

# CRA PUBLIC FILE

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## **CRA Contact Information**

CRA Officer, Rachael Hadley

Email: [CRA@northwest-bank.com](mailto:CRA@northwest-bank.com)

Phone: (801) 416-4800

Address: 6975 S Union Park Ctr.

Suite 420

Cottonwood Heights, UT 84047

## Community Reinvestment Act Notice

Under the Federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FDIC also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the FDIC; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the:

Regional Director, FDIC  
Division of Depositor and Consumer Protection (DSC)  
25 Jessie Street at Ecker Square, Suite 2300  
San Francisco, CA, 94105-2780  
Or Online: <https://www.fdic.gov/banker-resource-center/cra-examination-schedule-125>

You may send written comments about our performance in helping to meet community credit needs to:

Rachael Hadley, SVP, CRA Officer  
Northwest Bank  
6975 S Union Park Ctr.  
Suite 420  
Cottonwood Heights, UT 84047

Regional Director, FDIC  
Division of Supervision and Consumer Protection (DSC)  
25 Jessie Street at Ecker Square, Suite 2300  
San Francisco, CA 94105-2780

Your letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the FDIC Regional Director. You may also request from the FDIC Regional Director an announcement of our applications covered by the CRA filed with the FDIC. We are an affiliate of Western Capital Corporation, a bank holding company. You may request from the Officer in Charge of Supervision, Federal Reserve Bank of San Francisco 101 Market St, MS #615 San Francisco, CA 94120-7702 an announcement of applications covered by the CRA filed by bank holding companies.

Appendix F to Part 345 - CRA Notice, [89 FR 7205, Feb. 1, 2024]

## Public Comments

Northwest Bank received no written comments or complaints during the current or the last two years (2024-2025). If you have comments regarding Northwest Bank's CRA performance, please contact us at:

**By Mail:**

CRA Officer, Rachael Hadley  
Northwest Bank  
6975 S Union Park Ctr.  
Suite 420  
Cottonwood Heights, UT 84047

**By Email:** [CRA@northwest-bank.com](mailto:CRA@northwest-bank.com)

## CRA Performance Evaluation

Northwest Bank's most recent CRA Performance Evaluation completed on July 7, 2025, by the FDIC, is attached as [Appendix A](#). Northwest Bank received a rating of Satisfactory. If you have any questions regarding this performance evaluation, please contact us at:

**By Mail:**

CRA Officer, Rachael Hadley  
Northwest Bank  
6975 S Union Park Ctr.  
Suite 420  
Cottonwood Heights, UT 84047

**By Email:** [CRA@northwest-bank.com](mailto:CRA@northwest-bank.com)

## Branch Office Locations

Location Name	Address	MSA	State Code	County Code	Census Tract	Lobby Hours
<b>Main Office, Boise</b> Opened 3/31/2008	1750 W Front Street, Ste. 150 Boise, ID 83702	14260	16	001	0001.02	Monday – Friday: 9:00 am - 5:00 pm
<b>Coeur d’Alene Branch</b> Opened 9/18/2017	1745 W Tilford Lane Coeur d’Alene, ID 83814	17660	16	55	0009.02	Monday – Friday: 9:00 am - 5:00 pm
<b>Lake Oswego Branch</b> Opened 8/12/2012	4900 Meadows Road, Ste 410 Lake Oswego, OR 97035	38900	41	005	0203.02	Monday – Friday: 9:00 am - 5:00 pm
<b>Seattle Branch</b> Opened 12/31/2014	1301 5th Avenue, Suite 2110 Seattle, WA 98101	42644	53	033	0081.02	Monday – Friday: 9:00 am - 5:00 pm
<b>Salt Lake City Branch</b> Opened 5/1/2024	6975 S Union Park Ctr. Suite 420 Cottonwood Heights, UT 84047	41620	49	035	1112.02	By appointment only

## Branches Opened or Closed

Northwest Bank did not close any branches in the current year or the prior two years (2024-2025).

The Bank opened a branch in Salt Lake County, Utah, on May 1, 2024.

Location Name	Address	MSA	State Code	County Code	Census Tract	Lobby Hours
<b>Salt Lake City Branch</b> Opened 5/1/2024	6975 S Union Park Ctr. Suite 420 Cottonwood Heights, UT 84047	41620	49	035	1112.02	By appointment only

## Products and Services

The following table lists the products and services offered by the Bank and corresponding transaction fees, if applicable. The Bank also offers “bundled” products and services for a savings when compared to the cumulative pricing of each product and service in the bundle. The schedule of fees for the bundles are available at each branch. There are no material differences in the availability or cost of services between branch locations.

Lending Products & Services	Transaction Fee
Commercial Lines of Credit (Unsecured or Secured)	Custom fees based on inherent risk of loan and market factors.
Commercial Term Loans (Unsecured or Secured)	Custom fees based on inherent risk of loan and market factors.
CRE	Custom fees based on inherent risk of loan and market factors.
SBA	Custom fees based on inherent risk of loan and market factors.
Letters of Credit	Custom fees based on market factors.
HELOC	1%
Personal Lines of Credit (Unsecured or Secured)	Custom fees based on inherent risk of loan and market factors.
Personal Term Loans (Unsecured or Secured)	Custom fees based on inherent risk of loan and market factors.
Deposit Products & Services	
Business Checking (Interest and Non-Interest)	First 300 transactions are free, additional transactions are \$0.35 each
Business Money Market	\$0
Business Money Market Plus	\$0
Business CDs (regular and jumbo)	\$0
CDARS	\$0
Business Analysis Checking	
Monthly Service Charge	\$14 per account
Paper Deposit or Miscellaneous Credit	\$0.30 per item
Electronic Credit	\$0.15 per item
Deposited Item	\$0.08 per item
Paper Check or Miscellaneous Credit	\$0.15 per item
Cash Deposited/Purchased	\$0.10 per \$100
Coin Rolls Deposited/Purchased	\$0.10 per roll
Business Debit Cards	\$0
IOLTA Checking	\$0
IRETA	\$0
Personal Checking (Interest and Non-Interest)	\$0
Personal Savings	\$0
Personal Debit Cards	\$0
Personal Money Market	\$0

Personal Money Market Plus	\$0
Personal CDs (regular and jumbo)	\$0
DDM - Demand Deposit Marketplace • For clients sensitive to ensuring all funds are FDIC insured, once set up, sweeps any funds over \$250k to another account to maintain FDIC insurance.	\$0
Cashier's Check	\$6 each
Counter Checks	\$2 per page
Overdraft	\$30 per item
Non-Sufficient Funds	\$30 per item
Deposited Adjustments	\$5 each
Deposited Item Return	\$5 per item
Stop Payment	\$20 per item
Stop Payment through Online Banking	\$10 per item
<b>Treasury Management &amp; Merchant Services</b>	
<b>ACH Origination</b>	
Setup Fee (one-time)	\$75
Monthly ACH Origination	\$30 per entity
ACH File Processing (Credit or Debit)	\$6 per batch file
Corrections	\$5 each
ACH Credits	\$0.15 per entry
ACH Debits	\$0.15 per entry
Deposit Return Item	\$5 per item
ACH Return Notices	\$8 per company ID
SFTP ACH Transfers	\$0
<b>RDC</b>	
Setup Fee (one time)	\$75
Monthly RDC	\$50 per entity
RDC Deposited Item	\$0.12 per item
RDC Deposit	\$0.30 per deposit
Duplicate Scanned Item	\$25 per item
<b>Wire Transfers</b>	
Incoming Domestic Wire	\$15 per item
Incoming International Wire	\$20 per item
Outgoing Domestic Wire	\$20 per item
Outgoing Wire through Online Banking	\$15 per item
Outgoing International Wire	\$35 per item
Outgoing International Wire (US Currency) through Online Banking	\$30 each
Online Wire Setup Fee (one-time) for Business Accts.	\$75
Online Wire Monthly Service Charge for Business Accts.	\$15 per entity
Reverse/Drawdown	\$0
<b>Check Positive Pay</b>	

