PUBLIC DISCLOSURE

Date of Evaluation: **NOVEMBER 27, 2023**

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Name of Depository Institution: **ORRSTOWN BANK**

Institution's Identification Number: **342410**

Address: **4750 LINDLE ROAD**

           HARRISBURG, PENNSYLVANIA

FEDERAL RESERVE BANK OF PHILADELPHIA
TEN INDEPENDENCE MALL
PHILADELPHIA, PENNSYLVANIA 19106

PUBLIC DISCLOSURE

January 22, 2024

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Orrstown Bank
RSSD - 342410
4750 Lindle Road
Harrisburg, PA

THE FEDERAL RESERVE BANK OF PHILADELPHIA
TEN INDEPENDENCE MALL, PHILADELPHIA, PA 19106

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INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: SATISFACTORY

The follow table indicates the performance level of Orrstown Bank (Orrstown) with respect to the lending, investment, and service tests.

PERFORMANCE TEST RATINGS TABLE

PERFORMANCE LEVELS	ORRSTOWN BANK		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

*Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to this rating include:

- A high percentage of the bank's loans are made inside its assessment areas;
- The borrower distribution of loans reflects good penetration among retail customers of different income levels and good penetration among business customers of different sizes;
- The geographic distribution of loans reflects adequate penetration throughout the assessment area;
- The bank has made an adequate level of community development loans;
- The bank has made a significant level of qualified investments and donations; and
- The bank provides a limited level of community development services.

INSTITUTION

DESCRIPTION OF INSTITUTION

Orrstown was rated satisfactory at its previous CRA evaluation dated January 25, 2021, which used the Interagency Large Institution CRA Examination Procedures.

Orrstown is a state-chartered full-service commercial bank headquartered in Shippensburg, Cumberland County, Pennsylvania. The bank is a multistate financial institution providing consumer and commercial banking services through 21 full-service branches: five in Cumberland County, Pennsylvania; one in Dauphin County, Pennsylvania; five in Franklin County, Pennsylvania; four in Lancaster County, Pennsylvania; one in Perry County, Pennsylvania; one in Anne Arundel County, Maryland; two in Baltimore County, Maryland; one in Howard County, Maryland; and one in Washington County, Maryland. Using 2015 ACS data, one branch is located in a low-income census tract (5%), one branch is located in a moderate-income census tract (5%), seventeen branches are located in middle-income census tracts (80%), and two branches are located in upper-income census tracts (10%).

Using updated 2020 Census data, one branch is located in a low-income tract (almost 5%), two branches are located in moderate-income census tracts (10%), fourteen are located in middle-income tracts (67%), and four are located in upper-income census tracts (19%). The bank operates two loan production offices (LPOs) within its assessment areas: one in a middle-income census tract in Lancaster County, Pennsylvania as of the 2015 ACS and the 2020 Census; and one in a moderate-income census tract in Baltimore County, Maryland as of the 2015 ACS, and in a middle-income tract as of the 2020 Census.

Orrstown is the sole banking, and primary operating subsidiary of Orrstown Financial Services, a noncomplex financial holding company with consolidated assets of over $3 billion as of December 31, 2023, located in Shippensburg, Pennsylvania.

The following table details the locations of Orrstown's branches and LPOs as of the evaluation date.

Orrstown Bank Branch Locations			
Assessment Area	**County**	**State**	**Number of Branches / Offices**
Full-Service Branches			
Harrisburg, PA	Cumberland	Pennsylvania	5
Harrisburg, PA	Dauphin	Pennsylvania	1
Harrisburg, PA	Perry	Pennsylvania	1
Lancaster, PA	Lancaster	Pennsylvania	4
Chambersburg, PA	Franklin	Pennsylvania	5
Baltimore, MD	Anne Arundel	Maryland	1
Baltimore, MD	Baltimore	Maryland	2
Baltimore, MD	Howard	Maryland	1
Hagerstown, MD	Washington	Maryland	1
Total Full-Service Branches			**21**
Loan Production Offices			
Lancaster, PA	Lancaster	Pennsylvania	1
Baltimore, MD	Baltimore	Maryland	1
Total Loan Production Offices			**2**

According to the Consolidated Reports of Condition and Income (Call Report) as of December 31, 2023, Orrstown reported over $3 billion in assets, of which $2.3 billion, or 74%, were loans.

On a dollar volume basis, commercial loans (comprised of commercial mortgages and commercial and industrial loans) represent the largest segment of the bank's loan portfolio, at nearly $1.4 billion or 60% of the loan portfolio. Residential loans (comprised of open-end and closed-end residential properties, and multifamily loans) represented the second largest segment of the loan portfolio, at $709 million or 31% of all loans. Finally, construction and land development made up the third largest segment of the bank's loan portfolio, comprising nearly $140 million or 6% of the portfolio.

The composition of the bank's loan portfolio as of December 31, 2023 is presented in the table below.

Orrstown Bank		
LOANS as of 12/31/2023	**$ (000s)**	**%**
Loans Secured by Nonfarm Nonresidential Properties (Commercial Mortgages)	1,068,395	46.4
Commercial and Industrial Loans	306,005	13.3
Secured by Farmland	25,482	1.1
Secured by Residential Properties (Closed-end)	372,173	16.2
Secured by Residential Properties (Open-end)	186,450	8.1
Secured by Multifamily Residential Properties	150,675	6.5
Construction & Land Development	139,765	6.1
Consumer Loans	9,691	<1.0
Loans to Finance Agricultural Production & Other Loans to Farmers	1,365	<1.0
States and Political Subdivisions	9,812	<1.0
Loans to Non-depository Financial Institutions	1,627	<1.0
Other Loans	30,941	1.3
Other Leases	26	<1.0
Unearned Income on Loans	1,722	<1.0
TOTAL LOANS	**2,304,129**	**100.0**

Small Business Loans

Schedule RC-C Part II (Loans to Small Businesses and Small Farms) of the Call Report as of December 31, 2023 indicates that $195 million (14%) of the bank's outstanding commercial loans[1] were designated as small business loans. At the previous CRA evaluation, Orrstown's outstanding commercial loan volume was over $1.1 billion, of which $337 million (28%) was designated as small business loans. For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of $1 million or less, as detailed in the table on the following page.

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[1] Commercial loans are comprised of loans secured by nonfarm nonresidential properties, along with commercial and industrial loans.

Orrstown Bank Small Business Loans		
	Amount Outstanding as of 12/31/2023 $ (000s)	**%**
Loans with original amounts of $100,000 or less	9,185	<1.0
Loans with original amounts of $100,001 through $250,000	27,143	2.0
Loans with original amounts of $250,001 to $1 million	158,985	11.6
TOTAL SMALL BUSINESS LOANS	**195,313**	**14.2**
Loans with original amounts of more than $1,000,000	1,179,087	85.8
TOTAL COMMERCIAL LOANS	**1,374,400**	**100.0**

The bank's asset size and financial condition indicate that it has the ability to effectively meet the credit needs of its assessment areas. There are no legal or other impediments that would hamper the bank's ability to meet community credit needs.

DESCRIPTION OF ASSESSMENT AREAS

For the purposes of the CRA, Orrstown has designated five assessment areas, as follows:

(1)   The Harrisburg, PA Assessment Area, which consists of the entirety of Cumberland, Dauphin, and Perry Counties, PA, which is coterminous with the Harrisburg-Carlisle, PA Metropolitan Statistical Area (MSA).

(2)   The Lancaster, PA Assessment Area, which consists of the entirety of Lancaster Count, PA, which is coterminous with the Lancaster, PA MSA.

(3)   The Chambersburg, PA Assessment Area, which consists of the entirety of Frankin County, PA, which is coterminous with the Chambersburg-Waynesboro, PA MSA.

(4)   The Baltimore, MD Assessment Area, which consists of the entirety of Anne Arundel, Baltimore, Baltimore City, Carroll, Harford, Howard, and Queen Anne's Counties, MD, which is coterminous with the Baltimore-Columbia-Towson, MD MSA.

(5)   The Hagerstown, MD Assessment Area, which consists of the entirety of Washington County, MD, which is part of the larger Hagerstown-Martinsburg, MD-WV MSA.

The bank's assessment areas were determined to comply with the requirements of the CRA, and do not arbitrarily exclude low- or moderate-income census tracts.

It is noted that Orrstown's Harrisburg, PA assessment area was expanded since the previous CRA evaluation. More specifically, in February 2020, the bank added all of Dauphin County, PA to the assessment area, instead of only the southern portion of the County, which had been included previously. No changes were made to the bank's other four assessment areas.

<u>**SCOPE OF EXAMINATION**</u>

The current evaluation of the bank's CRA performance covers the period from January 26, 2021 through January 22, 2024, in accordance with the Interagency Large Institution CRA Evaluation Procedures adopted by the Board of Governors.

Under the lending test, loan products evaluated include:

- Home purchase, home improvement, and multifamily loans and the refinancing of such loans, open-end lines of credit, closed-end mortgage loans, and loans with purpose "not applicable," collectively titled Home Mortgage Disclosure Act (HMDA) loans, reported by the bank for calendar years 2020, 2021, and 2022[2];
- Small business loans reported by the bank, pursuant to the CRA, for calendar years 2020, 2021, and 2022; and
- Other loans that qualified as community development loans during the entire evaluation period from January 26, 2021 through January 22, 2024.

Orrstown originated a total of 4,067 HMDA loans totaling nearly $814 million within its assessment areas over the evaluation period. The bank originated 5,731 small business loans totaling $489 million within its assessment areas during the evaluation period. A significant portion of the bank's small business lending was conducted pursuant to the Paycheck Protection Program (PPP), which was a temporary lending facility offered from April 3, 2020 to May 31, 2021[3]. A significant portion of the bank's loans to small businesses did not contain revenue information, as permitted under CARES Act reporting requirements. Overall, HMDA loans were given the most weight in determining Orrstown's overall rating due to the dollar volume of such loans, followed by small business loans. When applicable, differences in the weighting of products are discussed within individual assessment area discussions.

Orrstown's HMDA and small business loans were compared to the aggregate of all lenders in the bank's assessment areas that report home-mortgage loans pursuant to HMDA, and small business loans pursuant to CRA. These data are reported annually.

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[2]On January 18, 2018, the Consumer Financial Protection Bureau's (CFPB) amendments to Regulation C became effective. See 80 FR 66128 (Oct. 28, 2015) (1) the types of institutions that are subject to Regulation C (covered institutions); (2) the types of transactions that are subject to Regulation C (covered loans); (3) the types of data that institutions are required to collect, record and report pursuant to Regulation C; and (4) the corresponding processes for reporting and disclosing HMDA data.) The Board of Governors, along with other agencies, amended their regulations implementing the CRA to conform with the CFPB regulation changes. Of note, changes include the "home-mortgage loan" definition in the CRA regulations to mean a "closed-end mortgage loan" or an "open-end line of credit," as those terms are defined in, and that are not excluded transactions under, amended Regulation C. As a result, home improvement loans that are not secured by a dwelling, which were previously required to be reported under Regulation C, are no longer reportable transactions; Home equity lines of credit (HELOCs) secured by a dwelling, which were previously reported at the option of the financial institution under Regulation C, are now covered transactions under HMDA; Also, "home equity loan" was deleted from the CRA definition of "consumer loan" because home equity loans are now included within the CRA definition of "home-mortgage loan." Finally, the CFPB amended the HMDA reporting thresholds. Institutions must report closed-end, dwelling-secured loans if they originate at least 25 in each of the two preceding calendar years, and must report open-end, dwelling-secured lines of credits if they originated at least 200 in each of the two preceding calendar years.

[3]Established as part of the Coronavirus Aid, Relief, and Economic Security (CARES) Act, the PPP directed hundreds of billions of dollars to small businesses and other organizations adversely affected by the COVID-19 crisis, providing resources to maintain payrolls and to cover business overhead. This program, which offered low-interest uncollateralized loans to small businesses, was available from April 3, 2020 through May 31, 2021.

Examiners also analyzed the demographic characteristics of each assessment area as one way to measure loan demand. Demographic information should not be construed as defining an expected level of lending for a particular loan product, group of borrowers, or geography. Rather, demographic data provides a business context for the bank's performance in the assessment areas where it operates. Further, bank management provided information regarding the bank's lending activities, credit demand, and competition.

For purposes of evaluating the geographic distribution of loans by census tract type, census tracts were classified on the basis of 2015 American Community Survey (ACS) data for loans made in 2020 and 2021, and 2020 Census data for loans made in 2022. The distribution of HMDA loans to borrowers of different income levels was based upon annually-adjusted median family income data for each of those years, made available by the Federal Financial Institutions Examination Council (FFIEC). All other demographic indices and statistics presented throughout this evaluation are based on 2015 ACS data in 2020 and 2021, and 2020 Census data in 2022, unless otherwise noted.

For small business loans, examiners used Dun & Bradstreet data for comparison purposes for the applicable years. Dun & Bradstreet collects and publishes this self-reported data detailing the revenues and locations of local businesses.

To supplement economic, demographic, and performance data, and to gain a better perspective on community credit needs, interviews were conducted with eight community representatives within the bank's five assessment areas (five in Pennsylvania and three in Maryland). Discussions were held with one organization focused on affordable housing, one local government official, one community development financial institution, two organizations focused on economic development through the financing of small businesses, and three organizations focused on community action and the provision of services. More information about the contacts and the community development and credit needs identified by the contacts is available in the discussions of each assessment area.

For purposes of assessing the bank's overall CRA performance, greatest weight was given to performance in the Commonwealth of Pennsylvania, where a substantial majority of the bank's operations, deposits, and lending were located. Specifically, sixteen of the bank's branches (76% of total branches) were located in Pennsylvania. These branches held 82% of the bank's total deposits. Finally, 81% of the bank's loans by number, and 78% of loans by dollar volume were made in the Pennsylvania assessment areas.

In reaching statewide conclusions within Pennsylvania, greatest weight was given to the bank's performance in the Harrisburg, PA assessment area, followed by performance in the Lancaster, PA assessment area, and the Chambersburg, PA assessment area, which were weighted equally behind the Harrisburg, PA assessment area.

A full-scope review was conducted in the Harrisburg, PA assessment area, which held a majority of the bank's operations and lending. Seven of the bank's branches (33%) were located in this assessment area, and held 46% of the bank's total deposits, 35% of loans by number, and 34% of loans by dollar volume.

In the interest of ensuring that all assessment areas are given periodic full-scope evaluations, the Lancaster, PA assessment area was also evaluated using full-scope review procedures. At the previous evaluation, the Lancaster, PA assessment area was reviewed using limited-scope procedures. During the evaluation period, Orrstown operated four branches in the assessment area (19%), which held 11% of the bank's total deposits, 21% of loans by number, and 25% loans by dollar volume.

Finally, the Chambersburg, PA assessment area received a limited-scope review, where performance was compared with that in the full-scope areas in the state to determine if it exceeded, was consistent with, or was below the performance of the full-scope assessment areas. At the previous evaluation, this assessment area was reviewed using full-scope procedures. Orrstown operated five branches (24%) in the Chambersburg, PA assessment area, which held 25% of the bank's deposits, 24% loans by number, and 19% loans by dollar volume.

Performance in the state of Maryland was given less weight than the Commonwealth of Pennsylvania. A total of five branches (24% of total branches) were located in the state of Maryland. These branches held 19% of the bank's total deposits, 19% of loans by number, and 22% by dollar volume.

In reaching the statewide conclusions for the State of Maryland, greater weight was given to the bank's performance in the Baltimore, MD assessment area, followed by the Hagerstown, MD assessment area, as detailed below.

A full-scope review of the Baltimore, MD assessment area was conducted. Orrstown operated four branches (19%) in the Baltimore, MD assessment area, which held 17% of the bank's total deposits, 16% of loans by number, and 20% of loans by dollar volume.

Finally, the Hagerstown, MD assessment area received a limited-scope review, where performance was compared with that in the full-scope areas in the state to determine if it exceeded, was consistent with, or was below the performance of the full-scope assessment areas. Orrstown operated one branch (5%) in the Hagerstown, MD assessment area, which held 2% of the bank's total deposits, 3% of loans by number, and 2% of loans by dollar volume.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Performance under the lending test is rated high satisfactory. The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Concentration of lending within assessment areas, including HMDA and small business lending;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers, and businesses of different sizes, including small businesses;

- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Lending Activity

Overall, the bank's lending activity demonstrates good responsiveness to the credit needs of its assessment areas.

As indicated earlier, as of December 31, 2023, Orrstown reported over $3 billion in assets, of which $2.3 billion, or 74%, were loans. At the previous evaluation conducted as of January 25, 2021, total loans measured $2 billion and represented 73% of total assets, using September 30, 2020 Call Report data.

The bank's loan-to-deposit ratio averaged 82% over the 13-quarter period ending December 31, 2023, while the peer group averaged 78% over the same time frame.[4]

The table on the following page depicts the bank's HMDA and CRA lending activity during the evaluation period.

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[4] Orrstown's Uniform Bank Performance Report (UBPR) peer group includes insured commercial banks having assets between $3 billion and $10 billion.

Orrstown Bank Summary of Lending Activity				
Loan Types	**#**	**%**	**$ (000s)**	**%**
Home Improvement	613	5.2	61,382	3.6
Home Purchase	1,171	9.9	317,613	18.9
Multifamily Housing	56	0.5	120,447	7.2
Refinancing	2,339	19.8	502,727	29.9
Loan Purpose Not Applicable	1	<0.1	125	<0.1
Other Purpose Closed-End	19	0.2	726	<0.1
Other Purpose LOC	563	4.8	67,104	4.0
Total HMDA related	**4,762**	**40.2**	**1,070,124**	**63.6**
Small Business	7,044	59.5	609,985	36.3
Total Small Business related	**7,044**	**59.5**	**609,985**	**36.3**
Small Farm	27	0.2	2,470	0.1
Total Small Farm related	**27**	**0.2**	**2,470**	**0.1**
TOTAL LOANS	**11,833**	**100.0**	**1,682,579**	**100.0**

Assessment Area Concentration

An analysis was performed to determine the volume of loans extended inside and outside of the bank's assessment areas. The analysis consisted of an evaluation of Orrstown's HMDA and small business loans. The assessment area concentration analysis indicated that a high percentage of loans were made in the bank's assessment areas.

More specifically, during the evaluation period, Orrstown made 85% of its HMDA loans by number, and 76% by dollar amount in the bank's assessment areas. This level of lending was a slight decrease from the previous evaluation, when 85% of the total number of HMDA loans, and 80% of total dollars were extended inside the bank's assessment areas.

With respect to small business loans, 81% of the number of small business loans, and 80% of the aggregate dollar amount of loans were extended in the bank's assessment areas. Again, this represents a decrease from the previous evaluation, when 88% of the total number of small business loans, and 83% by dollar amount were extended inside the bank's assessment area.

Overall, 83% of all loans by number, and 78% of loans by dollar volume, were made within the five assessment areas included in the evaluation.

The table on the following page shows the distribution of lending inside and outside the bank's assessment areas.

Orrstown Bank Lending Inside and Outside the Assessment Area								
Loan Types	Inside				Outside			
	#	%	$ (000s)	%	#	%	$ (000s)	%
Home Improvement	565	92.2	55,538	90.5	48	7.8	5,844	9.5
Home Purchase – Conventional	841	78.3	225,708	75.8	233	21.7	72,230	24.2
Home Purchase - FHA	61	77.2	11,650	78.1	18	22.8	3,271	21.9
Home Purchase - VA	16	88.9	4,259	89.6	2	11.1	495	10.4
Multifamily Housing	37	66.1	38,556	32.0	19	33.9	81,891	68.0
Other Purpose Closed-End	18	94.7	576	79.4	1	5.3	150	20.6
Other Purpose LOC	501	89.0	59,032	88.0	62	11.0	8,072	12.0
Refinancing	2,028	86.7	418,430	83.2	311	13.3	84,297	16.8
Loan Purpose Not Applicable	0	0.0	0	0.0	1	100.0	125	100.0
Total HMDA related	**4,067**	**85.4**	**813,750**	**76.0**	**695**	**14.6**	**256,374**	**24.0**
Total Small Business related	**5,731**	**81.4**	**489,013**	**80.2**	**1,313**	**18.6**	**120,972**	**19.8**
Total Small Farm related	**27**	**100.0**	**2,470**	**100.0**	**0**	**0.0**	**0**	**0.0**
TOTAL LOANS	9,825	83.0	1,305,233	77.6	2,008	17.0	377,346	22.4

Borrower and Geographic Distribution of Lending

Home-Mortgage Lending

Overall, Orrstown's distribution of HMDA loans among borrowers of different income levels, including low- and moderate-income borrowers is good, due to good performance in the Harrisburg, PA assessment area, and adequate performance in the Lancaster, PA assessment areas. Performance in the Chambersburg, PA assessment area was consistent with performance in the two full-scope Pennsylvania assessment areas, particularly with the Harrisburg, PA assessment area. Borrower distribution of HMDA loans was adequate in the Baltimore, MD assessment area, and performance in the Hagerstown, MD assessment area was consistent with that performance.

The geographic distribution of HMDA loans reflects adequate penetration throughout the bank's assessment areas, including low- and moderate-income census tracts, driven largely by the bank's performance in the Harrisburg, PA and Lancaster, PA assessment areas. The geographic distribution of HMDA loans was adequate in the Harrisburg, PA assessment area, and adequate in the other two full-scope assessment areas (Lancaster, PA and Baltimore, MD). Performance was consistent in the limited-scope assessment areas (Chambersburg, PA and Hagerstown, MD).

Small Business Lending

Overall, the bank's borrower distribution of small business loans reflects good penetration throughout the bank's assessment areas, driven by the bank's performance in the three full-scope assessment areas (Harrisburg, PA, Lancaster, PA and Baltimore, MD), and consistent performance in the two limited-scope assessment areas (Chambersburg, PA and Hagerstown, MD).

The geographic distribution of small business loans reflects good penetration throughout the bank's assessment areas, driven by the results of the bank's performance in its Harrisburg, PA and Lancaster, PA assessment areas, both of which were good. Performance in the full-scope Baltimore, MD assessment was adequate.

Responsiveness to Credit Needs

Overall, Orrstown exhibits a good record of serving the credit needs of low- and moderate-income individuals and very small businesses. Affordable housing was a credit need identified by community contacts in all of the bank's assessment areas. The bank's HMDA lending record shows that home-mortgage loans are being originated throughout the bank's assessment areas, including loans made to low- and moderate-income borrowers and in low- and moderate-income areas.

Lending to small businesses was also a need expressed by community contacts in the bank's assessment areas. The bank's retail small business lending record shows that such loans are being made throughout the bank's assessment areas. Additionally, the bank's participation in SBA's PPP provided emergency loans to small businesses throughout the bank's assessment areas.

More detail on the bank's responsiveness to credit needs can be found within individual assessment area discussions.

Innovative and Flexible Lending Practices

In an effort to address the credit needs of low- and moderate-income borrowers, Orrstown makes use of several innovative and flexible lending programs in meeting credit needs in its assessment areas. The bank participated in a variety of programs to meet the credit needs of low- and moderate-income individuals and small businesses, as summarized below and detailed in the discussions for each assessment area.

Often, the home-mortgage credit needs of low- and moderate-income borrowers can be more effectively addressed by alternative mortgage products, which have more flexible credit terms than traditional home financing. Throughout its assessment areas, Orrstown offers its own in-house proprietary first-time homebuyer product (Orrstown Bank First Time Homebuyer Loan Program), with flexible income requirements and underwriting criteria. The bank also offers loans through the Federal Housing Administration's (FHA) loan program; the U.S. Department of Veterans Affairs (VA) home loan program; the U.S. Department of Agriculture's (USDA) loan program; Pennsylvania Housing Finance Agency (PHFA) loan programs; Fannie Mae's HomeReady, HomeStyle Renovation, and RefiNOW loan programs; and Healthy Neighborhood Initiative, a program for homebuyers and homeowners in Baltimore City, MD. Additionally, Orrstown offers downpayment and closing cost assistance through many state and county programs that award first-time homebuyers with grants or no-interest loans, some of which are forgivable.

In total, during the evaluation period and throughout its four assessment areas, Orrstown made 49 in-house mortgages totaling $8.9 million, 37 FHA loans totaling over $7.3 million, 13 VA loans totaling almost $3.8 million, eight USDA loans totaling $1.5 million, 12 PHFA loans totaling $2.1 million, one Fannie Mae HomeReady loan totaling $194 thousand, 16 Fannie Mae HomeStyle Renovation loans totaling nearly $5.3 million, one Fannie Mae RefiNOW loan totaling $123 thousand, and 65 Healthy Neighborhood Initiative loans totaling $1.2 million. Finally, a total of 21 downpayment and closing cost assistance grants were made through a variety of programs, totaling almost $138 thousand.

Similarly, to address the credit needs of small businesses in its assessment areas, Orrstown participates in SBA's 7a and 504 loan programs. In total, the bank made six SBA 7a loans totaling $7.1 million, and four SBA 504 loans totaling $10.2 million in its five assessment areas.

All special program loans are discussed in more detail by assessment area throughout this Performance Evaluation.

Community Development Lending Activities

The bank makes an adequate level of community development loans.

During the evaluation period, the bank originated 14 community development loans totaling $23.7 million within its assessment areas. The number of community development loans and the dollar amount of those loans decreased since the previous evaluation, when the bank made 47 community development loans within its assessment areas totaling $36 million.

By dollar amount of community development loans, the bank's lending was highest in the Chambersburg, PA assessment area (five loans totaling $15.6 million, or nearly 66% of total community development lending), followed by the Harrisburg, PA assessment area (eight loans totaling $6.6 million, or 28%), and the Lancaster, PA assessment area (one loan totaling $1.4 million, or 6%). There were no community development loans made in the bank's two Maryland assessment areas.

By purpose, 15% of community development loan dollars were for affordable housing activities for low- and moderate-income individuals, 62% were for economic development through the financing of small businesses, and 23% were for activities that revitalized or stabilized low- or moderate-income areas. None of the bank's community development loans were for community development services for low- and moderate-income individuals.

The bank's lending test performance is discussed in more detail by assessment area throughout this Performance Evaluation.

INVESTMENT TEST

Overall, performance under the investment test is high satisfactory. The investment test was rated high satisfactory in both the Commonwealth of Pennsylvania and the state of Maryland.

Overall, Orrstown has a significant level of qualified investments and donations, which exhibit good responsiveness to community development needs. Qualified investments and donations in the bank's five assessment areas totaled over $31.9 million, which is a substantial increase from $16 million at the previous evaluation. The largest portion of investment and donation dollars were made in the bank's Harrisburg, PA assessment area (over $14.2 million, or 45%) and Baltimore, MD assessment area ($14.2 million, or 44%), followed by the Lancaster, PA assessment area (nearly $1.7 million, or 5%), the Chambersburg, PA assessment area ($1.4 million or nearly 5%) and finally the Hagerstown, MD assessment area ($347 thousand, or 1%).

Of the assessment area investments, nearly 91% supported affordable housing for low- and moderate-income individuals, 1% supported community services targeted to low- and moderate-income individuals, 6% supported economic development, and just under 2% supported revitalization/stabilization efforts within the assessment areas.

Orrstown exhibits good responsiveness to the credit and community development needs of its assessment areas. The vast majority of the bank's qualified investments and donations supported affordable housing, a primary need noted by community contacts. Finally, Orrstown makes occasional use of innovative and/or complex investments to support community development initiatives when opportunities exist.

The bank's investment test performance is discussed in more detail by assessment area throughout this Performance Evaluation.

SERVICE TEST

Overall, performance under the service test is low satisfactory.

The service test was rated low satisfactory in the Commonwealth of Pennsylvania and rated needs to improve in the State of Maryland.

Branch delivery systems, as well as alternative delivery systems such as automated teller machines (ATMs), telephone banking, and online banking, are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment areas. As noted previously, Orrstown provides retail services through its 21 full-service branches, 16 (76%) of which are located in Pennsylvania, and five (24%) in Maryland. By assessment area, branch locations are as follows: seven locations are located in the bank's Harrisburg, PA assessment area (33%); four are located in the Lancaster, PA assessment area (19%); five are located in the Chambersburg, PA assessment area (24%); four are located in the Baltimore, MD assessment area (19%); and one is located in the Hagerstown, MD assessment area (5%).

Orrstown's record of opening and closing branches has generally not affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals. Since the previous evaluation, the bank has closed five branches and moved one branch.[5] At the time of the branch closing, three of the branches were located in middle-income census tracts, and two were located in upper-income census tracts.

Banking services do not vary in a way that inconveniences the bank's constituents, particularly low- and moderate-income consumers in the bank's assessment areas. Hours of operation are reasonable, with most branches offering Saturday hours, and extended business hours at least one day a week. Differences are discussed in more detail by assessment area.

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[5] During the evaluation period, the bank closed five branches: one in the Harrisburg, PA assessment area, three in the Chambersburg, PA assessment area, and one in the Lancaster, PA assessment area. Further discussion is present in the evaluation of each assessment area.

Additionally, the bank provides alternative delivery systems that include mobile deposit capture, night deposit, telephone banking, online and mobile banking, which allow customers to obtain deposit and loan account information, transfer funds, and make loan and other bill payments. The bank's website is fully-transactional, allowing the capability to open accounts and apply for loans online.

Finally, the bank provides a limited level of community development services in its assessment areas. More specifically, the bank provides an adequate level of community development services in its Harrisburg, PA assessment area, and a limited level of community development services in its Lancaster, PA assessment area. Performance in the Chambersburg, PA assessment area was consistent with the bank's performance in Pennsylvania. The bank provides a limited level of community development services in its Baltimore, MD assessment area; performance in the Hagerstown, MD assessment area was below the performance level in Maryland.

The bank's service test performance is discussed in more detail by assessment area throughout this Performance Evaluation.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES

Orrstown is in compliance with the substantive provisions of the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices, inconsistent with helping to meet community needs, was identified.

COMMONWEALTH OF PENNSYLVANIA

STATE RATING

Performance Test	Performance Level
Lending	High Satisfactory
Investment	High Satisfactory
Service	Low Satisfactory
Overall	Satisfactory

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to the rating include the following:

- The distribution of borrowers, given the product lines offered by the bank, reflects good penetration among retail customers, and good distribution among businesses of different sizes;
- The geographic distribution of loans reflects good penetration throughout the Commonwealth of Pennsylvania assessment areas;
- The bank makes use of innovative and/or flexible lending practices;
- The bank made an adequate level of community development loans in the Commonwealth of Pennsylvania;
- The bank made a significant level of qualified community development investments and grants in the state;
- The bank exhibits good responsiveness to credit and community development needs; and
- The bank provides an adequate level of community development services.

SCOPE OF EXAMINATION

Orrstown's CRA performance in the Commonwealth of Pennsylvania was evaluated for the period of January 26, 2021 through January 22, 2024. The lending, investment, and services tests were applied in assessing the bank's performance under the CRA. Under the lending test, loan products evaluated included HMDA loans, small business loans, and other loans that qualified as community development loans.

Examiners completed a full-scope review of the Harrisburg, PA and Lancaster, PA assessment areas, and a limited-scope review of the Chambersburg, PA assessment area was conducted.

For purposes of assessing Orrstown's overall CRA performance, more weight was given to the performance in the Commonwealth of Pennsylvania than in the bank's Maryland assessment areas.

DESCRIPTION OF INSTITUTION'S OPERATIONS

In Pennsylvania, the greatest weight was given to the performance in the Harrisburg, PA assessment area. Of the bank's 21 branches, seven (33%) were located in the assessment area. Of the bank's total loans, 35% by number, and 34% by dollar volume were originated in the Harrisburg, PA assessment area. Finally, according to the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report as of June 30, 2023, 46% of the bank's total deposits were located in the assessment area. Performance in the Lancaster, PA and Chambersburg, PA assessment areas were weighted equally, but trailed the consideration given to performance in the Harrisburg, PA assessment area.

Of the bank's 21 branches, four (19%) were located in the Lancaster, PA assessment area. Additionally, one LPO was located in the Lancaster, PA assessment area. Of the bank's total loans, 21% by number, and 25% by dollar volume were originated in the Lancaster, PA assessment area. According to the FDIC Market Share Report as of June 30, 2023, 11% of the bank's total deposits were located in the assessment area.

Finally, of the bank's 21 branches, five (24%) were located in the Chambersburg, PA assessment area. Of the bank's total loans, 24% by number and 19% by dollar were originated in the Chambersburg, PA assessment area. According to the FDIC Market Share Report as of June 30, 2023, 25% of the bank's total deposits were located in the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overall, the lending test was determined to be high satisfactory in the Commonwealth of Pennsylvania. Primary drivers of the overall lending test rating were borrower and geographic distribution of HMDA and small business loans, the bank's usage of innovative and/or flexible lending products, and community development loans. It is noted that borrower distribution was weighed more heavily than geographic distribution, given the demographics of the Pennsylvania assessment areas. More detail on lending test components is provided in the discussions of each Pennsylvania assessment area.

INVESTMENT TEST

Overall, the investment test was determined to be high satisfactory in the Commonwealth of Pennsylvania. The investment test rating was driven by the amount of qualified investments and donations, with additional consideration given to the responsiveness, innovativeness, and complexity of such investments. More detail on the investment test components is provided in the discussions of each Pennsylvania assessment area.

SERVICE TEST

Overall, the service test was determined to be low satisfactory in the Commonwealth of Pennsylvania. The service test was influenced by retail service aspects, particularly the bank's accessibility of delivery systems, the reasonableness of hours and services in serving assessment are needs, and changes in branch locations, as well as the level of community development services in each assessment area. More detail on the service test components is provided in the discussions of each Pennsylvania assessment area.

HARRISBURG, PA ASSESSMENT AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of the Assessment Area

Orrstown's Harrisburg, PA assessment area is coterminous with the Harrisburg-Carlisle, PA MSA, and consists of Cumberland, Perry, and Dauphin Counties in Pennsylvania. As of the 2020 Census, the assessment area had a population of 591,712.

For purposes of assessing Orrstown's CRA performance in the Commonwealth of Pennsylvania, and overall, the greatest weight was given to the performance in the Harrisburg, PA assessment area. Of the bank's total loans, 35% by number, and 34% by dollar amount were originated in the Harrisburg, PA assessment area. The bank also operated seven branches in the assessment area (33% of the institution's total branches) which held nearly $1.2 billion in deposits, or 46% of the bank's total deposits as of June 30, 2023.

Orrstown's CRA performance in this assessment area as evaluated in terms of the demographic and business context in which the bank operates.

According to 2015 ACS data, the Harrisburg, PA assessment area contained 124 census tracts. Of those tracts, 11 (9%) tracts were designated as low-income, 27 (22%) as moderate-income, 61 (49%) as middle-income, 23 (19%) as upper-income, and two (less than 2%) were designated as unknown-income tracts. The low- and moderate-income tracts were mainly concentrated in the cities of Harrisburg and Carlisle. The tracts of unknown-income were comprised of a prison and a university.

According to 2020 Census data, the Harrisburg, PA assessment area contained 132 census tracts. Of those tracts, 11 (8%) tracts were designated as low-income, 22 (17%) as moderate-income, 66 (50%) as middle-income, 31 (23%) as upper-income, and two (less than 2%) were designated as unknown-income tracts. Once again, the low- and moderate-income tracts were mainly concentrated in the cities of Harrisburg and Carlisle.

Maps of the assessment area at the time of the 2015 ACS and 2020 Census are available in Appendix F.

According to the FDIC's Deposit Market Share Report as of June 30, 2023, there were 26 depository institutions operating in the bank's Harrisburg, PA assessment area. These institutions maintained a total of 145 branches, holding over $19.1 billion in deposits. Orrstown, with seven branches in the assessment area at the time of the most recently available FDIC report, ranked fifth with just under $1.2 billion, or 6% of the deposit market. PNC Bank, N.A. ranked first with nine branches holding $5.6 billion (29%) of the deposit market, followed by Mid Penn Bank with 15 branches and $2 billion (10%) of deposits. Manufacturers and Traders Trust Company ranked third, with 21 branches holding $1.9 billion (10%) of total deposits within the market.

Orrstown reports home-mortgage loans pursuant to HMDA and was compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. In 2020, a total of 463 institutions reported 27,101 HMDA loan originations and purchases within the assessment area. Orrstown ranked seventh in the HMDA market with 2% of total originations and purchases. Members 1st Federal Credit Union led the HMDA market with almost 11% of total HMDA originations and purchases, followed by Quicken Loans, LLC with 6% of the HMDA market, and Wells Fargo Bank, N.A. with 5% market share.

The 2021 aggregate HMDA data showed a 10% increase in overall HMDA lending compared to 2020, with 494 lenders originating and purchasing 29,776 home-mortgage loans in the assessment area. Orrstown ranked tenth with 2% of the market. Members 1st Federal Credit Union once again ranked first with 10% of the market share, followed by Rocket Mortgage, LLC with 7% of the market share, and Wells Fargo Bank, N.A. with nearly 5% market share.

Finally, the 2022 aggregate HMDA data showed a significant 35% drop in overall HMDA lending compared to 2021, with 441 lenders originating and purchasing 19,381 home-mortgage loans in the assessment area. Orrstown ranked seventh with 2% of the market. Members 1st Federal Credit Union ranked first with 13% of all HMDA loans, followed by Pennsylvania State Employees Credit Union with 7% market share, and Rocket Mortgage, LLC with 4% of the market.

Similarly, the institution reports its small business loans pursuant to the CRA, and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually. According to 2020 small business and small farm data, there were 140 CRA reporters in the assessment area, originating and purchasing a total of 10,717 small business and small farm loans. Orrstown ranked third with 8% of the market. Mid Penn Bank led the market with almost 12% of all small business and small farm loan originations and purchases, followed by American Express, N.B. with just under 11% of the market.

In 2021, there were 114 small business and small farm reporters originating and purchasing 11,482 CRA loans. Orrstown ranked second with 8% of the market share. American Express, N.B. ranked first with nearly 15% of the market, and Mid Penn Bank ranked third with 8% of the CRA market.

Finally, in 2022, there were 103 small business and small farm reporters originating and purchasing 10,384 CRA loans. Orrstown ranked nineteenth with 1% market share. American Express, N.B. led the market with 21% of CRA loans, followed by JP Morgan Chase Bank, N.A. with 11% of small business and small farm loan originations and purchases, and Capital One, N.A. with almost 9% of the market.

CRA data reporting includes PPP loans originated through the CARES Act, which accounts for the drop in small business and small farm lending in 2022. Since CRA data reporting also includes small business loans issued under corporate credit card arrangements, some of the top reporters in the assessment area in 2022 were national credit card originators. Specifically, the top 10 CRA reporters in the Harrisburg, PA assessment area were national credit card originators who collectively held 73% of the total small business and small farm loan market.

To supplement economic, demographic, and performance data, interviews were conducted with two local community organizations, which provided perspective on the credit and community development needs of the Harrisburg, PA assessment area. One interview was held with a community development financial institution (CDFI), and the second was held with a local community action agency that provides community development services in the assessment area.

The community contacts noted that low- and moderate-income residents in the assessment area are struggling, as resources made available during the pandemic are no longer available, causing many to struggle with basic needs such as utilities and groceries. Contacts also noted a need for financial literacy education, and the availability of banking resources for underbanked, minority, and immigrant populations, in particular. Finally, affordable housing, and revitalization and stabilization efforts were identified as needs within the assessment area.

ECONOMIC CHARACTERISTICS

Orrstown's Harrisburg, PA assessment area is situated in the Susquehanna Valley, located in South Central Pennsylvania, and is anchored by the state capital of Harrisburg, and the city of Carlisle.

According to Moody's Analytics January 2024 Precis Report for the Harrisburg-Carlisle, PA MSA, the area's economy is in a mid-expansion mode, driven by gains in healthcare, logistics and state government. The area's relative affordability is drawing residents from pricier nearby areas looking for more space, and in general, the area's jobless rates have fallen as new residents are absorbed into the workforce.

Harrisburg's strengths include its centralized location within Pennsylvania, which supports the strong transportation and logistics sectors in the area; low costs of living and doing business; and favorable population trends, as referenced above. Weaknesses described by Moody's include an overreliance on the area's logistics and state government sectors; below-average worker productivity; and high unemployment volatility relative to the U.S. as a whole.

The education and health services industry represents the largest employment sector in the Harrisburg-Carlisle, PA MSA, contributing almost 19% of jobs. Other significant industries include state government (16%), professional and business services (15%), and transportation/utilities (10%).

According to Moody's, top employers in the MSA include University of Pittsburgh Medical Center (UPMC), The Hershey Company, Penn State Health, the Harrisburg Area Community College, and Hershey Entertainment and Resorts.

Seasonally adjusted unemployment rates for the assessment area, according to the U.S. Department of Labor, Bureau of Labor Statistics, are presented in the following table. The COVID-19 pandemic significantly impacted the assessment area's unemployment rates in 2020. However, rates in all but Dauphin County were below the rates for the Commonwealth of Pennsylvania and the nation as a whole. Unemployment rates decreased in both 2021 and 2022, with rates in Cumberland and Perry counties falling below the state and national averages. In general, unemployment rates were highest in Dauphin County, and lowest in Cumberland County in all three years.

Orrstown Bank Harrisburg, PA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)			
Location	% 2020	% 2021	% 2022
Cumberland County	6.5	4.3	3.2
Dauphin County	8.7	5.8	3.7
Perry County	6.6	4.4	3.4
Harrisburg-Carlisle, PA MSA	7.5	5.1	3.5
Commonwealth of Pennsylvania	8.9	5.9	4.1
United States	8.1	5.3	3.6

Housing

2015 ACS Data

According to 2015 ACS data, the Harrisburg, PA assessment area contained 244,105 housing units, 62% of which were owner-occupied, nearly 30% of which were rental units, and 8% of which were vacant. The overall owner-occupancy rate in the assessment area (62%) was slightly higher than the rate in the Commonwealth of Pennsylvania (61%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such census tracts. According to 2015 ACS data, 3% of owner-occupied units were located in low-income census tracts, 12% were in moderate-income tracts, 58% were in middle-income tracts, and 27% were in upper-income tracts.

