



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

February 24, 2025

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Chain Bridge Bank NA  
Charter Number 24755

1445-A Laughlin Avenue  
McLean, VA 22101

Office of the Comptroller of the Currency

400 7th Street S.W.  
Washington, D.C. 20219

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

**Institution's CRA Rating:** This institution is rated **Outstanding**.

**The lending test is rated: Satisfactory**

**The community development test is rated: Outstanding**

The major factors that support this rating include: The Lending Test rating is based on the bank's record of performance in meeting credit needs of its assessment area (AA):

- The bank's loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and business strategy.
- The bank originated a majority of its loans within its AA.
- The geographic distribution of loans reflects reasonable distribution throughout the AA.
- The distribution of loans to borrowers of different incomes is reasonable.

The Community Development (CD) Test rating is based on the aggregate assessment of the bank's CD activities for loans, investments, and services in the bank's AA:

- Chain Bridge Bank (CBB) demonstrated excellent responsiveness to CD needs by engaging in a combination of CD loans, qualified investments, and CD services.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's loan-to-deposit ratio is reasonable.

The bank's quarterly average net LTD ratio over the 13 quarters since the last CRA evaluation was 26.2 percent. The ratio ranged from a quarterly low of 20.63 percent to a quarterly high of 38.98 percent during that time period. A substantial portion of the bank's deposits is derived from political organizations. The deposits of political organizations are typically seasonal in nature and have a significant impact on the bank's LTD ratio.

### Lending in Assessment Area

A majority of the bank's loans are inside its assessment area(s) (AAs).

The bank originated and purchased 51.5 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

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		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2021	49	48.0	53	52.0	102	39,781	54.2	33,656	45.8	73,437
2022	36	48.0	39	52.0	75	32,657	51.3	30,994	48.7	63,651
2023	19	76.0	6	24.0	25	19,387	76.3	6,023	23.7	25,410
Total	104	51.5	98	48.5	202	91,825	56.5	70,673	43.5	162,498

## Description of Institution

Chain Bridge Bank, National Association (CBB, bank, or institution) is an intrastate full-service national bank headquartered in McLean, Virginia. CBB is wholly owned by Chain Bridge Bancorp, Inc., a one-bank holding company headquartered in McLean, Virginia. The bank does not have any subsidiaries or affiliates.

CBB was chartered in 2007 and operates a single full-service branch and a deposit accepting automated teller machine (ATM) located in an upper-income census tract with no adjacent low- and moderate-income (LMI) census tracts. Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies or individuals. The bank did not close any branch offices during the evaluation period, nor were there any mergers or acquisitions.

CBB has one AA, which is located within the Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Division (MD) 47894, which is part of the larger Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Statistical Area (MSA) 47900. The AA includes all census tracts in Arlington County, Fairfax County, Fairfax City, and Falls Church in Virginia. The AA consists of whole geographies and does not arbitrarily exclude any LMI geographies.

The bank offers an array of retail and commercial banking services. Consumer products include checking accounts, savings programs, and money market accounts. Additionally, the bank offers home equity loans, home equity lines of credit, executive lines of credit, auto loans, personal loans, mortgage loans, and installment loans. The bank's commercial services include business checking, savings, and money market accounts. In addition, the bank provides commercial and industrial loans, commercial real estate loans, and construction and development loans. Additionally, the bank offers asset management services including investment management with sole or joint discretion, trustee services, estate services, custody services, and conservator or guardian of estate services. The bank's website <https://www.chainbridgebank.com/> provides additional information on its products and services.

As of December 31, 2024, CBB reported total assets of \$1.4 billion, total deposits of \$1.1 billion, tier 1 capital of \$99.9 million, and net loans and leases of \$299.8 million.

There are no financial or legal impediments to hinder CBB's ability to help meet the credit needs of the communities it services. CBB received an "Outstanding" rating during its last Intermediate Small Bank (ISB) CRA evaluation dated December 6, 2021.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

CBB was evaluated under the intermediate-small bank (ISB) examination procedures. The ISB procedures include a Lending Test and a CD Test. The Lending Test evaluates the bank's record of meeting the credit needs of the bank's AA through its lending activities. The CD Test evaluates the bank's responsiveness to CD needs in its AA through qualified CD lending, investments, and services.