Setup Fee (one-time)	\$50
Monthly Service Charge	\$50 per entity
Exceptions	\$0
<b>ACH Positive Pay</b>	
Setup Fee (one-time)	\$75
Monthly Service Charge	\$50 per entity
Exceptions	\$0
Mobile Deposits	\$0
Bill Pay Services	\$0
Online Banking	\$0
<b>Loan Sweeps &amp; Zero Balance Accounts (ZBA)</b>	
ZBA Lead Account Monthly Service Charge	\$25 per entity
ZBA Sub Account Monthly Service Charge	\$10 per entity
Loan Sweep Monthly Service Charge	\$95 per entity
Deposit Sweep Monthly Service Charge	\$25 per entity
DDM Sweep Monthly Service Charge	\$95 per entity
Lockbox	Custom Quote Available
<b>Miscellaneous Services</b>	
ATM Fees – MoneyPass ATM	\$0
ATM Deposit – MoneyPass ATM	\$0
Contactless Debit Card Replacement	\$10 per card
Check Copy	\$2 each
Foreign Currency	Third party charge passed onto client
Foreign Check/Draft	Varies
Deposit Correction	\$5 each
Dormant Account Fee	\$0
Garnishment/Levy Service Charge	\$75 each, when permissible
Image Statement on CD	\$25 each
Notary Public Services (Available to customers only)	\$0
Research	\$30 per hour
Statement Copy	\$4 each

## Assessment Areas

Northwest Bank’s CRA Assessment Areas are defined as follows:

Assessment Area (AA)	Counties	Census Tracts	Branches
Idaho			
Boise City AA	Ada, Canyon	183	1
Coeur d’Alene AA	Kootenai	39	1
Oregon			
Portland AA	Clackamas, Multnomah, Washington	418	1
Washington			
Seattle AA	King	495	1
Utah			
Salt Lake City AA	Salt Lake	251	1

County Maps



Ada County, Idaho



Canyon County, Idaho

2026 FFIEC Census Tract Data: Ada County

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
16	001	0001.01	Middle	No
16	001	0001.02	Upper	No
16	001	0002.01	Upper	No
16	001	0002.02	Upper	No
16	001	0003.02	Middle	No
16	001	0003.03	Middle	No
16	001	0003.05	Middle	No
16	001	0003.06	Upper	No
16	001	0004.01	Moderate	No
16	001	0004.02	Upper	No
16	001	0005.01	Middle	No
16	001	0005.02	Upper	No
16	001	0006.01	Upper	No
16	001	0006.02	Upper	No
16	001	0007.01	Upper	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
16	001	0007.03	Upper	No
16	001	0007.04	Upper	No
16	001	0008.03	Upper	No
16	001	0008.05	Upper	No
16	001	0008.06	Middle	No
16	001	0008.07	Moderate	No
16	001	0008.08	Upper	No
16	001	0008.09	Upper	No
16	001	0008.10	Middle	No
16	001	0009.01	Middle	No
16	001	0009.02	Low	No
16	001	0010.01	Upper	No
16	001	0010.02	Unknown	No
16	001	0010.03	Moderate	No
16	001	0011.00	Moderate	No
16	001	0012.01	Middle	No
16	001	0012.03	Middle	No
16	001	0012.04	Moderate	No
16	001	0014.01	Moderate	No
16	001	0014.02	Moderate	No
16	001	0015.00	Middle	No
16	001	0016.00	Middle	No
16	001	0017.01	Moderate	No
16	001	0017.02	Moderate	No
16	001	0018.00	Middle	No
16	001	0019.00	Middle	No
16	001	0020.00	Low	No
16	001	0021.00	Middle	No
16	001	0022.23	Upper	No
16	001	0022.25	Middle	No
16	001	0022.26	Middle	No
16	001	0022.27	Upper	No
16	001	0022.28	Middle	No
16	001	0022.29	Middle	No
16	001	0022.30	Upper	No
16	001	0022.31	Middle	No
16	001	0023.13	Middle	No
16	001	0023.14	Middle	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
16	001	0023.15	Middle	No
16	001	0023.16	Middle	No
16	001	0023.17	Moderate	No
16	001	0023.18	Middle	No
16	001	0023.19	Moderate	No
16	001	0024.12	Middle	No
16	001	0024.14	Middle	No
16	001	0024.15	Middle	No
16	001	0024.16	Middle	No
16	001	0024.17	Middle	No
16	001	0024.18	Middle	No
16	001	0024.19	Middle	No
16	001	0101.01	Upper	No
16	001	0101.02	Upper	No
16	001	0102.24	Upper	No
16	001	0102.26	Middle	No
16	001	0102.27	Middle	No
16	001	0102.28	Middle	No
16	001	0102.29	Middle	No
16	001	0102.30	Upper	No
16	001	0102.31	Upper	No
16	001	0102.32	Upper	No
16	001	0102.33	Upper	No
16	001	0102.34	Middle	No
16	001	0102.35	Middle	No
16	001	0102.36	Middle	No
16	001	0102.37	Middle	No
16	001	0103.36	Upper	No
16	001	0103.37	Upper	No
16	001	0103.38	Middle	No
16	001	0103.39	Upper	No
16	001	0103.40	Middle	No
16	001	0103.41	Upper	No
16	001	0103.42	Upper	No
16	001	0103.43	Upper	No
16	001	0103.44	Upper	No
16	001	0103.45	Middle	No
16	001	0103.46	Middle	No

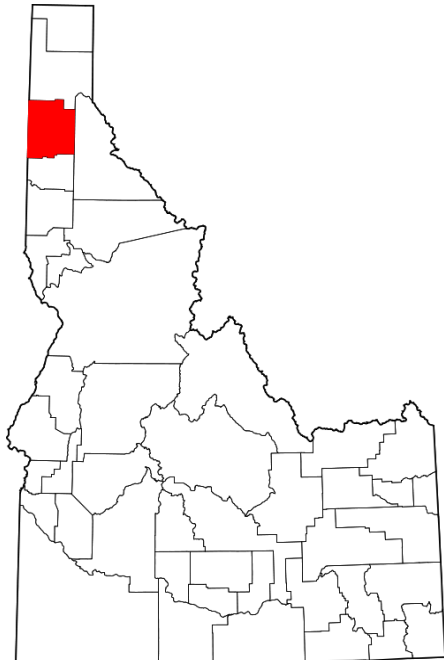
State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
16	001	0103.47	Middle	No
16	001	0103.48	Middle	No
16	001	0103.49	Upper	No
16	001	0103.50	Middle	No
16	001	0103.51	Moderate	No
16	001	0103.52	Middle	No
16	001	0103.53	Upper	No
16	001	0103.54	Middle	No
16	001	0103.55	Upper	No
16	001	0103.56	Upper	No
16	001	0103.57	Upper	No
16	001	0103.58	Upper	No
16	001	0103.59	Upper	No
16	001	0103.60	Upper	No
16	001	0103.61	Middle	No
16	001	0103.62	Upper	No
16	001	0103.63	Upper	No
16	001	0103.64	Middle	No
16	001	0103.65	Middle	No
16	001	0103.66	Middle	No
16	001	0103.67	Moderate	No
16	001	0103.68	Moderate	No
16	001	0103.69	Upper	No
16	001	0103.70	Upper	No
16	001	0103.71	Middle	No
16	001	0104.03	Upper	No
16	001	0104.04	Middle	No
16	001	0104.05	Moderate	No
16	001	0104.06	Middle	No
16	001	0104.07	Middle	No
16	001	0104.08	Upper	No
16	001	0104.09	Middle	No
16	001	0104.10	Middle	No
16	001	0104.11	Middle	No
16	001	0105.01	Upper	No
16	001	0105.03	Upper	No
16	001	0105.05	Upper	No
16	001	0105.06	Upper	No