Of the total existing housing units, nearly 75% were single-family units, just under 8% were two-to-four family units, 13% were multifamily units consisting of five or more units, and almost 5% of units were mobile homes. The median age of the housing stock was 50 years, making it slightly newer than the overall housing stock in the Commonwealth of Pennsylvania (54 years).

Data show that the cost of housing in the assessment area is higher than in the Commonwealth overall. According to 2015 ACS data, the median housing value in the Harrisburg, PA assessment area was $170,729, which was higher than the median value in the Commonwealth of Pennsylvania ($166,000). Further, data show a disparity between the median housing value in the assessment area's low- and moderate-income tracts, compared to those in middle- and upper-income tracts. The median housing value was $85,618 in low-income tracts, and $117,925 in moderate-income tracts. These values were lower than housing values in middle- and upper-income tracts ($166,641 and $231,808, respectively). Additionally, in the assessment area, less than 18% of the total owner-occupied housing units were valued at less than $100 thousand, compared to the Commonwealth, where 26% of owner-occupied housing units were valued at less than $100 thousand.

Finally, median gross rent (rent plus utilities) was slightly higher in the assessment area than in Pennsylvania. Specifically, median gross rent in the Harrisburg, PA assessment area was $856 compared to that of Pennsylvania ($840). Within the assessment area, 43% of renters spent more than 30% of their income on rent, which was just below the same figure in Pennsylvania as a whole (46%).

2020 Census Data

According to 2020 Census data, the Harrisburg, PA assessment area contained 252,832 housing units, 62% of which were owner-occupied, 30% of which were rental units, and 8% of which were vacant. The overall owner-occupancy rate in the assessment area (62%) matched the rate in the Commonwealth of Pennsylvania (62%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such census tracts. According to 2020 Census data, 2% of owner-occupied units were located in low-income census tracts, nearly 12% were in moderate- income tracts, almost 56% were in middle-income tracts, and just under 31% were in upper-income tracts.

Of the total existing housing units, 75% were single-family units, 8% were two-to-four family units, 13% were multifamily units consisting of five or more units, and 4% of units were mobile homes. The median age of the housing stock was 55 years, making it slightly newer than the housing stock in the Commonwealth of Pennsylvania (57 years).

2020 Census data show that the cost of housing in the assessment area remained slightly more expensive than in the Commonwealth overall. According to 2020 Census data, the median housing value in the Harrisburg, PA assessment area was $190,672, which was slightly higher than the median value in the Commonwealth of Pennsylvania ($187,500). Further, data show a disparity between the median housing value in the assessment area's low- and moderate-income tracts, compared to those in middle- and upper-income tracts. The median housing value was $73,496 in low-income tracts, and $133,537 in moderate-income tracts. These values were significantly lower than housing values in middle- and upper-income tracts ($179,855 and $255,798, respectively). Additionally, in the assessment area, 14% of the total owner-occupied housing units were valued at less than $100 thousand, compared to the Commonwealth, where 21% of owner-occupied housing units were valued at less than $100 thousand.

Finally, median gross rent (rent plus utilities) was slightly more expensive in the assessment area than in Pennsylvania. Specifically, median gross rent in the Harrisburg, PA assessment area was $969 compared to that of Pennsylvania ($958). Within the assessment area, 39% of renters spent more than 30% of their income on rent, which is a lower figure than that in Pennsylvania as a whole (43%).

Borrower Income Data

2015 ACS Data

The percentage of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. The 2015 ACS shows that there were 144,257 families in the assessment area. Of the total families in the assessment area, 20% were designated as low-income, 18% were designated as moderate-income, 22% were middle-income, and 40% were upper-income. Of all families in the assessment area, 7% were living below the poverty level, compared with a rate of 9% for the Commonwealth of Pennsylvania.

2020 Census Data

The 2020 Census shows that there were 148,285 families in the assessment area. Of the total families in the assessment area, 19% were designated as low-income, 19% were designated as moderate-income, 23% were middle-income, and 39% were upper-income. Of all families in the assessment area, 6% were living below the poverty level, compared with a rate of 8% for the Commonwealth of Pennsylvania.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon the U.S. Department of Housing and Urban Development (HUD) annually-adjusted median family income data made available by the FFIEC. Median family incomes for the bank's assessment area are listed in the following table for each of the years covered by the evaluation, and are categorized by the dollar amounts recognized as low-, moderate-, middle-, and upper-income.

Year	HUD-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
2020	$85,000	Less than $42,500	$42,500 – $67,999	$68,000 - $101,999	$102,000 or more
2021	$84,900	Less than $42,450	$42,450 - $67,919	$67,920 - $101,879	$101,880 or more
2022	$94,300	Less than $47,150	$47,150 - $75,439	$75,440 - $113,159	$113,160 or more

Geographic Business Data

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for business credit within such census tracts. Dun & Bradstreet reports business demographics annually. According to Dun & Bradstreet data, in 2020, there were 26,419 businesses in the Harrisburg, PA assessment area. Of these businesses, 5% were located in low- income tracts, and 17% were located in moderate-income tracts. The majority of businesses were located in middle-income tracts, and upper-income tracts (over 55% and over 22%, respectively). Business demographic data also revealed that of the businesses located in the assessment area, 90% were small businesses with gross annual revenues of $1 million or less.

In 2021, there were 26,256 businesses in the assessment area. As in 2020, of these businesses, 5% were located in low-income tracts, 17% were located in moderate-income tracts, over 55% were located in middle-income tracts, and over 22% were located in upper-income tracts. Of the 26,256 businesses in the assessment area, 90% were small businesses with gross annual revenues of $1 million or less.

Finally, in 2022, there were 26,153 businesses in the assessment area. Of these businesses, 4% were located in low-income tracts, 16% were located in moderate-income tracts, 53% were located in middle-income tracts, and 27% were located in upper-income tracts. Of the 26,153 businesses in the assessment area, 90% were small businesses with gross annual revenues of $1 million or less.

Assessment area demographics used in evaluating Orrstown's performance in the Harrisburg, PA assessment area in 2020, 2021, and 2022 are detailed in the tables on the following pages.

Orrstown Bank **Harrisburg, PA Assessment Area** **Assessment Area Demographics** **2020**								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	11	8.9	7,137	4.9	2,432	34.1	28,458	19.7
Moderate-income	27	21.8	20,663	14.3	2,759	13.4	26,383	18.3
Middle-income	61	49.2	81,101	56.2	4,690	5.8	31,781	22.0
Upper-income	23	18.5	35,344	24.5	922	2.6	57,635	40.0
Unknown-income	2	1.6	12	0.0	0	0.0	0	0.0
Total Assessment Area	**124**	**100.0**	**144,257**	**100.0**	**10,803**	**7.5**	**144,257**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	16,411	4,056	2.7	24.7	9,154	55.8	3,201	19.5
Moderate-income	43,544	18,561	12.2	42.6	19,176	44.0	5,807	13.3
Middle-income	132,325	88,658	58.5	67.0	34,249	25.9	9,418	7.1
Upper-income	51,813	40,375	26.6	77.9	9,417	18.2	2,021	3.9
Unknown-income	12	3	0.0	25.0	9	75.0	0	0.0
Total Assessment Area	**244,105**	**151,653**	**100.0**	**62.1**	**72,005**	**29.5**	**20,447**	**8.4**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	1,372	5.2	1,238	5.2	117	5.5	17	4.0
Moderate-income	4,489	17.0	3,889	16.3	428	20.0	172	41.0
Middle-income	14,626	55.4	13,230	55.4	1,210	56.6	186	44.3
Upper-income	5,926	22.4	5,498	23.0	383	17.9	45	10.7
Unknown-income	6	0.0	5	0.0	1	0.0	0	0.0
Total Assessment Area	**26,419**	**100.0**	**23,860**	**100.0**	**2,139**	**100.0**	**420**	**100.0**
	Percentage of Total Businesses:		**90.3**		**8.1**			**1.6**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	6	1.1	5	0.9	1	7.1	0	0.0
Moderate-income	40	7.4	38	7.2	2	14.3	0	0.0
Middle-income	403	74.1	392	74.0	11	78.6	0	0.0
Upper-income	95	17.5	95	17.9	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**544**	**100.0**	**530**	**100.0**	**14**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**97.4**		**2.6**			**0.0**

2015 ACS Data and 2020 Dun & Bradstreet Information

Orrstown Bank Harrisburg, PA Assessment Area Assessment Area Demographics 2021								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	11	8.9	7,137	4.9	2,432	34.1	28,458	19.7
Moderate-income	27	21.8	20,663	14.3	2,759	13.4	26,383	18.3
Middle-income	61	49.2	81,101	56.2	4,690	5.8	31,781	22.0
Upper-income	23	18.5	35,344	24.5	922	2.6	57,635	40.0
Unknown-income	2	1.6	12	0.0	0	0.0	0	0.0
Total Assessment Area	**124**	**100.0**	**144,257**	**100.0**	**10,803**	**7.5**	**144,257**	**100.0**

	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	16,411	4,056	2.7	24.7	9,154	55.8	3,201	19.5
Moderate-income	43,544	18,561	12.2	42.6	19,176	44.0	5,807	13.3
Middle-income	132,325	88,658	58.5	67.0	34,249	25.9	9,418	7.1
Upper-income	51,813	40,375	26.6	77.9	9,417	18.2	2,021	3.9
Unknown-income	12	3	0.0	25.0	9	75.0	0	0.0
Total Assessment Area	**244,105**	**151,653**	**100.0**	**62.1**	**72,005**	**29.5**	**20,447**	**8.4**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	1,391	5.3	1,261	5.3	109	5.2	21	4.6
Moderate-income	4,478	17.1	3,873	16.4	423	20.0	182	39.5
Middle-income	14,528	55.3	13,116	55.4	1,207	57.1	205	44.5
Upper-income	5,854	22.3	5,427	22.9	374	17.7	53	11.5
Unknown-income	5	0.0	5	0.0	0	0.0	0	0.0
Total Assessment Area	**26,256**	**100.0**	**23,682**	**100.0**	**2,113**	**100.0**	**461**	**100.0**
	Percentage of Total Businesses:		**90.2**		**8.0**			**1.8**

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	6	1.1	5	1.0	1	7.7	0	0.0
Moderate-income	36	6.7	34	6.5	2	15.4	0	0.0
Middle-income	398	74.4	388	74.3	10	76.9	0	0.0
Upper-income	95	17.8	95	18.2	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**535**	**100.0**	**522**	**100.0**	**13**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**97.6**		**2.4**			**0.0**

2015 ACS Data and 2021 Dun & Bradstreet Information

Orrstown Bank Harrisburg, PA Assessment Area Assessment Area Demographics 2022								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	11	8.3	7,158	4.8	2,309	32.3	28,506	19.2
Moderate-income	22	16.7	20,073	13.5	2,161	10.8	27,796	18.7
Middle-income	66	50.0	79,250	53.4	4,138	5.2	33,955	22.9
Upper-income	31	23.5	41,799	28.2	988	2.4	58,028	39.1
Unknown-income	2	1.5	5	0.0	0	0.0	0	0.0
Total Assessment Area	**132**	**100.0**	**148,285**	**100.0**	**9,596**	**6.5**	**148,285**	**100.0**

	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	15,375	3,587	2.3	23.3	8,965	58.3	2,823	18.4
Moderate-income	39,812	18,307	11.6	46.0	17,767	44.6	3,738	9.4
Middle-income	133,858	87,597	55.6	65.4	36,617	27.4	9,644	7.2
Upper-income	63,781	48,125	30.5	75.5	12,476	19.6	3,180	5.0
Unknown-income	6	5	0.0	83.3	1	16.7	0	0.0
Total Assessment Area	**252,832**	**157,621**	**100.0**	**62.3**	**75,826**	**30.0**	**19,385**	**7.7**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	1,085	4.1	975	4.1	88	4.3	22	4.9
Moderate-income	4,118	15.7	3,584	15.2	374	18.2	160	35.6
Middle-income	13,853	53.0	12,535	53.0	1,117	54.2	201	44.7
Upper-income	7,095	27.1	6,547	27.7	481	23.3	67	14.9
Unknown-income	2	0.0	2	0.0	0	0.0	0	0.0
Total Assessment Area	**26,153**	**100.0**	**23,643**	**100.0**	**2,060**	**100.0**	**450**	**100.0**
	Percentage of Total Businesses:		**90.4**			**7.9**		**1.7**

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	3	0.6	2	0.4	1	7.7	0	0.0
Moderate-income	41	7.7	40	7.7	1	7.7	0	0.0
Middle-income	399	75.3	389	75.2	10	76.9	0	0.0
Upper-income	87	16.4	86	16.6	1	7.7	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**530**	**100.0**	**517**	**100.0**	**13**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**97.5**			**2.5**		**0.0**

2020 Census Data and 2022 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers, and businesses of all sizes, including small businesses;
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Lending Activity

Orrstown's lending levels in the Harrisburg, PA assessment area reflect good responsiveness to the assessment area's credit needs. During the evaluation period, lending activity in the Harrisburg, PA assessment area represented 35% of the bank's overall lending by number of loans, and 34% by dollar volume. During the evaluation period, Orrstown made 1,606 HMDA loans totaling almost $310 million, and 1,857 small business loans totaling nearly $139 million in the Harrisburg, PA assessment area.[6] Of the bank's total small business lending during the evaluation period, only 242 loans in the amount of $30 million were made to businesses with reported revenues of $1 million or less.

Borrower Distribution of Lending

Given the assessment area's demographics and economic characteristics, the borrower distribution of lending reflects, given the product lines offered, good penetration among individuals of different income levels, including low- and moderate-income individuals, and businesses of different sizes, including small businesses.

It is noted that borrower distribution is given more weight than geographic distribution in this assessment area in driving lending performance. Further, due to loan dollar volumes, HMDA loans were given the most weight in determining the bank's borrower distribution of loans, followed by small business loans.

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[6] A large portion of the bank's small business loans consisted of loans made under the PPP, which did not require reporting the business revenue size.

Home-Mortgage Lending

Orrstown's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers, is good.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families in an assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to the 2015 ACS data, 20% of assessment area families were low-income, 18% were moderate-income, 22% were middle-income, and 40% were upper-income. Thirty-eight percent of families, using 2015 ACS Census data, were designated as low- or moderate-income families. This indicates a notable need for home-mortgage credit among this segment of the population.

According to the 2020 Census data, 19% of assessment area families were low-income, 19% were moderate-income, 23% were middle-income, and 39% were upper-income. Thirty-eight percent of families, using 2020 Census data, were designated as low- or moderate-income families.

The following tables compare Orrstown's home-mortgage lending to aggregate lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The table used to evaluate lending in 2020 and 2021 relies on 2015 ACS data to estimate demand for home-mortgage credit among low- and moderate-income families, along with updated HMDA data. The table used to evaluate lending 2022 relies on 2020 Census data to estimate demand for home-mortgage credit among low- and moderate-income families, along with updated HMDA data.

		Aggregate Comparison			
		2020		**2021**	
Income Level	**% Families by Family Income (2015 ACS Data)**	**% Orrstown Lending**	**% Aggregate Lending**	**% Orrstown Lending**	**% Aggregate Lending**
Low	19.7	6.5	8.3	10.1	8.6
Moderate	18.3	18.3	19.0	18.3	19.5
Middle	22.0	22.2	21.4	21.3	21.6
Upper	40.0	48.9	34.3	44.3	32.8
Unknown	0.0	4.1	17.1	6.0	17.5
Total	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**

Table title (above header): **Orrstown Bank / Harrisburg, PA Assessment Area / Distribution of HMDA Loans by Borrower Income Level**

Orrstown Bank Harrisburg, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level			
		Aggregate Comparison	
		2022	
Income Level	**% Families by Family Income (2020 Census Data)**	**% Orrstown Lending**	**% Aggregate Lending**
Low	19.2	12.0	10.7
Moderate	18.7	18.8	22.2
Middle	22.9	20.4	23.1
Upper	39.1	40.6	31.0
Unknown	0.0	8.2	13.0
Total	**100.0**	**100.0**	**100.0**

Lending to Low-Income Borrowers

For the period under review, Orrstown's lending to low-income borrowers was good.

2015 ACS Data

In assessing the level of the bank's lending among low-income borrowers, the evaluation takes into consideration median family incomes and housing costs, and the challenges faced by low-income borrowers in saving for a down payment and closing costs, which can present a significant obstacle to homeownership, thereby limiting lending opportunities.

Orrstown's lending in 2020 to low-income borrowers was adequate. In total, close to 7% of the bank's HMDA loans (38 loans) were originated to low-income borrowers, falling slightly below the aggregate lending level of 8%, and the proxy of 20%. By loan category, Orrstown originated just under 8% of its home purchase loans, 5% of refinance loans, 11% of home improvement loans, no multifamily loans, 10% of its other purpose lines of credit, 33% of other purpose closed/exempt loans, and no loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 13% of home purchase loans, 6% of refinance loans, 7% of home improvement loans, less than 1% of multifamily loans, 9% of other purpose lines of credit, 7% of other purpose closed/exempt loans, and 2% of loans with purpose "not applicable" to low-income borrowers in 2020.

Orrstown's lending in 2021 to low-income borrowers was good. In total, 10% of the bank's HMDA loans (61 loans) were originated to low-income borrowers, slightly above the aggregate lending level of 9% and below the proxy of 20%. By loan category, Orrstown originated 11% of its home purchase loans, 9% of refinance loans, 11% of home improvement loans, no multifamily loans, 12% of its other purpose lines of credit, and no other purpose closed/exempt loans, or loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 11% of its home purchase loans, 7% of its refinance loans, 8% of home improvement loans, no multifamily loans, 11% of other purpose lines of credit, 8% of other purpose closed/exempt loans, and 2% of loans with purpose "not applicable" to low-income borrowers in 2021.

2020 Census Data

Orrstown's lending in 2022 to low-income borrowers was good. In total, 12% of the bank's HMDA loans (50 loans) were originated to low-income borrowers, exceeding the aggregate lending level of just under 11% and falling below the proxy of 19%. By loan category, Orrstown originated 10% of its home purchase loans, 15% of refinance loans, 14% of home improvement loans, no multifamily loans, 9% of its other purpose lines of credit, 50% of its other purpose closed/exempt loans, and no loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 11% of its home purchase loans, 13% of its refinance loans, 8% of home improvement loans, no multifamily loans, 9% of other purpose lines of credit, 10% of other purpose closed/exempt loans, and 2% of loans with purpose "not applicable" to low-income borrowers in 2022.

Lending to Moderate-Income Borrowers

For the period under review, Orrstown's lending to moderate-income borrowers was excellent.

2015 ACS Data

Orrstown's lending in 2020 to moderate-income borrowers was excellent. In total, 18% of the bank's HMDA loans (108 loans) were originated to moderate-income borrowers, falling slightly below the aggregate lending level of 19%, but matching the proxy of 18%. By loan category, Orrstown originated 20% of its home purchase loans, 16% of refinance loans, 30% of home improvement loans, no multifamily loans, 20% of its other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 25% of home purchase loans, 16% of refinance loans, 19% of home improvement loans, almost 2% of multifamily loans, 19% of other purpose lines of credit, 18% of other purpose closed/exempt loans, and just over 1% of loans with purpose "not applicable" to moderate-income borrowers in 2020.

Orrstown's lending in 2021 to moderate-income borrowers was excellent. In total, 18% of the bank's HMDA loans (110 loans) were originated to moderate-income borrowers, falling below the aggregate lending level of nearly 20%, but meeting the proxy of 18%. By loan category, Orrstown originated 18% of its home purchase loans, 19% of refinance loans, 19% of home improvement loans, no multifamily loans, 16% of other purpose lines of credit, and no other purpose closed/exempt loans, or loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 23% of its home purchase loans, 17% of its refinance loans, 18% of home improvement loans, 1% of multifamily loans, 20% of other purpose lines of credit, 18% of other purpose closed/exempt loans, and just under 3% of loans with purpose "not applicable" to moderate-income borrowers in 2021.

2020 Census Data

Orrstown's lending in 2022 to moderate-income borrowers was excellent. In total, 19% of the bank's HMDA loans (78 loans) were originated to moderate-income borrowers, falling below the aggregate lending level of 22%, but matching the proxy of 19%. By loan category, Orrstown originated 17% of its home purchase loans, 20% of refinance loans, 15% of home improvement loans, no multifamily loans, 29% of its other purpose lines of credit, and no other purpose closed/exempt loans, or loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 23% of its home purchase loans, 23% of its refinance loans, 20% of home improvement loans, 1% of multifamily loans, 22% of other purpose lines of credit, 24% of other purpose closed/exempt loans, and no loans with purpose "not applicable" to moderate-income borrowers in 2022.

Small Business Lending

The bank's distribution of loans to businesses reflects good penetration among business customers of different sizes, including small businesses. For purpose of this evaluation, a small business loan is defined as a commercial loan with an origination amount of $1 million or less. Small business loans are further quantified to identify those loans to businesses with gross annual revenues of $1 million or less, namely small businesses.

The number of businesses operating in the bank's assessment area is used as a proxy to estimate demand for business credit in that assessment area. According to Dun & Bradstreet business demographic data, in 2020 there were 26,419 businesses in the assessment area, with 23,860 (90%) designated as small businesses. In 2021, there were 26,256 businesses in the assessment area, 23,682 (90%) of which were small businesses. Finally, in 2022, there were 26,153 businesses in the assessment area, 23,643 (90%) of which were small businesses.

2015 ACS Data

In 2020, the bank's borrower distribution of small business loans was good, considering performance context factors. In 2020, Orrstown originated 810 small business loans within the assessment area, aggregating almost $68 million. Of these loans, 16% (126 loans) were originated to small businesses. Notably, 75% of the bank's small business loan originations (605 loans) were to businesses with unknown revenues. This is attributable to the bank's participation in the SBA's PPP[7]. Under this program, institutions were not required to collect revenue information. The COVID-19 pandemic was an unprecedented global event that impacted businesses of all sizes, most notably smaller businesses that typically do not have an excess of capital to weather long periods of closure and slashed revenues. Orrstown's participation in this program is considered in the evaluation of its borrower distribution of lending.

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[7] In April 2020, the PPP was established by the CARES Act and implemented by the SBA (Federal Register 13 CFR Part 120). The PPP provided small businesses with funds to pay up to eight weeks of payroll costs, including benefits. Funds could also be used to pay interest on mortgages, rent and utilities.

When only considering the bank's loans where revenues were reported as $1 million or less, the bank's performance (16%) was below the aggregate lending level of 36% to small businesses, and the proxy of 90%. However, when considering the bank's PPP lending, which is reasonably inferred to be supportive of small businesses in need for capital, the bank's performance is considered to be good.

Small business loans were further analyzed to determine the extent of loans originated in an amount of $100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus added weight is given to such loans in determining whether an institution is meeting the credit needs of small businesses. In 2020, 79% of Orrstown's small business loans were extended in amounts of $100 thousand or less. Aggregate data indicates that 84% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

In 2021, the bank's borrower distribution of small business loans was excellent, considering performance context. In 2021, Orrstown originated 928 small business loans within the assessment area, aggregating $45 million. Of these loans, 5% were originated to small businesses (46 loans). As noted above, Orrstown's participation in the PPP significantly impacted the bank's small business loan data. Ninety-two percent of the bank's small business loan originations (854 loans) were to businesses with unknown revenues, and it is reasonably inferred that these originations were to benefit small businesses impacted by the COVID-19 pandemic.

When only considering the bank's loans where revenues were reported as $1 million or less, the bank's performance (5%) was below the aggregate lending level of 41% to small businesses, and the proxy of 90%. When considering the bank's PPP lending, the bank's performance was good.

In 2021, 89% of Orrstown's small business loans were extended in amounts of $100 thousand or less. Aggregate data indicates that 90% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

2020 Census Data

Finally, in 2022, the bank's borrower distribution of small business loans was good. In 2022, Orrstown originated 119 small business loans within the assessment area, aggregating almost $26 million. Of these loans, 59% were originated to small businesses (70 loans). The bank's lending to small businesses exceeded the aggregate lending level of 50% to small businesses, and was below the proxy of 90% small businesses in the assessment area.

In 2022, 50% of Orrstown's small business loans were extended in amounts of $100 thousand or less. Aggregate data indicates that 92% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

Geographic Distribution of Loans

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. The overall analysis reflects good penetration throughout the Harrisburg, PA assessment area, including low- and moderate-income tracts. Once again, it is noted that HMDA loans were given greater weight in determining this conclusion, given their higher volume, followed by small business loans.

Home-Mortgage Lending

Orrstown's distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts is adequate. As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage credit within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the greater the demand for home-mortgage credit is in the tract.

According to 2015 ACS data, slightly less than 3% of the assessment area's owner-occupied housing stock was located in low-income census tracts, and 12% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (almost 59% and nearly 27%, respectively). According to 2020 Census data, 2% of the assessment area's owner-occupied housing stock was located in low-income census tracts, and 12% was located in moderate-income tracts. Once again, the majority of owner-occupied housing was located in middle- and upper-income tracts (just under 56% and 31%, respectively).

The following tables present Orrstown's geographic distribution of HMDA loans in 2020, 2021, and 2022, in comparison to the applicable owner-occupied housing proxies and the aggregate lending levels in the assessment area. The tables rely on 2015 ACS data for 2020 and 2021, and 2020 Census data for 2022, along with updated HMDA data.

| | | Aggregate Comparison | | | |
| Census Tract Income Level | % Owner-Occupied Units (2015 ACS Data) | 2020 | | 2021 | |
		% Orrstown Lending	% Aggregate Lending	% Orrstown Lending	% Aggregate Lending
Low	2.7	2.2	2.1	5.2	2.5
Moderate	12.2	6.8	9.9	6.2	10.8
Middle	58.5	59.9	53.4	57.9	54.3
Upper	26.6	31.1	34.7	30.8	32.4
Unknown	0.0	0.0	0.0	0.0	0.0
Total	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**

Orrstown Bank / Harrisburg, PA Assessment Area / Geographic Distribution of HMDA Loans

Orrstown Bank Harrisburg, PA Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	**% Owner-Occupied Units (2020 Census Data)**	**Aggregate Comparison**	
		2022	
		% Orrstown Lending	**% Aggregate Lending**
Low	2.3	2.9	3.0
Moderate	11.6	7.2	12.6
Middle	55.6	62.3	50.1
Upper	30.5	27.6	34.3
Unknown	0.0	0.0	0.0
Total	**100.0**	**100.0**	**100.0**

Lending in Low-Income Census Tracts

For the period under review, Orrstown's overall HMDA lending in low-income tracts was good.

2015 ACS Data

Orrstown's lending in low-income census tracts in 2020 was good. Of the bank's 589 HMDA loans in 2020, Orrstown originated 2% (13 loans) in low-income tracts, which was slightly below the proxy of 3% and in-line with the aggregate lending of 2%. Categorized by loan product type, Orrstown made 4% of its home purchase loans, 2% of its refinance loans, 2% of home improvement loans, no multifamily loans, 2% of other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" in low-income tracts in 2020. Aggregate 2020 lending data show that 3% of home purchase loans, 1% of refinance loans, 1% of home improvement loans, 20% of multifamily loans, 2% of other purpose lines of credit, 1% of other purpose closed/exempt loans, and nearly 4% of loans with purpose "not applicable" were made in low-income tracts in the assessment area.

Orrstown's lending in low-income census tracts in 2021 was excellent. Of the bank's 601 HMDA loans in 2021, Orrstown originated 5% (31 loans) in low-income tracts, which was above the proxy of 3% and the aggregate lending of just below 3%. Categorized by loan product type, Orrstown made 9% of its home purchase loans, 5% of its refinance loans, 1% of home improvement loans, 14% of multifamily loans, 2% of other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" in low-income tracts in 2021. Aggregate 2021 lending data show that 4% of home purchase loans, 2% of refinance loans, 1% of home improvement loans, 19% of multifamily loans, 2% of other purpose lines of credit, less than 1% of other purpose closed/exempt loans, and 3% of loans with purpose "not applicable" were made in low-income tracts in the assessment area.

2020 Census Data

Orrstown's lending in low-income census tracts in 2022 was good. Of the bank's 416 HMDA loans in 2022, Orrstown originated 3% (12 loans) in low-income tracts, which was slightly above the proxy of 2% and comparable to the aggregate lending of 3%. Categorized by loan product type, Orrstown made 5% of its home purchase loans, 3% of its refinance loans, no home improvement loans, 18% of its multifamily loans, no other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" in low-income tracts in 2022. Aggregate 2022 lending data show that 4% of home purchase loans, 3% of refinance loans, 2% of home improvement loans, 11% of multifamily loans, less than 1% of other purpose lines of credit, 2% of other purpose closed/exempt loans, and 7% of loans with purpose "not applicable" were made in low-income tracts in the assessment area.

Lending in Moderate-Income Census Tracts

For the period under review, the bank's HMDA lending in moderate-income tracts was rated poor.

2015 ACS Data

Orrstown's lending in moderate-income census tracts in 2020 was poor. Of the bank's 589 HMDA loans in 2020, Orrstown originated 7% (40 loans) in moderate-income tracts, which was below both the proxy of 12%, and the aggregate lending of 10%. Categorized by loan product type, Orrstown made 14% of its home purchase loans, 5% of its refinance loans, 4% of home improvement loans, no multifamily loans, 2% of other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" in moderate-income tracts in 2020. Aggregate 2020 lending data show that 13% of home purchase loans, 7% of refinance loans, 9% of home improvement loans, 27% of multifamily loans, 8% of other purpose lines of credit, 11% of other purpose closed/exempt loans, and 23% of loans with purpose "not applicable" were made in moderate-income tracts in the assessment area.

Orrstown's lending in moderate-income census tracts in 2021 was poor. Of the bank's 601 HMDA loans in 2021, Orrstown originated 6% (37 loans) in moderate-income tracts, which was below both the proxy of 12%, and the aggregate lending of 11%. Categorized by loan product type, Orrstown made 7% of its home purchase loans, 7% of its refinance loans, 4% of home improvement loans, 14% of multifamily loans, 3% of other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" in moderate-income tracts in 2021. Aggregate 2021 lending data show that 14% of home purchase loans, 9% of refinance loans, 9% of home improvement loans, 35% of multifamily loans, 7% of other purpose lines of credit, 9% of other purpose closed/exempt loans, and 23% of loans with purpose "not applicable" were made in moderate-income tracts in the assessment area.

2020 Census Data

Orrstown's lending in moderate-income census tracts in 2022 was poor. Of the bank's 416 HMDA loans in 2022, Orrstown originated 7% (30 loans) in moderate-income tracts, which was below both the proxy of 12%, and the aggregate lending of almost 13%. Categorized by loan product type, Orrstown made 9% of its home purchase loans, 7% of its refinance loans, 5% of home improvement loans, 9% of multifamily loans, 7% of other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" in moderate-income tracts in 2022. Aggregate 2022 lending data show that 14% of home purchase loans, 12% of refinance loans, 11% of home improvement loans, 22% of multifamily loans, 9% of other purpose lines of credit, 10% of other purpose closed/exempt loans, and 19% of loans with purpose "not applicable" were made in moderate-income tracts in the assessment area.

Small Business Lending

The geographic distribution of Orrstown's small business loans reflects good penetration throughout the assessment area, in the context of the assessment area's demographic and economic characteristics during the evaluation period.

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract. Based on Dun & Bradstreet business data in 2020, there were 26,419 businesses operating in the assessment area. Of these, 5% were located in low-income tracts, and 17% were located in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (just over 55% and 22%, respectively). In 2021, there were 26,256 businesses operating in the assessment area, and there was no change in the distribution of businesses using 2021 Dun & Bradstreet data. Finally, in 2022, there were 26,153 businesses operating in the assessment area. Of these, 4% were located in low-income tracts, and 16% were located in moderate-income tracts. Once again, the majority of businesses were located in middle- and upper-income tracts (53% and 27%, respectively).

The tables below present Orrstown's small business geographic distribution, in comparison to the applicable business proxy and aggregate lending levels in the assessment area for the years evaluated.

Orrstown Bank Harrisburg, PA Assessment Area Geographic Distribution of Small Business Loans			
		Aggregate Comparison	
		2020	
Census Tract Income Level	**% Businesses by Tract Income Level (2020 Dun & Bradstreet Data)**	**% Orrstown Lending**	**% Aggregate Lending**
Low	5.2	8.4	4.4
Moderate	17.0	10.9	16.5
Middle	55.4	55.6	54.4
Upper	22.4	25.2	24.5
Unknown	0.0	0.0	0.2
Total	**100.0**	**100.0**	**100.0**

Orrstown Bank Harrisburg, PA Assessment Area Geographic Distribution of Small Business Loans			
		Aggregate Comparison	
		2021	
Census Tract Income Level	**% Businesses by Tract Income Level (2021 Dun & Bradstreet Data)**	**% Orrstown Lending**	**% Aggregate Lending**
Low	5.3	6.8	4.6
Moderate	17.1	10.5	15.8
Middle	55.3	58.4	55.3
Upper	22.3	24.4	24.0
Unknown	0.0	0.0	0.3
Total	**100.0**	**100.0**	**100.0**

Orrstown Bank Harrisburg, PA Assessment Area Geographic Distribution of Small Business Loans			
		Aggregate Comparison	
		2022	
Census Tract Income Level	**% Businesses by Tract Income Level (2022 Dun & Bradstreet Data)**	**% Orrstown Lending**	**% Aggregate Lending**
Low	4.1	2.5	3.5
Moderate	15.7	7.6	13.5
Middle	53.0	65.5	53.3
Upper	27.1	24.4	29.4
Unknown	0.0	0.0	0.3
Total	**100.0**	**100.0**	**100.0**

Lending in Low-Income Census Tracts

Orrstown's small business lending in low-income tracts was excellent.

2015 ACS Data

In 2020, the geographic distribution of the bank's small business lending in low-income census tracts was excellent. Orrstown originated 8% of its small business loans (68 loans) in the assessment area's low-income census tracts. The bank's lending level was above both the applicable business loan demand proxy of 5%, and the 2020 aggregate small business lending level of 4%.

In 2021, the geographic distribution of the bank's small business lending in low-income census tracts was excellent. Orrstown originated 7% of its small business loans (63 loans) in the assessment area's low-income census tracts. The bank's lending level was above both the applicable business loan demand proxy of 5%, and the 2021 aggregate small business lending level of just under 5%.

2020 Census Data

In 2022, the geographic distribution of the bank's small business lending in low-income census tracts was adequate. Orrstown originated under 3% of its small business loans (three loans) in the assessment area's low-income census tracts. The bank's lending level trailed the applicable business loan demand proxy of 4%, and the 2022 aggregate small business lending level of just under 4%.

Lending in Moderate-Income Census Tracts

Orrstown's small business lending in moderate-income tracts was adequate.

2015 ACS Data

In 2020, the geographic distribution of the bank's small business lending in moderate-income census tracts was adequate. Orrstown originated 11% of its small business loans (88 loans) in the assessment area's moderate-income census tracts. The bank's lending level was below both the applicable business loan demand proxy of 17%, and the 2020 aggregate small business lending level of 17%.

In 2021, the geographic distribution of the bank's small business lending in moderate-income census tracts was adequate. Orrstown originated 11% of its small business loans (97 loans) in the assessment area's moderate-income census tracts. The bank's lending level was below both the applicable business loan demand proxy of 17%, and the 2021 aggregate small business lending level of 16%.

2020 Census Data

In 2022, the geographic distribution of the bank's small business lending in moderate-income census tracts was poor. Orrstown originated 8% of its small business loans (nine loans) in the assessment area's moderate-income census tracts. The bank's lending level was below both the applicable business loan demand proxy of 16%, and the 2022 aggregate small business lending level of 14%.

Responsiveness to Credit Needs

Orrstown exhibits a good record of serving the credit needs of low- and moderate-income individuals and areas, and very small businesses, consistent with safe and sound banking practices. As mentioned previously, the bank's responsiveness to credit needs was met primarily through its retail HMDA and small business lending, its use of innovative and flexible retail lending practices and, to a lesser extent, its community development lending, which are all discussed below. Community contacts identified resources to aid low- and moderate-income individuals, financial education and other banking services, affordable housing, and revitalization/stabilization efforts as needs in the assessment area.

The bank also offers its own proprietary mortgage product for low- and moderate-income individuals, and offers similar alternative home-mortgage products in partnership with other agencies. Additionally, Orrstown made $6 million in SBA loans, which provide alternative financing for small businesses in the Harrisburg, PA assessment area.

As discussed below, $4 million of the bank's community development loan dollars (62%) benefitted revitalization and stabilization efforts in the assessment area. Additionally, almost $2.5 million of the bank's community development loan dollars (38%) benefitted affordable housing for low- and moderate-income individuals.

Finally, Orrstown was a participant in the SBA PPP, and funded a total of 1,459 PPP loans totaling $67.9 million. The funding of these PPP loans demonstrates responsiveness to the needs of small businesses affected by the COVID-19 pandemic. Three of these loans were provided with community development consideration, as they qualified under the revitalization & stabilization criteria.

Innovative and/or Flexible Lending Practices

Orrstown makes use of innovative and/or flexible lending practices in serving the Harrisburg, PA assessment area's credit needs. Through a number of different programs, the bank made home-mortgage loans to low- and moderate-income borrowers, and small business loans during the evaluation period.

Often, the home-mortgage credit needs of low- and moderate-income individuals and families can be addressed more effectively by alternative mortgage products. The bank offers several programs for first-time homebuyers. Orrstown offers a proprietary residential mortgage product (Orrstown Bank First Time Homebuyer Loan Program), which limits applicant income to reserve the product for low- and moderate-income borrowers. The product requires completion of pre-purchase homebuyer counseling to qualify. During the evaluation period, Orrstown made 13 affordable mortgage loans totaling $2.2 million within the Harrisburg, PA assessment area.

Additionally, Orrstown offers first-time homebuyer products through government-backed lending programs (FHA, VA, and USDA) and Fannie Mae's HomeReady® Mortgage, HomeStyle Renovation, and RefiNOW Programs. Through these programs, the bank makes home-mortgage loans to low- and moderate-income borrowers in conjunction with grants and forgivable loans. The programs have income parameters that effectively restrict them to low- and moderate-income borrowers. During the evaluation period, Orrstown made 22 FHA loans totaling $4 million, eight VA loans totaling almost $2.3 million, seven PHFA loans totaling almost $1.2 million, three USDA loans totaling $537 thousand, one HomeReady® loan totaling $194 thousand, five HomeStyle loans totaling $1.9 million, and one RefiNOW loan totaling $123 thousand.

The bank also provided closing cost/downpayment assistance through a variety of different programs. Specifically, in the Harrisburg, PA assessment area, three grants were provided through The Cumberland County Affordable Housing Trust Fund First-Time Homebuyers Down Payment and Closing Cost Assistance Program totaling $27 thousand, one grant was provided through the Dauphin County First-Time Homebuyers Second or Subordinated Mortgage Program totaling $3 thousand, seven grants were provided through the Federal Home Loan Bank (FHLB) of Pittsburgh's First Front Door Program totaling $35 thousand, and five grants were provided through PHFA's Keystone Forgivable in Ten Years (K-FIT) Program totaling $42 thousand.

Similarly, the credit needs of small businesses can often be addressed more effectively by alternative products. In an effort to address the credit needs of small businesses in its assessment area, Orrstown participates in SBA loan programs, including the SBA 504 and 7A programs. Orrstown made one SBA 504 loan totaling $5.4 million, and one SBA 7A loan totaling $650 thousand in the Harrisburg, PA assessment area.

Community Development Lending

Orrstown makes an adequate level of community development loans in the assessment area.

During the evaluation period of January 26, 2021 through January 22, 2024, the bank made eight community development loans in the assessment area totaling almost $6.6 million. Orrstown's community development lending showed a substantial decrease from the prior evaluation when community development loans totaled $14.5 million (nine loans). Of the bank's total community development lending by dollar volume, just under 28% was within the Harrisburg, PA assessment area.

Five of the eight loans, totaling nearly $2.5 million (38%) supported affordable housing initiatives for low- and moderate-income individuals. Three loans totaling $4 million (62%) supported activities for revitalization and stabilization within low- or moderate-income census tracts in the assessment area.

The following table includes the bank's community development loans, broken out by community development purpose.

Orrstown Bank Harrisburg, PA Assessment Area Community Development Lending									
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
2020	0	0	0	0	0	0	0	0	0	0
2021	2	1,081	0	0	0	0	3	4,099	5	5,180
2022	3	1,375	0	0	0	0	0	0	3	1,375
TOTAL	5	2,456	0	0	0	0	3	4,099	8	6,555

INVESTMENT TEST

The investment test evaluates a financial institution's level of qualified investments that serve low- or moderate-income areas or individuals, together with the responsiveness, innovativeness, and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include: a lawful investment, deposit, membership share, or grant, including a donation or in-kind contribution of property, that has as its primary purpose, community development.

Volume of Investment and Grant Activity

Orrstown has a significant level of qualified community development investments and grants, occasionally in a leadership position. Qualified investments, grants, and donations for the Harrisburg, PA assessment area totaled $14.2 million, which is an increase from $9 million during the prior evaluation. Of the bank's overall investments within its assessment areas, nearly 45% were within the Harrisburg, PA assessment area.

Investments and donations totaling $14 million supported affordable housing initiatives (98%) and $225 thousand (2%) supported the provision of community services in the assessment area.

Of the $14 million in qualified investments in the Harrisburg, PA assessment area, $13.8 million (99%) were comprised of low-income housing tax credits that provide affordable housing to low- or moderate-income individuals. The remaining $170 thousand comprised funds invested primarily in mortgage-backed securities that support affordable housing.

The bank also made donations and grants totaling $225 thousand to local organizations that routinely provide community development services to low- and moderate-income individuals in the assessment area.

The following table presents the investment and grant activity for the Harrisburg, PA assessment area.