The evaluation period for the Lending Test and CD Test was from January 1, 2021, through December 31, 2023. During the evaluation period the bank's primary loan product was home mortgage loans. This was determined from examiner review of the bank's business strategy and discussions with bank management. The bank is a Home Mortgage Disclosure Act (HMDA) reporter; therefore, all home mortgage loans reported on the bank's 2021, 2022, and 2023 HMDA Loan Application Registers (LARs) were considered. The HMDA LAR data was tested and found to be reliable.

The OCC also reviewed the integrity of the bank's CD activities to ensure these activities qualify for credit under the CRA regulation. Refer to the table in appendix A for more information on the scope of the review.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### Ratings

CBB has only one rating area, which is the state of Virginia; therefore, the conclusions formed, and ratings assigned are based on a full-scope review of the bank's single AA.

Refer to the "Scope" section under the state rating section for details.

## 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 AA 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 Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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.

## State Rating

### State of Virginia

**CRA rating for the State of Virginia:** Outstanding.

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

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

The major factors that support this rating include:

- Reasonable geographic distribution of loans in the AA.
- Reasonable distribution of lending to borrowers of different income levels in the AA.
- Excellent responsiveness to CD needs through CD activities in the AA.

### **Description of Institution's Operations in Virginia**

The bank provides products and services through one full-service branch office and a deposit accepting ATM located in an upper-income census tract within the state of Virginia. The composition of the AA is fully detailed in the Description of Institution section and in appendix A of this evaluation.

The AA is a competitive market for financial services. According to the June 30, 2023, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, there were 80 financial institutions within the bank's AA that operated 336 full-service branches with aggregate deposits of \$304.34 billion. CBB ranked 21<sup>st</sup> with a 0.33 percent deposit market share. The five most prominent financial institutions accounted for a total of 83.47 percent of the total market share.

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders in the bank's AA. According to the most recent 2023 Peer Mortgage Data, there were 491 HMDA reporters who originated or purchased \$12.82 billion in home mortgage loans within the bank's AA. CBB ranked 136<sup>th</sup> with a market share of less than 0.10 percent. The top five lenders were Truist Bank, Navy Federal Credit Union, PennyMac Loan Services, Rocket Mortgage, and United Wholesale Mortgage, who held a combined market share of 20.92 percent in the AA.

According to the US Bureau of Labor Statistics, unemployment rates in the Washington-Arlington-Alexandria, DC-VA-MD-WV MSA experienced a steady drop early in the evaluation period. As of August 2023, the unemployment rate for the MSA was 3.0 percent.

### **Demographic Data**

The following tables provide a summary of the demographics that includes housing and business information for the AA in 2021 and 2023.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2021 Washington-Arlington-Alexandria DC-VA-MD-WV						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	325	2.8	8.9	36.0	50.8	1.5
Population by Geography	1,389,377	3.4	9.6	36.6	50.4	0.0
Housing Units by Geography	533,787	2.9	9.6	37.4	50.0	0.0
Owner-Occupied Units by Geography	318,346	1.0	5.8	33.7	59.5	0.0
Occupied Rental Units by Geography	186,083	6.2	15.9	43.6	34.3	0.0
Vacant Units by Geography	29,358	3.2	11.3	38.8	46.7	0.0
Businesses by Geography	196,510	1.5	6.2	38.7	53.6	0.1
Farms by Geography	2,242	1.4	6.2	38.4	53.9	0.0
Family Distribution by Income Level	334,848	16.2	13.6	19.0	51.3	0.0
Household Distribution by Income Level	504,429	16.6	13.7	18.4	51.3	0.0
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC- VA-MD-WV		\$106,105	Median Housing Value			\$512,900
			Median Gross Rent			\$1,791
			Families Below Poverty Level			4.2%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2023 Washington-Arlington-Alexandria DC-VA-MD-WV						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	353	3.1	11.3	34.8	48.2	2.5
Population by Geography	1,427,756	3.9	12.6	35.5	47.6	0.5
Housing Units by Geography	546,496	3.5	12.9	36.7	46.2	0.7
Owner-Occupied Units by Geography	329,060	1.7	9.0	32.9	56.1	0.2
Occupied Rental Units by Geography	192,579	6.6	19.0	43.0	29.9	1.5
Vacant Units by Geography	24,857	3.3	17.3	36.7	41.8	0.8
Businesses by Geography	251,583	2.2	10.1	35.6	51.7	0.4
Farms by Geography	2,873	1.7	11.2	34.7	52.3	0.1
Family Distribution by Income Level	340,781	17.1	13.8	18.8	50.3	0.0
Household Distribution by Income Level	521,639	18.0	14.0	18.2	49.9	0.0
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC- VA-MD-WV		\$126,224	Median Housing Value			\$577,743
			Median Gross Rent			\$1,974
			Families Below Poverty Level			4.0%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						