2026 FFIEC Census Tract Data: Canyon County

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
16	027	0201.00	Moderate	No
16	027	0202.00	Moderate	No
16	027	0203.00	Moderate	No
16	027	0204.03	Middle	No
16	027	0204.04	Moderate	No
16	027	0204.05	Low	No
16	027	0204.06	Middle	No
16	027	0205.01	Moderate	No
16	027	0205.03	Middle	No
16	027	0205.05	Moderate	No
16	027	0205.06	Low	No
16	027	0206.01	Middle	No
16	027	0206.03	Middle	No
16	027	0206.04	Middle	No
16	027	0207.00	Middle	No
16	027	0209.03	Middle	No
16	027	0209.04	Middle	No
16	027	0209.05	Middle	No
16	027	0209.06	Middle	No
16	027	0209.07	Upper	No
16	027	0209.08	Middle	No
16	027	0209.09	Middle	No
16	027	0209.10	Middle	No
16	027	0210.03	Middle	No
16	027	0210.04	Middle	No
16	027	0210.05	Middle	No
16	027	0210.06	Middle	No
16	027	0210.07	Moderate	No
16	027	0210.08	Middle	No
16	027	0211.01	Moderate	No
16	027	0211.02	Middle	No
16	027	0211.03	Moderate	No
16	027	0211.04	Middle	No
16	027	0211.05	Middle	No
16	027	0212.01	Middle	No
16	027	0212.02	Moderate	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
16	027	0213.00	Moderate	No
16	027	0215.00	Moderate	No
16	027	0216.00	Moderate	No
16	027	0217.01	Moderate	No
16	027	0217.02	Moderate	No
16	027	0218.01	Middle	No
16	027	0218.02	Middle	No
16	027	0219.01	Moderate	No
16	027	0219.04	Moderate	No
16	027	0219.05	Middle	No
16	027	0219.06	Upper	No
16	027	0219.07	Upper	No
16	027	0221.00	Moderate	No
16	027	0222.00	Middle	No
16	027	0223.01	Middle	No
16	027	0223.02	Upper	No
16	027	0223.03	Upper	No
16	027	0224.00	Upper	No

County Map



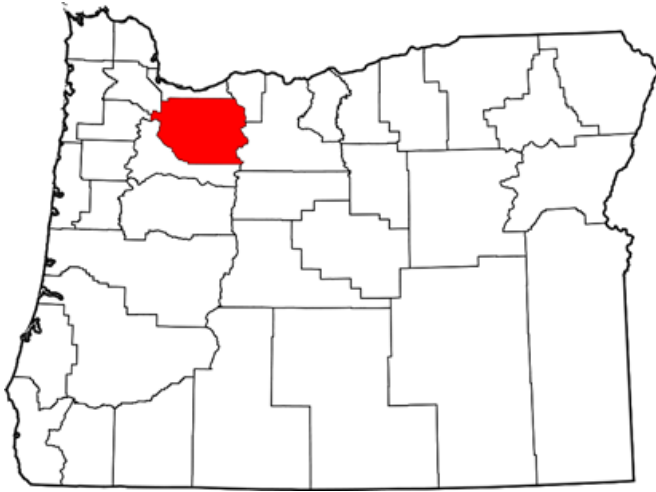
Kootenai County, Idaho

2026 FFIEC Census Tract Data: Kootenai County

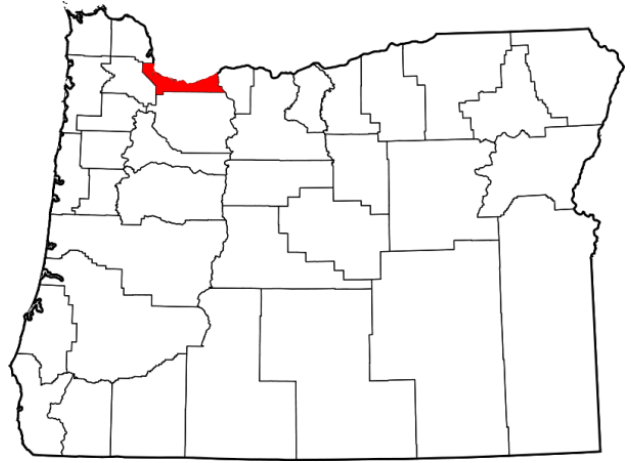
State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
16	055	0001.01	Upper	No
16	055	0001.02	Middle	No
16	055	0002.01	Upper	No
16	055	0002.02	Upper	No
16	055	0002.03	Moderate	No
16	055	0003.01	Middle	No
16	055	0003.03	Middle	No
16	055	0003.04	Middle	No
16	055	0004.01	Middle	No
16	055	0004.02	Middle	No
16	055	0005.01	Middle	No
16	055	0005.02	Middle	No
16	055	0005.03	Middle	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
16	055	0006.01	Middle	No
16	055	0006.02	Middle	No
16	055	0007.01	Middle	No
16	055	0007.02	Middle	No
16	055	0007.03	Middle	No
16	055	0007.04	Middle	No
16	055	0008.00	Middle	No
16	055	0009.01	Moderate	No
16	055	0009.02	Moderate	No
16	055	0010.02	Middle	No
16	055	0010.03	Middle	No
16	055	0010.04	Moderate	No
16	055	0011.00	Upper	No
16	055	0012.01	Middle	No
16	055	0012.02	Moderate	No
16	055	0013.00	Moderate	No
16	055	0014.00	Upper	No
16	055	0015.00	Moderate	No
16	055	0016.00	Middle	No
16	055	0017.00	Upper	No
16	055	0018.01	Upper	No
16	055	0018.02	Upper	No
16	055	0019.01	Upper	No
16	055	0019.02	Upper	No
16	055	0020.00	Upper	No
16	055	9400.00	Moderate	No