	Orrstown Bank Harrisburg, PA Assessment Area Qualified Investments									
CD Category	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$ (000s)**	**#**	**$ (000s)**	**#**	**$ (000s)**	**#**	**$ (000s)**	**#**	**$ (000s)**
Qualified Investments	6	14,023	0	0	0	0	0	0	6	14,023
Donations	0	0	16	225	0	0	0	0	16	225
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	**6**	**14,023**	**16**	**225**	**0**	**0**	**0**	**0**	**22**	**14,248**

Responsiveness to Credit and Community Development Needs

Orrstown exhibits good responsiveness to credit and community development needs in the Harrisburg, PA assessment area.

Community contacts identified community services and affordable housing as pronounced community needs in the assessment area. All of the bank's investments and donations, which increased in both number and dollar volume since the prior evaluation in this assessment area, addressed these needs.

Community Development Initiatives

Orrstown makes significant use of innovative and/or complex investments to support community development initiatives. In the Harrisburg, PA assessment area, the bank invested in five low-income housing tax credits and one mortgage-backed security totaling over $14 million. These investment types carry more complexity than simple donations.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- the accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms;
- the impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;
- the reasonableness of business hours and services in meeting assessment area needs; and
- the extent to which an institution provides community development services.

Accessibility of Delivery Systems

Delivery systems are accessible to the bank's geographies and individuals of different income levels in the assessment area.

During the evaluation period, Orrstown operated seven full-service branches in the Harrisburg, PA assessment area (33% of all branch locations). Using 2015 ACS data, one branch was located in a low-income tract (14.3%), one was located in a moderate-income tract (14.3%), and five were located in middle-income tracts (71.4%). Census tract data changed slightly with the updated 2020 Census. More specifically, using updated 2020 Census data, one branch was located in a low-income tract (14.3%), five were located in middle-income tracts (71.4%), and one was located in an upper-income tract (14.3%).

The following tables detail the location of the bank's branches with comparison to both 2015 ACS population demographics and 2020 Census demographics. The tables indicate that the majority of the population is located in middle- and upper-income tracts, where most branch locations are situated.

Orrstown Bank Harrisburg, PA Assessment Area Retail Branch Distribution 2015 ACS Data				
Census Tract Type	**Number of Branches**	**Percent of Branches**	**Population**	**Percent of Population**
Low	1	14.3	33,615	6.0
Moderate	1	14.3	91,753	16.5
Middle	5	71.4	301,042	53.9
Upper	0	0.0	125,779	22.5
Unknown Income	0	0.0	6,009	1.1
Totals	**7**	**100.0**	**558,198**	**100.0**

Orrstown Bank Harrisburg, PA Assessment Area Retail Branch Distribution 2020 Census Data				
Census Tract Type	**Number of Branches**	**Percent Branches**	**Population**	**Percent of Population**
Low	1	14.3	35,758	6.0
Moderate	0	0.0	86,606	14.6
Middle	5	71.4	303,534	51.3
Upper	1	14.3	160,083	27.1
Unknown Income	0	0.0	5,731	1.0
Totals	**7**	**100.0**	**591,712**	**100.0**

All of the bank's branches in the Harrisburg, PA assessment area have ATMs available, which provide electronic access to banking services. Additionally, the bank operates one additional stand-alone ATM, which was located in a moderate-income census tract at the time of the 2015 ACS, and shifted to a middle-income tract as of the 2020 Census.

To supplement traditional banking services, Orrstown provides online banking services, telephone banking services, and a smart phone mobile banking application that includes mobile deposit capture capabilities. Using online banking services, bank customers can pay bills, open accounts, and apply for loan products via the bank's website at https://www.orrstown.com.

Changes in Branch Locations

Orrstown's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- or moderate-income census tracts or individuals. During the evaluation period, Orrstown closed one branch in the assessment area, located in a middle-income tract at the time of closure. No branches were opened in this assessment area since the prior evaluation.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- or moderate-income census tracts or individuals. As mentioned above, all of Orrstown's branches in the assessment area include ATMs, and all but one of the branches have drive-up facilities. The branches operate Monday through Friday, with all but one branch offering extended hours on Thursdays and/or Fridays. Similarly, six out of the seven branches offer Saturday hours.[8]

Bank Products

Orrstown provides the following products with reduced or no fees, and/or no minimum balance requirements, which provide greater access to banking services for low- and moderate-income customers, and small businesses.

- Free Checking Account, a personal checking account with no minimum balance requirement, no monthly service fee, no per-check charge, and no $2 paper statement fee if customers opt-in to electronic statements and online banking.
- Growth Checking Account, a personal checkless account designed for those who don't qualify for a standard checking account. This account is certified by Bank On, a national platform that supports financial institution efforts to connect unbanked and underbanked consumers to safe, affordable bank accounts. Orrstown's Growth Checking Account requires a $25 minimum opening deposit, has a low $5 monthly maintenance fee, and waives the standard $2 paper statement fee for customers who opt-in to electronic statements and online banking.
- Free Business Checking, a business checking account designed for small businesses with low transaction volumes. This account features no minimum opening deposit, no monthly service fees, 1,000 free items per statement cycle ($0.25 per item fee applies thereafter), and access to online bill pay services (first 10 bill pays per statement cycle are free).
- Non-profit Checking Account, an interest-bearing business checking account for non-profit or religious organizations, with no minimum opening deposit, no per-item fees, and no monthly maintenance fees.

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[8]The branch located at 4750 Lindle Road, Harrisburg, PA 17111, located in a middle-income census tract, does not have drive-up facilities, Saturday hours, or extended hours on Thursdays and Fridays.

Community Development Services

Orrstown provides an adequate level of community development services in the Harrisburg, PA assessment area.

Over the evaluation period, bank employees provided community development services, provided technical assistance to community development organizations, and served in various capacities on boards and board-level committees. Some examples include:

- A bank officer served as a board member of Community CARES, an organization located in Carlisle, PA that provides emergency shelter, resources, and supportive services to low- and moderate-income individuals, and families at risk of, or experiencing, homelessness.
- A bank officer served on the board of Employment Skills Center, an organization located in Carlisle, PA that provides community services through workforce development training and other adult education programs including a GED program and ESL program.
- Bank officers and staff served as trainers in financial literacy programs offered to low- and moderate-income individuals and students within the assessment area.

LANCASTER, PA ASSESSMENT AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of Assessment Area

Orrstown's Lancaster, PA assessment area is coterminous with the Lancaster, PA MSA, and consists of Lancaster County in Pennsylvania. As of the 2020 Census, the assessment area had a population of 552,984.

For purposes of assessing Orrstown's CRA performance in the Commonwealth of Pennsylvania, and overall, equal weight was given to performance in the Lancaster, PA and Chambersburg, PA assessment areas. Performance in these two assessment areas followed that of the Harrisburg, PA assessment area, which was weighted the highest. Of the bank's total loans, 21% by number, and 25% by dollar amount were originated in the Lancaster, PA assessment area. The bank also operated four branches in the assessment area (19% of the institution's total branches) which held $271 million in deposits, or 11% of the bank's total deposits as of June 30, 2023.

Orrstown's CRA performance in this assessment area as evaluated in terms of the demographic and business context in which the bank operates.

According to 2015 ACS data, the Lancaster, PA assessment area contained 98 census tracts. Six (6% of tracts) were designated as low-income, 14 (14%) as moderate-income, 67 (68%) as middle-income, and 11 (11%) were designated as upper-income census tracts. The low- and moderate-income tracts were mainly concentrated in the city of Lancaster.

According to 2020 Census data, the Lancaster, PA assessment area contained 116 census tracts. Four (3% of tracts) were designated as low-income, 16 (14%) as moderate-income, 81 (70%) as middle-income, and 15 (13%) were designated as upper-income tracts. Once again, the low- and moderate-income tracts were mainly concentrated in the city of Lancaster.

A map of the assessment area at the time of the 2015 ACS and 2020 Census are available in Appendix F.

According to the FDIC's Deposit Market Share Report as of June 30, 2023, there were 24 depository institutions operating in the bank's Lancaster, PA assessment area. These institutions maintained a total of 154 branches, holding just under $16.6 billion in deposits. Orrstown, with four branches in the assessment area at the time of the most recently available FDIC report, ranked fourteenth with $271 million, or just under 2% of the deposit market. Fulton Bank, N.A. ranked first with 20 branches holding $4.8 billion (29%) of the deposit market, followed by Truist Bank with 22 branches and $2.7 billion (16%) of deposits, and PNC Bank, N.A., with 14 branches holding $1.8 billion (11%) of total deposits within the market.

Orrstown reports home-mortgage loans pursuant to HMDA and was compared to the aggregate of all lenders in the market reporting real estate loans. The data is reported annually. In 2020, a total of 448 institutions reported 22,704 HMDA loan originations and purchases within the assessment area. Orrstown ranked twenty-fifth in the HMDA market with 1% of total originations and purchases. Fulton Bank, N.A. led the HMDA market with 7% of total HMDA originations and purchases, followed by Wells Fargo Bank, N.A. with just under 6% of the HMDA market, and Quicken Loans, LLC with 6% market share.

The 2021 aggregate HMDA data showed a 9% increase in overall HMDA lending compared to 2020, with 483 lenders originating and purchasing 24,692 home-mortgage loans in the assessment area. Orrstown ranked twenty-seventh with 1% of the market. Rocket Mortgage, LLC ranked first with 7% of the market share, followed by Fulton Bank, N.A. with 7% of the market share, and Wells Fargo Bank, N.A. with 5% of the market share.

The 2022 aggregate HMDA data showed a significant 35% decrease in overall HMDA lending compared to 2021, with 405 lenders originating and purchasing 15,954 home-mortgage loans in the assessment area. Orrstown ranked twentieth with 1% of the market. Members 1st Federal Credit Union ranked first with almost 9% of the market share, followed by Fulton Bank, N.A. with 7% of the market, and The Ephrata National Bank with 6% market share.

Similarly, the institution reports its small business loans pursuant to the CRA and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually. According to 2020 small business and small farm data, there were 137 CRA reporters in the assessment area, originating and purchasing a total of 14,328 small business and small farm loans. Orrstown ranked seventh with 5% of the market. Fulton Bank, N.A. led the market with 10% of all small business and small farm loan originations and purchases, followed by Truist Bank with 9% of the market, and American Express, N.B. with 8% of the CRA market.

In 2021, there were 140 small business and small farm reporters originating and purchasing 14,793 CRA loans. Orrstown ranked tenth with 4% of the market share. American Express, N.B. ranked first with 11% of the market, followed by US Bank, N.A. with 9% of the market's total small business and small farm loan originations and purchases, and JP Morgan Chase Bank, N.A. with 8% of the CRA market.

Finally, in 2022, there were 116 small business and small farm reporters originating and purchasing 13,346 CRA loans. Orrstown tied for nineteenth with less than 1% of the market share. American Express, N.B. led reporters with 14% of the market, followed by US Bank, N.A. with 13% of the market's total small business and small farm loan originations and purchases, and JP Morgan Chase Bank, N.A. with just under 13% of the CRA market.

Since CRA data reporting includes small business loans issued under corporate credit card arrangements, some of the top reporters in the assessment area are national credit card originators. This was particularly the case in 2021 and 2022. For example, in 2022, the top six CRA reporters were large national banks including American Express, N.B., US Bank, N.A., and JP Morgan Chase Bank, N.A., Capital One, N.A., Truist Bank, and Synchrony Bank, who collectively held 60% of the total small business and small farm loan originations and purchases in the assessment area.

To supplement economic, demographic, and performance data, interviews were conducted with two local community organizations, which provided perspective on the credit and community development needs of the Lancaster, PA assessment area. One interview was held with a local community action agency providing services and emergency and affordable housing to low- and moderate-income residents in the assessment area, while the other was held with a community foundation serving Lancaster County.

Community contacts identified affordable housing and credit products for first-time homebuyers and low- and moderate-income borrowers, and affordable rental options as important needs in the area. Further, basic community services to aid low- and moderate-income individuals were identified, as resources available to assist this segment of the population during the COVID-19 pandemic have depleted. Both contacts indicated an increase in black, indigenous, and other people of color, and noticed that language and cultural barriers prevent these individuals from gaining access to bank funding and other services. Finally, contacts expressed the need for career development and job placement training, as well as credit for area small businesses.

Economic Characteristics

Orrstown's Lancaster, PA assessment area is situated in South Central Pennsylvania, and is anchored by the city of Lancaster.

According to Moody's Analytics January 2024 Precis Report for the Lancaster, PA MSA, the assessment area is in a mid-expansion phase, with employment growth outpacing both the state and the nation. A strengthening manufacturing sector and regionally strong population growth place the area in a long-term advantage compared to other regional and stateside areas. Additionally, the logistics sector has exceeded projected expectations, with the assessment area's central location driving strong investment.

Lancaster's strengths include its proximity to major East Coast metropolitan areas; a well-diversified economy for its size; a relatively equal distribution of income; and a strong rate of business formation. Noted economic weaknesses by Moody's include the area's reliance on traditional manufacturing; low per capita income and education levels; and low worker productivity.

The education and health services industry represents the largest employment sector in the Lancaster, PA MSA, contributing 18% of jobs. Other significant industries include manufacturing (14%), retail trade (12%), and professional and business services (10%), and leisure and hospitality services (just under 10%). According to Moody's, top employers in the MSA include Lancaster General Hospital, Giant Food Stores, LLC, Eurofins Lancaster Laboratories, Inc., High Companies, and the Masonic Villages at Elizabethtown.

Seasonally unadjusted unemployment rates for the assessment area, according to the U.S. Department of Labor, Bureau of Labor Statistics, are presented in the following table. Overall, throughout the evaluation period, the Lancaster, PA assessment area had a lower unemployment rate than the Commonwealth and the nation as a whole.

Notably, the COVID-19 pandemic significantly impacted the assessment area's unemployment rates in 2020, though rates were below the national average, and below that of the Commonwealth. Unemployment rates in 2021 and 2022 dropped overall, with rates staying below both the Commonwealth and national average.

Orrstown Bank Lancaster, PA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)			
Location	**% 2020**	**% 2021**	**% 2022**
Lancaster, PA MSA/Lancaster County	7.3	4.6	3.3
Commonwealth of Pennsylvania	8.9	5.9	4.1
United States	8.1	5.3	3.6

Housing

2015 ACS Data

According to 2015 ACS data, the Lancaster, PA assessment area contained 205,587 housing units, 65% of which were owner-occupied, 30% of which were rental units, and 5% of which were vacant. The overall owner-occupancy rate in the assessment area (65%) was above the rate in the Commonwealth of Pennsylvania (61%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such census tracts. According to 2015 ACS data, under 2% of owner-occupied units were located in low-income census tracts, 9% were in moderate- income tracts, 76% were in middle-income tracts, and almost 14% were in upper-income tracts.

Of the total existing housing units, 76% were single-family units, 8% were two-to-four family units, 12% were multifamily units consisting of five or more units, and 4% of units were mobile homes. The median age of the housing stock was 47 years, making it newer than the housing stock in the Commonwealth of Pennsylvania (54 years).

Data show that the cost of housing in the assessment area is higher than in the Commonwealth overall. According to 2015 ACS data, the median housing value in the Lancaster, PA assessment area was $189,229, which was higher than the median value in the Commonwealth of Pennsylvania ($166,000). Further, data show a disparity between the median housing value in the assessment area's low- and moderate-income tracts, compared to those in middle- and upper-income tracts. The median housing value was $85,882 in low-income tracts, and $114,714 in moderate-income tracts. These values were significantly lower than housing values in middle- and upper-income tracts ($193,421 and $229,686, respectively). Additionally, in the assessment area, under 13% of the total owner-occupied housing units were valued at less than $100 thousand, compared to the Commonwealth, where 26% of owner-occupied housing units were valued at less than $100 thousand.

Finally, median gross rent (rent plus utilities) was higher in the assessment area than in Pennsylvania. Specifically, median gross rent in the Lancaster, PA assessment area was $909 compared to that of Pennsylvania ($840). Within the assessment area, almost 49% of renters spent more than 30% of their income on rent, which is a higher figure than that in Pennsylvania as a whole (46%).

2020 Census Data

According to 2020 Census data, the Lancaster, PA assessment area contained 212,160 housing units, 67% of which were owner-occupied, 29% of which were rental units, and 4% of which were vacant. The overall owner-occupancy rate in the assessment area (67%) was higher than the rate in the Commonwealth of Pennsylvania (62%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such census tracts. According to 2020 Census data, less than 2% of owner-occupied units were located in low-income census tracts, 11% were in moderate- income tracts, just under 73% were in middle-income tracts, and almost 15% were in upper-income tracts.

Of the total existing housing units, 77% were single-family units, 7% were two-to-four family units, 13% were multifamily units consisting of five or more units, and 3% of units were mobile homes. The median age of the housing stock was 50 years, making it newer than the housing stock in the Commonwealth of Pennsylvania (57 years).

As with 2015 ACS data, 2020 Census data show that the cost of housing in the assessment area is higher than in the Commonwealth overall. According to 2020 Census data, the median housing value in the Lancaster, PA assessment area was $218,747, which was notably higher than the median value in the Commonwealth of Pennsylvania ($187,500). Further, data show a disparity between the median housing value in the assessment area's low- and moderate-income tracts, compared to those in middle- and upper-income tracts. The median housing value was $96,837 in low-income tracts, and $166,445 in moderate-income tracts. These values were significantly below housing values in middle- and upper-income tracts ($220,036 and $272,749, respectively). Additionally, in the assessment area, just under 9% of the total owner-occupied housing units were valued at less than $100 thousand, compared to the Commonwealth, where 21% of owner-occupied housing units were valued at less than $100 thousand.

Finally, median gross rent (rent plus utilities) was higher in the assessment area than in Pennsylvania. Specifically, median gross rent in the Lancaster, PA assessment area was $1,051 compared to that of Pennsylvania ($958). Within the assessment area, 45% of renters spent more than 30% of their income on rent, which is a slightly higher figure than that in Pennsylvania as a whole (43%).

Borrower Income Data

2015 ACS Data

The percentage of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. The 2015 ACS shows that there were 137,133 families in the assessment area. Of the total families in the assessment area, 18% were designated as low-income, 19% were designated as moderate-income, 23% were middle-income, and over 39% were upper-income. Of all families in the assessment area, 7% were living below the poverty level, compared with a rate of 9% for the Commonwealth of Pennsylvania.

2020 Census Data

The 2020 Census shows that there were 143,101 families in the assessment area. Of the total families in the assessment area, over 17% were designated as low-income, 19% were designated as moderate-income, 25% were middle-income, and 39% were upper-income. Of all families in the assessment area, 6% were living below the poverty level, compared with a rate of 8% for the Commonwealth of Pennsylvania.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon the HUD annually-adjusted median family income data made available by the FFIEC. Median family incomes for the bank's assessment area are listed in the following table for each of the years covered by the evaluation, and are categorized by the dollar amounts recognized as low-, moderate-, middle-, and upper-income.

Year	HUD-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
2020	$79,500	Less than $39,750	$39,750 – $63,599	$63,600 - $95,399	$95,400 or more
2021	$83,000	Less than $41,500	$41,500 – $66,399	$66,400 - $99,599	$99,600 or more
2022	$90,200	Less than $45,100	$45,100 – $72,159	$72,160 - $108,239	$108,240 or more

Geographic Business Data

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for business credit within such census tracts. Dun & Bradstreet reports business demographics annually. According to Dun & Bradstreet data, in 2020, there were 24,850 businesses in the Lancaster, PA assessment area. Of these businesses, 4% were located in low- income tracts, and 11% were located in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (almost 74% and 12%, respectively). Business demographic data also revealed that of the businesses located in the assessment area, 90% were small businesses with gross annual revenues of $1 million or less.

In 2021, there were 24,807 businesses in the assessment area. Again, of these businesses, 4% were located in low-income tracts, 11% were located in moderate-income tracts, almost 74% in middle-income tracts, and nearly 12% in upper-income tracts. Of the businesses in the assessment area, 90% were small businesses with gross annual revenues of $1 million or less.

Finally, in 2022, there were 24,630 businesses in the assessment area. Of these businesses, less than 4% were located in low-income tracts, and nearly 11% were located in moderate-income tracts. Once again, the majority of businesses were located in middle- and upper-income tracts (almost 71% and 15%, respectively). Of the businesses in the assessment area, just under 91% were small businesses with gross annual revenues of $1 million or less.

Assessment area demographics used in evaluating Orrstown's performance in the Lancaster, PA assessment area in 2020, 2021, and 2022 are detailed in the tables on the following pages.

Orrstown Bank Lancaster, PA Assessment Area Assessment Area Demographics 2020								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	6	6.1	4,407	3.2	1,708	38.8	25,060	18.3
Moderate-income	14	14.3	12,532	9.1	1,781	14.2	26,380	19.2
Middle-income	67	68.4	102,889	75.0	6,108	5.9	31,628	23.1
Upper-income	11	11.2	17,305	12.6	397	2.3	54,065	39.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**98**	**100.0**	**137,133**	**100.0**	**9,994**	**7.3**	**137,133**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	**%**	**%**	**#**	**%**	**#**	**%**
Low-income	8,182	2,131	1.6	26.0	5,218	63.8	833	10.2
Moderate-income	23,282	11,893	8.8	51.1	9,716	41.7	1,673	7.2
Middle-income	148,916	102,334	76.1	68.7	40,099	26.9	6,483	4.4
Upper-income	25,207	18,190	13.5	72.2	5,749	22.8	1,268	5.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**205,587**	**134,548**	**100.0**	**65.4**	**60,782**	**29.6**	**10,257**	**5.0**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	991	4.0	894	4.0	88	4.1	9	3.5
Moderate-income	2,713	10.9	2,402	10.7	287	13.4	24	9.3
Middle-income	18,267	73.5	16,541	73.7	1,531	71.5	195	75.6
Upper-income	2,879	11.6	2,614	11.6	235	11.0	30	11.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**24,850**	**100.0**	**22,451**	**100.0**	**2,141**	**100.0**	**258**	**100.0**
	Percentage of Total Businesses:		**90.3**		**8.6**			**1.0**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	2	0.2	2	0.2	0	0.0	0	0.0
Moderate-income	6	0.6	6	0.6	0	0.0	0	0.0
Middle-income	936	90.2	903	90.0	33	94.3	0	0.0
Upper-income	94	9.1	92	9.2	2	5.7	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**1,038**	**100.0**	**1,003**	**100.0**	**35**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**96.6**		**3.4**			**0.0**

2015 ACS Data and 2020 Dun & Bradstreet Information

Orrstown Bank Lancaster, PA Assessment Area Assessment Area Demographics 2021							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	6	6.1	4,407	3.2	1,708	38.8	25,060	18.3
Moderate-income	14	14.3	12,532	9.1	1,781	14.2	26,380	19.2
Middle-income	67	68.4	102,889	75.0	6,108	5.9	31,628	23.1
Upper-income	11	11.2	17,305	12.6	397	2.3	54,065	39.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**98**	**100.0**	**137,133**	**100.0**	**9,994**	**7.3**	**137,133**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	8,182	2,131	1.6	26.0	5,218	63.8	833	10.2
Moderate-income	23,282	11,893	8.8	51.1	9,716	41.7	1,673	7.2
Middle-income	148,916	102,334	76.1	68.7	40,099	26.9	6,483	4.4
Upper-income	25,207	18,190	13.5	72.2	5,749	22.8	1,268	5.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**205,587**	**134,548**	**100.0**	**65.4**	**60,782**	**29.6**	**10,257**	**5.0**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	968	3.9	877	3.9	83	3.9	8	3.0
Moderate-income	2,684	10.8	2,374	10.6	283	13.4	27	10.0
Middle-income	18,268	73.6	16,555	73.8	1,508	71.4	205	75.9
Upper-income	2,887	11.6	2,620	11.7	237	11.2	30	11.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**24,807**	**100.0**	**22,426**	**100.0**	**2,111**	**100.0**	**270**	**100.0**
	Percentage of Total Businesses:		**90.4**		**8.5**			**1.1**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	2	0.2	2	0.2	0	0.0	0	0.0
Moderate-income	7	0.7	7	0.7	0	0.0	0	0.0
Middle-income	933	90.7	899	90.5	34	94.4	0	0.0
Upper-income	87	8.5	85	8.6	2	5.6	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**1,029**	**100.0**	**993**	**100.0**	**36**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**96.5**		**3.5**			**0.0**

2015 ACS Data and 2021 Dun & Bradstreet Information

Orrstown Bank Lancaster, PA Assessment Area Assessment Area Demographics 2022							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	4	3.4	3,695	2.6	954	25.8	24,856	17.4
Moderate-income	16	13.8	18,133	12.7	1,596	8.8	27,588	19.3
Middle-income	81	69.8	102,368	71.5	5,050	4.9	35,138	24.6
Upper-income	15	12.9	18,905	13.2	489	2.6	55,519	38.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**116**	**100.0**	**143,101**	**100.0**	**8,089**	**5.7**	**143,101**	**100.0**

	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	6,072	2,110	1.5	34.7	3,528	58.1	434	7.1
Moderate-income	29,484	15,940	11.3	54.1	12,187	41.3	1,357	4.6
Middle-income	150,455	102,629	72.5	68.2	42,353	28.1	5,473	3.6
Upper-income	26,149	20,826	14.7	79.6	4,430	16.9	893	3.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**212,160**	**141,505**	**100.0**	**66.7**	**62,498**	**29.5**	**8,157**	**3.8**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	867	3.5	775	3.5	86	4.2	6	2.2
Moderate-income	2,618	10.6	2,390	10.7	197	9.6	31	11.4
Middle-income	17,405	70.7	15,789	70.8	1,419	69.3	197	72.4
Upper-income	3,740	15.2	3,355	15.0	347	16.9	38	14.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**24,630**	**100.0**	**22,309**	**100.0**	**2,049**	**100.0**	**272**	**100.0**
	Percentage of Total Businesses:		**90.6**		**8.3**		**1.1**	

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	2	0.2	2	0.2	0	0.0	0	0.0
Moderate-income	95	9.2	91	9.2	4	10.8	0	0.0
Middle-income	812	78.8	783	78.8	29	78.4	0	0.0
Upper-income	122	11.8	118	11.9	4	10.8	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**1,031**	**100.0**	**994**	**100.0**	**37**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**96.4**		**3.6**		**0.0**	

2020 Census Data and 2022 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers, and businesses of all sizes, including small businesses;
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Lending Activity

Orrstown's lending levels in the Lancaster, PA assessment area reflect adequate responsiveness to the assessment area's credit needs. During the evaluation period, lending activity in the Lancaster, PA assessment area represented 21% of the bank's overall lending by number of loans, and 25% by dollar volume. During the evaluation period, Orrstown made 688 HMDA loans totaling over $177 million, and 1,409 small business loans totaling $148 million in the Lancaster, PA assessment area.[9] Of the bank's total small business lending during the evaluation period, 224 loans in the amount of $34 were made to businesses with reported revenues of $1 million or less.

Borrower Distribution of Lending

Given the assessment area's demographics and economic characteristics, the borrower distribution of lending reflects, given the product lines offered, good penetration among individuals of different income levels, including low- and moderate-income individuals, and businesses of different sizes, including small businesses.

It is noted that borrower distribution is given more weight than geographic distribution in this assessment area in driving lending performance. Further, due to loan volumes by number of loans, small business loans are given the most weight in determining the bank's overall borrower distribution of loans, followed by HMDA loans.

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[9] A large portion of the bank's small business loans originated in 2020 and 2021 consisted of loans made under the PPP, which did not require reporting the business revenue size.

Small Business Lending

The bank's distribution of loans to businesses reflects good penetration among business customers of different sizes, including small businesses. For purpose of this evaluation, a small business loan is defined as a commercial loan with an origination amount of $1 million or less. Small business loans are further quantified to identify those loans to businesses with gross annual revenues of $1 million or less, namely small businesses.

The number of businesses operating in the bank's assessment area is used as a proxy to estimate demand for business credit in that assessment area. According to Dun & Bradstreet business demographic data, in 2020 there were 24,850 businesses in the assessment area, with 22,451 (90%) designated as small businesses. In 2021, there were 24,807 businesses in the assessment area, 22,426 (90%) of which were small businesses. Finally, in 2022, there were 24,630 businesses in the assessment area, 22,309 (91%) of which were small businesses.

2015 ACS Data

In 2020, the bank's borrower distribution of small business loans was good, considering performance context factors. In 2020, Orrstown originated 680 small business loans within the assessment area, aggregating almost $74 million. Of these loans, 24% (165 loans) were originated to small businesses. Notably, 66% of the bank's small business loan originations (449 loans) were to businesses with unknown revenues. This is attributable to the bank's participation in the SBA's PPP. Under this program, institutions were not required to collect revenue information. The COVID-19 pandemic was an unprecedented global event that impacted businesses of all sizes, most notably smaller businesses that typically do not have an excess of capital to weather long periods of closure and slashed revenues. Orrstown's participation in this program is considered in the evaluation of its borrower distribution of small business lending.

When only considering the bank's loans where revenues were reported as $1 million or less, performance was below the aggregate lending level of 47% to small businesses, and the proxy of 90%. However, when considering the bank's PPP lending, which is reasonably inferred to be supportive of small businesses in need for capital, the bank's performance is considered to be good.

Small business loans were further analyzed to determine the extent of loans originated in an amount of $100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus added weight is given to such loans in determining whether an institution is meeting the credit needs of small businesses. In 2020, 72% of Orrstown's small business loans were extended in amounts of $100 thousand or less. Aggregate data indicates that 82% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

In 2021, the bank's borrower distribution of small business loans was good, considering performance context. In 2021, Orrstown originated 649 small business loans within the assessment area, aggregating over $54 million. Of these loans, 5% were originated to small businesses (29 loans). As noted above, Orrstown's participation in the PPP significantly impacted the bank's small business loan data. Ninety percent of the bank's small business loan originations (584 loans) were to businesses with unknown revenues, and it is reasonably inferred that these originations were to benefit small businesses impacted by the COVID-19 pandemic.

When only considering the bank's loans where revenues were reported as $1 million or less, performance was below the aggregate lending level of 51% to small businesses, and the proxy of 90%. However, when considering the bank's PPP lending, the bank's performance was once again considered to be good.

In 2021, 81% of Orrstown's small business loans were extended in amounts of $100 thousand or less (525 loans). Aggregate data indicates that 88% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

2020 Census Data

Finally, in 2022, the bank's borrower distribution of small business loans was adequate. In 2022, Orrstown originated 80 small business loans within the assessment area, aggregating $20 million. Of these loans, 38% were originated to small businesses (30 loans). The bank's lending to small businesses fell below the aggregate lending level of 55% to small businesses and the proxy of 91% small businesses in the assessment area.

In 2022, 39% of Orrstown's small business loans were extended in amounts of $100 thousand or less (31 loans). Aggregate data indicates that 91% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

Home-Mortgage Lending

Orrstown's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers, is adequate.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families in an assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to 2015 ACS data, over 18% of assessment area families were designated as low-income, 19% were designated as moderate-income, 23% were middle-income, and over 39% were upper-income. Using 2015 ACS Census data, over 37% were designated as low- or moderate-income families. This indicates a notable need for home-mortgage credit among this segment of the population.

According to 2020 Census data, over 17% of assessment area families were designated as low-income, 19% were designated as moderate-income, 25% were middle-income, and 39% were upper-income. Thirty-six percent of families, using 2020 Census data, were designated as low- or moderate-income families.

The following tables compare Orrstown's home-mortgage lending to aggregate lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The table used to evaluate lending in 2020 and 2021 relies on 2015 ACS data to estimate demand for home-mortgage credit among low- and moderate-income families, along with updated HMDA data, following the requirements of Regulation C. The table used to evaluate 2022 lending relies on 2020 Census data to estimate demand for home-mortgage credit among low- and moderate-income families.

		Aggregate Comparison			
Income Level	**% Families by Family Income (2015 ACS Data)**	**2020**		**2021**	
		% Orrstown Lending	**% Aggregate Lending**	**% Orrstown Lending**	**% Aggregate Lending**
Low	18.3	2.4	5.1	2.4	7.0
Moderate	19.2	10.6	19.9	14.2	21.2
Middle	23.1	26.0	23.3	19.3	24.0
Upper	39.4	56.5	36.2	61.0	33.7
Unknown	0.0	4.5	15.6	3.1	14.0
Total	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**

Orrstown Bank
Lancaster, PA Assessment Area
Distribution of HMDA Loans by Borrower Income Level

		Aggregate Comparison	
Income Level	**% Families by Family Income (2020 Census Data)**	**2022**	
		% Orrstown Lending	**% Aggregate Lending**
Low	17.4	3.7	7.9
Moderate	19.3	15.4	21.8
Middle	24.6	19.1	24.5
Upper	38.8	59.0	34.8
Unknown	0.0	2.7	11.0
Total	**100.0**	**100.0**	**100.0**

Lending to Low-Income Borrowers

For the period under review, Orrstown's lending to low-income borrowers was poor.

2015 ACS Data

In assessing the level of the bank's lending among low-income borrowers, the evaluation takes into consideration median family incomes and housing costs, and the challenges faced by low-income borrowers in saving for a down payment and closing costs, which can present a significant obstacle to homeownership, thereby limiting lending opportunities.

Orrstown's lending in 2020 to low-income borrowers was poor. In total, 2% of the bank's HMDA loans (six loans) were originated to low-income borrowers, which was below both the aggregate lending level of 5%, and the proxy of 18%. By loan category, Orrstown originated 4% of its home purchase loans, 2% of refinance loans, 4% of home improvement loans, no multifamily loans, no other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 7% of home purchase loans, 4% of refinance loans, 4% of home improvement loans, less than 1% of multifamily loans, 5% of other purpose lines of credit, almost 2% of other purpose closed/exempt loans, and 1% of loans with purpose "not applicable" to low-income borrowers in 2020.

Orrstown's lending in 2021 to low-income borrowers was poor. In total, 2% of the bank's HMDA loans (6 loans) were originated to low-income borrowers, once again falling below both the aggregate lending level of 7%, and the proxy of 18%. By loan category, Orrstown originated 7% of its home purchase loans, no refinance loans, 6% of its home improvement loans, no multifamily loans, 2% of its other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 9% of home purchase loans, 6% of refinance loans, 5% of home improvement loans, no multifamily loans, 6% of other purpose lines of credit, 8% of other purpose closed/exempt loans, and 2% of loans with purpose "not applicable" to low-income borrowers in 2021.

2020 Census Data

Orrstown's lending in 2022 to low-income borrowers was poor. In total, just under 4% of the bank's HMDA loans (seven loans) were originated to low-income borrowers, yet again falling below both the aggregate lending level of 8% and the proxy of 17%. By loan category, Orrstown originated just under 5% of its home purchase loans, 2% of refinance loans, 3% of home improvement loans, no multifamily loans, almost 6% of its other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 7% of home purchase loans, 10% of refinance loans, almost 6% of home improvement loans, no multifamily loans, nearly 8% of other purpose lines of credit, 8% of other purpose closed/exempt loans, and 2% of loans with purpose "not applicable" to low-income borrowers in 2022.

Lending to Moderate-Income Borrowers

For the period under review, Orrstown's lending to moderate-income borrowers was adequate.

2015 ACS Data

Orrstown's lending in 2020 to moderate-income borrowers was adequate. In total, just under 11% of the bank's HMDA loans (26 loans) were originated to moderate-income borrowers, falling below the aggregate lending level of 20%, and the proxy of 19%. By loan category, Orrstown originated 17% of its home purchase loans, 12% of refinance loans, 8% of home improvement loans, no multifamily loans, no other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" to moderate-income borrowers.

In comparison, aggregate lenders made 27% of home purchase loans, 17% of refinance loans, 17% of home improvement loans, less than 1% of multifamily loans, 16% of other purpose lines of credit, 19% of other purpose closed/exempt loans, and less than 1% of loans with purpose "not applicable" to moderate-income borrowers in 2020.

Orrstown's lending in 2021 to moderate-income borrowers was adequate. In total, 14% of the bank's HMDA loans (36 loans) were originated to moderate-income borrowers, once again falling below the aggregate lending level of 21%, and the proxy of 19%. By loan category, Orrstown originated almost 19% of its home purchase loans, 16% of refinance loans, 6% of home improvement loans, no multifamily loans, 7% of its other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 26% of home purchase loans, 20% of refinance loans, 17% of home improvement loans, less than 1% of multifamily loans, 17% of other purpose lines of credit, 20% of other purpose closed/exempt loans, and less than 1% of loans with purpose "not applicable" to moderate-income borrowers in 2021.

2020 Census Data

Orrstown's lending in 2022 to moderate-income borrowers was adequate. In total, 15% of the bank's HMDA loans (29 loans) were originated to moderate-income borrowers, falling below the aggregate lending level of 22%, and the proxy of 19%. By loan category, Orrstown originated 23% of its home purchase loans, 4% of refinance loans, 13% of home improvement loans, no multifamily loans, 19% of its other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 24% of its home purchase loans, 23% of its refinance loans, 17% of home improvement loans, no multifamily loans, 20% of other purpose lines of credit, 17% of other purpose closed/exempt loans, and 1% of loans with purpose "not applicable" to moderate-income borrowers in 2022.

Geographic Distribution of Loans

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. The overall analysis reflects good penetration throughout the Lancaster, PA assessment area, including low- and moderate-income tracts. Once again, it is noted that small business loans were given greater weight in determining this conclusion, given their higher volume, followed by HMDA loans.

Small Business Lending

The geographic distribution of Orrstown's small business loans reflects good penetration throughout the assessment area, in the context of the assessment area's demographic and economic characteristics during the evaluation period.

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract.

Based on Dun & Bradstreet business data in 2020, there were 24,850 businesses operating in the assessment area. Of these, 4% were located in low-income tracts, 11% were located in moderate-income tracts, just under 74% were located in middle-income tracts, and just under12% were located in upper-income tracts. In 2021, there were 24,807 businesses operating in the assessment area, but there was no change in the distribution of businesses using 2021 Dun & Bradstreet data. In 2022, there were 24,630 businesses operating in the assessment area. Of these, less than 4% were located in low-income tracts, just under 11% were located in moderate-income tracts, 71% were located in middle-income tracts, and 15% were located in upper-income tracts.

The tables below present Orrstown's small business geographic distribution, in comparison to the applicable business proxy and aggregate lending levels in the assessment area for the years evaluated.

Orrstown Bank Lancaster, PA Assessment Area Geographic Distribution of Small Business Loans			
		Aggregate Comparison	
		2020	
Census Tract Income Level	% Businesses by Tract Income Level (2020 Dun & Bradstreet Data)	% Orrstown Lending	% Aggregate Lending
Low	4.0	4.9	3.6
Moderate	10.9	14.3	10.6
Middle	73.5	65.4	73.4
Upper	11.6	15.4	12.2
Unknown	0.0	0.0	0.2
Total	**100.0**	**100.0**	**100.0**

Orrstown Bank Lancaster, PA Assessment Area Geographic Distribution of Small Business Loans			
		Aggregate Comparison	
		2021	
Census Tract Income Level	% Businesses by Tract Income Level (2021 Dun & Bradstreet Data)	% Orrstown Lending	% Aggregate Lending
Low	3.9	2.8	3.6
Moderate	10.8	14.2	9.9
Middle	73.6	66.9	73.5
Upper	11.6	16.2	12.7
Unknown	0.0	0.0	0.3
Total	**100.0**	**100.0**	**100.0**

Orrstown Bank Lancaster, PA Assessment Area Geographic Distribution of Small Business Loans			
		Aggregate Comparison	
		2022	
Census Tract Income Level	% Businesses by Tract Income Level (2022 Dun & Bradstreet Data)	% Orrstown Lending	% Aggregate Lending
Low	3.5	0.0	2.6
Moderate	10.6	6.3	10.3
Middle	70.7	61.3	71.6
Upper	15.2	32.5	15.1
Unknown	0.0	0.0	0.4
Total	**100.0**	**100.0**	**100.0**

Lending in Low-Income Census Tracts

Orrstown's small business lending in low-income tracts was good.

2015 ACS Data

In 2020, the geographic distribution of the bank's small business lending in low-income census tracts was excellent. Orrstown originated 5% of its small business loans (33 loans) in the assessment area's low-income census tracts. The bank's lending level was above both the applicable business loan demand proxy of 4%, and the 2020 aggregate small business lending level of just under 4%.

In 2021, the geographic distribution of the bank's small business lending in low-income census tracts was good. Orrstown originated 3% of its small business loans (18 loans) in the assessment area's low-income census tracts. The bank's lending level was slightly below both the applicable business loan demand proxy of 4%, and the 2021 aggregate small business lending level of just under 4%.

2020 Census Data

In 2022, the geographic distribution of the bank's small business lending in low-income census tracts was very poor. Orrstown originated none of its small business loans in the assessment area's low-income census tracts. The bank's lending level was below both the applicable business loan demand proxy of 4%, and the 2022 aggregate small business lending level of less than 3%.

Lending in Moderate-Income Census Tracts

Orrstown's small business lending in moderate-income tracts was good.

2015 ACS Data

In 2020, the geographic distribution of the bank's small business lending in moderate-income census tracts was excellent. Orrstown originated 14% of its small business loans (97 loans) in the assessment area's moderate-income census tracts. The bank's lending level was above both the applicable business loan demand proxy of 11%, and the 2020 aggregate small business lending level of just under 11%.

In 2021, the geographic distribution of the bank's small business lending in moderate-income census tracts was excellent. Orrstown originated 14% of its small business loans (92 loans) in the assessment area's moderate-income census tracts. The bank's lending level was above both the applicable business loan demand proxy of 11%, and the 2021 aggregate small business lending level of 10%.

2020 Census Data

In 2022, the geographic distribution of the bank's small business lending in moderate-income census tracts was adequate. Orrstown originated 6% of its small business loans (five loans) in the assessment area's moderate-income census tracts. The bank's lending level was below both the applicable business loan demand proxy of just under 11%, and the 2022 aggregate small business lending level of 10%.

