real estate, construction, home improvement, agricultural, and auto loans. Online banking services include bill pay and mobile banking.

As of March 31, 2018, net loans represented 36.9 percent of average assets. The loan portfolio mix was as follows: commercial real estate loans (45.8 percent), one-to-four family residential real estate loans (34.3 percent), consumer loans (9.3 percent), commercial and industrial loans (7.8 percent), and all other loans (2.8 percent).

FNB competes with only one branch of a large national bank in Clay County. However, competition from other institutions in Laurel County is strong. According to Federal Deposits Insurance Corporation (FDIC) data as of June 30, 2017, the AA had 13 financial institutions with 29 branch locations. The same data indicates FNB held \$118.4 million in deposits, or 12.2 percent of the AA market share.

There are no legal or financial impediments affecting FNB's ability to meet the credit needs of its AA. The last CRA evaluation was performed by The Office of the Comptroller of the Currency (OCC) on December 31, 2012. FNB received a Satisfactory rating.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

We evaluated FNB's CRA performance using the OCC's Small Bank CRA Examination Procedures. These procedures assess an institution's record of meeting the credit needs of its AA through lending activities. The CRA evaluation covers the period from the previous CRA examination through June 5, 2018. Conclusions regarding the bank's lending performance were based on a random sample of primary loan product originations between January 1, 2015 and December 31, 2017.



Based on both the number and dollar volume of loan origination data supplied by the bank, FNB's primary loan products are business and residential real estate loans. Business loans represented 47.7 percent of the dollar volume and 8.6 percent of the number of loan originations for 2015, 2016, and 2017. Residential real estate loans represented 20.2 percent of the dollar volume and 6.6 percent of the number of loan originations for the same period. Strategic focuses during the evaluation period included attracting commercial borrowers and developing a secondary market mortgage product.

For analysis purposes, we compared the bank's lending performance with demographic data from the 2010 United States (U.S.) Census, the 2015 American Community Survey (ACS) U.S. Census, 2016 and 2017 Business Geodemographic data, and FDIC deposit market share data as of June 30, 2017. As the income designation of some CTs in the AA changed in 2017, we reviewed the 2015 and 2016 originations separately from 2017. Please refer to *Appendix A: Scope of Examination* and *Appendix B: Community Profiles for Full-Scope Areas* for more information on the scope of the examination.

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

FNB has one AA, consisting of Clay and Laurel Counties in their entirety. Please refer to *Appendix A: Scope of Examination* and *Appendix B: Community Profiles for Full-Scope Areas* for a description of the AA.

### **Ratings**

The bank's overall rating is based on the full-scope review of the AA. As the percentage of LMI families (46.0 percent) was not significantly dissimilar from the percentage of LMI geographies (36.8 percent), equal weight was placed on borrower income and geographic distribution results.

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

Pursuant to 12 C.F.R. §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**

FNB's performance under the lending test is Satisfactory.

- The LTD ratio is reasonable.
- FNB originates a substantial majority of loans inside the AA.
- The distribution of loans to LMI individuals and small businesses reflects reasonable penetration.
- The geographic distribution of loans reflects excellent dispersion in LMI census tracts.

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

FNB's net LTD ratio is reasonable given its size, financial condition, and the distressed economic condition of the AA.

FNB's LTD ratio averaged 42.9 percent over the last 21 quarters, with a quarterly high of 48.0 percent and a quarterly low of 39.5 percent. We compared this performance to two banks in the AA with similar asset size and product types. Their average LTD ratios ranged from 56.2 percent to 69.9 percent. We noted several factors which depress FNB's LTD ratio:

- The two similarly situated banks are headquartered in Laurel County and have no Clay County presence. FNB, however, is headquartered in Clay County and has only one Laurel County location.
- Clay County's is one of the poorest counties in the U.S. Forty two percent of the population live below the poverty line compared to the national average of 14 percent. The county's 2016 median household income of \$22,174 was 60.0 percent lower than the national median household income of \$55,322. The annual 2017 unemployment rate for Clay County was 8.5 percent, compared to 5.9 percent for Laurel County and 4.9 percent for the state.

### **Lending in Assessment Area**

FNB originated a substantial majority of its primary loan products within the AA. Our sample showed 90.0 percent of the total number and 93.4 percent of the total dollar volume of these loans were originated within the AA.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%	#	\$	%	\$	%	
Residential	38	95.0	2	5.0	40	2,660	96.7	89	3.3	2,749
Business	34	85.0	6	15.0	40	3,445	91.0	342	9.0	3,787
Total	72	90.0	8	10.0	80	6,105	93.4	431	6.6	6,536

Source: Evaluation Period: 1/1/2015 - 12/31/2017 Bank Data

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

FNB's distribution of loans to low- and moderate-income individuals and small businesses reflects reasonable penetration, considering performance context information, demographic, and HMDA Aggregate comparators.