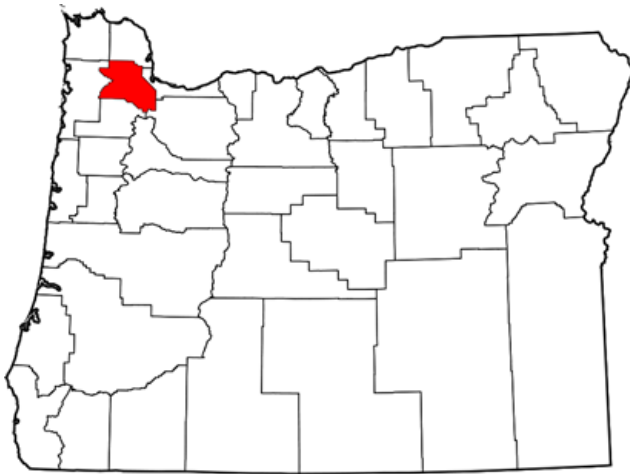
County Maps



Clackamas County, OR



Multnomah County, OR



Washington County, OR

2026 FFIEC Census Tract Data: Clackamas County

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
41	005	0201.01	Upper	No
41	005	0201.02	Upper	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
41	005	0202.01	Upper	No
41	005	0202.02	Upper	No
41	005	0203.02	Upper	No
41	005	0203.03	Upper	No
41	005	0203.04	Upper	No
41	005	0204.01	Upper	No
41	005	0204.03	Upper	No
41	005	0204.04	Upper	No
41	005	0205.03	Upper	No
41	005	0205.04	Upper	No
41	005	0205.05	Upper	No
41	005	0205.06	Upper	No
41	005	0205.07	Upper	No
41	005	0206.01	Upper	No
41	005	0206.02	Upper	No
41	005	0207.00	Upper	No
41	005	0208.00	Moderate	No
41	005	0209.00	Moderate	No
41	005	0210.00	Middle	No
41	005	0211.00	Middle	No
41	005	0212.00	Middle	No
41	005	0213.00	Moderate	No
41	005	0214.00	Middle	No
41	005	0215.00	Middle	No
41	005	0216.01	Moderate	No
41	005	0216.02	Moderate	No
41	005	0217.00	Middle	No
41	005	0218.01	Upper	No
41	005	0218.02	Moderate	No
41	005	0219.00	Moderate	No
41	005	0220.00	Middle	No
41	005	0221.01	Middle	No
41	005	0221.05	Middle	No
41	005	0221.07	Moderate	No
41	005	0221.08	Middle	No
41	005	0221.09	Middle	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
41	005	0221.10	Middle	No
41	005	0222.01	Low	No
41	005	0222.05	Upper	No
41	005	0222.06	Upper	No
41	005	0222.07	Upper	No
41	005	0222.08	Upper	No
41	005	0223.01	Middle	No
41	005	0223.02	Middle	No
41	005	0224.00	Middle	No
41	005	0225.01	Middle	No
41	005	0225.02	Middle	No
41	005	0226.02	Middle	No
41	005	0226.03	Middle	No
41	005	0226.05	Middle	No
41	005	0226.06	Middle	No
41	005	0227.02	Upper	No
41	005	0227.07	Upper	No
41	005	0227.08	Upper	No
41	005	0227.10	Middle	No
41	005	0228.00	Middle	No
41	005	0229.01	Middle	No
41	005	0229.04	Moderate	No
41	005	0229.05	Middle	No
41	005	0229.06	Middle	No
41	005	0229.07	Moderate	No
41	005	0230.01	Middle	No
41	005	0230.02	Middle	No
41	005	0231.00	Middle	No
41	005	0232.01	Upper	No
41	005	0232.02	Middle	No
41	005	0233.00	Middle	No
41	005	0234.01	Middle	No
41	005	0234.03	Middle	No
41	005	0234.04	Middle	No
41	005	0235.00	Middle	No
41	005	0236.00	Middle	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
41	005	0237.00	Middle	No
41	005	0238.00	Middle	No
41	005	0239.01	Middle	No
41	005	0239.02	Moderate	No
41	005	0240.00	Middle	No
41	005	0241.00	Middle	No
41	005	0242.00	Moderate	No
41	005	0243.02	Middle	No
41	005	0243.03	Moderate	No
41	005	0243.04	Middle	No
41	005	0244.01	Moderate	No
41	005	0244.02	Middle	No
41	005	9800.00	Unknown	No

2026 FFIEC Census Tract Data: Multnomah County

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
41	051	0001.01	Upper	No
41	051	0001.02	Upper	No
41	051	0002.01	Upper	No
41	051	0002.02	Middle	No
41	051	0003.01	Middle	No
41	051	0003.02	Upper	No
41	051	0004.01	Middle	No
41	051	0004.02	Middle	No
41	051	0005.01	Middle	No
41	051	0005.02	Middle	No
41	051	0006.01	Moderate	No
41	051	0006.02	Moderate	No
41	051	0007.01	Middle	No
41	051	0007.02	Middle	No
41	051	0008.01	Upper	No
41	051	0008.02	Middle	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
41	051	0009.01	Upper	No
41	051	0009.02	Middle	No
41	051	0010.00	Middle	No
41	051	0011.01	Middle	No
41	051	0011.02	Upper	No
41	051	0012.02	Upper	No
41	051	0012.03	Middle	No
41	051	0012.04	Moderate	No
41	051	0013.01	Upper	No
41	051	0013.02	Upper	No
41	051	0014.00	Upper	No
41	051	0015.00	Upper	No
41	051	0016.01	Middle	No
41	051	0016.02	Moderate	No
41	051	0017.02	Middle	No
41	051	0017.03	Moderate	No
41	051	0017.04	Middle	No
41	051	0018.01	Upper	No
41	051	0018.02	Middle	No
41	051	0019.00	Upper	No
41	051	0020.01	Moderate	No
41	051	0020.02	Middle	No
41	051	0021.01	Upper	No
41	051	0021.02	Moderate	No
41	051	0022.03	Middle	No
41	051	0023.03	Middle	No
41	051	0024.01	Upper	No
41	051	0024.02	Upper	No
41	051	0025.01	Upper	No
41	051	0025.02	Middle	No
41	051	0026.00	Upper	No
41	051	0027.01	Upper	No
41	051	0027.02	Middle	No
41	051	0028.01	Upper	No
41	051	0028.02	Upper	No
41	051	0029.01	Middle	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
41	051	0029.02	Middle	No
41	051	0029.03	Middle	No
41	051	0030.00	Upper	No
41	051	0031.00	Upper	No
41	051	0032.00	Upper	No
41	051	0033.01	Moderate	No
41	051	0033.02	Middle	No
41	051	0034.01	Middle	No
41	051	0034.02	Upper	No
41	051	0035.01	Middle	No
41	051	0035.02	Middle	No
41	051	0036.01	Middle	No
41	051	0036.02	Upper	No
41	051	0036.03	Middle	No
41	051	0037.01	Middle	No
41	051	0037.02	Upper	No
41	051	0038.01	Middle	No
41	051	0038.02	Upper	No
41	051	0038.03	Middle	No
41	051	0039.02	Middle	No
41	051	0039.03	Middle	No
41	051	0039.04	Middle	No
41	051	0040.02	Middle	No
41	051	0040.03	Moderate	No
41	051	0041.02	Middle	No
41	051	0041.03	Middle	No
41	051	0041.04	Low	No
41	051	0042.00	Middle	No
41	051	0043.00	Upper	No
41	051	0045.00	Upper	No
41	051	0046.01	Upper	No
41	051	0046.02	Upper	No
41	051	0047.00	Upper	No
41	051	0048.00	Middle	No
41	051	0049.01	Upper	No
41	051	0049.02	Low	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
41	051	0050.01	Upper	No
41	051	0050.02	Upper	No
41	051	0051.01	Upper	No
41	051	0051.02	Upper	No
41	051	0051.03	Middle	No
41	051	0052.01	Upper	No
41	051	0052.02	Middle	No
41	051	0055.00	Middle	No
41	051	0056.01	Middle	No
41	051	0056.02	Moderate	No
41	051	0057.01	Upper	No
41	051	0057.02	Middle	No
41	051	0058.00	Upper	No
41	051	0059.01	Upper	No
41	051	0059.02	Upper	No
41	051	0059.03	Upper	No
41	051	0060.01	Upper	No
41	051	0060.02	Upper	No
41	051	0061.00	Upper	No
41	051	0062.00	Upper	No
41	051	0063.00	Upper	No
41	051	0064.02	Upper	No
41	051	0064.03	Middle	No
41	051	0064.04	Upper	No
41	051	0065.01	Upper	No
41	051	0065.02	Upper	No
41	051	0066.01	Upper	No
41	051	0066.02	Middle	No
41	051	0067.01	Upper	No
41	051	0067.02	Middle	No
41	051	0068.01	Upper	No
41	051	0068.02	Upper	No
41	051	0069.00	Upper	No
41	051	0070.01	Upper	No
41	051	0070.02	Upper	No
41	051	0071.00	Middle	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
41	051	0072.01	Middle	No
41	051	0072.02	Middle	No
41	051	0073.00	Middle	No
41	051	0074.00	Moderate	No
41	051	0075.00	Middle	No
41	051	0076.00	Moderate	No
41	051	0077.00	Moderate	No
41	051	0078.00	Middle	No
41	051	0079.00	Moderate	No
41	051	0080.01	Moderate	No
41	051	0080.02	Middle	No
41	051	0081.00	Moderate	No
41	051	0082.01	Middle	No
41	051	0082.03	Moderate	No
41	051	0082.04	Low	No
41	051	0083.01	Moderate	No
41	051	0083.02	Moderate	No
41	051	0084.00	Moderate	No
41	051	0085.00	Moderate	No
41	051	0086.00	Moderate	No
41	051	0087.00	Middle	No
41	051	0088.00	Moderate	No
41	051	0089.02	Middle	No
41	051	0089.03	Middle	No
41	051	0089.04	Moderate	No
41	051	0090.01	Moderate	No
41	051	0090.02	Low	No
41	051	0091.01	Moderate	No
41	051	0091.02	Middle	No
41	051	0092.02	Moderate	No
41	051	0092.03	Moderate	No
41	051	0092.04	Moderate	No
41	051	0093.01	Moderate	No
41	051	0093.02	Moderate	No
41	051	0094.00	Moderate	No
41	051	0095.01	Moderate	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
41	051	0095.02	Moderate	No
41	051	0096.03	Moderate	No
41	051	0096.04	Moderate	No
41	051	0096.05	Moderate	No
41	051	0096.06	Moderate	No
41	051	0097.01	Moderate	No
41	051	0097.03	Moderate	No
41	051	0097.04	Low	No
41	051	0098.01	Low	No
41	051	0098.03	Moderate	No
41	051	0098.04	Moderate	No
41	051	0099.03	Middle	No
41	051	0099.04	Middle	No
41	051	0099.05	Middle	No
41	051	0099.06	Upper	No
41	051	0099.07	Middle	No
41	051	0100.01	Low	No
41	051	0100.02	Middle	No
41	051	0101.01	Moderate	No
41	051	0101.02	Middle	No
41	051	0102.00	Middle	No
41	051	0103.03	Middle	No
41	051	0103.04	Moderate	No
41	051	0103.05	Middle	No
41	051	0103.06	Middle	No
41	051	0104.02	Middle	No
41	051	0104.05	Moderate	No
41	051	0104.07	Middle	No
41	051	0104.08	Low	No
41	051	0104.10	Low	No
41	051	0104.11	Moderate	No
41	051	0104.12	Middle	No
41	051	0104.13	Middle	No
41	051	0105.00	Middle	No
41	051	0106.01	Unknown	No
41	051	0106.02	Upper	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
41	051	9800.00	Unknown	No