Home-Mortgage Lending

Orrstown's distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts is adequate. As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage credit within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the greater the demand for home-mortgage credit is in the tract.

According to 2015 ACS data, less than 2% of the assessment area's owner-occupied housing stock was located in low-income census tracts, 9% was located in moderate-income tracts, 76% was located in middle-income tracts, and just under 14% was located in upper-income tracts.

According to 2020 Census data, less than 2% of the assessment area's owner-occupied housing stock was located in low-income census tracts, and 11% was located in moderate-income tracts. Once again, the majority of owner-occupied housing was located in middle- and upper-income tracts (almost 73% and 15%, respectively).

The following tables present Orrstown's geographic distribution of HMDA loans in 2020, 2021, and 2022 in comparison to the applicable owner-occupied housing proxies and the aggregate lending levels in the assessment area. The tables rely on 2015 ACS data for 2020 and 2021 lending, and 2020 Census data for 2022 lending, along with updated HMDA data, following the requirements of Regulation C.

Orrstown Bank Lancaster, PA Assessment Area Geographic Distribution of HMDA Loans					
		Aggregate Comparison			
Census Tract Income Level	**% Owner-Occupied Units (2015 ACS Data)**	**2020**		**2021**	
		% Orrstown Lending	**% Aggregate Lending**	**% Orrstown Lending**	**% Aggregate Lending**
Low	1.6	2.0	1.9	1.2	2.2
Moderate	8.8	8.1	9.3	5.9	10.3
Middle	76.1	66.3	73.7	75.2	72.6
Upper	13.5	23.6	15.1	17.7	14.9
Unknown	0.0	0.0	0.0	0.0	0.0
Total	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**

Orrstown Bank Lancaster, PA Assessment Area Geographic Distribution of HMDA Loans			
		Aggregate Comparison	
Census Tract Income Level	**% Owner-Occupied Units (2020 Census Data)**	**2022**	
		% Orrstown Lending	**% Aggregate Lending**
Low	1.5	1.6	2.0
Moderate	11.3	8.0	13.0
Middle	72.5	72.3	69.3
Upper	14.7	18.1	15.7
Unknown	0.0	0.0	0.0
Total	**100.0**	**100.0**	**100.0**

Lending in Low-Income Census Tracts

For the period under review, Orrstown's overall HMDA lending in low-income tracts was adequate.

2015 ACS Data

Orrstown's lending in low-income census tracts in 2020 was good. Of the bank's 246 HMDA loans in 2020, Orrstown originated 2% (five loans) in low-income tracts, which was in-line with the proxy of 2%, and the aggregate lending of just under 2%. Categorized by loan product type, Orrstown made 2% of its home purchase loans, 1% of its refinance loans, 8% of home improvement loans, no multifamily loans, no other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" in low-income tracts in 2020. Aggregate 2020 lending data show that 3% of home purchase loans, 1% of refinance loans, 2% of home improvement loans, 12% of multifamily loans, 1% of other purpose lines of credit, 2% of other purpose closed/exempt loans, and 4% of loans with purpose "not applicable" were made in low-income tracts in the assessment area.

Orrstown's lending in low-income census tracts in 2021 was adequate. Of the bank's 254 HMDA loans in 2021, Orrstown originated 1% (three loans) in low-income tracts, which was below the proxy of 2%, and the aggregate lending of just under2%. Categorized by loan product type, Orrstown made 2% of its home purchase loans, less than 1% of its refinance loans, 6% of home improvement loans, no multifamily loans, no other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" in low-income tracts in 2021. Aggregate 2021 lending data show that just under 4% of home purchase loans, 1% of refinance loans, 1% of home improvement loans, 16% of multifamily loans, 1% of other purpose lines of credit, less than 1% of other purpose closed/exempt loans, and 3% of loans with purpose "not applicable" were made in low-income tracts in the assessment area.

2020 Census Data

Orrstown's lending in low-income census tracts in 2022 was adequate. Of the bank's 188 HMDA loans in 2022, Orrstown originated just under 2% (three loans) in low-income tracts, which was in-line with the proxy of under 2%, and the aggregate lending of 2%. Categorized by loan product type, Orrstown made 3% of its home purchase loans, 2% of its refinance loans, no home improvement loans, no multifamily loans, no other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" in low-income tracts in 2022. Aggregate 2022 lending data show that 3% of home purchase loans, 2% of refinance loans, just less than 1% of home improvement loans, 9% of multifamily loans, 1% of other purpose lines of credit, just under 1% of other purpose closed/exempt loans, and 3% of loans with purpose "not applicable" were made in low-income tracts in the assessment area.

Lending in Moderate-Income Census Tracts

For the period under review, the bank's HMDA lending in moderate-income tracts was adequate.

2015 ACS Data

Orrstown's lending in moderate-income census tracts in 2020 was adequate. Of the bank's 246 HMDA loans in 2020, Orrstown originated 8% (20 loans) in moderate-income tracts, which was slightly below the proxy of just under 9%, and the aggregate lending of just over 9%. Categorized by loan product type, Orrstown made 6% of its home purchase loans, 9% of its refinance loans, 12% of home improvement loans, 50% if its multifamily loans, no other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" in moderate-income tracts in 2020. Aggregate 2020 lending data show that 13% of home purchase loans, 7% of refinance loans, 8% of home improvement loans, 26% of multifamily loans, 4% of other purpose lines of credit, 7% of other purpose closed/exempt loans, and 18% of loans with purpose "not applicable" were made in moderate-income tracts in the assessment area.

Orrstown's lending in moderate-income census tracts in 2021 was adequate. Of the bank's 254 HMDA loans in 2021, Orrstown originated 6% (15 loans) in moderate-income tracts, which was below both the proxy of nearly 9%, and the aggregate lending of 10%. Categorized by loan product type, Orrstown made 5% of its home purchase loans, 7% of its refinance loans, 13% of home improvement loans, no multifamily loans, 2% of its other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" in moderate-income tracts in 2021. Aggregate 2021 lending data show that 15% of home purchase loans, 8% of refinance loans, 8% of home improvement loans, 24% of multifamily loans, 6% of other purpose lines of credit, 12% of other purpose closed/exempt loans, and 18% of loans with purpose "not applicable" were made in moderate-income tracts in the assessment area.

2020 Census Data

Orrstown's lending in moderate-income census tracts in 2022 was adequate. Of the bank's 188 HMDA loans in 2022, Orrstown originated 8% (15 loans) in moderate-income tracts, which was below both the proxy of 11%, and the aggregate lending of 13%. Categorized by loan product type, Orrstown made 9% of its home purchase loans, 7% of its refinance loans, 5% of home improvement loans, 50% of multifamily loans, 8% of other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" in moderate-income tracts in 2022. Aggregate 2022 lending data show that 15% of home purchase loans, 12% of refinance loans, 10% of home improvement loans, 27% of multifamily loans, 10% of other purpose lines of credit, 10% of other purpose closed/exempt loans, 22% of loans with purpose "not applicable" were made in moderate-income tracts in the assessment area.

Responsiveness to Credit Needs

Orrstown exhibits an adequate record of serving the credit needs of low- and moderate-income individuals and areas, and very small businesses, consistent with safe and sound banking practices. As mentioned previously, community contacts identified affordable housing, community services to aid low- and moderate-income individuals, and small business credit as needs within the assessment area.

The bank's responsiveness to credit needs was met primarily through its retail HMDA and small business lending, and to a lesser extent, through its use of innovative and flexible retail lending practices, and its community development lending, which are discussed below. Further, Orrstown was a participant in the SBA PPP, and funded a total of 1,033 PPP loans totaling $71.4 million. The funding of these PPP loans demonstrates responsiveness to the needs of small businesses affected by the COVID-19 pandemic. One of these loans totaling $1.4 million was included in the bank's community development lending totals.

Innovative and/or Flexible Lending Practices

Orrstown makes use of innovative and/or flexible lending practices in serving the Lancaster, PA assessment area's credit needs. Through a number of different programs, the bank made home-mortgage loans to low- and moderate-income borrowers, and small business loans during the evaluation period.

Often, the home-mortgage credit needs of low- and moderate-income individuals and families can be addressed more effectively by alternative mortgage products. The bank offers several programs for first-time homebuyers. Orrstown offers a proprietary residential mortgage product (Orrstown Bank First Time Homebuyer Loan Program), which limits applicant income to reserve the product for low- and moderate-income borrowers. The product requires completion of pre-purchase homebuyer counseling to qualify. During the evaluation period, Orrstown made 15 affordable mortgage loans totaling $2.7 million within the Lancaster, PA assessment area.

Additionally, Orrstown offers first-time homebuyer products through government-backed lending programs (FHA, VA, and USDA) and Fannie Mae's HomeReady® Mortgage, HomeStyle Renovation, and RefiNOW Programs. Through these programs, the bank makes home-mortgage loans to low- and moderate-income borrowers in conjunction with grants and forgivable loans. The programs have income parameters that effectively restrict them to low- and moderate-income borrowers. During the evaluation period, Orrstown made nine FHA loans totaling $2 million, two VA loans totaling $711 thousand, and four HomeStyle Renovation loans totaling $1.5 million.

Similarly, the credit needs of small businesses can often be addressed more effectively by alternative products. In an effort to address the credit needs of small businesses in its assessment area, Orrstown participates in SBA loan programs, including the SBA 504 and 7A programs. Orrstown made two SBA 504 loans totaling $1.1 million, and one SBA 7A loan totaling $492 thousand in the Lancaster, PA assessment area.

Community Development Lending

Orrstown makes an adequate level of community development loans in the assessment area.

During the evaluation period of January 26, 2021 through January 22, 2024, the bank made one community development loan in the assessment area totaling over $1.4 million. Orrstown's community development lending showed a decrease from the prior evaluation when the bank made eight community development loans totaling $6 million. Of the bank's total community development lending by dollar volume, 6% was within the Lancaster, PA assessment area.

The bank's single community development loan supported activities for revitalization and stabilization of a moderate-income tract within the assessment area.

The following table includes the bank's community development loans, broken out by community development purpose.

	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
Activity Year	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
2020	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	0	0	1	1,442	1	1,442
2022	0	0	0	0	0	0	0	0	0	0
TOTAL	**0**	**0**	**0**	**0**	**0**	**0**	**1**	**1,442**	**1**	**1,442**

Orrstown Bank — Lancaster, PA Assessment Area — Community Development Lending

INVESTMENT TEST

The investment test evaluates a financial institution's level of qualified investments that serve low- or moderate-income areas or individuals, together with the responsiveness, innovativeness, and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include: a lawful investment, deposit, membership share, or grant, including a donation or in-kind contribution of property, that has as its primary purpose, community development.

Volume of Investment and Grant Activity

Orrstown has an adequate of qualified community development investments and grants, rarely in a leadership position. Qualified investments, grants, and donations for the Lancaster, PA assessment area totaled $1.7 million, which is a slight decrease from $2 million during the prior evaluation. Of the bank's overall investments within its assessment areas, 5% were within the Lancaster, PA assessment area.

Investments and donations totaling $1.5 million supported affordable housing initiatives (88%), $155 thousand (9%) supported the provision of community services in the assessment area, and $45 thousand promoted economic development through the financing of small businesses (3%).

Of the $1.5 million in qualified investments in the Lancaster, PA assessment area, all funds were invested in mortgage-backed securities that supported affordable housing.

The bank also made a total of 29 donations and grants totaling $200 thousand to local organizations that provided community development services and economic development through assisting small businesses in the assessment area.

The following table presents the investment and grant activity for the Lancaster, PA assessment area.

	Orrstown Bank Lancaster, PA Assessment Area Qualified Investments									
CD Category	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$ (000s)**	**#**	**$ (000s)**	**#**	**$ (000s)**	**#**	**$ (000s)**	**#**	**$ (000s)**
Qualified Investments	3	1,499	0	0	0	0	0	0	3	1,499
Donations	0	0	23	155	6	45	0	0	29	200
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	**3**	**1,499**	**23**	**155**	**6**	**45**	**0**	**0**	**32**	**1,699**

Responsiveness to Credit and Community Development Needs

Orrstown exhibits adequate responsiveness to credit and community development needs in the Lancaster, PA assessment area. As noted in the table above, the vast majority of the investment and donation dollars in this assessment area addressed affordable housing and community services, which were both pronounced community needs in the assessment area.

Community Development Initiatives

Orrstown makes occasional use of innovative and/or complex investments to support community development initiatives. In the Lancaster, PA assessment area, the bank invested in three mortgage-backed securities.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- the accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms;
- the impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;
- the reasonableness of business hours and services in meeting assessment area needs; and
- the extent to which an institution provides community development services.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment area.

During the evaluation period, Orrstown operated four full-service branches in the Lancaster, PA assessment area (19% of all branch locations). Using 2015 ACS data, no branches were located in low- or moderate-income tracts, three were located in middle-income tracts (75%), and one was located in an upper-income tract (25%). Using updated 2020 Census data, no branches were located in low-income tracts, one was located in a moderate-income tract (25%), two were located in middle-income tracts (50%), and one was located in an upper-income tract (25%).

The following tables detail the location of the bank's branches with comparison to both 2015 ACS population demographics and 2020 Census demographics.

Orrstown Bank Lancaster, PA Assessment Area Retail Branch Distribution 2015 ACS Data				
Census Tract Type	**Number of Branches**	**Percent of Branches**	**Population**	**Percent of Population**
Low	0	0.0	22,775	4.3
Moderate	0	0.0	56,045	10.6
Middle	3	75.0	390,040	73.5
Upper	1	25.0	61,356	11.6
Unknown Income	0	0.0	0	0.0
Totals	**4**	**100.0**	**530,216**	**100.0**

Orrstown Bank Lancaster, PA Assessment Area Retail Branch Distribution 2020 Census Data				
Census Tract Type	**Number of Branches**	**Percent Branches**	**Population**	**Percent of Population**
Low	0	0.0	15,766	2.9
Moderate	1	25.0	70,924	12.8
Middle	2	50.0	394,806	71.4
Upper	1	25.0	71,488	12.9
Unknown Income	0	0.0	0	0.0
Totals	**4**	**100.0**	**552,984**	**100.0**

All of the bank's branches in the Lancaster, PA assessment area have ATMs available, which provide electronic access to banking services. To supplement traditional banking services, Orrstown provides online banking services, telephone banking services, and a smart phone mobile banking application that includes mobile deposit capture capabilities. Using online banking services, bank customers can pay bills, open accounts, and apply for loan products via the bank's website at https://www.orrstown.com/.

Changes in Branch Locations

Orrstown's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- or moderate-income census tracts or individuals. During the evaluation period, Orrstown closed one branch in the assessment area, located in an upper-income tract at the time of closure. No branches were opened in this assessment area since the prior evaluation.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services do not vary in such a way that inconveniences certain portions of the assessment area, particularly low- or moderate-income census tracts or individuals. As mentioned above, all of Orrstown's branches in the assessment area include ATMs, and all of the branches have drive-up facilities. All branches operate Monday through Friday, and all offer extended hours on Thursdays and Fridays. Three of the four branches in the assessment area offer Saturday hours[10].

Bank Products

Orrstown provides the following products with reduced or no fees, and/or no minimum balance requirements, which provide greater access to banking services for low- and moderate-income customers, and small businesses.

- Free Checking Account, a personal checking account with no minimum balance requirement, no monthly service fee, no per-check charge, and no $2 paper statement fee if customers opt-in to electronic statements and online banking.
- Growth Checking Account, a personal checkless account designed for those who don't qualify for a standard checking account. This account is certified by Bank On, a national platform that supports financial institution efforts to connect unbanked and underbanked consumers to safe, affordable bank accounts. Orrstown's Growth Checking Account requires a $25 minimum opening deposit, has a low $5 monthly maintenance fee, and waives the standard $2 paper statement fee for customers who opt in to electronic statements and online banking.
- Free Business Checking, a business checking account designed for small businesses with low transaction volumes. This account features no minimum opening deposit, no monthly service fees, 1,000 free items per statement cycle ($0.25 per item fee applies thereafter), and access to online bill pay services (first 10 bill pays per statement cycle are free).
- Non-profit Checking Account, an interest-bearing business checking account for non-profit or religious organizations, with no minimum opening deposit, no per-item fees, and no monthly maintenance fees.

Community Development Services

Orrstown provides a limited level of community development services in the Lancaster, PA assessment area.

Over the evaluation period, a bank officer served as a board member and committee chair for Lancaster City Alliance, a non-profit city revitalization organization focusing on revitalizing and stabilizing low- and moderate-income tracts in the city of Lancaster, and supporting small and start-up businesses in the area.

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[10]The branch located at 920 Lititz Pike, Lititz, PA 17543 does not offer Saturday hours.

CHAMBERSBURG, ASSESSMENT AREA
LIMITED-SCOPE REVIEW

A limited-scope review of the bank's performance in the Chambersburg, PA assessment area was conducted. At the previous evaluation, the Chambersburg, PA assessment area was reviewed using full-scope procedures. For the purposes of assessing Orrstown's performance in the Commonwealth of Pennsylvania and overall, the Chambersburg, PA assessment area was given equal weighting to performance in the Lancaster, PA assessment area. The performance in these two assessment areas followed that of the Harrisburg, PA assessment area, which was weighted the highest. During the evaluation period, lending activity in the Chambersburg, PA assessment area represented 24% of the bank's overall lending by number of loans, and just under 19% by dollar volume. The assessment area accounted for $626 million in deposits, or 25% of the bank's total deposits as of June 30, 2023. Orrstown operated five branches in the assessment area (24% of total branches).

The bank's performance in the Chambersburg, PA assessment area is consistent with its performance in the full-scope review assessment areas, as seen in the table below. The facts and data reviewed, including performance and demographic information, are presented in the Appendices accompanying the report. Conclusions regarding performance are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Chambersburg, PA Assessment Area	Consistent	Consistent	Consistent

DESCRIPTION OF INSTITUTION'S OPERATIONS

The bank's Chambersburg, PA assessment area is coterminous with the Chambersburg-Waynesboro, PA MSA, which consists solely of Franklin County, PA.

According to 2015 ACS data, the assessment area had a population of 152,285 and consisted of 27 census tracts, one of which was designated as low-income (4%), four of which were moderate-income (15%), 20 of which were middle-income (74%), and two of which were upper-income (7%). The low-income census tract and one moderate-income tract were located in the borough of Chambersburg. The remaining three moderate-income tracts were located in the borough of Waynesboro.

According to 2020 Census data, the assessment area had a population of 155,932 and consisted of 33 census tracts, none of which were low-income, four of which were moderate-income (12%), 27 of which were middle-income (82%), and two of which were upper-income (6%). The moderate-income census tracts were concentrated in the boroughs of Chambersburg and Waynesboro.

Maps of the Chambersburg, PA assessment area using both 2015 ACS data and 2020 Census data are available in Appendix F.

Orrstown's performance was evaluated in terms of the demographic and business context in which the bank operates. According to the FDIC's Market Share Report dated June 30, 2023, there were nine depository institutions operating in the Chambersburg-Waynesboro, PA MSA. These institutions maintained a total of 40 branches holding $2.7 billion in deposits. Orrstown ranked second, with $626 million in deposits, and almost 23% of the retail deposit market. Farmers and Merchants Trust Company of Chambersburg ranked first with $1 billion of the deposit market (38%), and Manufacturers and Traders Trust Company ranked third with $540 million of the deposit market (20%).

Orrstown was an important player in the assessment area's small HMDA market, holding nearly 6% of the market in 2020 and 2021, and almost 7% of the market in 2022. In 2020, a total of 267 HMDA reporters originated or purchased a total of 7,355 HMDA loans. Orrstown ranked third in the HMDA market with just under 6% of loans. Patriot Mortgage led the market with 10% of loans, followed by Farmers and Merchants Trust Company with 9% of HMDA loans.

In 2021, a total of 283 HMDA reporters originated or purchased a total of 8,271 HMDA loans. Orrstown ranked fourth in the HMDA market with just under 6% of loans. Patriot Mortgage led the market with 8% of loans, followed by Farmers and Merchants Trust Company with 7%, and Rocket Mortgage, LLC with 6% market share.

Finally, in 2022, a total of 268 HMDA reporters originated or purchased a total of 4,919 HMDA loans. Orrstown ranked third in the HMDA market with 7% of loans. Farmers and Merchants Trust Company led the market with 8% of loans, followed by Patriot Mortgage with 7% of HMDA loans.

Regarding small business lending, Orrstown was a major player in the CRA market in 2020 and 2021 due to its PPP lending, though the bank's CRA lending cooled in 2022. In 2020, a total of 73 reporters originated or purchased a total of 2,559 small business loans. Orrstown ranked first with 18% of the market. American Express, N.B. ranked second with 14%, followed by Manufacturers & Traders Trust Company with 11% market share.

In 2021, a total of 78 reporters originated or purchased a total of 3,192 small business loans. Orrstown ranked first with 19% of the market. American Express, N.B ranked second with 18% of the market, followed by JP Morgan Chase Bank, N.A. with 8% of the market.

Finally, in 2022, a total of 65 reporters originated or purchased a total of 2,985 small business loans. Orrstown ranked tenth with under 3% of the market. American Express, N.B. ranked first with 26% of the market, followed by JP Morgan Chase Bank, N.A. with 11%, and US Bank, N.A. with just under 11% market share.

According to the January 2024 Moody's Analytics Precis Report, the Chambersburg, PA economy is in a mid-expansion mode, and has recently faltered as the result of the contraction of non-farm payrolls. However, the logistics and healthcare industries are both strong, and are expected to carry the economy forward. Leading industries in the assessment area include education and health services (15% of total employment by sector), manufacturing (14%), transportation/utilities (13%), and retail trade and government (both 12%). The largest employers are WellSpan, Letterkenny Army Depot, Manitowoc Crane Group, Proctor & Gamble, and Volvo Construction Equipment.

An interview was conducted with a local small business development center to provide perspective on the credit needs of the Chambersburg, PA assessment area. This information was supplemented with demographic and economic data pertinent to the assessment area. According to the community contact, who represented an organization focused on serving small and very small businesses, economic conditions in the area are on the decline, with many small businesses closing, and consumers struggling as the result of inflation and higher home prices. Prominent credit needs in the area that were identified by the contact were affordable housing for low- and moderate-income borrowers, small business loans, and credit products tailored to the needs of borrowers with limited credit history, and the minority and immigrant populations.

Tables showing the assessment area demographics of the Chambersburg, PA assessment area in 2020, 2021, and 2022 are contained on the following pages.

Orrstown Bank Chambersburg, PA Assessment Area Assessment Area Demographics 2020								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	1	3.7	1,263	3.1	445	35.2	7,548	18.6
Moderate-income	4	14.8	3,433	8.5	634	18.5	8,085	19.9
Middle-income	20	74.1	32,238	79.4	2,216	6.9	9,060	22.3
Upper-income	2	7.4	3,664	9.0	214	5.8	15,905	39.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**27**	**100.0**	**40,598**	**100.0**	**3,509**	**8.6**	**40,598**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	2,210	608	1.4	27.5	1,334	60.4	268	12.1
Moderate-income	6,334	2,729	6.5	43.1	2,982	47.1	623	9.8
Middle-income	50,167	34,726	82.7	69.2	11,208	22.3	4,233	8.4
Upper-income	5,236	3,951	9.4	75.5	1,032	19.7	253	4.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**63,947**	**42,014**	**100.0**	**65.7**	**16,556**	**25.9**	**5,377**	**8.4**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	274	4.4	240	4.1	33	8.1	1	1.5
Moderate-income	523	8.3	481	8.3	34	8.4	8	12.1
Middle-income	5,003	79.9	4,632	80.0	315	77.4	56	84.8
Upper-income	465	7.4	439	7.6	25	6.1	1	1.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**6,265**	**100.0**	**5,792**	**100.0**	**407**	**100.0**	**66**	**100.0**
	Percentage of Total Businesses:		**92.5**		**6.5**			**1.1**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	4	1.0	4	1.1	0	0.0	0	0.0
Middle-income	370	94.4	356	94.2	14	100.0	0	0.0
Upper-income	18	4.6	18	4.8	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**392**	**100.0**	**378**	**100.0**	**14**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**96.4**		**3.6**			**0.0**

2015ACS Data and 2020 Dun & Bradstreet Information

Orrstown Bank Chambersburg, PA Assessment Area Assessment Area Demographics 2021								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	1	3.7	1,263	3.1	445	35.2	7,548	18.6
Moderate-income	4	14.8	3,433	8.5	634	18.5	8,085	19.9
Middle-income	20	74.1	32,238	79.4	2,216	6.9	9,060	22.3
Upper-income	2	7.4	3,664	9.0	214	5.8	15,905	39.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**27**	**100.0**	**40,598**	**100.0**	**3,509**	**8.6**	**40,598**	**100.0**

	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	2,210	608	1.4	27.5	1,334	60.4	268	12.1
Moderate-income	6,334	2,729	6.5	43.1	2,982	47.1	623	9.8
Middle-income	50,167	34,726	82.7	69.2	11,208	22.3	4,233	8.4
Upper-income	5,236	3,951	9.4	75.5	1,032	19.7	253	4.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**63,947**	**42,014**	**100.0**	**65.7**	**16,556**	**25.9**	**5,377**	**8.4**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	277	4.5	245	4.3	31	7.7	1	1.4
Moderate-income	509	8.2	466	8.1	34	8.5	9	12.9
Middle-income	4,948	79.7	4,577	79.8	312	77.8	59	84.3
Upper-income	471	7.6	446	7.8	24	6.0	1	1.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**6,205**	**100.0**	**5,734**	**100.0**	**401**	**100.0**	**70**	**100.0**
	Percentage of Total Businesses:		**92.4**		**6.5**		**1.1**	

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	4	1.0	4	1.1	0	0.0	0	0.0
Middle-income	365	94.6	352	94.4	13	100.0	0	0.0
Upper-income	17	4.4	17	4.6	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**386**	**100.0**	**373**	**100.0**	**13**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**96.6**		**3.4**		**0.0**	

2015ACS Data and 2021 Dun & Bradstreet Information

Orrstown Bank Chambersburg, PA Assessment Area Assessment Area Demographics 2022								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	7,034	16.4
Moderate-income	4	12.1	3,843	8.9	527	13.7	8,947	20.8
Middle-income	27	81.8	35,909	83.6	1,812	5.0	10,301	24.0
Upper-income	2	6.1	3,212	7.5	125	3.9	16,682	38.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**33**	**100.0**	**42,964**	**100.0**	**2,464**	**5.7**	**42,964**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	7,732	3,139	7.2	40.6	4,286	55.4	307	4.0
Middle-income	53,764	37,086	84.9	69.0	12,905	24.0	3,773	7.0
Upper-income	4,312	3,463	7.9	80.3	738	17.1	111	2.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**65,808**	**43,688**	**100.0**	**66.4**	**17,929**	**27.2**	**4,191**	**6.4**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	701	11.4	635	11.2	60	15.0	6	9.1
Middle-income	4,934	80.3	4,581	80.6	297	74.4	56	84.8
Upper-income	511	8.3	465	8.2	42	10.5	4	6.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**6,146**	**100.0**	**5,681**	**100.0**	**399**	**100.0**	**66**	**100.0**
	Percentage of Total Businesses:		**92.4**		**6.5**		**1.1**	
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	3	0.8	3	0.8	0	0.0	0	0.0
Middle-income	374	95.4	362	95.3	12	100.0	0	0.0
Upper-income	15	3.8	15	3.9	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**392**	**100.0**	**380**	**100.0**	**12**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**96.9**		**3.1**		**0.0**	

2020 Census Data and 2022 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance in this assessment area is consistent with the lending, investment, and service levels in the full-scope assessment areas in the Commonwealth of Pennsylvania.

LENDING TEST

The bank's lending in this assessment area is consistent with the bank's lending levels in the full-scope review assessment areas in the Commonwealth of Pennsylvania. Due to the number and dollar volume of loans, HMDA loans held more weight in determining this overall conclusion, followed by small business loans. In total during the evaluation period, Orrstown originated 1,234 HMDA loans totaling almost $178 million, and 1,130 small business loans totaling over $63 million.

Borrower and Geographic Distribution of Loans

Home-Mortgage Lending

In 2020, Orrstown originated 425 HMDA loans in the Chambersburg, PA assessment area, aggregating $58.5 million. The bank's HMDA lending to low-income borrowers (9%) was below the proxy of low-income families (19%), but above the aggregate lending level (7%). Lending to moderate-income borrowers (21%) exceeded both the proxy (20%), and aggregate lending (19%).. In 2020, the bank's geographic distribution of HMDA loans in low-income tracts (1%) was in-line with the proxy of owner-occupied housing in low-income tracts (1%), and slightly below the aggregate lending level of 2%. The bank's geographic distribution of HMDA loans in moderate-income tracts (1%) fell below both the proxy of 7%, and the aggregate lending level of 7%.

In 2021, Orrstown originated 481 HMDA loans in the Chambersburg, PA assessment area, aggregating $68.9 million. HMDA lending to low--income borrowers (11%) was below the proxy of low-income families (19%), but above the aggregate lending level (6%). The bank's lending to moderate-income borrowers (20%) matched proxy (20%), and exceeded aggregate lending (18%).. In 2021, the bank's geographic distribution of HMDA loans in low-income tracts (2%) was above the proxy of owner-occupied housing in such tracts (1%), but just below the aggregate lending level of 3%. The bank's geographic distribution of HMDA loans in moderate-income tracts (2%) fell below both the proxy of 7%, and the aggregate lending level of 8%.

Finally, in 2022, Orrstown originated 328 HMDA loans in the Chambersburg, PA assessment area, aggregating $50 million. HMDA lending to low-income borrowers (9%) was below the proxy of low-income families (16%), but above aggregate lending (8%). The bank's lending to moderate-income borrowers (25%) exceeded both proxy (21%), and aggregate lending (23%).. In 2022, the bank's geographic distribution of HMDA loans in low-income tracts was not evaluated, as no low-income census tracts existed. Geographic distribution of HMDA loans in moderate-income tracts (6%) was below both the owner-occupancy proxy of 7%, and the aggregate lending level of 10%.

Small Business Lending

In 2020, Orrstown originated 454 small business loans aggregating $28.5 million in the Chambersburg, PA assessment area. Of these loans, 20% were originated to small businesses, which was below the aggregate lending level of 36% to small businesses by all lenders in the assessment area, and below the proxy of 93%. As noted in the full-scope Pennsylvania assessment areas, the bank participated in PPP lending in both 2020 and 2021, which did not require banks to collect business revenue information, thus classifying many of the bank's small business loans as revenue not known (75% in 2020). It can be reasonably inferred that these loans with unknown revenues were PPP loans and were provided to small businesses. From a geographic perspective, in 2020, 3% of the bank's small business loans were originated in low-income census tracts. The bank's lending level was below both the aggregate lending level (4%), and the proxy of businesses located in low-income tracts (4%). Orrstown's lending in moderate-income geographies (2%) was below both the aggregate lending level in moderate-income geographies (7%), and the proxy (8%).

In 2021, Orrstown originated 604 small business loans aggregating almost $24 million in the Chambersburg, PA assessment area. Of these loans, 7% were originated to small businesses, which was below the aggregate lending level of 37% to small businesses by all lenders in the assessment area, and below the proxy of 92%. Due to the PPP's revenue collection requirements, Orrstown reported 91% of its small business loans as revenue not known, which also likely benefitted small businesses. From a geographic perspective, in 2021, 2% of the bank's small business loans were originated in low-income census tracts. The bank's lending level was below both the aggregate lending level (3%), and the proxy of businesses located in low-income geographies (5%). Orrstown's lending in moderate-income geographies (2%) was below both the aggregate lending level in moderate-income geographies (5%), and the proxy (8%).

In 2022, Orrstown originated 72 small business loans aggregating $10.9 million in the Chambersburg, PA assessment area. Of these loans, 78% were originated to small businesses, which was well above the aggregate lending level of 49% to small businesses by all lenders in the assessment area, but below the proxy of 92%. As noted earlier, geographic distribution analysis for loans in low-income tracts was not evaluated in 2022, as no low-income tracts existed as of the 2020 Census In 2022, 3% of the bank's small business loans were originated in moderate-income census tracts. The bank's lending level was significantly below both the aggregate lending level (9%), and the proxy of businesses located in moderate-income geographies (11%).

Innovative and/or Flexible Lending Practices and Community Development Lending

As discussed earlier, the bank meets the needs of low- and moderate-income individuals and families by offering several alternative mortgage products. In an effort to address the credit needs of such borrowers in the Chambersburg, PA assessment area, Orrstown originated 13 of its in-house mortgage program loans, totaling $2.2 million. Additionally, the bank originated 24 loans totaling just over $5 million through government programs. More specifically, the bank originated five FHA loans totaling $948 thousand; five USDA loans totaling $985 thousand; two VA loans totaling $383 thousand; five PHFA loans totaling $958 thousand; and seven Fannie Mae HomeStyle Renovation loans totaling nearly $1.9 million. Finally, closing cost assistance was provided to three borrowers through three different programs (FHLB of Pittsburgh's First Front Door program, the PHFA Keystone Advantage program, and the PHFA K-FIT program), totaling $23 thousand.

To address the credit needs of small businesses in its assessment area, Orrstown participates in the SBA 504 and SBA 7A loan programs. Orrstown made a total of four SBA loans totaling $4.9 million. Further, Orrstown also participated in the PPP, originating approximately 888 PPP loans totaling $32.6 million in the assessment area.

As indicated in the following table, Orrstown made five community development loans totaling over $15.6 million in this assessment area. Four loans totaling almost $14.7 million (94%) supported economic development by financing small businesses, and one loan totaling $982 thousand (6%) supported affordable housing. Of the bank's overall community development lending, 66% by dollar was within the Chambersburg, PA assessment area.

	Orrstown Bank Chambersburg, PA Assessment Area Community Development Lending									
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
2020	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	4	14,672	0	0	4	14,672
2022	1	982	0	0	0	0	0	0	1	982
TOTAL	1	982	0	0	4	14,672	0	0	5	15,654

INVESTMENT TEST

The bank's investment performance in the Chambersburg, PA assessment area is consistent with the bank's investment performance in the full-scope assessment areas in the Commonwealth of Pennsylvania. Qualified investments, grants, and donations for the Chambersburg, PA totaled over $1.4 million. This represents an increase from the $402 thousand in qualified investments in this assessment area at the previous evaluation. Of the bank's overall investments, 5% were within the Chambersburg, PA assessment area.

Of the total investments, mortgage-backed securities with qualified mortgages in the assessment area totaled $922 thousand (64%). This total is comprised of two investments providing home-mortgage loans to low- and moderate-income individuals and/or geographies within the Chambersburg, PA assessment area. The bank also contributed to a municipal bond to benefit the Chambersburg, PA school district totaling $490 thousand (34%), which promoted revitalization & stabilization efforts in the area. Finally, the bank made three donations benefitting organizations providing community services to low- and moderate-income individuals totaling $30 thousand (2%).

The following table presents investment and donation activity for the Chambersburg, PA assessment area.

	Orrstown Bank Chambersburg, PA Assessment Area Qualified Investments									
CD Category	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
Qualified Investments	2	923	0	0	0	0	1	490	3	1,413
Donations	0	0	3	30	0	0	0	0	3	30
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	**2**	**923**	**3**	**30**	**0**	**0**	**1**	**490**	**6**	**1,443**

SERVICE TEST

The bank's service test performance in the Chambersburg, PA assessment area is consistent with the bank's service test performance in the full-scope assessment areas in the Commonwealth of Pennsylvania.

Orrstown operates five branches in the Chambersburg, PA assessment area (24% of total branches) as well as two stand-alone ATMs. According to 2015 ACS data, all five branches were located in middle-income census tracts. According to 2020 Census data, one branch was located in a moderate-income tract (20%),[11] and four were located in middle-income tracts (80%). During the evaluation period, the bank closed three branches, two of which were located in middle-income tracts at the time of closure, and one that was located in an upper-income tract at the time of closure. Retail banking services offered through the bank's five assessment area branches were generally in-line with those offered in the full-scope Pennsylvania assessment areas, including branch house, ATMs, drive-up services, and products offered

In addition to retail services, the bank conducted community development services, with bank officers participating as board members for organizations supporting economic and revitalization & stabilization efforts in the community.

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[11] 2020 Census changes updated the bank's 1355 Orchard Drive, Chambersburg, PA branch location from a middle-income to a moderate-income tract.

STATE OF MARYLAND

STATE RATING

Performance Test	Performance Level
Lending	Low Satisfactory
Investment	High Satisfactory
Service	Needs to Improve
Overall	Satisfactory

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to the rating include the following:

- The distribution of borrowers, given the product lines offered by the bank, reflects adequate penetration among retail customers, and good distribution among businesses of different sizes;
- The geographic distribution of loans reflects adequate penetration throughout the State of Maryland assessment areas;
- The bank makes use of innovative and/or flexible lending practices;
- The bank did not make any community development loans in the State of Maryland;
- The bank made a good volume of qualified community development investments and grants in the state;
- The bank exhibits a good level of responsiveness to credit and community development needs; and
- The bank provides a limited level of community development services.

SCOPE OF EXAMINATION

Orrstown's CRA performance in the State of Maryland was evaluated for the period of January 26, 2021 through January 22, 2024. The lending, investment, and services tests were applied in assessing the bank's performance under the CRA. Under the lending test, loan products evaluated included HMDA loans, small business loans, and other loans that qualified as community development loans.

Examiners completed a full-scope review of the Baltimore, MD assessment area, as the majority of the bank's operations in Maryland are within this assessment area, including branches, as well as deposits and lending production. A limited-scope review of the Hagerstown, MD assessment area was conducted, as the assessment area contained the smallest portion of the bank's branch, deposit and lending activity, both in Maryland and in the bank's footprint overall.

As explained previously, for purposes of assessing Orrstown's overall CRA performance, less weight was given to the performance in Maryland than to the bank's Pennsylvania assessment areas.

DESCRIPTION OF INSTITUTION'S OPERATIONS

In Maryland, the greatest weight was given to the performance in the Baltimore, MD assessment area. Of the bank's 21 total branches, four (19%) were located in the Baltimore, MD assessment area. Of the bank's total loans, 16% by number, and 20% by dollar volume were originated in the Baltimore, MD assessment area. According to the FDIC's Deposit Market Share Report as of June 30, 2023, just under 17% of the bank's total deposits were located in the Baltimore, MD assessment area.

Performance in the Hagerstown, MD assessment area received the second highest weight in Maryland, and the least weight overall. Of the bank's 21 branches, one (5%) was located in the Hagerstown, MD assessment area. Of the bank's total loans, under 3% by number, and 2% by dollar volume were originated in the Hagerstown, MD assessment area. According to the FDIC Market Share Report as of June 30, 2023, 2% of the bank's total deposits were located in the Hagerstown, MD assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overall, the lending test was determined to be low satisfactory in the State of Maryland. Primary drivers of the overall lending test rating were borrower and geographic distribution of HMDA and small business loans, and the use of innovative and/or flexible lending products in meeting credit needs. It is noted that borrower distribution was weighed more heavily than geographic distribution, given the demographics of the Maryland assessment areas. More detail on lending test components is provided in the discussions of each Maryland assessment area.

INVESTMENT TEST

Overall, the investment test was determined to be high satisfactory in the State of Maryland. The investment test rating was driven by the amount of qualified investments, with additional consideration given to the responsiveness, innovativeness, and complexity of such investments. More detail on the investment test components is provided in the discussions of each Maryland assessment area.

SERVICE TEST

Overall, the service test was determined to be needs to improve in the State of Maryland. The service test was influenced by retail service aspects, particularly the bank's accessibility of delivery systems, and the reasonableness of hours and services in serving assessment are needs. More detail on the service test components is provided in the discussions of each Maryland assessment area.

BALTIMORE, MD ASSESSMENT AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of Assessment Area

Orrstown's Baltimore, MD assessment area is coterminous with the Baltimore-Columbia-Towson, MD MSA, and is part of the larger Washington-Baltimore-Arlington, DC-MD-VA-WV-PA Combined Statistical Area (CSA). The assessment area consists of Anne Arundel, Baltimore, Baltimore City, Carroll, Harford, Howard, Queen Anne's Counties in Maryland. The assessment area is situated in Central Maryland, and as of the 2020 Census, had a population of 2,844,510.

For purposes of assessing Orrstown's CRA performance in the State of Maryland, the greatest weight was given to the Baltimore, MD assessment area. The assessment area was given the fourth highest weight in determining the institution's overall rating. Of the bank's total loans, 16% by number, and 20% by dollar volume were originated in the Baltimore, MD assessment area. The bank also operated four branches in the assessment area (19%), which held $420 million in deposits, or just under17% of the bank's total deposits as of June 30, 2023.

Orrstown's CRA performance in this assessment area is evaluated in terms of the demographic and business context in which the bank operates.

According to 2015 ACS data, the Baltimore, MD assessment area contained 683 census tracts. Of those tracts, 89 (13%) were designated as low-income, 154 (23%) as moderate-income, 228 (33%) as middle-income, 196 (29%) as upper-income, and 16 (2%) were designated as unknown-income tracts. The low- and moderate-income tracts were mainly concentrated in the city of Baltimore. The tracts of unknown-income contained various facilities such as prisons, military bases, airports, and universities.

According to 2020 Census data, the Baltimore, MD assessment area contained 717 census tracts. Of those tracts, 80 (11%) were designated as low-income, 161 (23%) as moderate-income, 247 (37%) as middle-income, 209 (29%) as upper-income, and 20 (3%) designated as unknown-income tracts. Once again, the low- and moderate-income were mainly concentrated in the city of Baltimore.

Maps of the assessment area at the time of the 2015 ACS and 2020 Census are available in Appendix F.