When looking at housing affordability, the AA has a remarkably high cost of living that makes homeownership for most LMI persons difficult to obtain. The table below illustrates housing affordability calculations for the MSA included in the bank's AA. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$75,050 per year (or less than 50 percent of the 2023 FFIEC adjusted median family income in the AA) could afford a \$349,511 mortgage with a payment of \$1,876 per month. A moderate-income borrower making \$120,080 per year (or less than 80 percent of the 2023 FFIEC adjusted median family income in the AA) could afford a \$559,217 mortgage with a payment of \$3,002 per month. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$3,162. The median housing value in the AA was \$489,900 and \$589,000 in 2021 and 2023, reflecting a percent change of 20.2 percent from 2021 to 2023 according to Realtor.com data.

Furthermore, there was a limited number of owner-occupied units available in the bank's LMI geographies. The population within the low-income geographies was 47,238 and 55,682 in 2021 and 2023, respectively; however, there were just 18,467 and 5,594 owner-occupied units in 2021 and 2023, respectively. The population within the moderate-income geographies was 133,380 and 179,897 in 2021 and 2023, respectively; however, there were just 18,467 and 29,615 owner-occupied units in 2021 and 2023, respectively.

<b>2023 Housing Affordability</b>									
<b>MD/MSA Name</b>	<b>2023 Updated MFI</b>	<b>Maximum Low-Income Annual Income</b>	<b>Maximum Affordable Mortgage Amount</b>	<b>Maximum Monthly Mortgage Payment</b>	<b>Maximum Moderate-Income Annual Income</b>	<b>Maximum Affordable Mortgage Amount</b>	<b>Maximum Monthly Mortgage Payment</b>	<b>2023 Median Home Sales Price*</b>	<b>Mortgage Payment Based on Sales Price</b>
MSA47894	\$150,100	\$75,050	\$349,511	\$1,876	\$120,080	\$559,217	\$3,002	\$589,000	\$3,162

\*Source – National Association of Realtors 2023 median home sales price of existing single-family homes for Metropolitan Areas.

## **Economic Data**

According to the August 2023 Moody Analytics report, the Washington-Arlington-Alexandria economy was nearing a full recovery. Job growth has been consistent as the labor force has expanded to surpass its pre-pandemic level. The public sector remains a key pillar of the economy while healthcare has led industries in job creation. Strengths for the area are favorable demographics, emergence as an East Coast technology hub, and tourism. Weaknesses included exposure to downturns in tourism, high livings costs, high exposure to the federal government, and high business and regulatory costs.

## **Community Contacts**

Based on comments provided from two community contacts serving the AA, affordable housing is the most prominent issue for families in the region. The median home price is in excess of \$500 thousand in the area, which is a significant barrier for low- and moderate-income families. One contact noted that there have been some partnerships between financial institutions and non-profit entities to create more affordable housing units in the area, which have been successful. The contact also noted there are other banks who are interested in partnering on other affordable housing projects. Overall, the perception of banks in the AA is positive.

## **LENDING TEST**

The bank's performance under the Lending Test in Virginia is rated Satisfactory.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on the full-scope review, the bank's lending performance in the state of Virginia is satisfactory.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits an adequate geographic distribution of loans in the state.