2026 FFIEC Census Tract Data: Washington County

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
41	067	0301.03	Middle	No
41	067	0301.04	Upper	No
41	067	0301.05	Middle	No
41	067	0301.06	Upper	No
41	067	0302.00	Upper	No
41	067	0303.00	Upper	No
41	067	0304.01	Middle	No
41	067	0304.02	Upper	No
41	067	0305.01	Middle	No
41	067	0305.02	Upper	No
41	067	0306.00	Middle	No
41	067	0307.00	Moderate	No
41	067	0308.01	Middle	No
41	067	0308.03	Middle	No
41	067	0308.05	Middle	No
41	067	0308.06	Upper	No
41	067	0309.00	Moderate	No
41	067	0310.05	Moderate	No
41	067	0310.07	Upper	No
41	067	0310.08	Middle	No
41	067	0310.09	Upper	No
41	067	0310.10	Upper	No
41	067	0310.11	Moderate	No
41	067	0310.12	Middle	No
41	067	0311.00	Moderate	No
41	067	0312.01	Moderate	No
41	067	0312.02	Moderate	No
41	067	0313.01	Middle	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
41	067	0313.02	Middle	No
41	067	0314.02	Moderate	No
41	067	0314.03	Middle	No
41	067	0314.04	Middle	No
41	067	0315.04	Middle	No
41	067	0315.06	Middle	No
41	067	0315.07	Upper	No
41	067	0315.09	Upper	No
41	067	0315.11	Upper	No
41	067	0315.14	Upper	No
41	067	0315.15	Upper	No
41	067	0315.16	Upper	No
41	067	0315.17	Middle	No
41	067	0315.18	Upper	No
41	067	0315.19	Upper	No
41	067	0315.20	Upper	No
41	067	0316.06	Moderate	No
41	067	0316.12	Moderate	No
41	067	0316.14	Middle	No
41	067	0316.15	Moderate	No
41	067	0316.16	Middle	No
41	067	0316.17	Moderate	No
41	067	0316.18	Middle	No
41	067	0316.19	Middle	No
41	067	0316.20	Middle	No
41	067	0316.21	Upper	No
41	067	0316.22	Middle	No
41	067	0316.23	Middle	No
41	067	0316.24	Middle	No
41	067	0316.25	Middle	No
41	067	0316.26	Moderate	No
41	067	0317.03	Moderate	No
41	067	0317.05	Moderate	No
41	067	0317.06	Moderate	No
41	067	0317.07	Middle	No
41	067	0317.08	Moderate	No
41	067	0318.04	Upper	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
41	067	0318.06	Middle	No
41	067	0318.07	Middle	No
41	067	0318.13	Upper	No
41	067	0318.14	Upper	No
41	067	0318.16	Middle	No
41	067	0318.17	Upper	No
41	067	0318.18	Middle	No
41	067	0318.19	Middle	No
41	067	0318.20	Upper	No
41	067	0318.21	Upper	No
41	067	0319.04	Upper	No
41	067	0319.09	Upper	No
41	067	0319.11	Middle	No
41	067	0319.12	Upper	No
41	067	0319.13	Middle	No
41	067	0319.14	Moderate	No
41	067	0319.15	Upper	No
41	067	0319.16	Upper	No
41	067	0319.17	Upper	No
41	067	0319.18	Upper	No
41	067	0320.01	Middle	No
41	067	0320.03	Moderate	No
41	067	0320.04	Middle	No
41	067	0320.05	Moderate	No
41	067	0321.04	Upper	No
41	067	0321.07	Upper	No
41	067	0321.08	Upper	No
41	067	0321.09	Upper	No
41	067	0321.10	Middle	No
41	067	0321.11	Upper	No
41	067	0321.12	Middle	No
41	067	0322.01	Upper	No
41	067	0322.02	Upper	No
41	067	0323.01	Middle	No
41	067	0323.02	Middle	No
41	067	0324.04	Middle	No
41	067	0324.07	Middle	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
41	067	0324.09	Low	No
41	067	0324.10	Middle	No
41	067	0324.11	Middle	No
41	067	0324.12	Middle	No
41	067	0324.13	Middle	No
41	067	0324.14	Upper	No
41	067	0325.01	Moderate	No
41	067	0325.02	Middle	No
41	067	0325.03	Middle	No
41	067	0326.03	Middle	No
41	067	0326.04	Middle	No
41	067	0326.06	Moderate	No
41	067	0326.08	Upper	No
41	067	0326.09	Upper	No
41	067	0326.10	Middle	No
41	067	0326.11	Upper	No
41	067	0326.12	Upper	No
41	067	0327.00	Upper	No
41	067	0328.00	Upper	No
41	067	0329.01	Middle	No
41	067	0329.03	Moderate	No
41	067	0329.04	Moderate	No
41	067	0330.00	Middle	No
41	067	0331.01	Middle	No
41	067	0331.02	Middle	No
41	067	0332.01	Moderate	No
41	067	0332.02	Moderate	No
41	067	0333.01	Middle	No
41	067	0333.02	Upper	No
41	067	0334.00	Middle	No
41	067	0335.00	Middle	No
41	067	0336.00	Middle	No

### County Map



King County, WA

### 2026 FFIEC Census Tract Data: King County

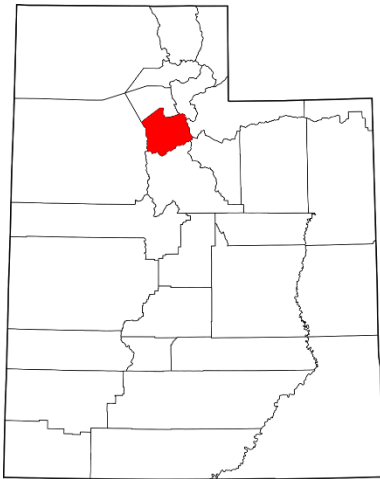
State	County	Tract Code	Tract Income Level
53	033	0001.00	Middle
53	033	0002.00	Moderate
53	033	0003.00	Middle
53	033	0004.01	Moderate
53	033	0004.02	Middle
53	033	0005.00	Upper
53	033	0006.00	Moderate
53	033	0007.00	Middle
53	033	0008.00	Upper
53	033	0009.00	Upper
53	033	0010.00	Moderate
53	033	0011.00	Middle
53	033	0012.00	Moderate
53	033	0013.00	Middle
53	033	0014.00	Middle
53	033	0015.00	Upper
53	033	0016.00	Upper
53	033	0017.01	Middle
53	033	0017.02	Middle
53	033	0018.00	Middle