According to the FDIC's Deposit Market Share report as of June 30, 2023, there were 41 depository institutions operating in the Baltimore, MD assessment area. These institutions maintained a total of 549 branches, holding nearly $96.5 billion in deposits. Orrstown, with four branches in the assessment area at the time of the most recently available FDIC report, ranked nineteenth with $420 million, or less than 1% of the deposit market. Bank of America, N.A. ranked first with 65 branches holding $28 billion (29%) of the deposit market, followed by Manufacturers and Traders Trust Company with 95 branches holding $17.9 billion (19%) of the deposit market. Truist Bank ranked third, with 60 branches holding $10 billion (10%) of total deposits within the market.

Orrstown reports home-mortgage loans pursuant to HMDA and was compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. The data is reported annually. In 2020, a total of 679 institutions reported 177,685 HMDA loan originations and purchases within the assessment area. Orrstown tied for one hundred and fifty-second in the HMDA market with less than 1% of total originations and purchases. Quicken Loans, LLC ranked first in the HMDA market with over 6% of total HMDA originations and purchases, followed by Wells Fargo Bank, N.A. with less than 6% of the HMDA market, and Freedom Mortgage Corporation with 4% market share.

The 2021 aggregate HMDA data showed a 3% increase in overall HMDA lending compared to 2020, with 695 lenders originating and purchasing 182,661 home-mortgage loans in the assessment area. Orrstown ranked one hundred and twenty-seventh with less than 1% of the market. Rocket Mortgage led the market with 7% of HMDA originations or purchases, followed by Truist Bank with 4% of the market share, and Penny Mac Loan Services, LLC with 4% of the market share.

Finally, the 2022 aggregate HMDA data showed a significant 51% decrease in overall HMDA lending compared to 2021, with 660 lenders originating and purchasing 90,323 home-mortgage loans in the assessment area. Orrstown tied for one hundred and twelfth with less than 1% of the market. Truist Bank ranked first with 5% of the market, followed by Rocket Mortgage, LLC with almost 5% of the market, and Penny Mac Loan Services, LLC with just under 4% of the market share.

Similarly, the institution reports its small business loans pursuant to the CRA and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually. According to 2020 small business and small farm data, there were 234 CRA reporters in the assessment area, originating and purchasing a total of 73,309 small business and small farm loans. Orrstown ranked nineteenth with less than 1% of the market. Bank of America, N.A. led the market with 15% of all small business and small farm loan originations and purchases, followed by American Express, N.B. with 13% of the market, and Manufacturers and Traders Trust Company with nearly 10% of the market.

In 2021, there were 227 small business and small farm reporters originating and purchasing 82,338 CRA loans. Orrstown ranked twentieth with less than 1% of the market share. American Express, N.B. ranked first with 18% of the market, followed by Bank of America, N.A. with 14% of the market, and JP Morgan Chase Bank, N.A. with nearly 10% of the CRA market.

Finally, in 2022, there were 184 small business and small farm reporters originating and purchasing 76,001 CRA loans. Orrstown fell to the fifty-fourth position with less than 1% of the market share. American Express, N.B. ranked first with 25% of the market, followed by JP Morgan Chase Bank, N.A. with 16% of the market, and Bank of America, N.A. with 13% of the market share.

CRA data reporting includes PPP loans originated through the CARES Act, which accounts for the 8% drop in community bank lending from 2021 to 2022. Since CRA data reporting also includes small business loans issued under corporate credit card arrangements, some of the top reporters in the assessment area in 2020, 2021, and 2022 were national credit card originators. For example, national banks were the top 10 CRA reporters in 2022, collectively holding 81% of the total small business and small farm loan originations and purchases in the assessment area.

To supplement economic, demographic, and performance data, interviews were conducted with two local community organizations, which provided perspective on the credit and community development needs of the Baltimore, MD assessment area. One interview was held with an organization that builds and renovates affordable housing in the Baltimore region, and another was held with an organization focusing on economic development through support of local businesses in the assessment area.

The community contacts identified affordable housing for low- and moderate-income families, and economic development through support of small businesses and start-ups as needs within the assessment area. Additionally, contacts noted that financial literacy and workforce development training were sorely needed, and that first-time homebuyer credit products would help make housing loans more accessible to borrowers in the assessment area.

Economic Characteristics

As indicated previously, Orrstown's Baltimore, MD assessment area consists of Anne Arundel, Baltimore, Baltimore City, Carroll, Harford, Howard, Queen Anne's Counties in Maryland. The assessment area is anchored by the cities of Baltimore, Columbia, and Towson.

According to Moody's Analytics January 2024 Precis Report for the entire Baltimore-Columbia-Towson, MD MSA, the local economy is in recovery mode, fueled by healthcare employment and professional/business services job growth, both of which have attracted people back into the labor force after the job losses in 2022. However, the rise of remote work has enabled high-wage earners to relocate outside of the area, and supply chain issues have persisted longer than expected, weighing on the area's gains.

Strengths of the assessment area include its status as a hub for the growing cybersecurity sector due to the presence of the National Security Agency (NSA), the presence of established and well-funded medical research centers, and strong transportation and distribution industries. However, the area suffers from below-average population growth, and despite its proximity to Washington DC, few public transportation links are available.

Education and health services represents the largest employment sector in the assessment area, making up 19% of total employment in the assessment area. The second largest employment sector was professional and business services (18%), followed by government (16%). Top employers in the region include Fort George G. Meade, John Hopkins University, John Hopkins Health System, University of Maryland Medical System, and Aberdeen Proving Ground.

Data related to Baltimore City are included for additional performance context, given that its demographic make-up is considerably different from the other, more rural and less densely populated counties in the assessment area. Baltimore City is home to the largest population of low- and moderate-income families in the assessment area, with almost 64% of families reporting such incomes using 2015 ACS data, and 60% of families using 2020 Census data. Baltimore City also contains the most low- and moderate-income census tracts in the assessment area. According to 2015 ACS data, 69 (35%) of tracts were designated as low-income and 62 tracts (31%) as moderate-income. According to 2020 Census data, 83 tracts (42%) were designated as low-income, and 65 (33%) as moderate-income.

Seasonally unadjusted unemployment rates for the assessment area, according to the U.S. Department of Labor, Bureau of Labor Statistics, are presented in the following table. The COVID-19 pandemic significantly impacted the assessment area's unemployment rates in 2020. However, all counties in the assessment area except for Baltimore City maintained unemployment rates well under the national average in all three years evaluated. Of the counties in the assessment area, Baltimore City consistently held the highest unemployment rates for all years, while Carroll County reported the lowest unemployment rates.

Orrstown Bank Baltimore, MD Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)			
Location	% 2020	% 2021	% 2022
Anne Arundel County	5.6	4.4	2.8
Baltimore County	6.6	5.2	3.3
Baltimore City County	8.5	7.0	4.3
Carroll County	4.9	3.9	2.7
Harford County	5.5	4.4	3.0
Howard County	4.9	4.0	2.6
Queen Anne's County	5.2	4.0	2.8
Baltimore-Columbia-Towson, MD MSA	6.3	5.0	3.2
State of Maryland	6.5	5.3	3.2
United States	8.1	5.3	3.6

Housing

2015 ACS Data

According to 2015 ACS data, the Baltimore, MD assessment area contained 1,145,512 housing units, 60% of which were owner-occupied, 30% of which were rental units, and 10% of which were vacant units. The overall owner-occupancy rate in the assessment area (60%) matched the level in the State of Maryland (60%). It is notable that the owner-occupancy rate in Baltimore City was just under 39%, with 43% of units designated as rentals, and 18% as vacant.

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such census tracts. According to 2015 ACS data, 5% of owner-occupied units were located in low-income tracts, 17% were in moderate-income tracts, 38% were in middle-income tracts, and 40% were in upper-income tracts. In Baltimore City, 28% of owner-occupied units were in low-income tracts, 39% in moderate-income tracts, 20% in middle-income tracts, and 13% in upper-income tracts.

Of the total existing housing units in the assessment area, 74% were single-family units, 5% were two-to-four family units, 20% were multifamily units consisting of five or more units, and 1% of units were mobile homes. The median age of housing stock was 49 years, making it older than the median age of housing stock in the State of Maryland (39 years). The median age of housing stock in Baltimore City was 72 years, with 58% of units built prior to 1950.

Data show that the cost of housing in the assessment area was slightly lower than in the State of Maryland. According to 2015 ACS data, the median housing value in the Baltimore, MD assessment area was $277,463, which was slightly lower than the median value in the State of Maryland ($286,900), and well above the median value in Baltimore City ($152,400). Further, the data show a disparity between the median housing value in the assessment area's low- and moderate-income census tracts, compared to those in middle- and upper-income census tracts. The median housing value was $99,461 in low-income tracts, $168,394 in moderate-income tracts, $254,254 in middle-income tracts, and $395,830 in upper-income tracts. Additionally, in the assessment area, just under 9% of the total owner-occupied housing units were valued at less than $100 thousand, which was just above the same measure in the State of Maryland, where 8% of owner-occupied housing units were valued at less than $100 thousand. In Baltimore City, almost 27% of owner-occupied housing units were valued at less than $100 thousand.

Finally, median gross rent (rent plus utilities) was slightly lower in the assessment area than in Maryland. Specifically, median gross rent in the Baltimore, MD assessment area was $1,152 compared to that of Maryland ($1,230). The lowest median gross rent within the assessment area was in Baltimore City ($951). Within the assessment area, almost 49% of renters spent more than 30% of their income on rent, which is on-par with the level in the State of Maryland (49%). In Baltimore City, 52% of renters suffered such rent burden.

<u>2020 Census Data</u>

According to 2020 Census data, the Baltimore, MD assessment area contained 1,164,762 housing units, 61% of which were owner-occupied, 30% of which were rental units, and 9% of which were vacant units. The overall owner-occupancy rate in the assessment area (61%) was at the same level as the State of Maryland (61%). The owner-occupancy rate in Baltimore City was 39%, with 43% of units designated as rentals, and 18% as vacant.

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such census tracts. According to 2020 Census data, 4% of owner-occupied units were located in low-income tracts, 18% were in moderate-income tracts, 40% were in middle-income tracts, and 38% were in upper-income tracts. In Baltimore City, 22% of owner-occupied units were in low-income tracts, 40% in moderate-income tracts, 20% in middle-income tracts, and 18% in upper-income tracts.

Of the total existing housing units in the assessment area, 74% were single-family units, 5% were two-to-four family units, 20% were multifamily units consisting of five or more units, and 1% of units were mobile homes. The median age of housing stock was 53 years, making it older than the median age of housing stock in the State of Maryland (43 years). The median age of housing stock in Baltimore City was 75 years, with 56% of units built prior to 1950.

Again, data show that the cost of housing in the assessment area was slightly lower than in the State of Maryland. According to 2020 Census data, the median housing value in the Baltimore, MD assessment area was $307,181, which was lower than the median value in the State of Maryland ($325,400) and well above the median value in Baltimore City ($167,300).

Further, the data show a disparity between the median housing value in the assessment area's low- and moderate-income census tracts, compared to those in middle- and upper-income census tracts. The median housing value was $95,794 in low-income tracts, $180,953 in moderate-income tracts. These values were considerably lower than those in middle- and upper-income census tracts ($282,901 and $443,823, respectively). Additionally, in the assessment area, 7% of the total owner-occupied housing units were valued at less than $100 thousand, compared to the State of Maryland, where 6% of owner-occupied housing units were valued at less than $100 thousand. In Baltimore City, 23% of owner-occupied housing units were valued at less than $100 thousand.

Finally, median gross rent (rent plus utilities) was slightly lower in the assessment area than in Maryland. Specifically, median gross rent in the Baltimore, MD assessment area was $1,324 compared to that of Maryland ($1,415). The lowest median gross rent within the assessment area was in Baltimore City ($1,094). Within the assessment area, 46% of renters spent more than 30% of their income on rent, which is slightly below the level in the State of Maryland (47%). In Baltimore City, 47% of renters suffered such rent burden.

Borrower Income Data

2015 ACS Data

The percentage of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. The 2015 ACS shows that there were 675,620 families in the assessment area. Of the total families in the assessment area, 22% were designated as low-income, 17% were designated as moderate-income, 20% were middle-income, and 41% were upper-income. Of all families in the assessment area, just under 8% were living below the poverty level, slightly higher the rate of 7% for the State of Maryland. In Baltimore City, 44% of families were designated as low-income and 20% as moderate-income, with 19% of families living below the poverty level.

2020 Census Data

The 2020 Census shows that there 684,359 were families in the assessment area. Of the total families in the assessment area, 22% were designated as low-income, 17% were designated as moderate-income, 21% were middle-income, and 40% were upper-income. Of all families in the assessment area, 6% were living below the poverty level, which was in-line with the rate of 6% for the State of Maryland. In Baltimore City, 41% of families were designated as low-income and 20% as moderate-income, with 15% of families living below the poverty level.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon the HUD annually-adjusted median family income data made available by the FFIEC. Median family incomes for the bank's assessment area are listed in the following table for each of the years covered by the evaluation and are categorized by the dollar amounts recognized as low-, moderate-, middle-, and upper-income.

Year	HUD-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
2020	$104,000	Less than $52,000	$52,000 - $83,199	$83,200 – $124,799	$124,800 or more
2021	$105,100	Less than $52,550	$52,550 - $84,079	$84,080 - $126,119	$126,120 or more
2022	$116,100	Less than $58,050	$58,050 - 92,879	$92,880 - $139,319	$139,320 or more

Geographic Business Data

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for business credit within such census tracts. Dun & Bradstreet reports business demographics annually. According to Dun & Bradstreet data, in 2020, there were 130,531 businesses in the Baltimore, MD assessment area. Of these businesses, 5% of businesses were located in low-income tracts, and almost 16% were located in moderate-income tracts. The majority of businesses were located in middle-income tracts, and upper-income tracts (38% and 41%, respectively). Business demographic data also revealed that of the businesses located in the assessment area, 91% were small businesses with gross annual revenues of $1 million or less.

In 2021, there were 128,493 businesses in the assessment area. Of these businesses, 5% were located in low-income tracts, 16% were located in moderate-income tracts, 38% in middle-income tracts, and 41% in upper-income tracts. Of the 128,493 businesses in the assessment area, 91% were small businesses with gross annual revenues of $1 million or less.

Finally, in 2022, there were 129,197 businesses in the assessment area. Of these businesses, 5% were located in low-income tracts, 17% were located in moderate-income tracts, 38% in middle-income tracts, and over 39% in upper-income tracts. Of the 129,197 businesses in the assessment area, 91% were small businesses with gross annual revenues of $1 million or less.

Assessment area demographics used in evaluating Orrstown's performance in the Baltimore, MD assessment area in 2020, 2021, and 2022 are detailed in the tables on the following pages.

Orrstown Bank Baltimore, MD Assessment Area Assessment Area Demographics 2020							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	89	13.0	51,583	7.6	14,975	29.0	150,619	22.3
Moderate-income	154	22.5	139,009	20.6	16,748	12.0	115,141	17.0
Middle-income	228	33.4	244,704	36.2	13,122	5.4	133,931	19.8
Upper-income	196	28.7	239,449	35.4	6,138	2.6	275,929	40.8
Unknown-income	16	2.3	875	0.1	413	47.2	0	0.0
Total Assessment Area	**683**	**100.0**	**675,620**	**100.0**	**51,396**	**7.6**	**675,620**	**100.0**

	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	122,695	33,878	4.9	27.6	58,061	47.3	30,756	25.1
Moderate-income	262,370	118,674	17.3	45.2	114,565	43.7	29,131	11.1
Middle-income	406,639	262,778	38.2	64.6	114,662	28.2	29,199	7.2
Upper-income	350,736	271,844	39.5	77.5	59,665	17.0	19,227	5.5
Unknown-income	3,072	381	0.1	12.4	1,804	58.7	887	28.9
Total Assessment Area	**1,145,512**	**687,555**	**100.0**	**60.0**	**348,757**	**30.4**	**109,200**	**9.5**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	6,424	4.9	5,817	4.9	563	5.4	44	4.7
Moderate-income	20,149	15.4	18,584	15.6	1,442	13.9	123	13.1
Middle-income	49,675	38.1	45,084	37.8	4,230	40.8	361	38.5
Upper-income	53,403	40.9	49,002	41.1	3,993	38.5	408	43.5
Unknown-income	880	0.7	743	0.6	135	1.3	2	0.2
Total Assessment Area	**130,531**	**100.0**	**119,230**	**100.0**	**10,363**	**100.0**	**938**	**100.0**
	Percentage of Total Businesses:		**91.3**		**7.9**		**0.7**	

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	16	1.2	16	1.2	0	0.0	0	0.0
Moderate-income	89	6.7	86	6.7	2	6.1	1	33.3
Middle-income	547	41.4	533	41.5	14	42.4	0	0.0
Upper-income	668	50.6	649	50.5	17	51.5	2	66.7
Unknown-income	1	0.1	1	0.1	0	0.0	0	0.0
Total Assessment Area	**1,321**	**100.0**	**1,285**	**100.0**	**33**	**100.0**	**3**	**100.0**
	Percentage of Total Farms:		**97.3**		**2.5**		**0.2**	

2015 ACS Data and 2020 Dun & Bradstreet Information

	Orrstown Bank Baltimore, MD Assessment Area Assessment Area Demographics 2021							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	89	13.0	51,583	7.6	14,975	29.0	150,619	22.3
Moderate-income	154	22.5	139,009	20.6	16,748	12.0	115,141	17.0
Middle-income	228	33.4	244,704	36.2	13,122	5.4	133,931	19.8
Upper-income	196	28.7	239,449	35.4	6,138	2.6	275,929	40.8
Unknown-income	16	2.3	875	0.1	413	47.2	0	0.0
Total Assessment Area	**683**	**100.0**	**675,620**	**100.0**	**51,396**	**7.6**	**675,620**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	122,695	33,878	4.9	27.6	58,061	47.3	30,756	25.1
Moderate-income	262,370	118,674	17.3	45.2	114,565	43.7	29,131	11.1
Middle-income	406,639	262,778	38.2	64.6	114,662	28.2	29,199	7.2
Upper-income	350,736	271,844	39.5	77.5	59,665	17.0	19,227	5.5
Unknown-income	3,072	381	0.1	12.4	1,804	58.7	887	28.9
Total Assessment Area	**1,145,512**	**687,555**	**100.0**	**60.0**	**348,757**	**30.4**	**109,200**	**9.5**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	6,457	5.0	5,868	5.0	543	5.4	46	4.8
Moderate-income	20,147	15.7	18,630	15.9	1,395	13.9	122	12.7
Middle-income	48,909	38.1	44,405	37.8	4,120	41.0	384	40.1
Upper-income	52,151	40.6	47,878	40.8	3,871	38.5	402	42.0
Unknown-income	829	0.6	699	0.6	127	1.3	3	0.3
Total Assessment Area	**128,493**	**100.0**	**117,480**	**100.0**	**10,056**	**100.0**	**957**	**100.0**
	Percentage of Total Businesses:		**91.4**		**7.8**			**0.7**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	15	1.2	15	1.2	0	0.0	0	0.0
Moderate-income	77	6.2	74	6.1	2	5.9	1	33.3
Middle-income	522	42.0	506	42.0	16	47.1	0	0.0
Upper-income	628	50.5	610	50.6	16	47.1	2	66.7
Unknown-income	1	0.1	1	0.1	0	0.0	0	0.0
Total Assessment Area	**1,243**	**100.0**	**1,206**	**100.0**	**34**	**100.0**	**3**	**100.0**
	Percentage of Total Farms:		**97.0**		**2.7**			**0.2**

2015 ACS Data and 2021 Dun & Bradstreet Information

Orrstown Bank Baltimore, MD Assessment Area Assessment Area Demographics 2022							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	80	11.2	44,679	6.5	11,725	26.2	148,750	21.7
Moderate-income	161	22.5	138,775	20.3	13,946	10.0	116,042	17.0
Middle-income	247	34.4	257,861	37.7	11,710	4.5	144,676	21.1
Upper-income	209	29.1	239,672	35.0	4,970	2.1	274,891	40.2
Unknown-income	20	2.8	3,372	0.5	1,278	37.9	0	0.0
Total Assessment Area	**717**	**100.0**	**684,359**	**100.0**	**43,629**	**6.4**	**684,359**	**100.0**

	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	108,173	29,551	4.2	27.3	52,637	48.7	25,985	24.0
Moderate-income	265,062	125,274	17.7	47.3	111,970	42.2	27,818	10.5
Middle-income	427,377	280,971	39.7	65.7	119,262	27.9	27,144	6.4
Upper-income	354,236	269,767	38.1	76.2	65,485	18.5	18,984	5.4
Unknown-income	9,914	2,299	0.3	23.2	5,564	56.1	2,051	20.7
Total Assessment Area	**1,164,762**	**707,862**	**100.0**	**60.8**	**354,918**	**30.5**	**101,982**	**8.8**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	5,827	4.5	5,322	4.5	464	4.6	41	3.8
Moderate-income	22,091	17.1	20,369	17.2	1,548	15.4	174	16.2
Middle-income	49,371	38.2	44,701	37.9	4,304	42.9	366	34.0
Upper-income	50,787	39.3	46,726	39.6	3,581	35.7	480	44.6
Unknown-income	1,121	0.9	973	0.8	132	1.3	16	1.5
Total Assessment Area	**129,197**	**100.0**	**118,091**	**100.0**	**10,029**	**100.0**	**1,077**	**100.0**
	Percentage of Total Businesses:		**91.4**		**7.8**		**0.8**	

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	15	1.2	15	1.3	0	0.0	0	0.0
Moderate-income	115	9.5	109	9.3	5	15.2	1	33.3
Middle-income	514	42.4	499	42.4	15	45.5	0	0.0
Upper-income	565	46.6	550	46.8	13	39.4	2	66.7
Unknown-income	3	0.2	3	0.3	0	0.0	0	0.0
Total Assessment Area	**1,212**	**100.0**	**1,176**	**100.0**	**33**	**100.0**	**3**	**100.0**
	Percentage of Total Farms:		**97.0**		**2.7**		**0.2**	

2020 Census Data and 2022 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers, and businesses of all sizes, including small businesses;
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Lending Activity

Orrstown's lending levels in the Baltimore, MD assessment area reflect adequate responsiveness to the assessment area's credit needs. During the evaluation period, lending activity in the Baltimore, MD assessment area represented 16% of the bank's overall lending by number of loans, and 20% by dollar volume. During the evaluation, Orrstown made 422 HMDA loans totaling $132 million, and 1,182 small business loans totaling $129 million in the Baltimore, MD assessment area.[12] Of the bank's total small business lending during the evaluation period, 80 loans in the amount of $17 million were made to businesses with reported revenues of $1 million or less.

Borrower Distribution of Lending

Given the assessment area's demographics and economic characteristics, the borrower distribution of lending reflects, given the product lines offered, good penetration among individuals of different income levels, including low- and moderate-income individuals, and businesses of different sizes, including small businesses.

It is noted that the borrower distribution is given more weight than geographic distribution in this assessment area in driving lending performance. Further, due to loan volumes by number of loans, small business loans are given the most weight in determining the bank's overall borrower distribution of loans, followed by HMDA loans.

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[12] A large portion of the bank's small business loans consisted of loans made under the PPP, which did not require reporting the business revenue size.

Small Business Lending

The bank's distribution of loans to businesses reflects good penetration among business customers of different sizes, including small businesses. For purpose of this evaluation, a small business loan is defined as a commercial loan with an origination amount of $1 million or less. Small business loans are further quantified to identify those loans to businesses with gross annual revenues of $1 million or less, namely small businesses.

The number of businesses operating in the bank's assessment area is used as a proxy to estimate demand for business credit in that assessment area. According to Dun & Bradstreet business demographic data, in 2020 there were 130,531 businesses in the assessment area, with 119,230 (91%) designated as small businesses. In 2021, there were 128,493 businesses in the assessment area, 117,480 (91%) of which were small businesses. Finally, in 2022, there were 129,197 businesses in the assessment area, 118,091 (91%) of which were small businesses.

2015 ACS Data

In 2020, the bank's borrower distribution of small business loans was good, considering performance context factors. In 2020, Orrstown originated 599 small business loans within the assessment area, aggregating $60 million. Of these loans, 8% (50 loans) were originated to small businesses. Notably, 85% of the bank's small business loan originations (507 loans) were to businesses with unknown revenues. This is attributable to the bank's participation in the SBA's PPP. Under this program, institutions were not required to collect revenue information. The COVID-19 pandemic was an unprecedented global event that impacted businesses of all sizes, most notably smaller businesses that typically do not have an excess of capital to weather long periods of closure and slashed revenues. Orrstown's participation in this program is considered in the evaluation of its borrower distribution of lending.

When only considering the bank's loans where revenues were reported as $1 million or less, performance was below the aggregate lending level of 43% to small businesses, and the proxy of 91%. However, when considering the bank's PPP lending, which is reasonably inferred to be supportive of small businesses in need for capital, the bank's performance is considered to be good.

Small business loans were further analyzed to determine the extent of loans originated in an amount of $100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus added weight is given to such loans in determining whether an institution is meeting the credit needs of small businesses. In 2020, 76% of Orrstown's small business loans were extended in amounts of $100 thousand or less. Aggregate data indicates that 87% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

In 2021, the bank's borrower distribution of small business loans was good, considering performance context. In 2021, Orrstown originated 547 small business loans within the assessment area, aggregating over $56 million. Of these loans, 4% were originated to small businesses (21 loans). As noted above, Orrstown's participation in the PPP significantly impacted the bank's small business loan data. More specifically, 92% of the bank's small business loan originations (504 loans) were to businesses with unknown revenues, and it is reasonably inferred that these originations were to benefit small businesses impacted by the COVID-19 pandemic.

When only considering the bank's loans where revenues were reported as $1 million or less, performance was below the aggregate lending level of 46% to small businesses, and the proxy of 91%. When considering the bank's PPP lending, the bank's performance was good.

In 2021, 76% of Orrstown's small business loans were extended in amounts of $100 thousand or less (414 loans). Aggregate data indicates that 92% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

2020 Census Data

In 2022, the bank's borrower distribution of small business loans was adequate. In 2022, Orrstown originated 36 small business loans within the assessment area, aggregating almost $13 million. Of these loans, 25% were originated to small businesses (nine loans). The bank's lending to small businesses fell below the aggregate lending level of 52% to small businesses and below the proxy of 91% small businesses in the assessment area.

In 2022, 22% of Orrstown's small business loans were extended in amounts of $100 thousand or less (8 loans). Aggregate data indicates that 95% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

Home-Mortgage Lending

Orrstown's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers, is adequate.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families in an assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to the 2015 ACS data, 22% of assessment area families were low-income, 17% were moderate-income, 20% were middle-income, and 41% were upper-income. Thirty-nine percent of families, using 2015 ACS Census data, were designated as low- or moderate-income families. This indicates a notable need for home-mortgage credit among this segment of the population.

According to the 2020 Census data, 22% of assessment area families were low-income, 17% were moderate-income, 21% were middle-income, and 40% were upper-income. Thirty-nine percent of families, using 2020 Census data, were designated as low- or moderate-income families.

The following tables compare Orrstown's home-mortgage lending to aggregate lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The table used to evaluate lending in 2020 and 2021 relies on 2015 ACS data to estimate demand for home-mortgage credit among low- and moderate-income families, along with updated HMDA data, following the requirements of Regulation C. The table used to evaluate 2022 lending relies on 2020 Census data to estimate demand for home-mortgage credit among low- and moderate-income families.

Orrstown Bank Baltimore, MD Assessment Area Distribution of HMDA Loans by Borrower Income Level					
		Aggregate Comparison			
	%	2020		2021	
Income Level	Families by Family Income (2015 ACS Data)	% Orrstown Lending	% Aggregate Lending	% Orrstown Lending	% Aggregate Lending
Low	22.3	4.4	6.5	7.6	7.6
Moderate	17.0	16.9	17.4	22.4	18.5
Middle	19.8	20.6	19.0	18.8	19.3
Upper	40.8	55.1	32.7	48.2	30.7
Unknown	0.0	2.9	24.3	2.9	23.9
Total	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**

Orrstown Bank Baltimore, MD Assessment Area Distribution of HMDA Loans by Borrower Income Level			
		Aggregate Comparison	
	%	2022	
Income Level	Families by Family Income (2020 Census Data)	% Orrstown Lending	% Aggregate Lending
Low	21.7	6.0	10.3
Moderate	17.0	16.4	20.8
Middle	21.1	21.6	21.0
Upper	40.2	53.4	29.1
Unknown	0.0	2.6	18.8
Total	**100.0**	**100.0**	**100.0**

Lending to Low-Income Borrowers

For the period under review, Orrstown's lending to low-income borrowers was poor.

2015 ACS Data

In assessing the level of the bank's lending among low-income borrowers, the evaluation takes into consideration median family incomes and housing costs, and the challenges faced by low-income borrowers in saving for a down payment and closing costs, which can present a significant obstacle to homeownership, thereby limiting lending opportunities.

Orrstown's lending in 2020 to low-income borrowers was poor. In total, 4% of the bank's HMDA loans (six loans) were originated to low-income borrowers, falling below both the aggregate lending level of 7%, and the proxy of 22%. By loan category, Orrstown originated 16% of its home purchase loans, 2% of refinance loans, no home improvement loans, no multifamily loans, 13% of its other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 10% of home purchase loans, 5% of refinance loans, 7% of home improvement loans, no multifamily loans, 7% of other purpose lines of credit, 9% of other purpose closed/exempt loans, and 3% of loans with purpose "not applicable" to low-income borrowers in 2020.

Orrstown's lending in 2021 to low-income borrowers was good. In total, 8% of the bank's HMDA loans (13 loans) were originated to low-income borrowers, which was in-line with the aggregate lending level of 8%, but below the proxy of 22%. By loan category, Orrstown originated 10% of its home purchase loans, 9% of refinance loans, no home improvement loans, no multifamily loans, 8% of its other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 10% of its home purchase loans, 6% of its refinance loans, 6% of home improvement loans, no multifamily loans, 8% of other purpose lines of credit, 9% of other purpose closed/exempt loans, and 3% of loans with purpose "not applicable" to low-income borrowers in 2021.

2020 Census Data

Orrstown's lending in 2022 to low-income borrowers was poor. In total, 6% of the bank's HMDA loans (seven loans) were originated to low-income borrowers, falling below both the aggregate lending level of 10%, and the proxy of 22%. By loan category, Orrstown originated 3% of its home purchase loans, 5% of refinance loans, 5% of home improvement loans, no multifamily loans, 15% of its other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 10% of its home purchase loans, 13% of its refinance loans, 7% of home improvement loans, no multifamily loans, 9% of other purpose lines of credit, 11% of other purpose closed/exempt loans, and 4% of loans with purpose "not applicable" to low-income borrowers in 2022.

Lending to Moderate-Income Borrowers

For the period under review, Orrstown's lending to moderate-income borrowers was good.

2015 ACS Data

Orrstown's lending in 2020 to moderate-income borrowers was good. In total, 17% of the bank's HMDA loans (23 loans) were originated to moderate-income borrowers, matching both the aggregate lending level and the proxy (both 17%). By loan category, Orrstown originated none of its home purchase loans, 18% of refinance loans, 40% of home improvement loans, no multifamily loans, 25% of its other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 25% of home purchase loans, 14% of refinance loans, 15% of home improvement loans, no multifamily loans, 17% of other purpose lines of credit, 18% of other purpose closed/exempt loans, and 3% of loans with purpose "not applicable" to moderate-income borrowers in 2020.

Orrstown's lending in 2021 to moderate-income borrowers was excellent. In total, 22% of the bank's HMDA loans (38 loans) were originated to moderate-income borrowers, exceeding both the aggregate lending level of 19%, and the proxy of 17%. By loan category, Orrstown originated 33% of its home purchase loans, 20% of refinance loans, 18% of home improvement loans, no multifamily loans, 21% of its other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 23% of its home purchase loans, 16% of its refinance loans, 14% of home improvement loans, no multifamily loans, 16% of other purpose lines of credit, 17% of other purpose closed/exempt loans, and 2% of loans with purpose "not applicable" to moderate-income borrowers in 2021.

2020 Census Data

Orrstown's lending in 2022 to moderate-income borrowers was adequate. In total, 16% of the bank's HMDA loans (19 loans) were originated to moderate-income borrowers, falling below both the aggregate lending level of 21%, and the proxy of 17%. By loan category, Orrstown originated 13% of its home purchase loans, 14% of refinance loans, 25% of home improvement loans, no multifamily loans, 15% of its other purpose lines of credit, 100% of other purpose closed/exempt loans, and no loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 22% of its home purchase loans, 21% of its refinance loans, 16% of home improvement loans, no multifamily loans, 17% of other purpose lines of credit, 17% of other purpose closed/exempt loans, and 2% of loans with purpose "not applicable" to moderate-income borrowers in 2022.

Geographic Distribution of Loans

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. The overall analysis reflects adequate penetration throughout the Baltimore, MD assessment area, including low- and moderate-income tracts. Once again, it is noted that small business loans were given greater weight in determining this conclusion, given their higher volume, followed by HMDA loans.

Small Business Lending

The geographic distribution of Orrstown's small business loans reflects adequate penetration throughout the assessment area, in the context of the assessment area's demographic and economic characteristics during the evaluation period.

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract. Based on Dun & Bradstreet business data in 2020, there were 130,531 businesses operating in the assessment area. Of these, 5% were located in low-income tracts, and 15% were located in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (38% and 41%, respectively). Finally, just less than 1% of businesses were located in tracts of unknown income levels. In 2021, there were 128,493 businesses operating in the assessment area. Of these, 5% were located in low-income tracts, 16% in moderate-income tracts, 38% in middle-income tracts, and 41% in upper-income tracts, and less than 1% were located in tracts with unknown income levels. Finally, in 2022, there were 129,197 businesses operating in the assessment area. Of these, almost 5% were located in low-income tracts, and 17% were located in moderate-income tracts. Once again, the majority of businesses were located in middle- and upper-income tracts (38% and 39%, respectively). Approximately 1% of businesses were located in tracts of unknown income in 2022.

The tables below present Orrstown's small business geographic distribution, in comparison to the applicable business proxy and aggregate lending levels in the assessment area for the years evaluated.

Orrstown Bank Baltimore, MD Assessment Area Geographic Distribution of Small Business Loans			
		Aggregate Comparison	
		2020	
Census Tract Income Level	**% Businesses by Tract Income Level (2020 Dun & Bradstreet Data)**	**% Orrstown Lending**	**% Aggregate Lending**
Low	4.9	2.3	4.1
Moderate	15.4	13.9	13.8
Middle	38.1	37.7	37.7
Upper	40.9	44.9	43.6
Unknown	0.7	1.2	0.8
Total	**100.0**	**100.0**	**100.0**

Orrstown Bank Baltimore, MD Assessment Area Geographic Distribution of Small Business Loans			
		Aggregate Comparison	
		2021	
Census Tract Income Level	**% Businesses by Tract Income Level (2021 Dun & Bradstreet Data)**	**% Orrstown Lending**	**% Aggregate Lending**
Low	5.0	2.7	4.7
Moderate	15.7	10.4	15.2
Middle	38.1	36.9	38.4
Upper	40.6	48.8	41.0
Unknown	0.6	1.1	0.7
Total	**100.0**	**100.0**	**100.0**

Orrstown Bank Baltimore, MD Assessment Area Geographic Distribution of Small Business Loans			
		Aggregate Comparison	
		2022	
Census Tract Income Level	**% Businesses by Tract Income Level (2022 Dun & Bradstreet Data)**	**% Orrstown Lending**	**% Aggregate Lending**
Low	4.5	0.0	3.8
Moderate	17.1	5.6	15.9
Middle	38.2	33.3	38.8
Upper	39.3	61.1	40.6
Unknown	0.9	0.0	0.9
Total	**100.0**	**100.0**	**100.0**

Lending in Low-Income Census Tracts

Orrstown's small business lending in low-income tracts was adequate.

2015 ACS Data

In 2020, the geographic distribution of the bank's small business lending in low-income census tracts was adequate. Orrstown originated 2% of its small business loans (14 loans) in the assessment area's low-income census tracts. The bank's lending level lagged both the applicable business loan demand proxy of 5%, and the 2020 aggregate small business lending level of 4%.

In 2021, the geographic distribution of the bank's small business lending in low-income census tracts was adequate. Orrstown originated 3% of its small business loans (15 loans) in the assessment area's low-income census tracts. The bank's lending level was once again below both the applicable business loan demand proxy, and the 2021 aggregate small business lending level, both of which were 5%.

2020 Census Data

In 2022, the geographic distribution of the bank's small business lending in low-income census tracts was very poor. Orrstown did not originate any small business loans in the assessment area's low-income census tracts. The bank's lending level was below the applicable business loan demand proxy of 5%, and the 2022 aggregate small business lending level of 4%.

Lending in Moderate-Income Census Tracts

Orrstown's small business lending in moderate-income tracts was adequate.

2015 ACS Data

In 2020, the geographic distribution of the bank's small business lending in moderate-income census tracts was good. Orrstown originated 14% of its small business loans (83 loans) in the assessment area's moderate-income census tracts. The bank's lending level was slightly below both the applicable business loan demand proxy of 15%, but matched the 2020 aggregate small business lending level of 14%.

In 2021, the geographic distribution of the bank's small business lending in moderate-income census tracts was adequate. Orrstown originated 10% of its small business loans (57 loans) in the assessment area's moderate-income census tracts. The bank's lending level was below both the applicable business loan demand proxy of 16%, and the 2021 aggregate small business lending level of 15%.

2020 Census Data

Finally, in 2022, the geographic distribution of the bank's small business lending in moderate-income census tracts was poor. Orrstown originated 6% of its small business loans (two loans) in the assessment area's moderate-income census tracts. The bank's lending level was below both the applicable business loan demand proxy of 17%, and the 2022 aggregate small business lending level of 16%.

Home-Mortgage Lending

Orrstown's distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts is adequate. As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage credit within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the greater the demand for home-mortgage credit is in the tract.

According to 2015 ACS data, 5% of the assessment area's owner-occupied housing stock was located in low-income census tracts, and 17% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (38% and 40%, respectively). According to 2020 Census data, 4% of the assessment area's owner-occupied housing stock was located in low-income census tracts, and 18% was located in moderate-income tracts. Once again, the majority of owner-occupied housing was located in middle- and upper-income tracts (40% and 38%, respectively).

The following tables present Orrstown's geographic distribution of HMDA loans in 2020, 2021, and 2022, in comparison to the applicable owner-occupied housing proxies and the aggregate lending levels in the assessment area. The tables rely on 2015 ACS data for 2020 and 2021 lending, and 2020 Census data for 2022 lending, along with updated HMDA data, following the requirements of Regulation C.

		Aggregate Comparison			
Census Tract Income Level	% Owner-Occupied Units (2015 ACS Data)	2020		2021	
		% Orrstown Lending	% Aggregate Lending	% Orrstown Lending	% Aggregate Lending
Low	4.9	2.2	2.4	0.0	3.0
Moderate	17.3	11.0	12.5	10.6	14.2
Middle	38.2	33.8	38.5	32.9	39.3
Upper	39.5	52.9	46.6	56.5	43.4
Unknown	0.1	0.0	0.1	0.0	0.1
Total	**100.0**	**100.0**	**100.0**	**100.0**	**100.0**

Orrstown Bank — Baltimore, MD Assessment Area — Geographic Distribution of HMDA Loans

Orrstown Bank Baltimore, MD Assessment Area Geographic Distribution of HMDA Loans			
Census Tract Income Level	% Owner-Occupied Units (2020 Census Data)	Aggregate Comparison	
		2022	
		% Orrstown Lending	% Aggregate Lending
Low	4.2	0.9	4.5
Moderate	17.7	7.8	17.6
Middle	39.7	36.2	39.8
Upper	38.1	54.3	37.6
Unknown	0.3	0.9	0.5
Total	**100.0**	**100.0**	**100.0**

Lending in Low-Income Census Tracts

For the period under review, Orrstown's overall HMDA lending in low-income tracts was poor.

2015 ACS Data

Orrstown's lending in low-income census tracts in 2020 was good. Of the bank's 136 HMDA loans in 2020, Orrstown originated 2% (three loans) in low-income tracts, which was below the proxy of 5%, but matched the aggregate lending of 2%. Categorized by loan product type, Orrstown made none of its home purchase loans, 3% of its refinance loans, no home improvement loans, no multifamily loans, no other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" in low-income tracts in 2020. Aggregate 2020 lending data show that 4% of home purchase loans, 1% of refinance loans, just under 2% of home improvement loans, 20% of multifamily loans, 1% of other purpose lines of credit, 5% of other purpose closed/exempt loans, and 7% of loans with purpose "not applicable" were made in low-income tracts in the assessment area.

Orrstown's lending in low-income census tracts in 2021 was very poor. Of the bank's 170 HMDA loans in 2021, Orrstown did not originate any in low-income tracts, which was below the proxy of 5%, and aggregate lending of 3%. Aggregate 2021 lending data show that 5% of home purchase loans, 2% of refinance loans, 2% of home improvement loans, 16% of multifamily loans, 2% of other purpose lines of credit, 3% of other purpose closed/exempt loans, and 10% of loans with purpose "not applicable" were made in low-income tracts in the assessment area.

2020 Census Data

Orrstown's lending in low-income census tracts in 2022 was poor. Of the bank's 116 HMDA loans in 2022, Orrstown originated less than 1% (one loan) in a low-income tract, which was below both the proxy of 4%, and the aggregate lending of 5%. Categorized by loan product type, Orrstown's single loan in a low-income tract was a home purchase loan. Aggregate 2022 lending data show that 5% of home purchase loans, 4% of refinance loans, 2% of home improvement loans, 13% of multifamily loans, 2% of other purpose lines of credit, 4% of other purpose closed/exempt loans, and 8% of loans with purpose "not applicable" were made in low-income tracts in the assessment area.

Lending in Moderate-Income Census Tracts

For the period under review, the bank's HMDA lending in moderate-income tracts was rated adequate.