#### Residential Loans

##### 2015-2016

The overall borrower distribution of residential loans originated in 2015-2016 was reasonable, primarily due to the excellent penetration of loans to moderate-income borrowers. Bank performance significantly exceeded the demographic comparator and 2016 HMDA aggregate data for moderate-income borrowers. The distribution to low-income borrowers was poor. However, the number of people living in poverty within Clay County is extreme. Unemployment rates for both Clay and Laurel Counties are well above state and national averages. Thirty seven percent of AA households receive social security benefits. People living in poverty have a difficult time qualifying for traditional mortgages. The bank offers some alternative loan programs to assist LMI borrowers. The USDA Guaranteed Rural Development Housing Loan Program requires little or no down payment. As a member of the Federal Home Loan Bank, FNB participates in the Welcome Home Program that provides grants to LMI borrowers to assist with down payments and closing costs. See Appendix C, Table 1.

##### 2017

The overall borrower distribution of residential loans originated in 2017 was reasonable. Lending to low-income borrowers was significantly lower than the demographic comparator but met the 2017 HMDA aggregate data. Lending to moderate-income borrowers significantly exceeded both. See Appendix C, Table 2.

## Business Loans

2015-2016

We noted reasonable distribution of loans to business of different sizes within the 2015-2016 sample. The percentage of loans to small businesses met the demographic comparator but significantly exceeded the CRA aggregate data. However, we considered that 15.6 percent of AA businesses did not report revenues in the demographic data. Eighty percent of the loans in our sample had dollar amounts of less than \$100,000. This demonstrates that the bank is willing to make small dollar loans to meet the needs of smaller businesses.

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-16	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
FNB AA 2015 - 2016	20	2,569	30.2	924	79.5	80.0	49.2	4.9	20.0	15.6	0.0	
<i>Source: 2016 D&amp;B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, Due to rounding, totals may not equal 100.0</i>												

2017

In the 2017 analysis, we determined that borrower distribution was excellent. The percentage of loans to small business exceeded the demographic comparator and CRA aggregate data. Eighty five percent of the loans in our 2017 sample had dollar amounts of less than \$100,000. This demonstrates that the bank is willing to make small dollar loans to meet the needs of smaller businesses.

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
FNB AA 2017	20	1,632	13.3	924	80.7	95.2	49.2	5.9	4.8	13.4	0.0	
<i>Source: 2017 D&amp;B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, Due to rounding, totals may not equal 100.0</i>												

## **Geographic Distribution of Loans**

FNB's overall geographic distribution of home and business loans reflects excellent dispersion among different income tracts in the AA. We analyzed the bank's residential and small business lending activity over the evaluation period and did not identify any unexplained, conspicuous lending gaps in the AA.

### **Residential Loans**

2015-2016

The distribution of residential real estate loans to borrowers in different census tract income in 2015-2016 levels reflects excellent dispersion. Lending to borrowers in low- and moderate-income CTs significantly exceeded demographic comparators and aggregate data. *See Appendix C, Table 3.*

2017

The distribution of residential real estate loans to borrowers in different census tract income in 2017 levels reflects excellent dispersion. Lending to borrowers in low-income CTs met the demographic comparator and exceeded the aggregate data. Lending in moderate-income CTs exceeded both demographic comparators and aggregate data. *See Appendix C, Table 4.*

### **Business Loans**

2015-2016

The distribution of business loans originated in 2015-2016 to borrowers in different census tract income levels reflects excellent dispersion. Lending to borrowers in low- and moderate-income CTs significantly exceeded demographic comparators and aggregate data. *See Appendix C, Table 5.*

2017

The distribution of business loans originated in 2017 to borrowers in different census tract income levels reflects excellent dispersion. Lending to borrowers in low- and moderate-income CTs significantly exceeded demographic comparators and aggregate data. *See Appendix C, Table 6.*

### **Responses to Complaints**

FNB did not receive any written complaints regarding its CRA performance during the evaluation 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”).