State	County	Tract Code	Tract Income Level
53	033	0019.00	Middle
53	033	0020.00	Upper
53	033	0021.00	Upper
53	033	0022.00	Upper
53	033	0024.00	Upper
53	033	0025.00	Upper
53	033	0026.00	Upper
53	033	0027.00	Upper
53	033	0028.00	Upper
53	033	0029.00	Upper
53	033	0030.00	Middle
53	033	0031.00	Upper
53	033	0032.00	Middle
53	033	0033.00	Middle
53	033	0034.00	Upper
53	033	0035.00	Upper
53	033	0036.00	Upper
53	033	0038.00	Upper
53	033	0039.00	Upper
53	033	0040.00	Upper
53	033	0041.00	Upper
53	033	0042.00	Upper
53	033	0043.01	Upper
53	033	0043.02	Moderate
53	033	0044.00	Upper
53	033	0045.00	Middle
53	033	0046.00	Upper
53	033	0047.00	Middle
53	033	0048.00	Upper
53	033	0049.00	Middle
53	033	0050.00	Upper
53	033	0051.00	Upper
53	033	0052.00	Upper
53	033	0053.01	Moderate
53	033	0053.02	Unknown
53	033	0054.00	Upper
53	033	0056.00	Upper
53	033	0057.00	Middle

State	County	Tract Code	Tract Income Level
53	033	0058.01	Middle
53	033	0058.02	Middle
53	033	0059.00	Upper
53	033	0060.00	Upper
53	033	0061.00	Upper
53	033	0062.00	Upper
53	033	0063.00	Upper
53	033	0064.00	Upper
53	033	0065.00	Upper
53	033	0066.00	Middle
53	033	0067.00	Upper
53	033	0068.00	Upper
53	033	0069.00	Upper
53	033	0070.00	Upper
53	033	0071.00	Upper
53	033	0072.00	Upper
53	033	0073.00	Upper
53	033	0074.01	Middle
53	033	0074.02	Upper
53	033	0075.00	Middle
53	033	0076.00	Middle
53	033	0077.00	Upper
53	033	0078.00	Upper
53	033	0079.00	Middle
53	033	0080.01	Upper
53	033	0080.02	Moderate
53	033	0081.00	Upper
53	033	0082.00	Upper
53	033	0083.00	Middle
53	033	0084.00	Moderate
53	033	0085.00	Moderate
53	033	0086.00	Moderate
53	033	0087.00	Moderate
53	033	0088.00	Middle
53	033	0089.00	Middle
53	033	0090.00	Moderate
53	033	0091.00	Low
53	033	0092.00	Unknown

State	County	Tract Code	Tract Income Level
53	033	0093.00	Middle
53	033	0094.00	Moderate
53	033	0095.00	Upper
53	033	0096.00	Upper

### County Map



Salt Lake County

### 2023 FFIEC Census Tract Data: Salt Lake County

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
49	035	1001	Middle	No
49	035	1002	Upper	No
49	035	1003.06	Moderate	No
49	035	1003.07	Middle	No
49	035	1003.08	Moderate	No
49	035	1005	Moderate	No
49	035	1006	Moderate	No
49	035	1007	Moderate	No
49	035	1008	Middle	No
49	035	1010	Upper	No
49	035	1011.01	Middle	No
49	035	1011.02	Middle	No
49	035	1012	Upper	No
49	035	1014.01	Low	No
49	035	1014.02	Unknown	No
49	035	1015	Upper	No
49	035	1016	Middle	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
49	035	1017	Moderate	No
49	035	1018	Moderate	No
49	035	1019	Moderate	No
49	035	1020	Moderate	No
49	035	1021	Moderate	No
49	035	1023	Middle	No
49	035	1025.01	Moderate	No
49	035	1025.02	Upper	No
49	035	1026	Moderate	No
49	035	1027.01	Moderate	No
49	035	1027.02	Moderate	No
49	035	1028.01	Moderate	No
49	035	1028.02	Moderate	No
49	035	1029	Moderate	No
49	035	1030	Middle	No
49	035	1031	Middle	No
49	035	1032	Middle	No
49	035	1033	Middle	No
49	035	1034	Middle	No
49	035	1035	Upper	No
49	035	1036	Upper	No
49	035	1037	Upper	No
49	035	1038	Upper	No
49	035	1039	Middle	No
49	035	1040	Upper	No
49	035	1041	Upper	No
49	035	1042	Upper	No
49	035	1043	Middle	No
49	035	1044	Upper	No
49	035	1047	Middle	No
49	035	1048	Middle	No
49	035	1049	Middle	No
49	035	1101.03	Upper	No
49	035	1101.04	Upper	No
49	035	1101.05	Upper	No
49	035	1101.06	Upper	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
49	035	1102	Upper	No
49	035	1103	Middle	No
49	035	1104.01	Middle	No
49	035	1104.02	Upper	No
49	035	1105	Upper	No
49	035	1106	Upper	No
49	035	1107.01	Middle	No
49	035	1107.02	Middle	No
49	035	1108	Middle	No
49	035	1109	Upper	No
49	035	1110.01	Upper	No
49	035	1110.02	Upper	No
49	035	1111.04	Upper	No
49	035	1111.05	Moderate	No
49	035	1111.06	Middle	No
49	035	1111.07	Middle	No
49	035	1111.08	Upper	No
49	035	1111.09	Upper	No
49	035	1112.01	Middle	No
49	035	1112.02	Middle	No
49	035	1113.02	Upper	No
49	035	1113.04	Upper	No
49	035	1113.05	Middle	No
49	035	1113.06	Middle	No
49	035	1114	Moderate	No
49	035	1115	Moderate	No
49	035	1116.01	Middle	No
49	035	1116.02	Low	No
49	035	1117.01	Low	No
49	035	1117.02	Moderate	No
49	035	1118.01	Middle	No
49	035	1118.02	Middle	No
49	035	1119.03	Middle	No
49	035	1119.04	Middle	No
49	035	1119.05	Moderate	No
49	035	1119.06	Moderate	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
49	035	1120.01	Moderate	No
49	035	1120.02	Middle	No
49	035	1121.01	Low	No
49	035	1121.02	Middle	No
49	035	1122.01	Middle	No
49	035	1122.02	Middle	No
49	035	1123.01	Middle	No
49	035	1123.02	Middle	No
49	035	1124.02	Middle	No
49	035	1124.04	Moderate	No
49	035	1124.05	Moderate	No
49	035	1124.06	Moderate	No
49	035	1125.01	Middle	No
49	035	1125.03	Moderate	No
49	035	1125.04	Middle	No
49	035	1125.05	Moderate	No
49	035	1126.04	Middle	No
49	035	1126.08	Upper	No
49	035	1126.09	Upper	No
49	035	1126.10	Middle	No
49	035	1126.11	Middle	No
49	035	1126.12	Middle	No
49	035	1126.13	Middle	No
49	035	1126.14	Upper	No
49	035	1126.15	Upper	No
49	035	1126.16	Upper	No
49	035	1126.17	Upper	No
49	035	1126.18	Middle	No
49	035	1126.19	Upper	No
49	035	1126.20	Moderate	No
49	035	1126.21	Middle	No
49	035	1127.00	Moderate	No
49	035	1128.04	Upper	No
49	035	1128.05	Upper	No
49	035	1128.12	Middle	No
49	035	1128.13	Upper	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
49	035	1128.14	Upper	No
49	035	1128.15	Upper	No
49	035	1128.16	Upper	No
49	035	1128.18	Unknown	No
49	035	1128.21	Upper	No
49	035	1128.22	Middle	No
49	035	1128.23	Middle	No
49	035	1128.24	Upper	No
49	035	1128.25	Middle	No
49	035	1128.26	Upper	No
49	035	1128.27	Upper	No
49	035	1128.28	Upper	No
49	035	1128.29	Middle	No
49	035	1128.30	Upper	No
49	035	1128.31	Upper	No
49	035	1129.04	Middle	No
49	035	1129.05	Upper	No
49	035	1129.07	Middle	No
49	035	1129.12	Middle	No
49	035	1129.13	Middle	No
49	035	1129.14	Middle	No
49	035	1129.16	Middle	No
49	035	1129.17	Middle	No
49	035	1129.18	Middle	No
49	035	1129.20	Middle	No
49	035	1129.21	Middle	No
49	035	1130.07	Middle	No
49	035	1130.08	Upper	No
49	035	1130.10	Upper	No
49	035	1130.11	Upper	No
49	035	1130.12	Upper	No
49	035	1130.13	Upper	No
49	035	1130.14	Middle	No
49	035	1130.16	Upper	No
49	035	1130.17	Middle	No
49	035	1130.21	Middle	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
49	035	1130.22	Upper	No
49	035	1130.23	Middle	No
49	035	1130.24	Upper	No
49	035	1130.25	Middle	No
49	035	1131.01	Middle	No
49	035	1131.02	Middle	No
49	035	1131.05	Upper	No
49	035	1131.08	Upper	No
49	035	1131.09	Upper	No
49	035	1131.10	Middle	No
49	035	1131.11	Upper	No
49	035	1131.12	Upper	No
49	035	1131.13	Middle	No
49	035	1131.14	Middle	No
49	035	1133.07	Moderate	No
49	035	1133.08	Moderate	No
49	035	1133.09	Moderate	No
49	035	1133.10	Moderate	No
49	035	1133.11	Moderate	No
49	035	1133.12	Low	No
49	035	1133.13	Moderate	No
49	035	1133.14	Moderate	No
49	035	1134.06	Moderate	No
49	035	1134.08	Middle	No
49	035	1134.09	Middle	No
49	035	1134.10	Middle	No
49	035	1134.11	Middle	No
49	035	1134.12	Middle	No
49	035	1134.13	Middle	No
49	035	1134.14	Middle	No
49	035	1134.15	Middle	No
49	035	1135.05	Moderate	No
49	035	1135.09	Moderate	No
49	035	1135.10	Middle	No
49	035	1135.11	Moderate	No
49	035	1135.12	Moderate	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
49	035	1135.13	Middle	No
49	035	1135.14	Moderate	No
49	035	1135.15	Middle	No
49	035	1135.20	Middle	No
49	035	1135.21	Moderate	No
49	035	1135.22	Middle	No
49	035	1135.23	Moderate	No
49	035	1135.26	Middle	No
49	035	1135.27	Middle	No
49	035	1135.28	Middle	No
49	035	1135.32	Middle	No
49	035	1135.33	Middle	No
49	035	1135.36	Moderate	No
49	035	1135.37	Middle	No
49	035	1135.38	Middle	No
49	035	1135.39	Middle	No
49	035	1135.40	Middle	No
49	035	1135.41	Middle	No
49	035	1135.42	Middle	No
49	035	1135.43	Middle	No
49	035	1135.44	Middle	No
49	035	1135.45	Middle	No
49	035	1136.00	Moderate	No
49	035	1137.01	Middle	No
49	035	1137.02	Moderate	No
49	035	1138.01	Moderate	No
49	035	1138.02	Moderate	No
49	035	1138.04	Middle	No
49	035	1138.05	Middle	No
49	035	1139.03	Middle	No
49	035	1139.04	Middle	No
49	035	1139.05	Moderate	No
49	035	1139.06	Moderate	No
49	035	1139.08	Moderate	No
49	035	1139.09	Upper	No
49	035	1140.00	Middle	No