2015 ACS Data

Orrstown's lending in moderate-income census tracts in 2020 was adequate. Of the bank's 136 HMDA loans in 2020, Orrstown originated 11% (15 loans) in moderate-income tracts, which was below both the proxy of 17%, and the aggregate lending of 13%. Categorized by loan product type, Orrstown made 5% of its home purchase loans, 13% of its refinance loans, 20% of home improvement loans, no multifamily loans, no other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" in moderate-income tracts in 2020. Aggregate 2020 lending data show that 17% of home purchase loans, 9% of refinance loans, 9% of home improvement loans, 25% of multifamily loans, 9% of other purpose lines of credit, 17% of other purpose closed/exempt loans, and 29% of loans with purpose "not applicable" were made in moderate-income tracts in the assessment area.

Orrstown's lending in moderate-income census tracts in 2021 was adequate. Of the bank's 170 HMDA loans in 2021, Orrstown originated 11% (18 loans) in moderate-income tracts, which was below both the proxy of 17%, and the aggregate lending of 14%. Categorized by loan product type, Orrstown made 10% of its home purchase loans, 10% of its refinance loans, 9% of home improvement loans, no multifamily loans, 17% of other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" in moderate-income tracts in 2021. Aggregate 2021 lending data show that 18% of home purchase loans, 12% of refinance loans, 9% of home improvement loans, 32% of multifamily loans, 10% of other purpose lines of credit, 13% of other purpose closed/exempt loans, and 32% of loans with purpose "not applicable" were made in moderate-income tracts in the assessment area.

2020 Census Data

Orrstown's lending in moderate-income census tracts in 2022 was poor. Of the bank's 116 HMDA loans in 2022, Orrstown originated 8% (nine loans) in moderate-income tracts, which was below both the proxy and the aggregate lending, both of which were 18%. Categorized by loan product type, Orrstown made no home purchase loans, 14% of its refinance loans, 5% of home improvement loans, no multifamily loans, 10% of other purpose lines of credit, no other purpose closed/exempt loans, and no loans with purpose "not applicable" in moderate-income tracts in 2022. Aggregate 2022 lending data show that 18% of home purchase loans, 18% of refinance loans, 10% of home improvement loans, 40% of multifamily loans, 10% of other purpose lines of credit, 15% of other purpose closed/exempt loans, and 36% of loans with purpose "not applicable" were made in moderate-income tracts in the assessment area.

Responsiveness to Credit Needs

Orrstown exhibits a good record of serving the credit needs of low- and moderate-income individuals and area, and very small businesses, consistent with safe and sound banking practices. The bank's responsiveness to credit needs is reflected through its retail HMDA and small business lending, and its use of innovative and flexible retail lending practices, which are discussed below. Community contacts identified affordable housing, and economic development through the financing of small businesses as needs within the assessment area.

Notably, the bank did not make any qualified community development loans in the assessment area during the evaluation period.

However, Orrstown was a participant in the SBA PPP, and funded a total of 1,011 PPP loans totaling $86.5 million. None of these loans were provided with community development consideration, as they did not meet revitalization/stabilization standards.

Innovative and/or Flexible Lending Practices

Orrstown makes use of innovative and/or flexible lending practices in serving the Baltimore, MD assessment area's credit needs. Through a number of different programs, the bank made home-mortgage loans to low- and moderate-income borrowers, and small business loans during the evaluation period.

Often, the home-mortgage credit needs of low- and moderate-income individuals and families can be addressed more effectively by alternative mortgage products. The bank offers several programs for first-time homebuyers. Orrstown offers a proprietary residential mortgage product (Orrstown Bank First Time Homebuyer Loan Program), which limits applicant income to reserve the product for low- and moderate-income borrowers. The product requires completion of pre-purchase homebuyer counseling to qualify. During the evaluation period, Orrstown made eight affordable mortgage loans totaling almost $1.8 million within the Baltimore, MD assessment area.

Additionally, Orrstown offers first-time homebuyer products through government-backed lending programs (FHA, VA, and USDA) and Fannie Mae's HomeReady® Mortgage, HomeStyle Renovation, and RefiNOW Programs. Through these programs, the bank makes home-mortgage loans to low- and moderate-income borrowers in conjunction with grants and forgivable loans. The programs have income parameters that effectively restrict them to low- and moderate-income borrowers. During the evaluation period, Orrstown made one FHA loan totaling $259 thousand, and one VA loan totaling $383 thousand.

Orrstown also participated in Baltimore's Healthy Neighborhoods loan fund, which provides special below-market loans to homebuyers and homeowners in Baltimore City to encourage investment in targeted blocks in need of revitalization. Through Healthy Neighborhoods, Orrstown provided 65 loans totaling $1.2 million.

The bank also provided closing cost/downpayment assistance through one FHLB of Pittsburgh First Front Door Program grant totaling almost $3 thousand, and one Buying Into Baltimore grant totaling just under $5 thousand. The Buying Into Baltimore program provides downpayment and closing cost assistance in the form of a forgivable loan. The program does not have income restrictions, but is limited to Baltimore City, which has a housing stock in substantial need of investment and revitalization.

Similarly, the credit needs of small businesses can often be addressed more effectively by alternative products. In an effort to address the credit needs of small businesses in its assessment area, Orrstown participates in SBA loan programs, including the SBA 504 and 7A programs. During the evaluation period, Orrstown made one SBA 7A loan totaling $4.7 million in the Baltimore, MD assessment area.

Community Development Lending

The bank makes few, if any community development loans in the Baltimore, MD assessment area. During the evaluation period, Orrstown did not make any community development loans in the assessment area. This is a decrease from the prior evaluation when the bank made 29 community development loans totaling $13 million.

INVESTMENT TEST

The investment test evaluates a financial institution's level of qualified investments that serve low- or moderate-income areas or individuals, together with the responsiveness, innovativeness, and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include: a lawful investment, deposit, membership share, or grant, including a donation or in-kind contribution of property, that has as its primary purpose, community development.

Volume of Investment and Grant Activity

Orrstown has a significantlevel of qualified community development investments and grants, rarely in a leadership position. Qualified investments for the Baltimore, MD assessment area totaled just over $14 million, which is an increase from just under $4 million during the prior evaluation. Of the bank's overall investments within its assessment areas, 44% were within the Baltimore, MD assessment area.

Qualified investments totaling $12.2 million supported affordable housing initiatives through mortgage-backed security investments (86%), and over $1.9 million (14%) supported economic development through the financing of small businesses in the assessment area using investments in small business investment companies (SBICs).

The following table presents the investment activity for the Baltimore, MD assessment area.

CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
Qualified Investments	4	12,250	0	0	2	1,964	0	0	6	14,214
Donations	0	0	0	0	0	0	0	0	0	0
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	4	12,250	0	0	2	1,964	0	0	6	14,214

Orrstown Bank
Baltimore, MD Assessment Area
Qualified Investments

Responsiveness to Credit and Community Development Needs

Orrstown exhibits good responsiveness to credit and community development needs in the Baltimore, MD assessment area.

Community contacts identified affordable housing and economic development through support of small businesses as the most pronounced community needs in the assessment area. All of the bank's investments, which increased in dollar volume since the prior evaluation in this assessment area, addressed both affordable housing and economic development needs.

Community Development Initiatives

Orrstown makes occasional use of innovative and/or complex investments to support community development initiatives. In the Baltimore, MD assessment area, the bank invested in four mortgage-backed securities, and two SBIC funds.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- the accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms;
- the impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;
- the reasonableness of business hours and services in meeting assessment area needs; and
- the extent to which an institution provides community development services.

Accessibility of Delivery Systems

Delivery systems are unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels in the assessment area.

During the evaluation period, Orrstown operated four full-service branches in the Baltimore, MD assessment area. Using 2015 ACS data, three branches were located in middle-income tracts (75%), and one was located in an upper-income tract (25%). Using updated 2020 Census data, two branches were located in middle-income tracts (50%), and two were located in upper-income tracts (50%).

The following tables detail the location of the bank's branches with comparison to both 2015 ACS population demographics, and 2020 Census demographics.

Orrstown Bank Baltimore, MD Assessment Area Retail Branch Distribution 2015 ACS Data				
Census Tract Type	Number of Branches	Percent of Branches	Population	Percent of Population
Low	0	0.0	248,579	9.0
Moderate	0	0.0	610,002	22.0
Middle	3	75.0	979,081	35.4
Upper	1	25.0	908,817	32.8
Unknown Income	0	0.0	23,339	0.8
Totals	**4**	**100.0**	**2,769,818**	**100.0**

Orrstown Bank Baltimore, MD Assessment Area Retail Branch Distribution 2020 Census Data				
Census Tract Type	Number of Branches	Percent Branches	Population	Percent of Population
Low	0	0.0	202,921	7.1
Moderate	0	0.0	617,091	21.7
Middle	2	50.0	1,051,147	37.0
Upper	2	50.0	936,915	32.9
Unknown Income	0	0.0	36,436	1.3
Totals	**4**	**100.0**	**2,844,510**	**100.0**

Three of the four branches in the Baltimore, MD assessment area have ATMs available, which provide electronic access to banking services[13]. Additionally, the bank has two stand-alone ATMs. Using 2015 ACS demographics, one stand-alone ATM was located in a moderate-income tract, and the other was in a middle-income tract. Using 2020 Census data, both stand-alone ATMs were located in moderate-income tracts.

To supplement traditional banking services, Orrstown online banking services, telephone banking services, and a smart phone mobile application that includes mobile deposit capture capabilities. Using online banking services, bank customers can pay bills, open accounts, and apply for loan products via the bank's website at https://www.orrstown.com/.

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[13]The branch located at 4450 Long Gate Parkway, in Ellicott City, MD 21042, located in an upper-income tract, does not have an ATM on-site.

Changes in Branch Locations

No branches were either opened or closed in the Baltimore, MD assessment area since the prior evaluation, and therefore this component of the service test was not considered in this assessment area. However, during the evaluation period, the bank relocated its Elliott City, MD branch, located in an upper-income tract, to another location within Elliott City, also located in an upper-income tract.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- or moderate-income census tracts or individuals. As mentioned above, except for the Elliott City branch, all of Orrstown's branches in the assessment area include ATMs. Similarly, excluding the Elliott City branch, all of the branches have drive-up facilities. All four branches operate Monday through Friday, with extended hours on Fridays. Additionally, all four branches offer Saturday hours.

Bank Products

Orrstown provides the following products with reduced or no fees, and/or no minimum balance requirements, which provide greater access to banking services for low- and moderate-income customers, and small businesses.

- Free Checking Account, a personal checking account with no minimum balance requirement, no monthly service fee, no per-check charge, and no $2 paper statement fee if customers opt-in to electronic statements and online banking.
- Growth Checking Account, a personal checkless account designed for those who don't qualify for a standard checking account. This account is certified by Bank On, a national platform that supports financial institution efforts to connect unbanked and underbanked consumers to safe, affordable bank accounts. Orrstown's Growth Checking Account requires a $25 minimum opening deposit, has a low $5 monthly maintenance fee, and waives the standard $2 paper statement fee for customers who opt-in to electronic statements and online banking.
- Free Business Checking, a business checking account designed for small businesses with low transaction volumes. This account features no minimum opening deposit, no monthly service fees, 1,000 free items per statement cycle ($0.25 per item fee applies thereafter), and access to online bill pay services (first 10 bill pays per statement cycle are free).
- Non-profit Checking Account, an interest-bearing business checking account for non-profit or religious organizations, with no minimum opening deposit, no per-item fees, and no monthly maintenance fees.

Community Development Services

Orrstown provides a limited level of community development services in the Baltimore, MD assessment area.

Over the evaluation period, a bank officer served on the board of trustees of Healthy Neighborhoods, Inc., a community revitalization non-profit that helps undervalued neighborhoods in the city of Baltimore increase home values, market their communities, and create high standards for property improvements.

HAGERSTOWN, MD ASSESSMENT AREA
LIMITED-SCOPE REVIEW

A limited-scope review of the bank's performance in the Hagerstown, MD assessment area was conducted. For the purposes of assessing Orrstown's performance in the state of Maryland and overall, the least amount of weight was provided to this assessment area, given the bank's volume of loans, deposits and operations. More specifically, during the evaluation period, lending activity in the Hagerstown, MD assessment area represented less than 3% of the bank's overall lending by number of loans, and 2% by dollar amount. The assessment area accounted for $49 million in deposits, or 2% of the bank's total deposits as of June 30, 2023. Orrstown operated one branch in the assessment area (5% of the bank's total branches).

The bank's performance is the Hagerstown, MD assessment area is consistent with its performance in the Baltimore, MD full-scope review assessment area, as seen in the table below. The facts and data reviewed, including performance and demographic information, are presented in the Appendices accompanying the report. Conclusions regarding performance are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Hagerstown, MD Assessment Area	Consistent	Below	Consistent

DESCRIPTION OF INSTITUTION'S OPERATIONS

The bank's Hagerstown, MD assessment area consists solely of Washington County, MD, which is part of the larger Hagerstown-Martinsburg, MD-WV MSA (comprised of Washington County, MD, and Berkeley and Morgan Counties, WV).

According to 2018 Office of Management and Budget (OMB) data[14], the assessment area consisted of 32 census tracts, two (6%) of which were designated as low-income, seven (22%) of which were moderate-income, 15 (47%) of which were middle-income, seven (22%) of which were upper-income, and one (3%) of which had an unknown income level. The two low-income tracts, and six of the seven moderate-income tracts were located in the city of Hagerstown. The Hagerstown, MD assessment area had a population of 149,270 as of the 2018 OMB data release.

According to 2020 Census data, the assessment area consisted of 36 census tracts, one (3%) of which was designated as low-income, 10 (28%) of which were moderate-income, 16 (44%) of which were middle-income, eight (22%) of which were upper-income, and one (3%) which had an unknown income level. The low-income tracts, and nine of the ten moderate-income tracts were located in the city of Hagerstown. The Hagerstown, MD assessment area had a population of 154,705 as of the 2020 Census.

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[14] Because metropolitan areas grow over time, as populations increase and expand into nearby areas, the Census Bureau conducts a comprehensive Census every ten years, and releases updated ACS data in the interim, every five years. Ongoing surveys are conducted each year, and when minor periodic adjustments are warranted based on changes, the OMB may release updated data in between regularly scheduled ACS and Census releases. This was necessary in the Hagerstown, MD assessment area, and thus, instead of using 2015 ACS data, as used in other assessment areas, demographic data released by the OMB in 2018 is used to evaluate lending in 2020 and 2021.

Maps of the Hagerstown, MD assessment area, using 2018 OMB data and 2020 Census data are available in Appendix F.

Orrstown's performance was evaluated in terms of the demographic and business context in which the bank operates. According to the FDIC Market Share Report as of June 30, 2023, 13 depository institutions operated in the Hagerstown, MD assessment area. These institutions maintained a total of 40 branches, and held just over $3 billion in deposits inside Washington County, MD. Orrstown operated one branch in the assessment area and ranked ninth with almost 2% of the retail deposit market. Truist Bank held the largest share of deposits with 22% of the deposit market, followed by Fulton Bank, N.A. with 19% of deposits, and Manufacturers and Traders Trust Company with 18% of the market.

Similarly, Orrstown was a minor player in the HMDA market, with less than 1% market share for all years evaluated. In 2020, there were 329 HMDA reporters in the assessment area who originated or purchased 7,468 HMDA loans in the Hagerstown, MD assessment area. Orrstown ranked forty-second with less than 1% of the HMDA market. Quicken Loans, LLC ranked first with 9% of the market, followed by Penny Mac Loan Services, LLC with almost 5% of the market, and Freedom Mortgage Corporation with 4% of the market.

In 2021, there were 342 HMDA reporters in the assessment area who originated or purchased 8,591 HMDA loans in the Hagerstown, MD assessment area. Orrstown ranked thirty-eighth with less than 1% of the HMDA market. Rocket Mortgage, LCC ranked first with 8% of the market, followed by Penny Mac Loan Services, LLC with just under 5% of the market, and Freedom Mortgage Corporation with just under 4% of the market.

In 2022, there 309 HMDA reporters in the assessment area who originated or purchased 4,996 HMDA loans in the Hagerstown, MD assessment area. Orrstown tied for twenty-seventh with less than 1% of the HMDA market. Rocket Mortgage, LLC ranked first with 6% of the market, followed by Penny Mac Loan Services, LCC with 5% of the market, and Truist Bank with just under 5% of the market.

Finally, Orrstown was a minor play in the small business market for all years evaluated. According to 2020 small business and small farm data, there were 81 small business reporters in the assessment area, originating or purchasing 2,967 small business loans. Orrstown tied for twelfth with almost 3% of the market. American Express, N.B. ranked first with 16% of the market, followed by Manufacturers and Traders Trust Company with 10% of the market, and Truist Bank with 8% of the market.

In 2021, there were 81 small business reporters in the assessment area, originating or purchasing 3,540 small business loans. Orrstown ranked fourteenth with 2% of the market. American Express, N.B. ranked first with 20% of the market, followed by Truist Bank with 7% of the market, and JP Morgan Chase Bank, N.A. with just under 7% of the market.

In 2022, there were 74 small business reporters in the assessment area, originating or purchasing 3,353 small business loans. Orrstown tied for twenty-eighth with less than 1% of the market. American Express, N.B. ranked first with 25% of the market, followed by JP Morgan Chase Bank, N.A. with 11% of the market, and Capital One, N.A. with 8% of the market.

According to the January 2024 Moody's Precis report, the Hagerstown, MD economy is at risk, as manufacturing, logistics and healthcare jobs falter. Leading industries in the assessment area include government (17%), educational and health services (16%), retail trade (14%), leisure and hospitality services (both 10%), and manufacturing (9%). The largest employers in the Hagerstown, MD assessment area include Meritus Health, CitiCorp Credit Services, Inc., First Data Corporation, and Volvo Powertrain North America.

An interview was conducted with a local government official to provide perspective on the credit needs in the Hagerstown, MD assessment area. This information was supplemented with demographic and economic data pertinent to the assessment area. According to the community contact, the most noteworthy credit needs in the assessment area are affording housing for first time homebuyers, and loans for small businesses, particularly micro-loans and short-term financing options. Finally, the contact noted that revitalization/stabilization efforts are needed, as numerous shopping malls and outlets have turned over.

Tables showing the assessment area demographics of the Hagerstown, MD assessment area in 2020, 2021, and 2022 are contained on the following pages.

Orrstown Bank Hagerstown, PA Assessment Area Assessment Area Demographics 2020							
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	6.3	1,203	3.2	466	38.7	7,595	20.1
Moderate-income	7	21.9	6,600	17.5	1,466	22.2	6,093	16.1
Middle-income	15	46.9	18,827	49.8	1,271	6.8	8,310	22.0
Upper-income	7	21.9	11,145	29.5	447	4.0	15,777	41.8
Unknown-income	1	3.1	0	0.0	0	0.0	0	0.0
Total Assessment Area	**32**	**100.0**	**37,775**	**100.0**	**3,650**	**9.7**	**37,775**	**100.0**
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,567	577	1.6	22.5	1,559	60.7	431	16.8
Moderate-income	12,354	4,641	12.9	37.6	6,336	51.3	1,377	11.1
Middle-income	29,837	18,243	50.7	61.1	9,380	31.4	2,214	7.4
Upper-income	16,353	12,519	34.8	76.6	2,812	17.2	1,022	6.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**61,111**	**35,980**	**100.0**	**58.9**	**20,087**	**32.9**	**5,044**	**8.3**
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	447	7.6	379	7.1	61	12.2	7	13.7
Moderate-income	837	14.2	757	14.2	72	14.4	8	15.7
Middle-income	2,902	49.3	2,603	48.8	279	55.8	20	39.2
Upper-income	1,693	28.8	1,590	29.8	87	17.4	16	31.4
Unknown-income	2	0.0	1	0.0	1	0.2	0	0.0
Total Assessment Area	**5,881**	**100.0**	**5,330**	**100.0**	**500**	**100.0**	**51**	**100.0**
	Percentage of Total Businesses:		**90.6**		**8.5**			**0.9**
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	3	1.3	3	1.3	0	0.0	0	0.0
Moderate-income	3	1.3	3	1.3	0	0.0	0	0.0
Middle-income	97	41.6	96	41.4	1	100.0	0	0.0
Upper-income	130	55.8	130	56.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**233**	**100.0**	**232**	**100.0**	**1**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**99.6**		**0.4**			**0.0**

2018 OMB Data and 2020 Dun & Bradstreet Information

Orrstown Bank Hagerstown, PA Assessment Area Assessment Area Demographics 2021								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	2	6.3	1,203	3.2	466	38.7	7,595	20.1
Moderate-income	7	21.9	6,600	17.5	1,466	22.2	6,093	16.1
Middle-income	15	46.9	18,827	49.8	1,271	6.8	8,310	22.0
Upper-income	7	21.9	11,145	29.5	447	4.0	15,777	41.8
Unknown-income	1	3.1	0	0.0	0	0.0	0	0.0
Total Assessment Area	**32**	**100.0**	**37,775**	**100.0**	**3,650**	**9.7**	**37,775**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	2,567	577	1.6	22.5	1,559	60.7	431	16.8
Moderate-income	12,354	4,641	12.9	37.6	6,336	51.3	1,377	11.1
Middle-income	29,837	18,243	50.7	61.1	9,380	31.4	2,214	7.4
Upper-income	16,353	12,519	34.8	76.6	2,812	17.2	1,022	6.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**61,111**	**35,980**	**100.0**	**58.9**	**20,087**	**32.9**	**5,044**	**8.3**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	451	7.8	392	7.5	53	10.9	6	11.1
Moderate-income	817	14.1	734	14.0	75	15.4	8	14.8
Middle-income	2,869	49.6	2,573	49.0	271	55.5	25	46.3
Upper-income	1,650	28.5	1,547	29.5	88	18.0	15	27.8
Unknown-income	1	0.0	0	0.0	1	0.2	0	0.0
Total Assessment Area	**5,788**	**100.0**	**5,246**	**100.0**	**488**	**100.0**	**54**	**100.0**
	Percentage of Total Businesses:		**90.6**		**8.4**			**0.9**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	3	1.3	3	1.4	0	0.0	0	0.0
Moderate-income	3	1.3	3	1.4	0	0.0	0	0.0
Middle-income	95	42.2	94	42.3	1	33.3	0	0.0
Upper-income	124	55.1	122	55.0	2	66.7	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**225**	**100.0**	**222**	**100.0**	**3**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**98.7**		**1.3**			**0.0**

2018 OMB Data and 2021 Dun & Bradstreet Information

Orrstown Bank Hagerstown, PA Assessment Area Assessment Area Demographics 2022								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	1	2.8	346	0.9	98	28.3	7,773	20.5
Moderate-income	10	27.8	8,209	21.6	1,676	20.4	6,486	17.1
Middle-income	16	44.4	18,675	49.2	1,116	6.0	7,833	20.6
Upper-income	8	22.2	10,709	28.2	446	4.2	15,847	41.8
Unknown-income	1	2.8	0	0.0	0	0.0	0	0.0
Total Assessment Area	**36**	**100.0**	**37,939**	**100.0**	**3,336**	**8.8**	**37,939**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	1,068	138	0.4	12.9	644	60.3	286	26.8
Moderate-income	16,433	6,386	17.0	38.9	8,156	49.6	1,891	11.5
Middle-income	29,214	19,922	53.1	68.2	7,113	24.3	2,179	7.5
Upper-income	14,906	11,094	29.6	74.4	2,914	19.5	898	6.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**61,621**	**37,540**	**100.0**	**60.9**	**18,827**	**30.6**	**5,254**	**8.5**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	270	4.7	239	4.6	24	5.0	7	10.8
Moderate-income	1,411	24.5	1,237	23.7	163	34.1	11	16.9
Middle-income	2,724	47.3	2,476	47.4	216	45.2	32	49.2
Upper-income	1,359	23.6	1,270	24.3	74	15.5	15	23.1
Unknown-income	1	0.0	0	0.0	1	0.2	0	0.0
Total Assessment Area	**5,765**	**100.0**	**5,222**	**100.0**	**478**	**100.0**	**65**	**100.0**
	Percentage of Total Businesses:		**90.6**		**8.3**		**1.1**	
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	2	0.9	2	0.9	0	0.0	0	0.0
Moderate-income	6	2.7	6	2.7	0	0.0	0	0.0
Middle-income	116	51.8	113	51.1	3	100.0	0	0.0
Upper-income	100	44.6	100	45.2	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**224**	**100.0**	**221**	**100.0**	**3**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**98.7**		**1.3**		**0.0**	

2020 Census Data and 2022 Dun &Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance in the Hagerstown, MD assessment area is consistent with the institution's lending, below the institution's investments, and consistent with the institution's service performance in the full-scope Baltimore, MD assessment area.

LENDING TEST

The bank's lending in this assessment area is consistent with the bank's lending levels in the full-scope review assessment area in the State of Maryland. Though the bank made more small business loans by number, the dollar amount of HMDA loans far exceeded the dollar amount of small business loans. Due to the dollar volume of loans, home-mortgage loans were provided more weight in determining the overall conclusion, followed by small business loans. In total during the evaluation period, Orrstown made 117 HMDA loans totaling $17 million, and 153 small business loans totaling $9 million.

Borrower and Geographic Distribution of Lending

Home-Mortgage Lending

In 2020, Orrstown originated 34 HMDA loans in the Hagerstown, MD assessment area, aggregating just under $6 million. The bank's HMDA lending to low-income borrowers (3%) was below both the applicable proxy of low-income families (20%), and the aggregate lending level (4%). The bank's HMDA lending to moderate-income borrowers (15%) was below the proxy of moderate-income families (16%), and above the aggregate lending level (14%). The bank's geographic distribution of HMDA loans in low-income geographies (0%) was below both the proxy of owner-occupied housing in such tracts (2%), and the aggregate lending level (1%). The bank's geographic distribution of HMDA loans in moderate-income geographies (12%) was below the proxy of owner-occupied housing is such tracts (13%), and above the aggregate lending level (11%).

In 2021, Orrstown originated 46 HMDA loans in the Hagerstown, MD assessment area, aggregating just over $6 million. The bank's HMDA lending to low-income borrowers (7%) was below both the applicable proxy (20%), and above the aggregate lending level (6%). The bank's HMDA lending to moderate-income borrowers (15%) was just below both the proxy (16%), and the aggregate lending level (16%). The bank's geographic distribution of HMDA loans in low-income geographies (7%) was well above both the proxy (2%), and the aggregate lending level (2%). The bank's geographic distribution of HMDA loans in moderate-income geographies (11%) was below both the proxy (13%), and the aggregate lending level (13%).

Finally, in 2022, Orrstown originated 37 HMDA loans in the Hagerstown, MD assessment area, aggregating $5 million. The bank's HMDA lending to low-income borrowers (5%) was below the applicable proxy (21%), but matched the aggregate lending level (5%). The bank's HMDA lending to moderate-income borrowers (8%) was below both the proxy (17%), and the aggregate lending level (15%). The bank's geographic distribution of HMDA loans in low-income geographies (3%) was above both the proxy, and the aggregate lending level (both less than 1%). The bank's geographic distribution of HMDA loans in moderate-income geographies (16%) was below both the proxy (17%), and the aggregate lending level (22%).

Small Business Lending

In 2020, Orrstown originated 75 small business loans aggregating over $5 million in the Hagerstown, MD assessment area. Of these loans, 29% were originated to small businesses, which was below the aggregate lending level of 37% to small businesses by all lenders in the assessment area, and below the proxy of 91%. As noted in the full-scope Maryland assessment area, the bank participated in PPP lending in both 2020 and 2021, which did not require banks to collect business revenue information, thus classifying many of the bank's small business loans as revenue not known (60% in 2020). It can be reasonably inferred that these loans with unknown revenues were PPP loans and were provided to small businesses. From a geographic perspective, in 2020, 9% of the bank's small business loans were originated in low-income census tracts. The bank's lending level was above both the aggregate lending level (7%) for businesses located in low-income geographies, and the proxy of 8%. Orrstown's lending in moderate-income geographies (12%) was below both the aggregate lending level in moderate-income geographies (13%), and the proxy of 14%.

In 2021, Orrstown originated 73 small business loans aggregating just over $2 million in the Hagerstown, MD assessment area. Of these loans, 4% were originated to small businesses, which was below the aggregate lending level of 43% to small businesses by all lenders in the assessment area, and below the proxy of 91%. Due to the PPP's revenue collection requirements, Orrstown reported 96% of its small business loans as revenue not known, which also likely benefitted area small businesses. From a geographic perspective, in 2021, 4% of the bank's small business loans were originated in low-income census tracts. The bank's lending level was below both the aggregate lending level (6%) for businesses located in low-income geographies, and the proxy of 8%. Orrstown's lending in moderate-income geographies (16%) was above both the aggregate lending level in moderate-income geographies (13%), and the proxy of 14%.

Finally, in 2022, Orrstown originated five small business loans aggregating just over $1 million in the Hagerstown, MD assessment area. Of these loans, 80% were originated to small businesses, which was above the aggregate lending level of 52% to small businesses by all lenders in the assessment area, but below the proxy of 91%. From a geographic perspective, in 2022, none of the bank's small business loans were originated in low-income census tracts. The bank's lending level was below both the aggregate lending level (3%) for businesses located in low-income geographies, and the proxy of 5%. Orrstown's lending in moderate-income geographies (0%) was below both the aggregate lending level in moderate-income geographies (22%), and the proxy of 25%.

Innovative and/or Flexible Lending Practices and Community Development Lending

As discussed earlier, the bank meets the needs of low- and moderate-income individuals and families by offering several alternative mortgage products. However, there were no originations for these products in the Hagerstown, MD assessment area.

Similarly, to address the credit needs of small businesses in its assessment area, Orrstown participates in the SBA 504 and 7A loan programs. As with alternative mortgage products, there were no originations through these small business programs in the Hagerstown, MD assessment area. Orrstown also participated in the PPP, originating approximately 115 PPP loans totaling $5 million in the assessment area.

Orrstown did not make any community development loans within the Hagerstown, MD assessment area.

INVESTMENT TEST

The bank's investment test performance in the Hagerstown, MD assessment area was below the bank's investment performance in the full-scope assessment area in the State of Maryland. Qualified investments, grants, and donations for the Hagerstown, MD assessment area totaled $347 thousand. Of the bank's overall investments, 1% were within the Hagerstown, MD assessment area.

The bank's two qualified investments benefitted affordable housing needs. Specifically, the bank invested in two mortgage-backed securities comprised of home-mortgage loans throughout the Hagerstown, MD assessment area.

The following table presents the qualified investment activity for the Hagerstown, MD assessment area.

	Orrstown Bank Hagerstown, MD Assessment Area Qualified Investments									
CD Category	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
Qualified Investments	2	347	0	0	0	0	0	0	2	347
Donations	0	0	0	0	0	0	0	0	0	0
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	2	347	0	0	0	0	0	0	2	347

SERVICE TEST

The bank's service test performance in the Hagerstown, MD assessment area is consistent with the bank's service test performance in the full-scope assessment area in the State of Maryland.

Orrstown operates a single branch in the Hagerstown, MD assessment area (5% of the bank's total branches). Using 2018 OMB data, the branch was located in a middle-income census tract. As a result of 2020 Census changes, the income level of the branch location changes to a moderate-income tract.

Retail banking services offered through the branch were generally in-line with those offered in the full-scope Baltimore, MD assessment area, including branch hours, ATM, drive-up services, and products offered.

The bank did not provide any community development services in the assessment area.

CRA APPENDICES

CRA APPENDIX A: SCOPE OF EXAMINATION TABLE

SCOPE OF EXAMINATION			
Time Period Reviewed			
1/26/2021 – 1/22/2024			
Financial Institution		**Products Reviewed**	
Orrstown Bank		HMDA	
		Small Business	
Affiliates	**Affiliate Relationship**		**Products Reviewed**
N/A	N/A		N/A
List of Assessment Areas and Types of Examination			
Assessment Area	**Type of Examination**	**Branches Visited**[15]	**Other Information**
Harrisburg, PA Assessment Area	Full-Scope	N/A	N/A
Lancaster, PA Assessment Area	Full-Scope	N/A	N/A
Chambersburg, PA Assessment Area	Limited-Scope	N/A	No geographic distribution analysis in low-income tracts in 2022 (no low-income tracts reported as of 2020 Census).
Baltimore, MD Assessment Area	Full-Scope	N/A	N/A
Hagerstown, MD Assessment Area	Limited-Scope	N/A	N/A

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[15]No branch visits were performed in accordance with the scoping process for this evaluation. The institution's CRA Public File was reviewed electronically.

APPENDIX B: SUMMARY OF STATE RATINGS

State Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Commonwealth of Pennsylvania	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Maryland	Low Satisfactory	High Satisfactory	Needs to Improve	Satisfactory

CRA APPENDIX C: GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area or assessment area.

Census tract: 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 statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and its 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: Community development: All Agencies have adopted the following language.

(1) Affordable housing (including multifamily rental housing) for low- or moderate-income individuals;
(2) Community services targeted to low- or moderate-income individuals;
(3) Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of $1 million or less;
(4) Activities that revitalize or stabilize—
    (i) Low-or moderate-income geographies;
    (ii) Designated disaster areas; or
    (iii)Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on—
        A. Rates of poverty, unemployment, and population loss; or
        B. Population size, density, and dispersion. Activities revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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-scope review: Performance under the lending, investment, and service tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

Household: 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 (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

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 multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Small 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) and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): 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.

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

CRA APPENDIX D: HMDA LOAN DISTRIBUTION TABLES

2020 HMDA LOAN DISTRIBUTION TABLE (HARRISBURG, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	5	3.7%	966	3.5%	10	7.5%	1,283	4.7%
Moderate	19	14.2%	2,492	9.1%	27	20.1%	4,417	16.1%
Middle	71	53.0%	14,603	53.4%	34	25.4%	7,306	26.7%
Upper	39	29.1%	9,303	34.0%	48	35.8%	12,022	43.9%
Unknown	0	0.0%	0	0.0%	15	11.2%	2,336	8.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**134**	**100.0%**	**27,364**	**100.0%**	**134**	**100.0%**	**27,364**	**100.0%**
Refinance								
Low	6	1.7%	842	1.2%	17	4.8%	1,780	2.6%
Moderate	18	5.1%	1,997	2.9%	57	16.1%	7,639	11.3%
Middle	214	60.6%	40,934	60.4%	81	22.9%	13,992	20.6%
Upper	115	32.6%	24,003	35.4%	191	54.1%	41,009	60.5%
Unknown	0	0.0%	0	0.0%	7	2.0%	3,355	5.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**353**	**100.0%**	**67,775**	**100.0%**	**353**	**100.0%**	**67,775**	**100.0%**
Home Improvement								
Low	1	2.2%	59	1.4%	5	10.9%	174	4.1%
Moderate	2	4.3%	123	2.9%	14	30.4%	1,137	27.1%
Middle	32	69.6%	2,818	67.2%	6	13.0%	605	14.4%
Upper	11	23.9%	1,195	28.5%	21	45.7%	2,280	54.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**46**	**100.0%**	**4,195**	**100.0%**	**46**	**100.0%**	**4,195**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	4	100.0%	1,988	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	2	50.0%	1,200	60.4%
Unknown	0	0.0%	0	0.0%	2	50.0%	788	39.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4**	**100.0%**	**1,988**	**100.0%**	**4**	**100.0%**	**1,988**	**100.0%**

CONTINUED- 2020 HMDA LOAN DISTRIBUTION TABLE (HARRISBURG, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	1	2.0%	100	2.1%	5	10.2%	195	4.0%
Moderate	1	2.0%	76	1.6%	10	20.4%	869	18.0%
Middle	30	61.2%	2,378	49.2%	9	18.4%	557	11.5%
Upper	17	34.7%	2,277	47.1%	25	51.0%	3,210	66.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**49**	**100.0%**	**4,831**	**100.0%**	**49**	**100.0%**	**4,831**	**100.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	1	33.3%	9	6.6%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	66.7%	39	28.4%	1	33.3%	30	21.9%
Upper	1	33.3%	98	71.6%	1	33.3%	98	71.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**3**	**100.0%**	**137**	**100.0%**	**3**	**100.0%**	**137**	**100.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	13	2.2%	1,967	1.9%	38	6.5%	3,440	3.2%
Moderate	40	6.8%	4,687	4.4%	108	18.3%	14,062	13.2%
Middle	353	59.9%	62,760	59.0%	131	22.2%	22,489	21.2%
Upper	183	31.1%	36,875	34.7%	288	48.9%	59,819	56.3%
Unknown	0	0.0%	0	0.0%	24	4.1%	6,479	6.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**589**	**100.0%**	**106,289**	**100.0%**	**589**	**100.0%**	**106,289**	**100.0%**

2021 HMDA LOAN DISTRIBUTION TABLE (HARRISBURG, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	14	8.8%	1,272	3.5%	18	11.3%	2,160	6.0%
Moderate	11	6.9%	1,103	3.1%	29	18.1%	4,788	13.3%
Middle	87	54.4%	20,591	57.0%	36	22.5%	7,849	21.7%
Upper	48	30.0%	13,165	36.4%	57	35.6%	17,377	48.1%
Unknown	0	0.0%	0	0.0%	20	12.5%	3,957	11.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**160**	**100.0%**	**36,131**	**100.0%**	**160**	**100.0%**	**36,131**	**100.0%**
Refinance								
Low	14	4.6%	2,023	3.2%	28	9.2%	3,194	5.1%
Moderate	20	6.6%	2,679	4.3%	58	19.1%	8,654	13.7%
Middle	176	58.1%	38,832	61.6%	67	22.1%	11,940	18.9%
Upper	93	30.7%	19,475	30.9%	143	47.2%	31,854	50.6%
Unknown	0	0.0%	0	0.0%	7	2.3%	7,367	11.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**303**	**100.0%**	**63,010**	**100.0%**	**303**	**100.0%**	**63,010**	**100.0%**
Home Improvement								
Low	1	1.4%	139	2.1%	8	11.4%	756	11.6%
Moderate	3	4.3%	350	5.4%	13	18.6%	1,083	16.6%
Middle	44	62.9%	4,058	62.1%	16	22.9%	1,140	17.4%
Upper	22	31.4%	1,993	30.5%	31	44.3%	3,292	50.3%
Unknown	0	0.0%	0	0.0%	2	2.9%	268	4.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**70**	**100.0%**	**6,540**	**100.0%**	**70**	**100.0%**	**6,540**	**100.0%**
Multi-Family								
Low	1	14.3%	950	15.0%	0	0.0%	0	0.0%
Moderate	1	14.3%	131	2.1%	0	0.0%	0	0.0%
Middle	3	42.9%	3,776	59.8%	0	0.0%	0	0.0%
Upper	2	28.6%	1,456	23.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	7	100.0%	6,314	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**7**	**100.0%**	**6,314**	**100.0%**	**7**	**100.0%**	**6,314**	**100.0%**

CONTINUED- 2021 HMDA LOAN DISTRIBUTION TABLE (HARRISBURG, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	1	1.6%	100	1.3%	7	11.5%	436	5.7%
Moderate	2	3.3%	291	3.8%	10	16.4%	737	9.6%
Middle	38	62.3%	4,077	53.2%	9	14.8%	1,039	13.5%
Upper	20	32.8%	3,199	41.7%	35	57.4%	5,456	71.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**61**	**100.0%**	**7,668**	**100.0%**	**61**	**100.0%**	**7,668**	**100.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	31	5.2%	4,484	3.7%	61	10.1%	6,547	5.5%
Moderate	37	6.2%	4,555	3.8%	110	18.3%	15,262	12.8%
Middle	348	57.9%	71,335	59.6%	128	21.3%	21,968	18.4%
Upper	185	30.8%	39,288	32.8%	266	44.3%	57,980	48.5%
Unknown	0	0.0%	0	0.0%	36	6.0%	17,906	15.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**601**	**100.0%**	**119,662**	**100.0%**	**601**	**100.0%**	**119,662**	**100.0%**

2022 HMDA LOAN DISTRIBUTION TABLE (HARRISBURG, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	6	4.8%	797	2.4%	12	9.6%	1,771	5.4%
Moderate	11	8.8%	1,507	4.6%	21	16.8%	4,098	12.5%
Middle	78	62.4%	19,062	58.3%	21	16.8%	4,762	14.6%
Upper	30	24.0%	11,333	34.7%	51	40.8%	18,463	56.5%
Unknown	0	0.0%	0	0.0%	20	16.0%	3,606	11.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**125**	**100.0%**	**32,699**	**100.0%**	**125**	**100.0%**	**32,699**	**100.0%**
Refinance								
Low	4	2.8%	207	0.8%	21	14.8%	2,939	11.2%
Moderate	10	7.0%	1,228	4.7%	28	19.7%	3,880	14.8%
Middle	84	59.2%	15,284	58.2%	34	23.9%	5,828	22.2%
Upper	44	31.0%	9,528	36.3%	56	39.4%	13,229	50.4%
Unknown	0	0.0%	0	0.0%	3	2.1%	372	1.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**142**	**100.0%**	**26,247**	**100.0%**	**142**	**100.0%**	**26,247**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	11	14.1%	899	10.6%
Moderate	4	5.1%	759	9.0%	12	15.4%	1,155	13.6%
Middle	51	65.4%	4,982	58.8%	17	21.8%	1,449	17.1%
Upper	23	29.5%	2,732	32.2%	37	47.4%	4,945	58.4%
Unknown	0	0.0%	0	0.0%	1	1.3%	25	0.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**78**	**100.0%**	**8,472**	**100.0%**	**78**	**100.0%**	**8,472**	**100.0%**
Multi-Family								
Low	2	18.2%	539	7.0%	0	0.0%	0	0.0%
Moderate	1	9.1%	880	11.5%	0	0.0%	0	0.0%
Middle	6	54.5%	4,453	57.9%	1	9.1%	346	4.5%
Upper	2	18.2%	1,814	23.6%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	10	90.9%	7,340	95.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**11**	**100.0%**	**7,685**	**100.0%**	**11**	**100.0%**	**7,685**	**100.0%**