<b>Time Period Reviewed</b>	<b>Lending Test:</b> January 1, 2015 to December 31, 2017	
<b>Financial Institution</b>		<b>Products Reviewed</b>
The First National Bank of Manchester (FNB) Manchester, Kentucky		Residential Real Estate Loans Business Loans
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
<i>Not applicable</i>	<i>Not applicable</i>	<i>Not applicable</i>
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Kentucky: - Clay and Laurel Counties	Full-Scope	

## Appendix B: Community Profiles for Full-Scope Areas

### AA: Clay and Laurel Counties

Demographic Information of the Assessment Area						
Assessment Area: FNB Manchester AA - 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	5.3	31.6	52.6	10.5	0.0
Population by Geography	81,051	3.8	27.4	62.2	6.6	0.0
Housing Units by Geography	34,313	4.6	27.8	60.8	6.8	0.0
Owner-Occupied Units by Geography	21,809	5.0	28.4	58.8	7.8	0.0
Occupied Rental Units by Geography	9,062	2.8	25.2	68.8	3.2	0.0
Vacant Units by Geography	3,442	6.5	30.9	52.6	9.9	0.0
Businesses by Geography	3,967	1.0	18.7	75.9	4.4	0.0
Farms by Geography	134	1.5	20.9	68.7	9.0	0.0
Family Distribution by Income Level	21,572	29.0	17.0	18.1	36.0	0.0
Household Distribution by Income Level	30,871	29.2	15.7	17.2	37.9	0.0
Median Family Income Non-MSAs - KY		\$45,920	Median Housing Value			\$88,899
			Median Gross Rent			\$571
			Families Below Poverty Level			22.9%
<i>Source: 2015 ACS Census and 2017 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

FNB's AA consists of Clay and Laurel Counties. The AA is appropriate and does not arbitrarily exclude low- or moderate-income census tracts. Clay and Laurel Counties are adjacent and located in the Eastern Kentucky Coal Fields Region. Clay County lies almost entirely within the Daniel Boone National Forest. The largest city in Clay County is Manchester. The largest city in Laurel County is London. The total population in the AA is 81,051.

The 2010 U.S. Census divided the AA into 19 census tracts: three low-income, two moderate-income, 12 middle-income, and two upper-income. The distribution of the census tracts changed during the CRA evaluation period as a result of the 2015 American Community Survey (ACS) U.S. Census. The 2015 ACS U.S. Census divided the 19 census tracts into one low-income, six moderate-income, 10 middle-income, and two upper-income tracts.



According to the Bureau of Labor Statistics, the annual unemployment rates for Clay County in 2015, 2016, and 2017 were 9.4 percent, 9.8 percent, and 8.5 percent, respectively. The annual unemployment rates for Laurel County for 2015, 2016, and 2017 were 6.2 percent, 6.2 percent, and 5.9 percent, respectively. Unemployment rates for both counties were higher than the annual average for the state for these years (5.3 percent, 5.1 percent, and 4.9 percent). In the AA, approximately 22.9 percent of families live below the poverty level with 42.1 percent of people in Clay County living in poverty.

Over 64 percent of Clay County residents commute out of the county for employment. The largest employment sectors in Clay County are educational services (886 employees) and healthcare and social assistance (876 employees). The majority of Laurel County residents work inside the county. The most common employment sectors are manufacturing (3,270 employees) and retail trade (3,165 employees).

#### Community Contact

A community contact familiar with the AA identified a need for affordable home improvement loans in the AA. Background research indicates that there is a need for revitalization and stabilization of distressed areas in the AA. All middle-income census tracts within the AA were designated as distressed nonmetropolitan middle-income geographies in 2015, 2016, and 2017.

## Appendix C: Tables of Performance Data

Table 1

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2015-16		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
FNB AA 2015 - 2016	20	1,120	20.6	1,308	26.5	0.0	6.3	17.4	30.0	15.4	17.1	15.0	20.6	39.1	55.0	39.0	0.0	0.0	18.7		
Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table 2

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
FNB AA 2017	20	1,598	47.8	1,243	29.0	5.00	5.4	17.0	30.0	15.8	18.1	15.0	20.9	36.0	50.0	36.8	0.0	0.0	21.1		
Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table 3

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2015-2016		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
FNB AA 2015-2016	20	1,120	20.6	1,308	7.8	25.0	2.6	11.4	45.0	7.1	72.4	30.0	78.4	8.4	0.0	11.9	0.0	0.0	0.0		
Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0																					

Table 4

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
FNB AA 2017	20	1,598	47.8	1,243	5.0	5.0	1.4	28.4	35.0	18.2	58.8	60.0	71.8	7.8	0.0	8.6	0.0	0.0	0.0		
Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0																					

Table 5

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2015-16		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate		
FNB AA 2015 - 2016	20	2,569	30.2	924	2.1	5.0	2.2	13.5	50.0	14.1	76.6	30.0	76.0	7.8	15.0	7.8	0.0	0.0	0.0		

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0

Table 6

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate		
FNB AA 2017	21	1,632	13.3	924	1.0	14.2	1.3	18.7	33.3	18.1	75.9	47.6	75.4	4.4	4.76	5.2	0.0	0.0	0.0		

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data.  
Due to rounding, totals may not equal 100.0