State	County	Tract Code	Tract Income Level	Distressed or Underserved Tract
49	035	1141.00	Upper	No
49	035	1142.00	Middle	No
49	035	1143.01	Moderate	No
49	035	1143.02	Middle	No
49	035	1143.03	Upper	No
49	035	1143.04	Middle	No
49	035	1145.00	Middle	No
49	035	1146.01	Upper	No
49	035	1146.02	Upper	No
49	035	1147.00	Moderate	No
49	035	1148.00	Upper	No
49	035	1151.07	Upper	No
49	035	1151.08	Middle	No
49	035	1151.09	Middle	No
49	035	1152.10	Upper	No
49	035	1152.11	Middle	No
49	035	9800.00	Unknown	No
49	035	9801.00	Unknown	No

## Loan to Deposit Ratios

LOAN TO DEPOSIT					
<i>(in 000s)</i>	3/31/2025	6/30/2025	9/30/2025	12/31/2025	Quarterly Average
Total Loans, net of ALLL	\$ 910,600	\$ 904,943	\$ 898,106	\$ 863,697	\$ 894,337
Total Deposits	\$ 1,158,124	\$ 1,127,705	\$ 1,069,587	\$ 1,136,528	\$ 1,122,986
Loan to Deposit ratio	78.6%	80.2%	84.0%	76.0%	79.6%

# Appendix A: FDIC CRA Performance Evaluation

# **PUBLIC DISCLOSURE**

July 7, 2025

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Northwest Bank  
Certificate Number: 58752

1750 West Front Street  
Boise, Idaho 83702

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
San Francisco Regional Office

25 Jessie Street at Ecker Square, Suite 2300  
San Francisco, California 94105

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

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## INSTITUTION RATING

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

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

**The Lending Test is rated Satisfactory.**

- The loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and assessment area (AA) credit needs.
- A majority of loans were made within the institution's AAs.
- The geographic distribution of loans reflects reasonable dispersion throughout the AAs.
- The distribution of borrowers reflects, given the demographics of the AAs, poor penetration among businesses of different revenue sizes.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

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

The institution's community development (CD) performance demonstrates adequate responsiveness to CD needs in its AAs through CD loans, qualified investments, and CD services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for CD in the institution's AAs.

## DESCRIPTION OF INSTITUTION

Northwest Bank (NB) is a state-chartered institution headquartered in Boise, Idaho. NB is a wholly-owned subsidiary of Western Capital Corporation located in Boise, Idaho, which is a wholly-owned subsidiary of GWY, LLC, a one-bank holding company located in Bellevue, Washington. NB has no affiliates, and all lending activity presented in this evaluation was provided by the bank. No merger or acquisition activity has occurred since the previous evaluation.

NB offers a range of products and services via five full-service branches throughout Oregon, Idaho, Washington, and Utah. As of May 1, 2024, the institution’s operations expanded to include the state of Utah, when the bank converted a loan production office into a full-service branch in Salt Lake City. No branches were closed since the previous evaluation.

The institution remains primarily focused on commercial lending. Products include term loans, credit lines, operating lines, and letters of credit, among others. NB also continues to provide loans through the Small Business Association (SBA). Deposit products include personal and business checking, savings, and money market accounts, as well as certificates of deposit. Alternative banking services include online and mobile banking, electronic bill pay, and automated teller machines.

As of March 31, 2025, NB reported \$1.5 billion in total assets, \$924.9 million in total loans, and total deposits of \$1.2 billion. There have been no material changes to the financial condition since the previous evaluation. The following table details the banks’ loan portfolio distribution by loan category.

<b>Loan Portfolio Distribution as of 3/31/2025</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	100,950	10.9
Secured by Farmland	90	0.0
Secured by 1-4 Family Residential Properties	4,180	0.5
Secured by Multifamily (5 or more) Residential Properties	10,353	1.1
Secured by Nonfarm Nonresidential Properties	419,150	45.3
<b>Total Real Estate Loans</b>	<b>534,723</b>	<b>57.8</b>
Commercial and Industrial Loans	388,419	42.0
Agricultural Production and Other Loans to Farmers	1,366	0.1
Consumer Loans	-	-
Obligations of State and Political Subdivisions in the U.S.	-	-
Other Loans	407	-
Lease Financing Receivable (net of unearned income)	-	-
Less: Unearned Income	-	-
<b>Total Loans</b>	<b>924,915</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income</i>		

The institution received a “Satisfactory” rating at the previous CRA Performance Evaluation dated July 18, 2022, based on Interagency Intermediate Small Examination Procedures. Examiners did not identify any financial, legal, or other impediments that affect the institution’s ability to meet AA credit needs.