CONTINUED- 2022 HMDA LOAN DISTRIBUTION TABLE (HARRISBURG, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	5	8.6%	495	5.8%
Moderate	4	6.9%	477	5.6%	17	29.3%	1,400	16.4%
Middle	38	65.5%	5,492	64.2%	12	20.7%	1,677	19.6%
Upper	16	27.6%	2,588	30.2%	24	41.4%	4,985	58.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**58**	**100.0%**	**8,556**	**100.0%**	**58**	**100.0%**	**8,556**	**100.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	1	50.0%	5	14.7%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	34	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	50.0%	29	85.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**2**	**100.0%**	**34**	**100.0%**	**2**	**100.0%**	**34**	**100.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	12	2.9%	1,543	1.8%	50	12.0%	6,108	7.3%
Moderate	30	7.2%	4,850	5.8%	78	18.8%	10,533	12.6%
Middle	259	62.3%	49,306	58.9%	85	20.4%	14,061	16.8%
Upper	115	27.6%	27,994	33.4%	169	40.6%	41,650	49.8%
Unknown	0	0.0%	0	0.0%	34	8.2%	11,342	13.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**416**	**100.0%**	**83,694**	**100.0%**	**416**	**100.0%**	**83,694**	**100.0%**

2020 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	1	2.1%	50	0.4%	2	4.3%	192	1.6%
Moderate	3	6.4%	442	3.6%	8	17.0%	1,297	10.5%
Middle	35	74.5%	9,374	75.7%	10	21.3%	2,561	20.7%
Upper	8	17.0%	2,510	20.3%	22	46.8%	7,655	61.8%
Unknown	0	0.0%	0	0.0%	5	10.6%	672	5.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**47**	**100.0%**	**12,377**	**100.0%**	**47**	**100.0%**	**12,377**	**100.0%**
Refinance								
Low	2	1.4%	131	0.4%	3	2.2%	465	1.5%
Moderate	13	9.4%	1,882	5.9%	16	11.6%	2,379	7.5%
Middle	90	65.2%	20,182	63.7%	36	26.1%	6,667	21.1%
Upper	33	23.9%	9,475	29.9%	80	58.0%	21,694	68.5%
Unknown	0	0.0%	0	0.0%	3	2.2%	466	1.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**138**	**100.0%**	**31,670**	**100.0%**	**138**	**100.0%**	**31,670**	**100.0%**
Home Improvement								
Low	2	8.0%	215	7.5%	1	4.0%	110	3.8%
Moderate	3	12.0%	388	13.6%	2	8.0%	265	9.3%
Middle	13	52.0%	1,460	51.2%	8	32.0%	919	32.3%
Upper	7	28.0%	786	27.6%	13	52.0%	1,505	52.8%
Unknown	0	0.0%	0	0.0%	1	4.0%	50	1.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**25**	**100.0%**	**2,849**	**100.0%**	**25**	**100.0%**	**2,849**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	50.0%	2,400	57.2%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	50.0%	1,799	42.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	4,199	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**2**	**100.0%**	**4,199**	**100.0%**	**2**	**100.0%**	**4,199**	**100.0%**

CONTINUED- 2020 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	25	73.5%	2,607	62.6%	10	29.4%	1,086	26.1%
Upper	9	26.5%	1,554	37.4%	24	70.6%	3,075	73.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**34**	**100.0%**	**4,162**	**100.0%**	**34**	**100.0%**	**4,162**	**100.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	5	2.0%	396	0.7%	6	2.4%	767	1.4%
Moderate	20	8.1%	5,112	9.3%	26	10.6%	3,941	7.1%
Middle	163	66.3%	33,624	60.9%	64	26.0%	11,233	20.3%
Upper	58	23.6%	16,125	29.2%	139	56.5%	33,929	61.4%
Unknown	0	0.0%	0	0.0%	11	4.5%	5,387	9.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**246**	**100.0%**	**55,256**	**100.0%**	**246**	**100.0%**	**55,256**	**100.0%**

2021 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	1	1.7%	190	1.0%	4	6.8%	732	3.9%
Moderate	3	5.1%	1,187	6.3%	11	18.6%	2,379	12.6%
Middle	44	74.6%	12,851	68.2%	11	18.6%	2,720	14.4%
Upper	11	18.6%	4,615	24.5%	29	49.2%	11,167	59.3%
Unknown	0	0.0%	0	0.0%	4	6.8%	1,844	9.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**59**	**100.0%**	**18,843**	**100.0%**	**59**	**100.0%**	**18,843**	**100.0%**
Refinance								
Low	1	0.8%	104	0.3%	0	0.0%	0	0.0%
Moderate	9	6.9%	1,162	3.4%	21	16.0%	3,323	9.7%
Middle	98	74.8%	24,443	71.5%	24	18.3%	4,283	12.5%
Upper	23	17.6%	8,494	24.8%	84	64.1%	26,280	76.8%
Unknown	0	0.0%	0	0.0%	2	1.5%	318	0.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**131**	**100.0%**	**34,204**	**100.0%**	**131**	**100.0%**	**34,204**	**100.0%**
Home Improvement								
Low	1	6.3%	400	15.5%	1	6.3%	219	8.5%
Moderate	2	12.5%	190	7.4%	1	6.3%	144	5.6%
Middle	12	75.0%	1,761	68.1%	2	12.5%	204	7.9%
Upper	1	6.3%	233	9.0%	11	68.8%	1,842	71.3%
Unknown	0	0.0%	0	0.0%	1	6.3%	175	6.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**16**	**100.0%**	**2,584**	**100.0%**	**16**	**100.0%**	**2,584**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	2,979	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	50.0%	452	15.2%
Unknown	0	0.0%	0	0.0%	1	50.0%	2,528	84.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**2**	**100.0%**	**2,979**	**100.0%**	**2**	**100.0%**	**2,979**	**100.0%**

CONTINUED- 2021 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	1	2.2%	150	2.3%
Moderate	1	2.2%	158	2.4%	3	6.5%	188	2.9%
Middle	35	76.1%	4,916	75.0%	12	26.1%	1,980	30.2%
Upper	10	21.7%	1,478	22.6%	30	65.2%	4,233	64.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**46**	**100.0%**	**6,552**	**100.0%**	**46**	**100.0%**	**6,552**	**100.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	3	1.2%	694	1.1%	6	2.4%	1,102	1.7%
Moderate	15	5.9%	2,698	4.1%	36	14.2%	6,034	9.3%
Middle	191	75.2%	46,950	72.1%	49	19.3%	9,188	14.1%
Upper	45	17.7%	14,820	22.7%	155	61.0%	43,973	67.5%
Unknown	0	0.0%	0	0.0%	8	3.1%	4,865	7.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**254**	**100.0%**	**65,162**	**100.0%**	**254**	**100.0%**	**65,162**	**100.0%**

2022 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	2	3.0%	353	1.6%	3	4.5%	584	2.6%
Moderate	6	9.1%	1,297	5.7%	15	22.7%	3,191	14.1%
Middle	51	77.3%	15,051	66.5%	15	22.7%	4,058	17.9%
Upper	7	10.6%	5,917	26.2%	31	47.0%	14,176	62.7%
Unknown	0	0.0%	0	0.0%	2	3.0%	608	2.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**66**	**100.0%**	**22,617**	**100.0%**	**66**	**100.0%**	**22,617**	**100.0%**
Refinance								
Low	1	2.2%	103	0.6%	1	2.2%	179	1.1%
Moderate	3	6.7%	829	4.9%	2	4.4%	375	2.2%
Middle	30	66.7%	11,459	68.0%	6	13.3%	1,183	7.0%
Upper	11	24.4%	4,467	26.5%	35	77.8%	15,018	89.1%
Unknown	0	0.0%	0	0.0%	1	2.2%	103	0.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**45**	**100.0%**	**16,858**	**100.0%**	**45**	**100.0%**	**16,858**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	1	2.6%	10	0.2%
Moderate	2	5.3%	179	3.8%	5	13.2%	211	4.5%
Middle	27	71.1%	2,727	57.8%	9	23.7%	783	16.6%
Upper	9	23.7%	1,814	38.4%	23	60.5%	3,717	78.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**38**	**100.0%**	**4,720**	**100.0%**	**38**	**100.0%**	**4,720**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	50.0%	488	6.9%	0	0.0%	0	0.0%
Middle	1	50.0%	6,596	93.1%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	7,084	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**2**	**100.0%**	**7,084**	**100.0%**	**2**	**100.0%**	**7,084**	**100.0%**

CONTINUED- 2022 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	2	5.6%	799	13.7%
Moderate	3	8.3%	123	2.1%	7	19.4%	893	15.3%
Middle	26	72.2%	4,270	73.0%	6	16.7%	603	10.3%
Upper	7	19.4%	1,458	24.9%	21	58.3%	3,557	60.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**36**	**100.0%**	**5,851**	**100.0%**	**36**	**100.0%**	**5,851**	**100.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	50	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	50	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**1**	**100.0%**	**50**	**100.0%**	**1**	**100.0%**	**50**	**100.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	3	1.6%	457	0.8%	7	3.7%	1,572	2.7%
Moderate	15	8.0%	2,916	5.1%	29	15.4%	4,670	8.2%
Middle	136	72.3%	40,153	70.2%	36	19.1%	6,627	11.6%
Upper	34	18.1%	13,655	23.9%	111	59.0%	36,517	63.9%
Unknown	0	0.0%	0	0.0%	5	2.7%	7,795	13.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**188**	**100.0%**	**57,181**	**100.0%**	**188**	**100.0%**	**57,181**	**100.0%**

2020 HMDA LOAN DISTRIBUTION TABLE (CHAMBERSBURG, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	2	2.7%	178	1.2%	4	5.4%	529	3.6%
Moderate	2	2.7%	377	2.6%	12	16.2%	1,682	11.6%
Middle	58	78.4%	11,463	78.8%	18	24.3%	3,533	24.3%
Upper	12	16.2%	2,532	17.4%	32	43.2%	7,120	48.9%
Unknown	0	0.0%	0	0.0%	8	10.8%	1,688	11.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**74**	**100.0%**	**14,551**	**100.0%**	**74**	**100.0%**	**14,551**	**100.0%**
Refinance								
Low	3	1.3%	265	0.7%	20	8.4%	1,881	5.2%
Moderate	4	1.7%	394	1.1%	51	21.5%	6,353	17.7%
Middle	203	85.7%	31,371	87.2%	59	24.9%	8,594	23.9%
Upper	27	11.4%	3,948	11.0%	103	43.5%	18,620	51.8%
Unknown	0	0.0%	0	0.0%	4	1.7%	531	1.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**237**	**100.0%**	**35,978**	**100.0%**	**237**	**100.0%**	**35,978**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	9	14.1%	489	10.9%
Moderate	0	0.0%	0	0.0%	8	12.5%	330	7.3%
Middle	60	93.8%	4,435	98.5%	23	35.9%	1,742	38.7%
Upper	4	6.3%	68	1.5%	22	34.4%	1,763	39.2%
Unknown	0	0.0%	0	0.0%	2	3.1%	178	4.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**64**	**100.0%**	**4,502**	**100.0%**	**64**	**100.0%**	**4,502**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	171	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	171	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**1**	**100.0%**	**171**	**100.0%**	**1**	**100.0%**	**171**	**100.0%**

CONTINUED- 2020 HMDA LOAN DISTRIBUTION TABLE (CHAMBERSBURG, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	3	6.7%	198	6.1%
Moderate	0	0.0%	0	0.0%	16	35.6%	924	28.6%
Middle	40	88.9%	2,935	91.0%	7	15.6%	293	9.1%
Upper	5	11.1%	290	9.0%	19	42.2%	1,812	56.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**45**	**100.0%**	**3,226**	**100.0%**	**45**	**100.0%**	**3,226**	**100.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	1	25.0%	25	32.3%
Moderate	0	0.0%	0	0.0%	1	25.0%	21	26.5%
Middle	4	100.0%	78	100.0%	2	50.0%	32	41.3%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4**	**100.0%**	**78**	**100.0%**	**4**	**100.0%**	**78**	**100.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	5	1.2%	443	0.8%	37	8.7%	3,122	5.3%
Moderate	6	1.4%	772	1.3%	88	20.7%	9,309	15.9%
Middle	366	86.1%	50,453	86.2%	109	25.6%	14,193	24.3%
Upper	48	11.3%	6,838	11.7%	176	41.4%	29,315	50.1%
Unknown	0	0.0%	0	0.0%	15	3.5%	2,567	4.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**425**	**100.0%**	**58,506**	**100.0%**	**425**	**100.0%**	**58,506**	**100.0%**

2021 HMDA LOAN DISTRIBUTION TABLE (CHAMBERSBURG, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	3	4.2%	419	2.9%	9	12.7%	1,119	7.8%
Moderate	2	2.8%	267	1.9%	11	15.5%	1,607	11.3%
Middle	59	83.1%	12,443	87.1%	22	31.0%	4,649	32.5%
Upper	7	9.9%	1,155	8.1%	25	35.2%	6,402	44.8%
Unknown	0	0.0%	0	0.0%	4	5.6%	506	3.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**71**	**100.0%**	**14,283**	**100.0%**	**71**	**100.0%**	**14,283**	**100.0%**
Refinance								
Low	3	1.1%	337	0.8%	24	8.8%	2,544	5.7%
Moderate	5	1.8%	608	1.4%	56	20.5%	6,595	14.9%
Middle	237	86.8%	38,663	87.2%	67	24.5%	9,949	22.4%
Upper	28	10.3%	4,719	10.6%	121	44.3%	24,421	55.1%
Unknown	0	0.0%	0	0.0%	5	1.8%	818	1.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**273**	**100.0%**	**44,327**	**100.0%**	**273**	**100.0%**	**44,327**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	11	13.4%	592	10.1%
Moderate	1	1.2%	100	1.7%	15	18.3%	798	13.6%
Middle	70	85.4%	4,881	83.2%	13	15.9%	922	15.7%
Upper	11	13.4%	886	15.1%	43	52.4%	3,554	60.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**82**	**100.0%**	**5,867**	**100.0%**	**82**	**100.0%**	**5,867**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	699	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	699	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**2**	**100.0%**	**699**	**100.0%**	**2**	**100.0%**	**699**	**100.0%**

CONTINUED- 2021 HMDA LOAN DISTRIBUTION TABLE (CHAMBERSBURG, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	2	4.1%	50	1.4%	5	10.2%	183	5.0%
Moderate	0	0.0%	0	0.0%	11	22.4%	445	12.1%
Middle	41	83.7%	3,087	83.9%	11	22.4%	525	14.3%
Upper	6	12.2%	543	14.7%	22	44.9%	2,527	68.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**49**	**100.0%**	**3,680**	**100.0%**	**49**	**100.0%**	**3,680**	**100.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	2	50.0%	44	41.7%
Moderate	0	0.0%	0	0.0%	1	25.0%	21	20.3%
Middle	2	50.0%	54	51.2%	0	0.0%	0	0.0%
Upper	2	50.0%	51	48.8%	1	25.0%	40	38.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4**	**100.0%**	**105**	**100.0%**	**4**	**100.0%**	**105**	**100.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	8	1.7%	806	1.2%	51	10.6%	4,481	6.5%
Moderate	8	1.7%	975	1.4%	94	19.5%	9,468	13.7%
Middle	411	85.4%	59,826	86.8%	113	23.5%	16,044	23.3%
Upper	54	11.2%	7,355	10.7%	212	44.1%	36,945	53.6%
Unknown	0	0.0%	0	0.0%	11	2.3%	2,024	2.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**481**	**100.0%**	**68,962**	**100.0%**	**481**	**100.0%**	**68,962**	**100.0%**

2022 HMDA LOAN DISTRIBUTION TABLE (CHAMBERSBURG, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	7	8.8%	1,121	5.7%
Moderate	8	10.0%	1,047	5.3%	17	21.3%	3,005	15.3%
Middle	64	80.0%	15,672	79.9%	17	21.3%	3,833	19.5%
Upper	8	10.0%	2,900	14.8%	33	41.3%	10,835	55.2%
Unknown	0	0.0%	0	0.0%	6	7.5%	824	4.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**80**	**100.0%**	**19,619**	**100.0%**	**80**	**100.0%**	**19,619**	**100.0%**
Refinance								
Low	0	0.0%	0	0.0%	10	9.3%	1,215	7.0%
Moderate	5	4.7%	620	3.6%	27	25.2%	3,096	17.9%
Middle	93	86.9%	15,221	88.2%	24	22.4%	3,505	20.3%
Upper	9	8.4%	1,411	8.2%	41	38.3%	8,784	50.9%
Unknown	0	0.0%	0	0.0%	5	4.7%	653	3.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**107**	**100.0%**	**17,253**	**100.0%**	**107**	**100.0%**	**17,253**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	7	9.5%	356	6.4%
Moderate	3	4.1%	171	3.1%	20	27.0%	1,518	27.3%
Middle	66	89.2%	4,743	85.4%	19	25.7%	1,407	25.3%
Upper	5	6.8%	640	11.5%	28	37.8%	2,272	40.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**74**	**100.0%**	**5,553**	**100.0%**	**74**	**100.0%**	**5,553**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	66.7%	1,489	81.0%	0	0.0%	0	0.0%
Middle	1	33.3%	350	19.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	100.0%	1,839	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**3**	**100.0%**	**1,839**	**100.0%**	**3**	**100.0%**	**1,839**	**100.0%**

CONTINUED- 2022 HMDA LOAN DISTRIBUTION TABLE (CHAMBERSBURG, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	5	8.2%	338	5.9%
Moderate	2	3.3%	32	0.6%	18	29.5%	1,802	31.5%
Middle	57	93.4%	5,423	94.9%	14	23.0%	1,030	18.0%
Upper	2	3.3%	260	4.5%	24	39.3%	2,546	44.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**61**	**100.0%**	**5,716**	**100.0%**	**61**	**100.0%**	**5,716**	**100.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	33.3%	20	22.2%
Middle	3	100.0%	90	100.0%	2	66.7%	70	77.8%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**3**	**100.0%**	**90**	**100.0%**	**3**	**100.0%**	**90**	**100.0%**
Loan Purpose Not Applicable								
,Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	0	0.0%	0	0.0%	29	8.8%	3,029	6.1%
Moderate	20	6.1%	3,358	6.7%	83	25.3%	9,442	18.9%
Middle	284	86.6%	41,500	82.9%	76	23.2%	9,846	19.7%
Upper	24	7.3%	5,210	10.4%	126	38.4%	24,436	48.8%
Unknown	0	0.0%	0	0.0%	14	4.3%	3,316	6.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**328**	**100.0%**	**50,069**	**100.0%**	**328**	**100.0%**	**50,069**	**100.0%**

2020 HMDA LOAN DISTRIBUTION TABLE (BALTIMORE, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	3	15.8%	441	7.0%
Moderate	1	5.3%	112	1.8%	0	0.0%	0	0.0%
Middle	5	26.3%	1,398	22.3%	4	21.1%	1,269	20.2%
Upper	13	68.4%	4,767	75.9%	12	63.2%	4,567	72.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**19**	**100.0%**	**6,277**	**100.0%**	**19**	**100.0%**	**6,277**	**100.0%**
Refinance								
Low	3	2.9%	582	2.1%	2	1.9%	382	1.4%
Moderate	13	12.6%	2,247	8.1%	19	18.4%	3,126	11.3%
Middle	36	35.0%	8,813	31.9%	23	22.3%	5,313	19.3%
Upper	51	49.5%	15,952	57.8%	56	54.4%	17,817	64.6%
Unknown	0	0.0%	0	0.0%	3	2.9%	956	3.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**103**	**100.0%**	**27,594**	**100.0%**	**103**	**100.0%**	**27,594**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	20.0%	235	32.9%	2	40.0%	200	28.0%
Middle	1	20.0%	40	5.6%	0	0.0%	0	0.0%
Upper	3	60.0%	440	61.5%	3	60.0%	515	72.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**5**	**100.0%**	**715**	**100.0%**	**5**	**100.0%**	**715**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	4,000	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	4,000	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**1**	**100.0%**	**4,000**	**100.0%**	**1**	**100.0%**	**4,000**	**100.0%**

CONTINUED- 2020 HMDA LOAN DISTRIBUTION TABLE (BALTIMORE, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	1	12.5%	50	5.3%
Moderate	0	0.0%	0	0.0%	2	25.0%	350	37.4%
Middle	4	50.0%	450	48.0%	1	12.5%	50	5.3%
Upper	4	50.0%	487	52.0%	4	50.0%	487	52.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**8**	**100.0%**	**937**	**100.0%**	**8**	**100.0%**	**937**	**100.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	3	2.2%	582	1.5%	6	4.4%	873	2.2%
Moderate	15	11.0%	2,593	6.6%	23	16.9%	3,676	9.3%
Middle	46	33.8%	10,702	27.1%	28	20.6%	6,632	16.8%
Upper	72	52.9%	25,646	64.9%	75	55.1%	23,386	59.2%
Unknown	0	0.0%	0	0.0%	4	2.9%	4,956	12.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**136**	**100.0%**	**39,522**	**100.0%**	**136**	**100.0%**	**39,522**	**100.0%**

2021 HMDA LOAN DISTRIBUTION TABLE (BALTIMORE, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	3	10.0%	468	3.8%
Moderate	3	10.0%	566	4.6%	10	33.3%	2,695	21.7%
Middle	10	33.3%	4,344	34.9%	5	16.7%	1,428	11.5%
Upper	17	56.7%	7,520	60.5%	11	36.7%	7,277	58.6%
Unknown	0	0.0%	0	0.0%	1	3.3%	560	4.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**30**	**100.0%**	**12,429**	**100.0%**	**30**	**100.0%**	**12,429**	**100.0%**
Refinance								
Low	0	0.0%	0	0.0%	8	8.5%	952	3.3%
Moderate	9	9.6%	1,699	5.9%	19	20.2%	3,278	11.3%
Middle	33	35.1%	10,422	36.0%	15	16.0%	4,108	14.2%
Upper	52	55.3%	16,852	58.2%	48	51.1%	19,433	67.1%
Unknown	0	0.0%	0	0.0%	4	4.3%	1,201	4.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**94**	**100.0%**	**28,972**	**100.0%**	**94**	**100.0%**	**28,972**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	9.1%	118	3.3%	4	18.2%	289	8.0%
Middle	7	31.8%	694	19.3%	5	22.7%	926	25.7%
Upper	13	59.1%	2,790	77.5%	13	59.1%	2,388	66.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**22**	**100.0%**	**3,602**	**100.0%**	**22**	**100.0%**	**3,602**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**

CONTINUED- 2021 HMDA LOAN DISTRIBUTION TABLE (BALTIMORE, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	2	8.3%	80	2.1%
Moderate	4	16.7%	275	7.1%	5	20.8%	425	11.0%
Middle	6	25.0%	897	23.1%	7	29.2%	971	25.1%
Upper	14	58.3%	2,704	69.8%	10	41.7%	2,400	61.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**24**	**100.0%**	**3,876**	**100.0%**	**24**	**100.0%**	**3,876**	**100.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	0	0.0%	0	0.0%	13	7.6%	1,500	3.1%
Moderate	18	10.6%	2,657	5.4%	38	22.4%	6,686	13.7%
Middle	56	32.9%	16,356	33.5%	32	18.8%	7,433	15.2%
Upper	96	56.5%	29,865	61.1%	82	48.2%	31,498	64.4%
Unknown	0	0.0%	0	0.0%	5	2.9%	1,761	3.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**170**	**100.0%**	**48,879**	**100.0%**	**170**	**100.0%**	**48,879**	**100.0%**

2022 HMDA LOAN DISTRIBUTION TABLE (BALTIMORE, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	1	3.1%	109	0.5%	1	3.1%	242	1.2%
Moderate	0	0.0%	0	0.0%	4	12.5%	924	4.4%
Middle	14	43.8%	8,110	38.7%	8	25.0%	2,989	14.3%
Upper	17	53.1%	12,732	60.8%	18	56.3%	16,686	79.6%
Unknown	0	0.0%	0	0.0%	1	3.1%	109	0.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**32**	**100.0%**	**20,951**	**100.0%**	**32**	**100.0%**	**20,951**	**100.0%**
Refinance								
Low	0	0.0%	0	0.0%	2	4.8%	270	1.8%
Moderate	6	14.3%	1,009	6.8%	6	14.3%	1,015	6.8%
Middle	12	28.6%	3,259	22.0%	7	16.7%	1,742	11.8%
Upper	23	54.8%	10,371	70.0%	26	61.9%	11,613	78.4%
Unknown	1	2.4%	180	1.2%	1	2.4%	180	1.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**42**	**100.0%**	**14,819**	**100.0%**	**42**	**100.0%**	**14,819**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	1	5.0%	10	0.3%
Moderate	1	5.0%	25	0.7%	5	25.0%	649	19.2%
Middle	9	45.0%	1,579	46.6%	4	20.0%	403	11.9%
Upper	10	50.0%	1,781	52.6%	10	50.0%	2,323	68.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**20**	**100.0%**	**3,385**	**100.0%**	**20**	**100.0%**	**3,385**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	1,000	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	1,000	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**1**	**100.0%**	**1,000**	**100.0%**	**1**	**100.0%**	**1,000**	**100.0%**

CONTINUED- 2022 HMDA LOAN DISTRIBUTION TABLE (BALTIMORE, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	3	15.0%	225	6.9%
Moderate	2	10.0%	358	11.0%	3	15.0%	190	5.8%
Middle	5	25.0%	748	23.0%	6	30.0%	1,333	41.1%
Upper	13	65.0%	2,140	65.9%	8	40.0%	1,499	46.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**20**	**100.0%**	**3,247**	**100.0%**	**20**	**100.0%**	**3,247**	**100.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	100.0%	82	100.0%
Middle	1	100.0%	82	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**1**	**100.0%**	**82**	**100.0%**	**1**	**100.0%**	**82**	**100.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	1	0.9%	109	0.3%	7	6.0%	747	1.7%
Moderate	9	7.8%	1,392	3.2%	19	16.4%	2,860	6.6%
Middle	42	36.2%	14,778	34.0%	25	21.6%	6,467	14.9%
Upper	63	54.3%	27,024	62.1%	62	53.4%	32,120	73.9%
Unknown	1	0.9%	180	0.4%	3	2.6%	1,289	3.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**116**	**100.0%**	**43,483**	**100.0%**	**116**	**100.0%**	**43,483**	**100.0%**

2020 HMDA LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	20.0%	56	4.7%	0	0.0%	0	0.0%
Middle	3	60.0%	986	83.0%	3	60.0%	472	39.7%
Upper	1	20.0%	146	12.3%	2	40.0%	716	60.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**5**	**100.0%**	**1,188**	**100.0%**	**5**	**100.0%**	**1,188**	**100.0%**
Refinance								
Low	0	0.0%	0	0.0%	1	3.8%	40	0.9%
Moderate	3	11.5%	226	4.9%	4	15.4%	398	8.7%
Middle	14	53.8%	2,568	56.2%	3	11.5%	582	12.7%
Upper	9	34.6%	1,774	38.8%	18	69.2%	3,548	77.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**26**	**100.0%**	**4,568**	**100.0%**	**26**	**100.0%**	**4,568**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	33.3%	100	65.8%
Middle	2	66.7%	52	34.2%	1	33.3%	24	15.8%
Upper	1	33.3%	100	65.8%	1	33.3%	28	18.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**3**	**100.0%**	**152**	**100.0%**	**3**	**100.0%**	**152**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**

CONTINUED- 2020 HMDA LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	0	0.0%	0	0.0%	1	2.9%	40	0.7%
Moderate	4	11.8%	282	4.8%	5	14.7%	498	8.4%
Middle	19	55.9%	3,607	61.0%	7	20.6%	1,077	18.2%
Upper	11	32.4%	2,020	34.2%	21	61.8%	4,293	72.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**34**	**100.0%**	**5,908**	**100.0%**	**34**	**100.0%**	**5,908**	**100.0%**

2021 HMDA LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	2	20.0%	129	10.6%	0	0.0%	0	0.0%
Moderate	3	30.0%	174	14.3%	0	0.0%	0	0.0%
Middle	3	30.0%	582	47.7%	4	40.0%	385	31.6%
Upper	2	20.0%	334	27.4%	6	60.0%	834	68.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**10**	**100.0%**	**1,219**	**100.0%**	**10**	**100.0%**	**1,219**	**100.0%**
Refinance								
Low	1	4.2%	54	1.5%	1	4.2%	100	2.7%
Moderate	0	0.0%	0	0.0%	5	20.8%	636	17.2%
Middle	15	62.5%	2,349	63.4%	5	20.8%	571	15.4%
Upper	8	33.3%	1,302	35.1%	13	54.2%	2,399	64.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**24**	**100.0%**	**3,705**	**100.0%**	**24**	**100.0%**	**3,705**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	1	16.7%	50	16.3%
Moderate	1	16.7%	100	32.7%	1	16.7%	100	32.7%
Middle	3	50.0%	128	41.8%	0	0.0%	0	0.0%
Upper	2	33.3%	78	25.5%	4	66.7%	156	51.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**6**	**100.0%**	**306**	**100.0%**	**6**	**100.0%**	**306**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	600	100.0%	1	100.0%	600	100.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**1**	**100.0%**	**600**	**100.0%**	**1**	**100.0%**	**600**	**100.0%**

CONTINUED- 2021 HMDA LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	1	20.0%	27	8.5%
Moderate	1	20.0%	40	12.7%	1	20.0%	118	37.6%
Middle	3	60.0%	247	78.7%	2	40.0%	129	41.1%
Upper	1	20.0%	27	8.5%	1	20.0%	40	12.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**5**	**100.0%**	**314**	**100.0%**	**5**	**100.0%**	**314**	**100.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	3	6.5%	183	3.0%	3	6.5%	177	2.9%
Moderate	5	10.9%	314	5.1%	7	15.2%	854	13.9%
Middle	25	54.3%	3,906	63.6%	12	26.1%	1,685	27.4%
Upper	13	28.3%	1,741	28.3%	24	52.2%	3,429	55.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**46**	**100.0%**	**6,144**	**100.0%**	**46**	**100.0%**	**6,144**	**100.0%**

2022 HMDA LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	1	16.7%	76	7.1%	0	0.0%	0	0.0%
Moderate	3	50.0%	646	60.4%	0	0.0%	0	0.0%
Middle	1	16.7%	167	15.6%	3	50.0%	382	35.8%
Upper	1	16.7%	180	16.8%	3	50.0%	687	64.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**6**	**100.0%**	**1,069**	**100.0%**	**6**	**100.0%**	**1,069**	**100.0%**
Refinance								
Low	0	0.0%	0	0.0%	2	20.0%	176	12.1%
Moderate	2	20.0%	231	15.9%	1	10.0%	125	8.6%
Middle	5	50.0%	659	45.4%	4	40.0%	517	35.6%
Upper	3	30.0%	561	38.7%	3	30.0%	633	43.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**10**	**100.0%**	**1,451**	**100.0%**	**10**	**100.0%**	**1,451**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	6.3%	39	1.9%	2	12.5%	133	6.3%
Middle	13	81.3%	1,708	81.5%	3	18.8%	239	11.4%
Upper	2	12.5%	349	16.7%	11	68.8%	1,724	82.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**16**	**100.0%**	**2,095**	**100.0%**	**16**	**100.0%**	**2,095**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**

CONTINUED- 2022 HMDA LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	40.0%	125	29.9%	2	40.0%	125	29.9%
Upper	3	60.0%	293	70.1%	3	60.0%	293	70.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**5**	**100.0%**	**418**	**100.0%**	**5**	**100.0%**	**418**	**100.0%**
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	1	2.7%	76	1.5%	2	5.4%	176	3.5%
Moderate	6	16.2%	916	18.2%	3	8.1%	258	5.1%
Middle	21	56.8%	2,658	52.8%	12	32.4%	1,263	25.1%
Upper	9	24.3%	1,383	27.5%	20	54.1%	3,336	66.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**37**	**100.0%**	**5,033**	**100.0%**	**37**	**100.0%**	**5,033**	**100.0%**

CRA APPENDIX E: SMALL BUSINESS LOAN DISTRIBUTION TABLES

2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (HARRISBURG, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	68	8.4%	3,986	5.9%	0	0.0%	0	0.0%
Moderate	88	10.9%	7,812	11.6%	0	0.0%	0	0.0%
Middle	450	55.6%	42,761	63.3%	0	0.0%	0	0.0%
Upper	204	25.2%	13,043	19.3%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**810**	**100.0%**	**67,602**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	126	15.6%	6,272	9.3%	0	0.0%	0	0.0%
Over $1 Million	79	9.8%	19,849	29.4%	0	0.0%	0	0.0%
Not Known	605	74.7%	41,481	61.4%	0	0.0%	0	0.0%
Total	**810**	**100.0%**	**67,602**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	640	79.0%	16,177	23.9%	0	0.0%	0	0.0%
$100,001 - $250,000	99	12.2%	16,437	24.3%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	71	8.8%	34,988	51.8%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**810**	**100.0%**	**67,602**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	110	87.3%	2,599	41.4%	0	0.0%	0	0.0%
$100,001 - $250,000	11	8.7%	1,965	31.3%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	5	4.0%	1,708	27.2%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**126**	**100.0%**	**6,272**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2021 SMALL BUSINESS LOAN DISTRIBUTION TABLE (HARRISBURG, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	63	6.8%	3,500	7.7%	0	0.0%	0	0.0%
Moderate	97	10.5%	4,043	8.9%	0	0.0%	0	0.0%
Middle	542	58.4%	28,709	63.3%	1	100.0%	230	100.0%
Upper	226	24.4%	9,128	20.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**928**	**100.0%**	**45,380**	**100.0%**	**1**	**100.0%**	**230**	**100.0%**
By Revenue								
Total $1 Million or Less	46	5.0%	8,836	19.5%	1	100.0%	230	100.0%
Over $1 Million	28	3.0%	10,111	22.3%	0	0.0%	0	0.0%
Not Known	854	92.0%	26,433	58.2%	0	0.0%	0	0.0%
Total	**928**	**100.0%**	**45,380**	**100.0%**	**1**	**100.0%**	**230**	**100.0%**
By Loan Size								
$100,000 or less	824	88.8%	14,853	32.7%	0	0.0%	0	0.0%
$100,001 - $250,000	65	7.0%	10,854	23.9%	1	100.0%	230	100.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	39	4.2%	19,673	43.4%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**928**	**100.0%**	**45,380**	**100.0%**	**1**	**100.0%**	**230**	**100.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	25	54.3%	1,179	13.3%	0	0.0%	0	0.0%
$100,001 - $250,000	10	21.7%	1,860	21.1%	1	100.0%	230	100.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	11	23.9%	5,797	65.6%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**46**	**100.0%**	**8,836**	**100.0%**	**1**	**100.0%**	**230**	**100.0%**

2022 SMALL BUSINESS LOAN DISTRIBUTION TABLE (HARRISBURG, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	3	2.5%	1,768	6.9%	0	0.0%	0	0.0%
Moderate	9	7.6%	2,447	9.5%	1	25.0%	30	28.6%
Middle	78	65.5%	15,247	59.2%	3	75.0%	75	71.4%
Upper	29	24.4%	6,304	24.5%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	119	100.0%	25,766	100.0%	4	100.0%	105	100.0%
By Revenue								
Total $1 Million or Less	70	58.8%	15,026	58.3%	4	100.0%	105	100.0%
Over $1 Million	48	40.3%	10,540	40.9%	0	0.0%	0	0.0%
Not Known	1	0.8%	200	0.8%	0	0.0%	0	0.0%
Total	119	100.0%	25,766	100.0%	4	100.0%	105	100.0%
By Loan Size								
$100,000 or less	59	49.6%	2,760	10.7%	4	100.0%	105	100.0%
$100,001 - $250,000	29	24.4%	4,878	18.9%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	31	26.1%	18,128	70.4%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	119	100.0%	25,766	100.0%	4	100.0%	105	100.0%
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	34	48.6%	1,444	9.6%	4	100.0%	105	100.0%
$100,001 - $250,000	17	24.3%	2,760	18.4%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	19	27.1%	10,822	72.0%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	70	100.0%	15,026	100.0%	4	100.0%	105	100.0%

2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	33	4.9%	3,803	5.2%	0	0.0%	0	0.0%
Moderate	97	14.3%	8,477	11.5%	0	0.0%	0	0.0%
Middle	445	65.4%	49,727	67.5%	0	0.0%	0	0.0%
Upper	105	15.4%	11,681	15.9%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**680**	**100.0%**	**73,688**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	165	24.3%	15,119	20.5%	0	0.0%	0	0.0%
Over $1 Million	66	9.7%	19,313	26.2%	0	0.0%	0	0.0%
Not Known	449	66.0%	39,256	53.3%	0	0.0%	0	0.0%
Total	**680**	**100.0%**	**73,688**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	491	72.2%	12,495	17.0%	0	0.0%	0	0.0%
$100,001 - $250,000	94	13.8%	14,975	20.3%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	95	14.0%	46,218	62.7%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**680**	**100.0%**	**73,688**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	133	80.6%	2,301	15.2%	0	0.0%	0	0.0%
$100,001 - $250,000	11	6.7%	1,875	12.4%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	21	12.7%	10,943	72.4%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**165**	**100.0%**	**15,119**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2021 SMALL BUSINESS LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	18	2.8%	933	1.7%	0	0.0%	0	0.0%
Moderate	92	14.2%	9,290	17.1%	0	0.0%	0	0.0%
Middle	434	66.9%	39,708	73.0%	1	100.0%	50	100.0%
Upper	105	16.2%	4,437	8.2%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**649**	**100.0%**	**54,368**	**100.0%**	**1**	**100.0%**	**50**	**100.0%**
By Revenue								
Total $1 Million or Less	29	4.5%	10,565	19.4%	1	100.0%	50	100.0%
Over $1 Million	36	5.5%	11,632	21.4%	0	0.0%	0	0.0%
Not Known	584	90.0%	32,171	59.2%	0	0.0%	0	0.0%
Total	**649**	**100.0%**	**54,368**	**100.0%**	**1**	**100.0%**	**50**	**100.0%**
By Loan Size								
$100,000 or less	525	80.9%	10,617	19.5%	1	100.0%	50	100.0%
$100,001 - $250,000	62	9.6%	10,498	19.3%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	62	9.6%	33,253	61.2%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**649**	**100.0%**	**54,368**	**100.0%**	**1**	**100.0%**	**50**	**100.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	8	27.6%	328	3.1%	1	100.0%	50	100.0%
$100,001 - $250,000	7	24.1%	1,510	14.3%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	14	48.3%	8,727	82.6%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**29**	**100.0%**	**10,565**	**100.0%**	**1**	**100.0%**	**50**	**100.0%**

2022 SMALL BUSINESS LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	5	6.3%	1,200	5.9%	0	0.0%	0	0.0%
Middle	49	61.3%	14,774	72.9%	0	0.0%	0	0.0%
Upper	26	32.5%	4,284	21.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**80**	**100.0%**	**20,258**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	30	37.5%	8,426	41.6%	0	0.0%	0	0.0%
Over $1 Million	50	62.5%	11,832	58.4%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**80**	**100.0%**	**20,258**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	31	38.8%	1,278	6.3%	0	0.0%	0	0.0%
$100,001 - $250,000	17	21.3%	3,057	15.1%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	32	40.0%	15,923	78.6%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**80**	**100.0%**	**20,258**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	10	33.3%	468	5.6%	0	0.0%	0	0.0%
$100,001 - $250,000	6	20.0%	1,141	13.5%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	14	46.7%	6,817	80.9%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**30**	**100.0%**	**8,426**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (CHAMBERSBURG, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	12	2.6%	630	2.2%	0	0.0%	0	0.0%
Moderate	11	2.4%	727	2.5%	0	0.0%	0	0.0%
Middle	406	89.4%	25,419	89.1%	7	100.0%	699	100.0%
Upper	25	5.5%	1,747	6.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**454**	**100.0%**	**28,523**	**100.0%**	**7**	**100.0%**	**699**	**100.0%**
By Revenue								
Total $1 Million or Less	91	20.0%	4,453	15.6%	6	85.7%	449	64.2%
Over $1 Million	22	4.8%	6,465	22.7%	0	0.0%	0	0.0%
Not Known	341	75.1%	17,605	61.7%	1	14.3%	250	35.8%
Total	**454**	**100.0%**	**28,523**	**100.0%**	**7**	**100.0%**	**699**	**100.0%**
By Loan Size								
$100,000 or less	380	83.7%	10,709	37.5%	4	57.1%	165	23.6%
$100,001 - $250,000	50	11.0%	7,590	26.6%	3	42.9%	534	76.4%
$250,001 - $1 Million (Bus)-$500k (Farm)	24	5.3%	10,224	35.8%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**454**	**100.0%**	**28,523**	**100.0%**	**7**	**100.0%**	**699**	**100.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	81	89.0%	2,057	46.2%	4	66.7%	165	36.7%
$100,001 - $250,000	5	5.5%	814	18.3%	2	33.3%	284	63.3%
$250,001 - $1 Million (Bus)-$500k (Farm)	5	5.5%	1,582	35.5%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**91**	**100.0%**	**4,453**	**100.0%**	**6**	**100.0%**	**449**	**100.0%**