### ***Home Mortgage Loans***

Refer to Table O in the state of Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

#### ***2021***

The percentage of home mortgage loans to borrowers in low-income census tracts was somewhat lower than both the percentage of owner-occupied housing units and the percentage of loans by all lenders in low-income census tracts. The bank did not make any home mortgage loans to low-income borrowers in 2021.

The percentage of home mortgage loans to moderate-income tracts was somewhat lower than both the percentage of owner-occupied housing units and the percentage of loans by all lenders in moderate-income census tracts.

#### ***2022-2023***

The percentage of home mortgage loans to borrowers in low-income census tracts was somewhat lower than both the percentage of owner-occupied housing units and the percentage of loans by all lenders in low-income census tracts. The bank did not make any of its home mortgage loans in low-income tracts.

The percentage of home mortgage loans to moderate-income tracts was lower than both the percentage of owner-occupied housing units and the percentage of loans by all lenders in moderate-income census tracts.

In the analysis, the OCC considered several performance context factors including AA demographics and significant market competition in the AA. CBB has only one branch which is in an upper-income census tract with no adjacent LMI census tracts. The lack of branch presence in LMI census tracts constricts lending in those areas. In addition, the limited number of owner-occupied housing units in LMI geographies poses a significant challenge to lending in these areas. Most owner-occupied housing was in middle- and upper-income geographies. The bank's performance was consistent with the limited opportunities to lend to LMI geographies.

### **Lending Gap**

OCC examiners reviewed summary reports and AA maps detailing the bank's lending activity to identify any gaps in the geographic distribution of loans. No unexplained conspicuous gaps were identified.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits adequate distribution of loans to individuals of different income levels given the product lines offered by the bank.

### ***Home Mortgage Loans***

Refer to Table P in the state of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

#### ***2021***

The percentage of home mortgage loans to low-income borrowers was lower than both the distribution of low-income families and the percentage of loans by all lenders to low-income families. The bank did not make any home mortgage loans to low-income borrowers in 2021.

The percentage of home mortgage loans to moderate-income borrowers was near to or equal to both the distribution of moderate-income families and the percentage of loans by all lenders to moderate-income families.

#### ***2022-2023***

The percentage of home mortgage loans to low-income borrowers was lower than both the distribution of low-income families and the percentage of loans by all lenders to low-income families. The bank made one home mortgage loan to a low-income borrower in 2022.

The percentage of home mortgage loans to moderate-income borrowers was lower than both the distribution of moderate-income families and the percentage of loans by all lenders to moderate-income families.

The OCC considered the high median housing value compared to income that constrains affordability of homeownership for LMI people. The median value of homes in the MSA was nearly eight times the earnings of low-income families and nearly five times the earnings of moderate-income families. This indicates that a limited proportion of owner-occupied units were affordable for LMI borrowers. Furthermore, within the AA, 4.0 percent of families were below the poverty level and may find it difficult to qualify for a home loan.

## **Responses to Complaints**

CBB did not receive any complaints regarding its performance in helping to meet the credit needs in the bank's AAs during this evaluation period.

## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the State of Virginia is rated Outstanding.

Based on a full-scope the review, the bank exhibits excellent responsiveness to community development needs in the MMSA through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area(s).

### Number and Amount of Community Development Loans

Refer to the Community Development Loan table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
MSA	2	0.7	777	2.0
PPP Loans	161	55.7	18,740	48.0
PPP Loans (statewide & regional)	126	43.6	19,560	50.0

During the evaluation period, CBB originated 163 CD loans totaling \$19.5 million in the bank's AA. These loans provided payroll protection and job retention in the AA. Additionally, CBB originated 126 PPP loans totaling \$19.6 million that benefited the broader statewide and regional areas. CBB has effectively met the credit needs of its AA.

These loans demonstrated excellent responsiveness to identified needs in the AA. CBB was particularly responsive to the SBA's PPP lending and originated a significant volume of PPP loans, given the bank's size and capacity.

### Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
MD 47894 (Portion)	8	3,113	78	4,603	86	78.9	7,716	52.0	0	0
Statewide	7	5,958	16	1,157	23	21.1	7,115	48.0	0	0

\* Prior Period Investments means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The Qualified Investment Table, shown above, set forth the information and data used to evaluate the bank's level of qualified CD investments. These tables include all CD investment, including prior period investments that remain outstanding as of the examination date.