2021 SMALL BUSINESS LOAN DISTRIBUTION TABLE (CHAMBERSBURG, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	11	1.8%	438	1.8%	0	0.0%	0	0.0%
Moderate	13	2.2%	240	1.0%	0	0.0%	0	0.0%
Middle	528	87.4%	20,779	86.6%	7	77.8%	887	89.9%
Upper	52	8.6%	2,538	10.6%	2	22.2%	100	10.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**604**	**100.0%**	**23,995**	**100.0%**	**9**	**100.0%**	**987**	**100.0%**
By Revenue								
Total $1 Million or Less	39	6.5%	6,240	26.0%	8	88.9%	924	93.6%
Over $1 Million	18	3.0%	2,747	11.4%	1	11.1%	63	6.4%
Not Known	547	90.6%	15,008	62.5%	0	0.0%	0	0.0%
Total	**604**	**100.0%**	**23,995**	**100.0%**	**9**	**100.0%**	**987**	**100.0%**
By Loan Size								
$100,000 or less	553	91.6%	10,926	45.5%	6	66.7%	261	26.4%
$100,001 - $250,000	34	5.6%	5,188	21.6%	1	11.1%	129	13.1%
$250,001 - $1 Million (Bus)-$500k (Farm)	17	2.8%	7,881	32.8%	2	22.2%	597	60.5%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**604**	**100.0%**	**23,995**	**100.0%**	**9**	**100.0%**	**987**	**100.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	23	59.0%	912	14.6%	5	62.5%	198	21.4%
$100,001 - $250,000	6	15.4%	972	15.6%	1	12.5%	129	14.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	10	25.6%	4,356	69.8%	2	25.0%	597	64.6%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**39**	**100.0%**	**6,240**	**100.0%**	**8**	**100.0%**	**924**	**100.0%**

2022 SMALL BUSINESS LOAN DISTRIBUTION TABLE (CHAMBERSBURG, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	2.8%	325	3.0%	0	0.0%	0	0.0%
Middle	67	93.1%	9,509	87.0%	5	100.0%	399	100.0%
Upper	3	4.2%	1,093	10.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**72**	**100.0%**	**10,927**	**100.0%**	**5**	**100.0%**	**399**	**100.0%**
By Revenue								
Total $1 Million or Less	56	77.8%	6,175	56.5%	5	100.0%	399	100.0%
Over $1 Million	16	22.2%	4,752	43.5%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**72**	**100.0%**	**10,927**	**100.0%**	**5**	**100.0%**	**399**	**100.0%**
By Loan Size								
$100,000 or less	47	65.3%	2,065	18.9%	4	80.0%	221	55.4%
$100,001 - $250,000	10	13.9%	1,768	16.2%	1	20.0%	178	44.6%
$250,001 - $1 Million (Bus)-$500k (Farm)	15	20.8%	7,094	64.9%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**72**	**100.0%**	**10,927**	**100.0%**	**5**	**100.0%**	**399**	**100.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	42	75.0%	1,778	28.8%	4	80.0%	221	55.4%
$100,001 - $250,000	5	8.9%	863	14.0%	1	20.0%	178	44.6%
$250,001 - $1 Million (Bus)-$500k (Farm)	9	16.1%	3,534	57.2%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**56**	**100.0%**	**6,175**	**100.0%**	**5**	**100.0%**	**399**	**100.0%**

2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (BALTIMORE, MD ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	14	2.3%	2,256	3.7%	0	0.0%	0	0.0%
Moderate	83	13.9%	9,908	16.5%	0	0.0%	0	0.0%
Middle	226	37.7%	18,499	30.7%	0	0.0%	0	0.0%
Upper	269	44.9%	28,165	46.8%	0	0.0%	0	0.0%
Unknown	7	1.2%	1,366	2.3%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**599**	**100.0%**	**60,194**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	50	8.3%	5,353	8.9%	0	0.0%	0	0.0%
Over $1 Million	42	7.0%	12,095	20.1%	0	0.0%	0	0.0%
Not Known	507	84.6%	42,746	71.0%	0	0.0%	0	0.0%
Total	**599**	**100.0%**	**60,194**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	457	76.3%	14,231	23.6%	0	0.0%	0	0.0%
$100,001 - $250,000	72	12.0%	11,866	19.7%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	70	11.7%	34,097	56.6%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**599**	**100.0%**	**60,194**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	41	82.0%	1,511	28.2%	0	0.0%	0	0.0%
$100,001 - $250,000	3	6.0%	509	9.5%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	6	12.0%	3,333	62.3%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**50**	**100.0%**	**5,353**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2021 SMALL BUSINESS LOAN DISTRIBUTION TABLE (BALTIMORE, MD ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	15	2.7%	4,409	7.8%	0	0.0%	0	0.0%
Moderate	57	10.4%	6,935	12.3%	0	0.0%	0	0.0%
Middle	202	36.9%	18,444	32.7%	0	0.0%	0	0.0%
Upper	267	48.8%	26,161	46.3%	0	0.0%	0	0.0%
Unknown	6	1.1%	505	0.9%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	
Total	**547**	**100.0%**	**56,454**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	21	3.8%	8,387	14.9%	0	0.0%	0	0.0%
Over $1 Million	22	4.0%	4,260	7.5%	0	0.0%	0	0.0%
Not Known	504	92.1%	43,807	77.6%	0	0.0%	0	0.0%
Total	**547**	**100.0%**	**56,454**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	414	75.7%	11,825	20.9%	0	0.0%	0	0.0%
$100,001 - $250,000	64	11.7%	10,425	18.5%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	69	12.6%	34,204	60.6%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**547**	**100.0%**	**56,454**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	5	23.8%	275	3.3%	0	0.0%	0	0.0%
$100,001 - $250,000	4	19.0%	684	8.2%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	12	57.1%	7,428	88.6%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**21**	**100.0%**	**8,387**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2022 SMALL BUSINESS LOAN DISTRIBUTION TABLE (BALTIMORE, MD ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	5.6%	1,300	10.2%	0	0.0%	0	0.0%
Middle	12	33.3%	3,570	28.0%	0	0.0%	0	0.0%
Upper	22	61.1%	7,882	61.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**36**	**100.0%**	**12,752**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	9	25.0%	3,428	26.9%	0	0.0%	0	0.0%
Over $1 Million	27	75.0%	9,324	73.1%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**36**	**100.0%**	**12,752**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	8	22.2%	345	2.7%	0	0.0%	0	0.0%
$100,001 - $250,000	8	22.2%	1,518	11.9%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	20	55.6%	10,889	85.4%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**36**	**100.0%**	**12,752**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	3	33.3%	95	2.8%	0	0.0%	0	0.0%
$100,001 - $250,000	1	11.1%	167	4.9%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	5	55.6%	3,166	92.4%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**9**	**100.0%**	**3,428**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	7	9.3%	355	6.5%	0	0.0%	0	0.0%
Moderate	9	12.0%	404	7.4%	0	0.0%	0	0.0%
Middle	49	65.3%	4,061	74.0%	0	0.0%	0	0.0%
Upper	10	13.3%	667	12.2%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**75**	**100.0%**	**5,487**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	22	29.3%	512	9.3%	0	0.0%	0	0.0%
Over $1 Million	8	10.7%	1,598	29.1%	0	0.0%	0	0.0%
Not Known	45	60.0%	3,377	61.5%	0	0.0%	0	0.0%
Total	**75**	**100.0%**	**5,487**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	58	77.3%	1,422	25.9%	0	0.0%	0	0.0%
$100,001 - $250,000	11	14.7%	1,613	29.4%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	6	8.0%	2,452	44.7%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**75**	**100.0%**	**5,487**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	21	95.5%	392	76.6%	0	0.0%	0	0.0%
$100,001 - $250,000	1	4.5%	120	23.4%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**22**	**100.0%**	**512**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2021 SMALL BUSINESS LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	3	4.1%	64	2.7%	0	0.0%	0	0.0%
Moderate	12	16.4%	326	13.9%	0	0.0%	0	0.0%
Middle	45	61.6%	1,020	43.5%	0	0.0%	0	0.0%
Upper	13	17.8%	934	39.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**73**	**100.0%**	**2,344**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	3	4.1%	402	17.2%	0	0.0%	0	0.0%
Over $1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	70	95.9%	1,942	82.8%	0	0.0%	0	0.0%
Total	**73**	**100.0%**	**2,344**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	67	91.8%	1,252	53.4%	0	0.0%	0	0.0%
$100,001 - $250,000	5	6.8%	780	33.3%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	1	1.4%	312	13.3%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**73**	**100.0%**	**2,344**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	1	33.3%	77	19.2%	0	0.0%	0	0.0%
$100,001 - $250,000	2	66.7%	325	80.8%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**3**	**100.0%**	**402**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2022 SMALL BUSINESS LOAN DISTRIBUTION TABLE (HAGERSTOWN, MD ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	40.0%	675	52.9%	0	0.0%	0	0.0%
Upper	3	60.0%	600	47.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**5**	**100.0%**	**1,275**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	4	80.0%	775	60.8%	0	0.0%	0	0.0%
Over $1 Million	1	20.0%	500	39.2%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**5**	**100.0%**	**1,275**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	2	40.0%	100	7.8%	0	0.0%	0	0.0%
$100,001 - $250,000	1	20.0%	125	9.8%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	2	40.0%	1,050	82.4%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**5**	**100.0%**	**1,275**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	2	50.0%	100	12.9%	0	0.0%	0	0.0%
$100,001 - $250,000	1	25.0%	125	16.1%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	1	25.0%	550	71.0%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4**	**100.0%**	**775**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

<u>CRA APPENDIX F: ASSESSMENT AREA MAPS</u>

HARRISBURG, PA ASSESSMENT AREA (2015 ACS DATA)

2015 Census Year

INCOME
- ☐ Low
- ☐ Moderate
- ☐ Middle
- ☐ Upper
- ☐ Unknown
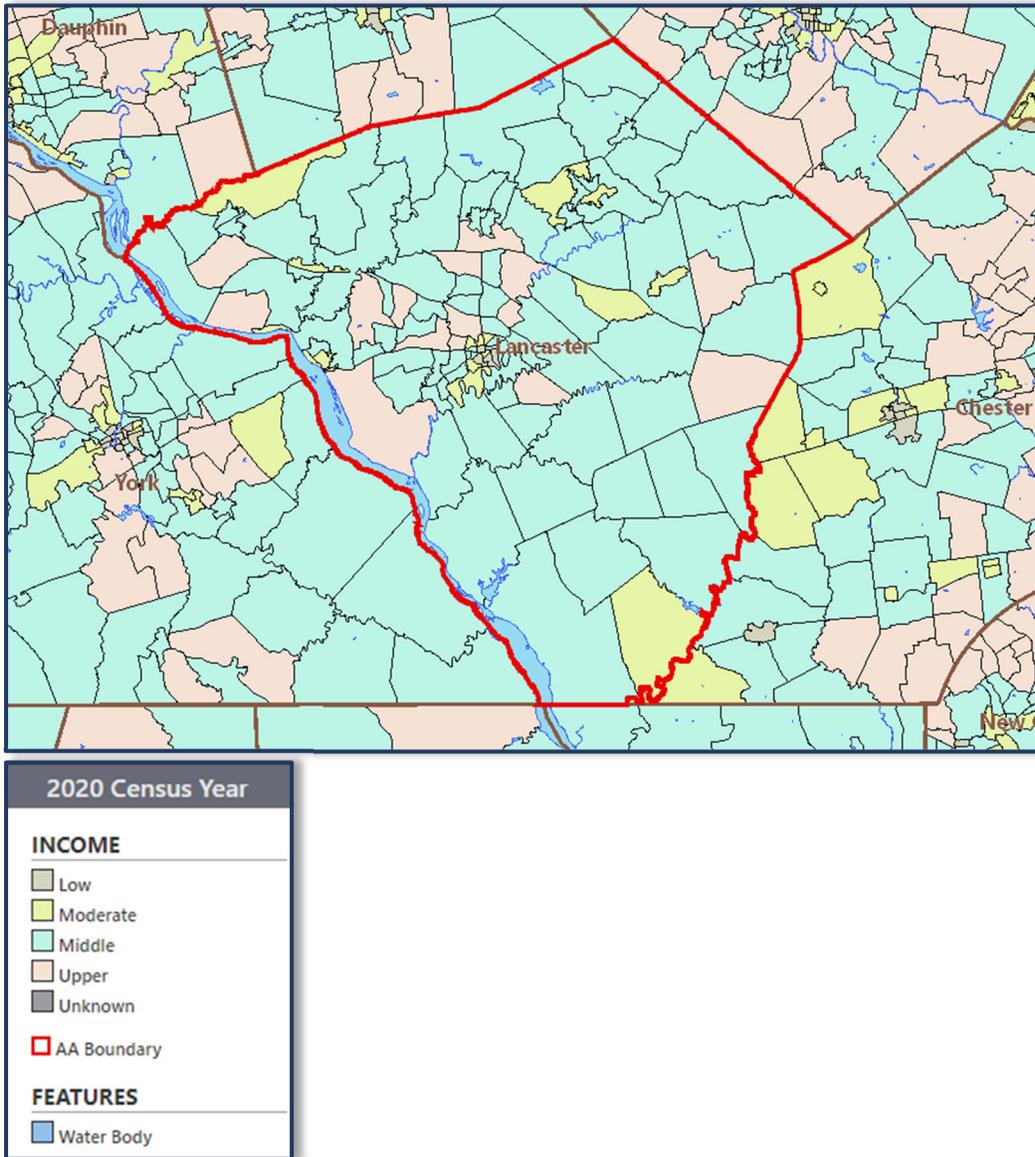- ☐ AA Boundary

FEATURES
- ☐ Water Body
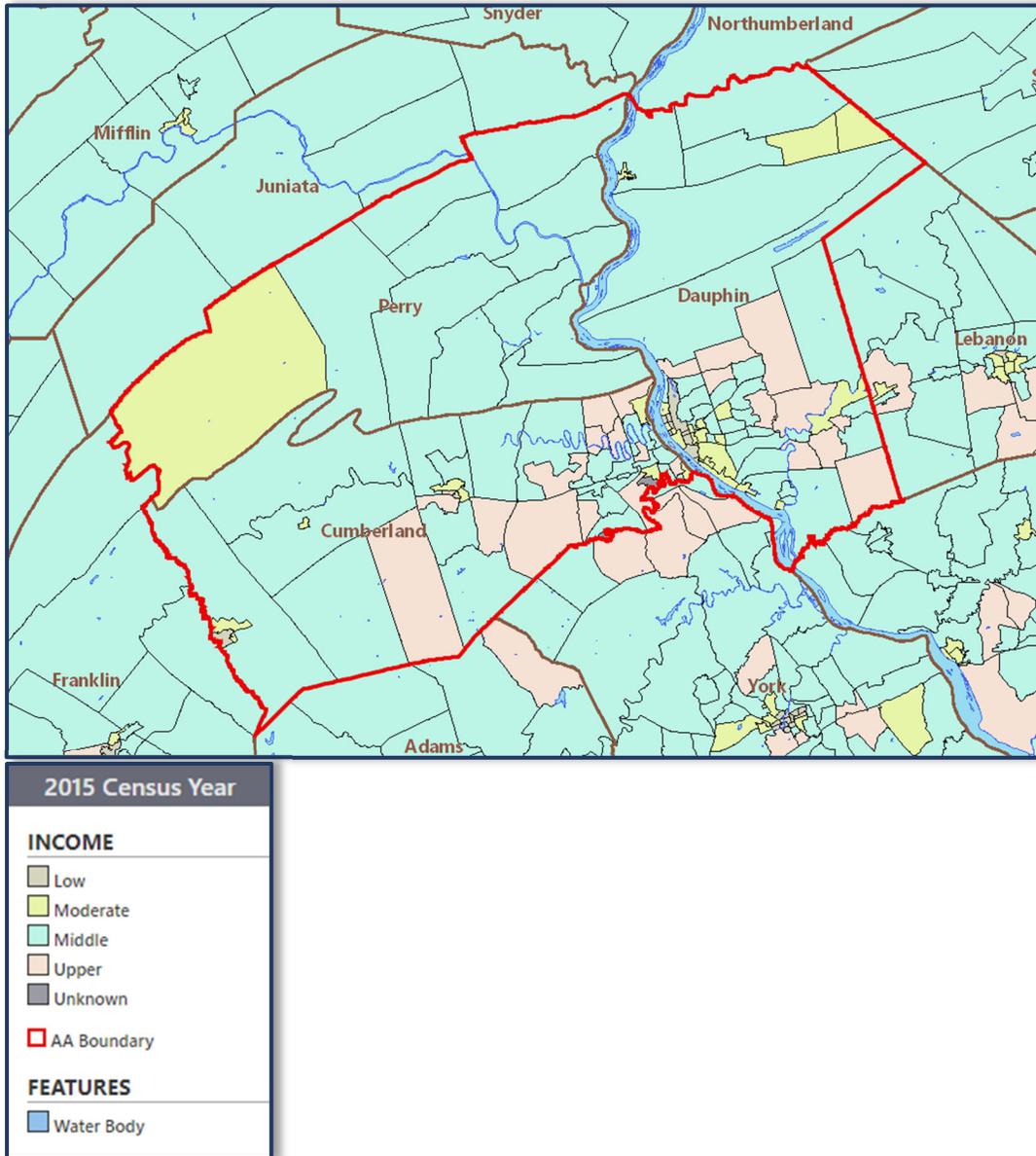
HARRISBURG, PA ASSESSMENT AREA (2020 CENSUS DATA)

LANCASTER, PA ASSESSMENT AREA (2015 ACS DATA)

2015 Census Year

INCOME
- ☐ Low
- ☐ Moderate
- ☐ Middle
- ☐ Upper
- ☐ Unknown
- ☐ AA Boundary

FEATURES
- ☐ Water Body
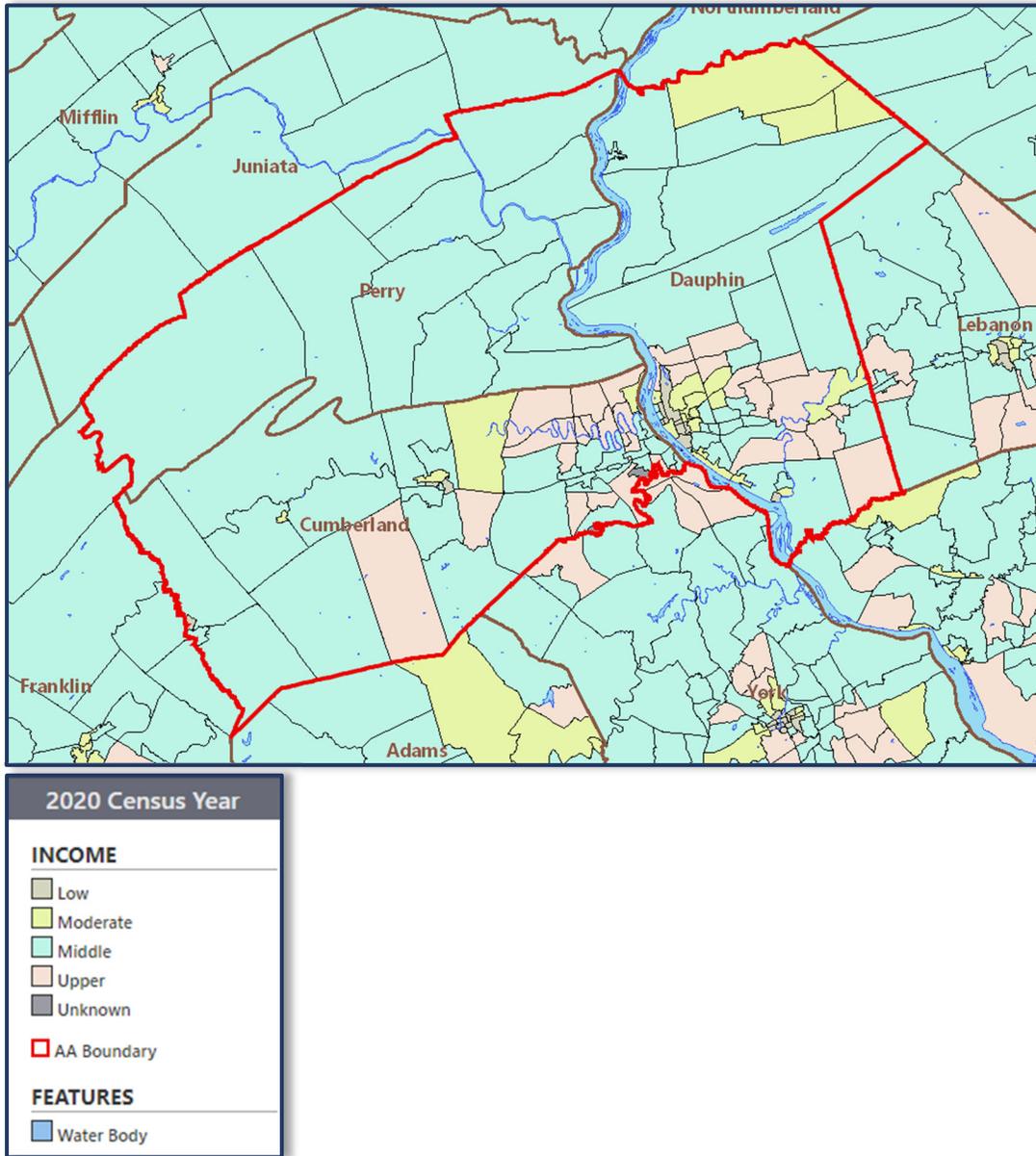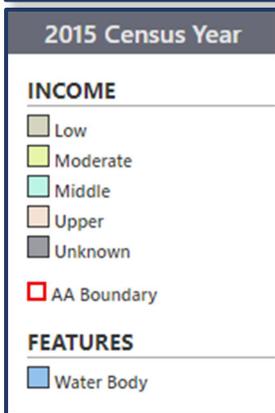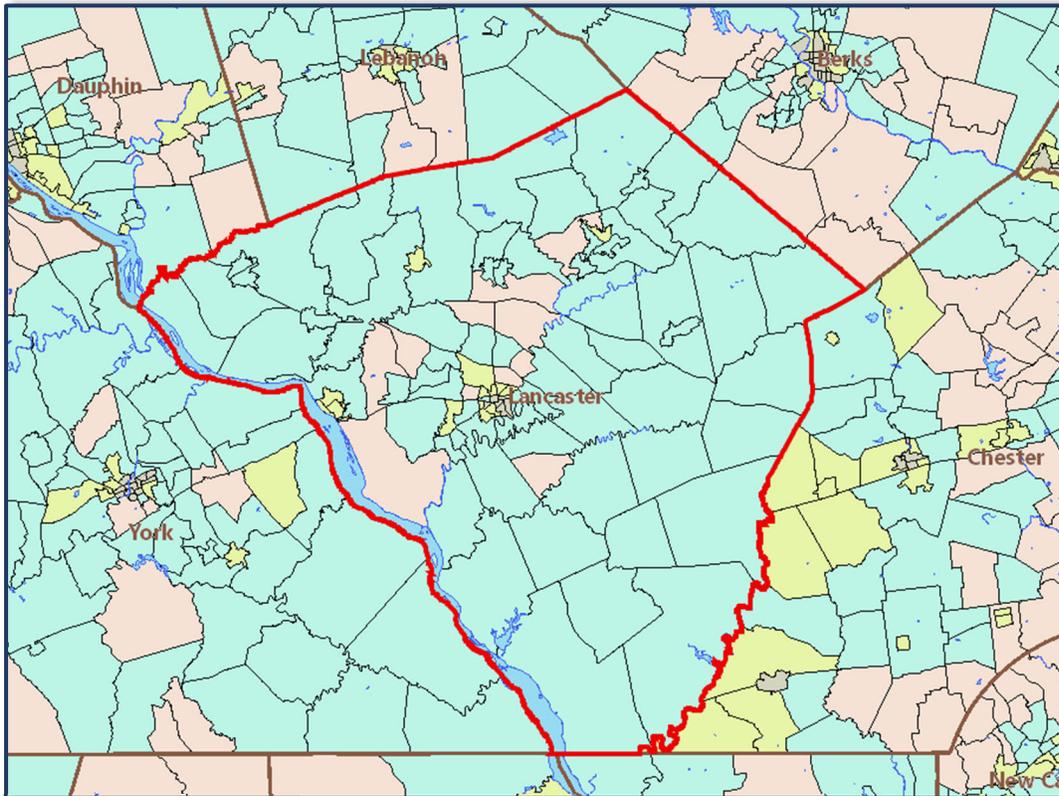
LANCASTER, PA ASSESSMENT AREA (2020 CENSUS DATA)

CHAMBERSBURG, PA ASSESSMENT AREA (2015 ACS DATA)
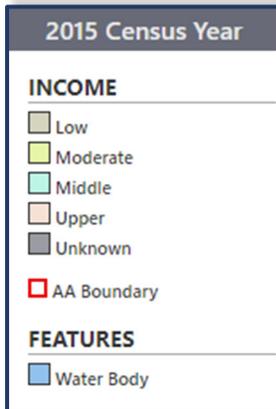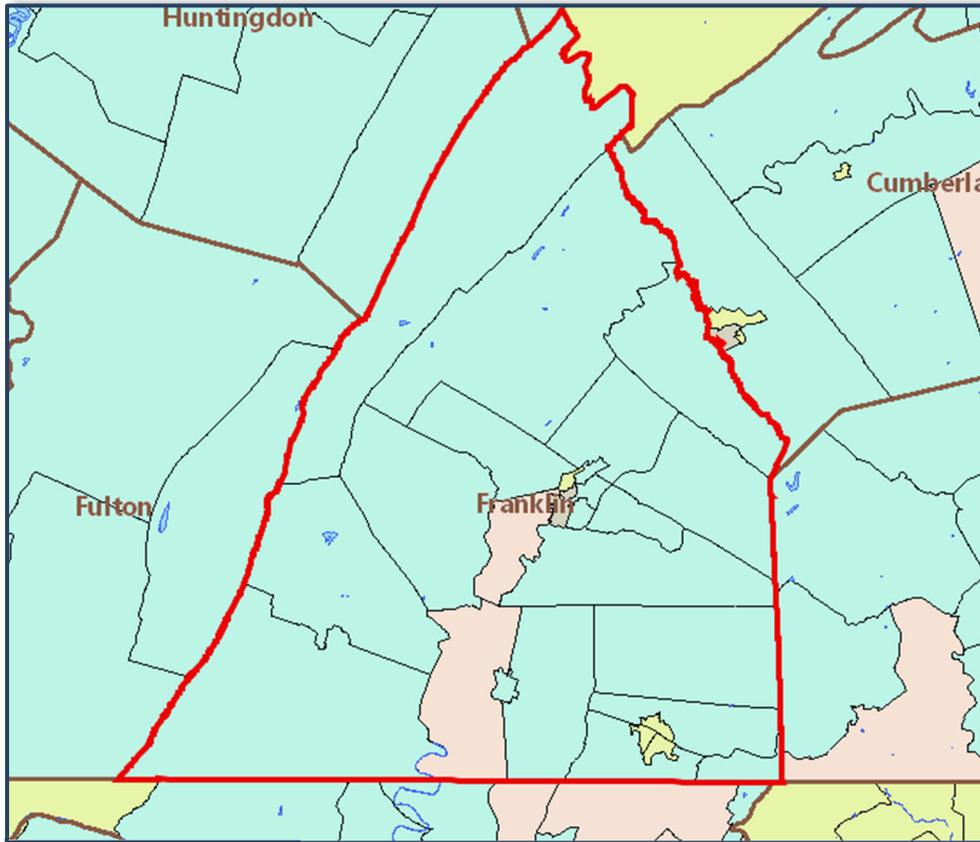
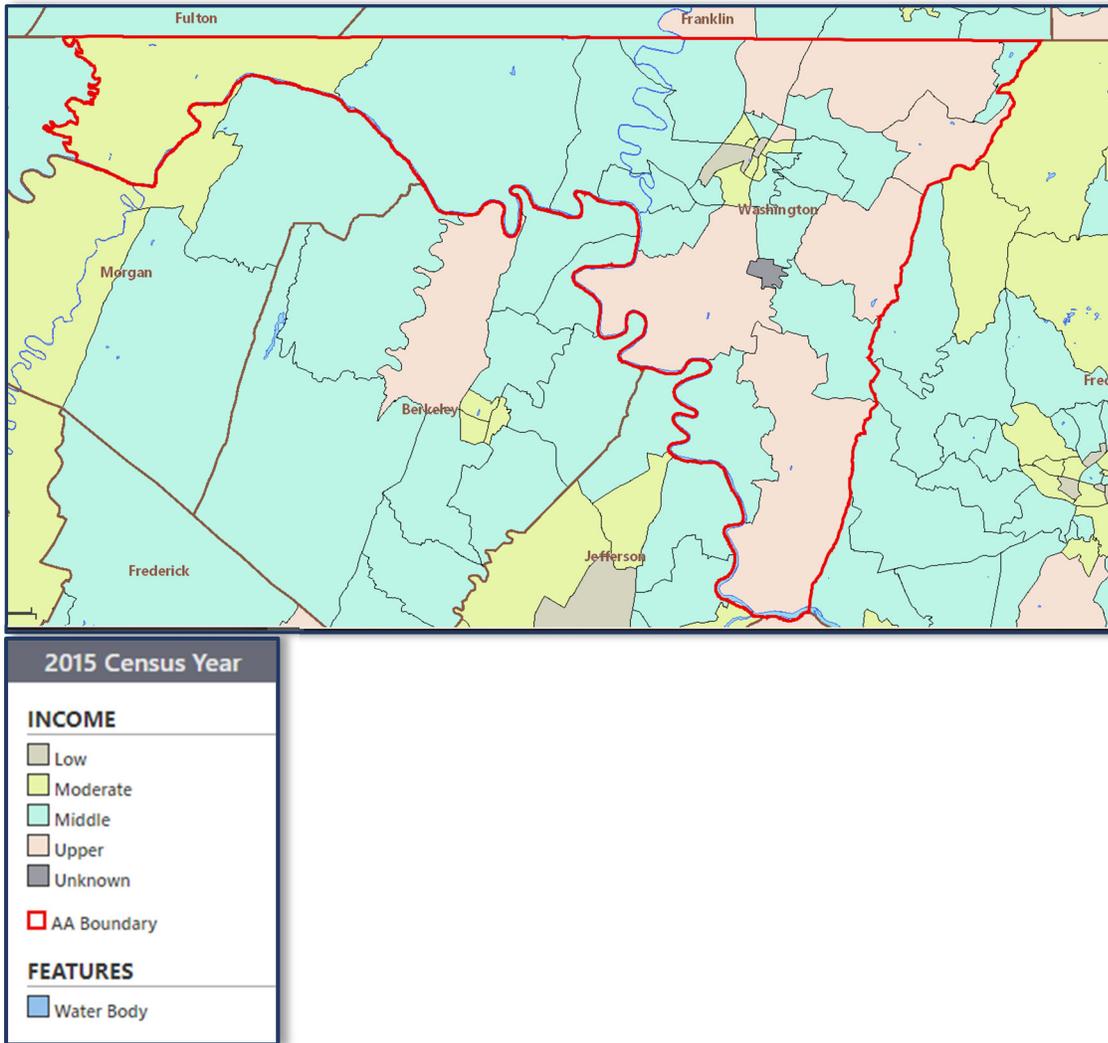## CHAMBERSBURG, PA ASSESSMENT AREA (2020 CENSUS DATA)
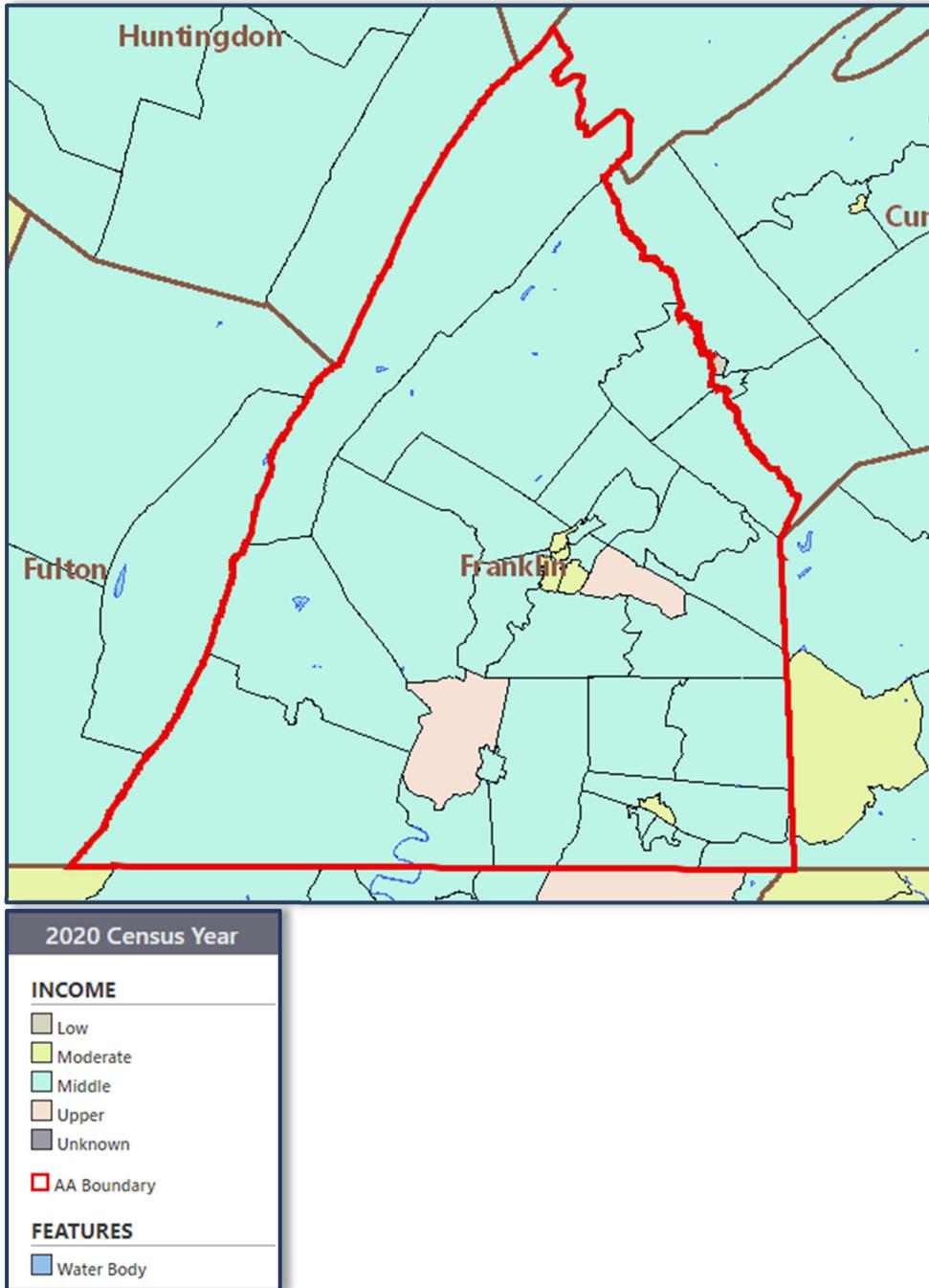
BALTIMORE, MD ASSESSMENT AREA (2015 ACS DATA)
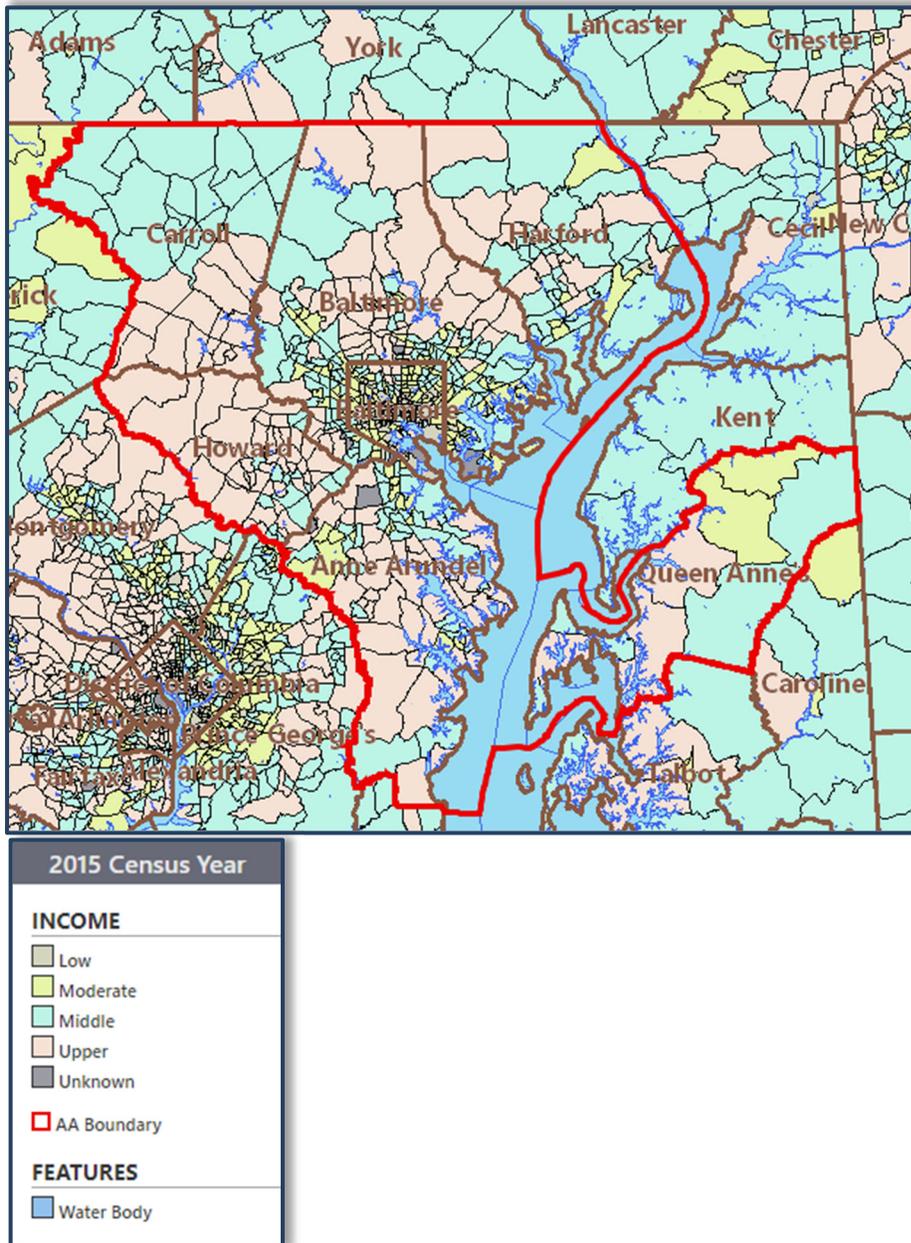
BALTIMORE, MD ASSESSMENT AREA (2020 CENSUS DATA)
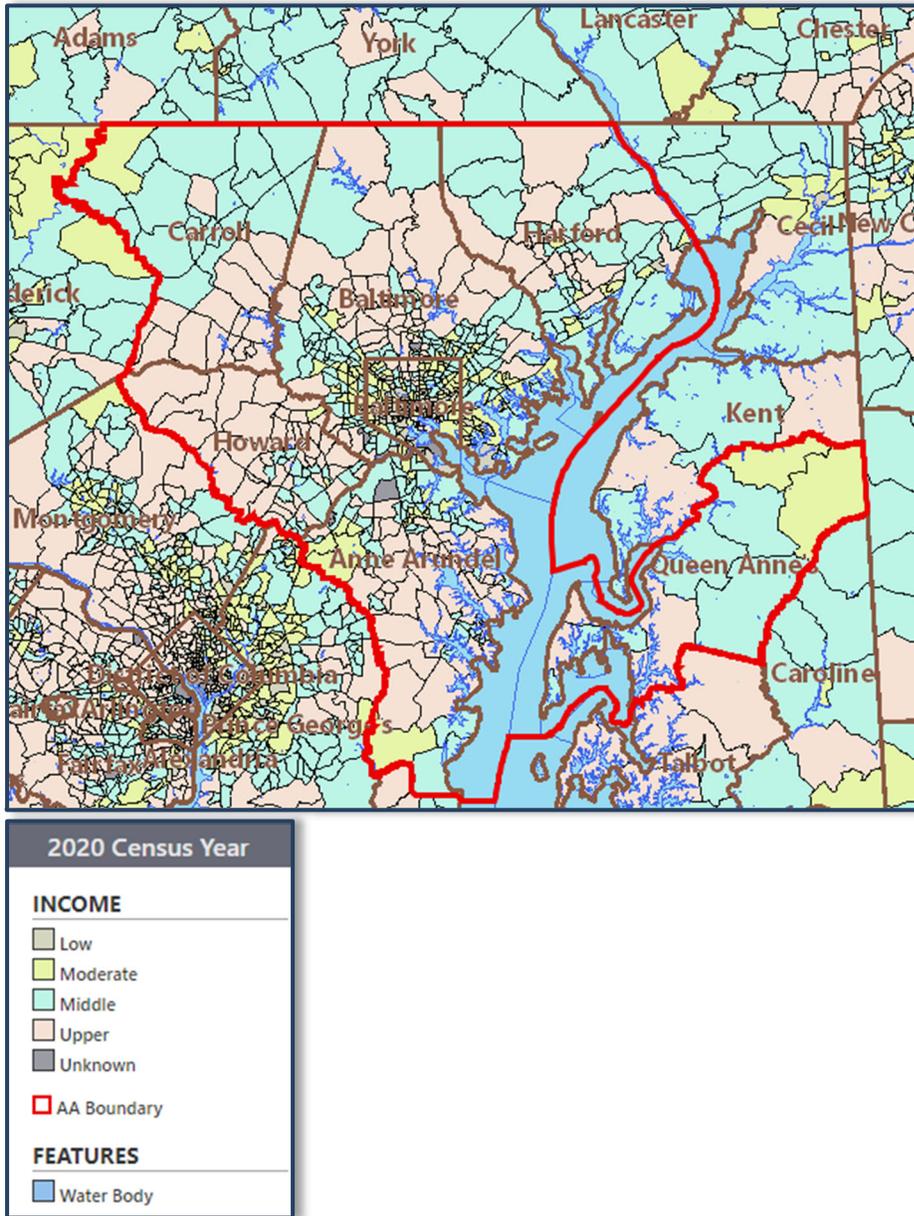
HAGERSTOWN, MD ASSESSMENT AREA (2018 OMB DATA)

HAGERSTOWN, MD ASSESSMENT AREA (2020 CENSUS DATA)