During the evaluation period the bank's qualified investments and donations totaled \$14.8 million. Qualified investments and donations include 94 new investments and donations totaling \$5.8 million and 10 prior period investments with a total current book value at the end of the evaluation period of approximately \$9.1 million. CBB is able to receive credit for qualified investments made outside of its AA because the bank has adequately addressed the community development needs within its AA. The investments demonstrate the bank's responsiveness to affordable housing initiatives, which is an identified community development need in the AA.

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

CD services were effective and responsive in addressing community needs. The bank conducted or supported several CD services consistent with its capacity and expertise. During the evaluation period, CBB employees provided approximately 311 service hours to CD organizations that benefit low- and moderate-income individuals and families in the AA.

The following are notable examples of CD services provided in the AA:

- A senior officer of the bank served as the Chair of the Loan Committee, providing underwriting expertise to a nonprofit that provides 504 loans to small businesses to promote economic development.
- A senior member of bank management team served on the board of directors for a non-profit that provides stable and affordable housing communities.

## Appendix A: Scope of Examination

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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 MSA(s) and non-MSA(s) 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>	(01/01/2021 to 12/31/2023)	
<b>Bank Products Reviewed:</b>	Home mortgage Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not Applicable		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State</b>		
Virginia	Full-Scope	Portion of the Washington-Arlington-Alexandria, DC-VA-MD (MD 47894) comprised of Arlington and Fairfax Counties, Virginia. Fairfax and Falls Church Cities, Virginia.

## Appendix B: Summary of MMSA and State Ratings

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RATINGS		Chain Bridge Bank	
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Chain Bridge Bank, NA	Satisfactory	Outstanding	Outstanding
<b>State:</b>			
Virginia	Satisfactory	Outstanding	Outstanding

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in 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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** 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; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, 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, 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-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders 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), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**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-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**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 state/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. The median is the point at which half of the families have income above, and half below, a range of incomes. 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, and half below, a range of incomes.

**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.

**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.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical 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 statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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 1 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.

# Appendix D: Tables of Performance Data

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## Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O.     Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P.     Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2021
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	
2021 Washington-Arlington-Alexandra DC-VA-MD-WV	49	39,781,700	100.0	101,595	1.0	0.0	1.0	5.8	2.0	5.4	33.7	12.2	34.5	59.5	85.7	59.1	0.0	0.0	0.0	
Total	49	39,781,700	100.0	101,595	1.0	0.0	1.0	5.8	2.0	5.4	33.7	12.2	34.5	59.5	85.7	59.1	0.0	0.0	0.0	
Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
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
2023 Washington-Arlington-Alexandria DC-VA-MD-WV	55	52,044,593	100.0	23,556	1.7	0.0	2.1	9.0	1.8	9.8	32.9	25.5	34.9	56.1	72.7	53.1	0.2	0.0	0.2
Total	55	52,044,593	100.0	23,556	1.7	0.0	2.1	9.0	1.8	9.8	32.9	25.5	34.9	56.1	72.7	53.1	0.2	0.0	0.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
2021 Washington-Arlington-Alexandria DC-VA-MD-WV	49	39,781,700	100.0	101,595	16.2	0.0	4.4	13.6	12.2	12.7	19.0	8.2	19.8	51.3	75.5	43.7	0.0	4.1	19.5
Total	49	39,781,700	100.0	101,595	16.2	0.0	4.4	13.6	12.2	12.7	19.0	8.2	19.8	51.3	75.5	43.7	0.0	4.1	19.5
Source: 2015 ACS ; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-23
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
2023 Washington-Arlington-Alexandria DC-VA-MD-WV	55	52,044,593	100.0	23,556	17.1	1.8	4.7	13.8	5.5	14.9	18.8	7.3	22.1	50.3	78.2	43.3	0.0	7.3	15.0
Total	55	52,044,593	100.0	23,556	17.1	1.8	4.7	13.8	5.5	14.9	18.8	7.3	22.1	50.3	78.2	43.3	0.0	7.3	15.0
Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.