## DESCRIPTION OF ASSESSMENT AREAS

NB's delineated AA consists of four rated areas and five individual AAs; see the following table for details. Refer to each AA for additional information.

Description of Assessment Areas			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
<b>Oregon</b>			
Portland AA	Clackamas, Multnomah, Washington	418	1
<b>Idaho</b>			
Boise City MSA	Ada, Canyon	183	1
Coeur d'Alene MSA	Kootenai	39	1
<b>Washington</b>			
Seattle AA	King	495	1
<b>Utah</b>			
Salt Lake City AA	Salt Lake	251	1
<i>Source: Bank Data</i>			

As of May 1, 2024, the bank converted a loan production office in Salt Lake City, Utah, to a full-service branch. As a result, the bank's AA was expanded to include all 251 tracts in Salt Lake County and the state of Utah represents a new rated area. Examiners did not conduct a full-scope review for this area as there is not a full year of lending activity; however, the bank's CD activities during the evaluation period were included in the conclusions for the Community Development Test. Refer to the overall Community Development Test for additional information.

## SCOPE OF EVALUATION

### **General Information**

Interagency Intermediate Small Institution CRA Examination Procedures were utilized to evaluate NB's performance from the previous evaluation dated July 18, 2022, to the current evaluation, dated July 7, 2025.

Based on the distribution of branches, deposits and reported loans, Oregon contributes the greatest weight to overall conclusions, followed by Idaho and Washington. Each rated area had one AA selected for a full-scope review; refer to each for complete details. The weight for full- and limited-scope reviews follow the same criteria as those noted for the rated areas.

### **Activities Reviewed**

Based upon the bank's business strategy, and the number and dollar volume of originations on the bank's CRA loan application register, examiners determined that NB's major product line is small business loans. Home mortgage lending is not included in this evaluation as it does not represent a major product line or provide material weight for overall conclusions. In 2024, NB originated two home mortgage loans totaling approximately \$2.0 million. Small farm lending is also not included in this evaluation because the bank does not offer this product.

As an Intermediate Small Institution, NB collects, but does not report, nor is it required to report small business loan data. Examiners validated the bank's collected small business loan data for 2024. Due to data integrity issues, additional years of loan data could not be relied upon, so examiners limited the analysis and presentation of small business loans to those originated in 2024. In 2024, NB originated 146 small business loans totaling \$63.9 million. Management confirmed the bank's performance in 2024 is representative of the review period. Demographic comparisons for small business lending performance are based on 2024 D&B data. Although the evaluation presents both the number and dollar volume of small business lending, examiners emphasized performance by number of loans, as it is a better indicator of businesses served.

Examiners considered all CD lending, investment and service activity from the date of the previous evaluation through the date of the current evaluation in forming CD conclusions.

## CONCLUSIONS ON PERFORMANCE CRITERIA

### LENDING TEST

NB's Lending Test performance is rated "Satisfactory." Performance in each rated area is consistent with this conclusion.

#### Loan-to-Deposit Ratio

The LTD ratio is reasonable given the institution's size, financial condition, and AA credit needs. The bank's net LTD ratio, calculated from Call Report data, averaged 72.4 percent over the previous 12 calendar quarters from June 30, 2022, to March 31, 2025. The ratio ranged from a high of 84.1 percent as of June 30, 2022, to a low of 64.5 as of September 31, 2023.

Examiners compared the bank's average net LTD ratio to three similarly situated institutions which were selected based on asset size, geographic location, and lending focus. The table below shows the bank's net LTD ratio is below peers. However, the bank utilized conservative lending practices to maintain a higher level of balance sheet liquidity than many of its peer institutions due to the interest rate environment which contributed to the lower net LTD ratio. Considering these factors, the bank's LTD ratio is reasonable.

<b>Loan-to-Deposit Ratio Comparison</b>		
<b>Institution</b>	<b>Total Assets as of (\$000s)</b>	<b>Average Net LTD Ratio (%)</b>
<b>Northwest Bank</b>	<b>1,495,006</b>	<b>72.3</b>
Similarly Situated Institution #1	961,640	88.2
Similarly Situated Institution #2	1,282,770	90.4
Similarly Situated Institution #3	1,932,097	80.0
<i>Source: Reports of Condition and Income 6/30/2022 - 3/31/2025</i>		

#### Assessment Area Concentration

A majority of loans are made in the bank's AA as depicted in the following table.

<b>Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total #</b>	<b>Dollar Amount of Loans \$(000)</b>				<b>Total \$(000)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
Small Business										
2024	99	67.8	47	32.2	146	42,755	66.9	21,165	33.1	63,920
<b>Total</b>	<b>99</b>	<b>67.8</b>	<b>47</b>	<b>32.2</b>	<b>146</b>	<b>42,755</b>	<b>66.9</b>	<b>21,165</b>	<b>33.1</b>	<b>63,920</b>
<i>Source: Bank Data, as reported Due to rounding, totals may not equal 100.0%.</i>										

#### Geographic Distribution

Overall, the geographic distribution of loans reflects reasonable dispersion throughout the AAs. The bank's performance is consistent in each of the rated areas.

**Borrower Profile**

Overall, the distribution of borrowers reflects, given the demographics of the AAs, poor penetration among businesses of different revenue sizes. The performance is consistent in each of the rated areas.

**Response to Complaints**

NB has not received any CRA-related complaints since the previous CRA evaluation; therefore, this criterion did not affect the Lending Test rating.

**COMMUNITY DEVELOPMENT TEST**

The Community Development Test is rated “Satisfactory.” The institution’s CD performance demonstrates adequate responsiveness to CD needs in its AAs through CD loans, qualified investments, and services, as appropriate, considering the institution’s capacity and the need and availability of such opportunities. NB’s performance is consistent among each rated area and is comparable to other similarly-situated institutions.

**Community Development Loans**

During the evaluation period, NB originated 48 CD loans totaling approximately \$36.8 million. This level of activity represents 2.8 percent of average total assets and 4.8 percent of average total loans. This is a 12.2 percent increase by dollar and 6.7 percent increase by number of loans from the prior evaluation, when NB originated 45 CD loans totaling \$32.8 million, which represented 3.4 percent of average total assets and 4.9 percent of average total loans.

Although the bulk of CD lending dollars provided funding for revitalization or stabilization efforts, the total number of CD loans targeted to providing support for affordable housing initiatives and demonstrates responsiveness to opportunities for CD needs. This conclusion is supported by economic and demographic data. NB’s performance is comparable to other similarly situated institutions. The following table provides further detail on the bank’s CD loans by year and CD purpose.

Community Development Lending										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$	#	\$	#	\$	#	\$	#	\$
2022	6	8,224	1	750	-	-	1	18,000	8	26,974
2023	18	425	-	-	3	1,383	-	-	21	1,808
2024	7	2,920	3	879	-	-	-	-	10	3,799
YTD 2025	4	80	-	-	5	4,118	-	-	9	4,198
<b>Total</b>	<b>35</b>	<b>11,649</b>	<b>4</b>	<b>1,629</b>	<b>8</b>	<b>5,501</b>	<b>1</b>	<b>18,000</b>	<b>48</b>	<b>36,779</b>

*Source: Bank Data*

The preceding table includes 2 SBA 504 loans originated in 2025, totaling approximately \$2.2 million, that were made in a larger, statewide area that includes the bank’s Utah AA, and are not

discussed elsewhere in this evaluation. These loans were originated in a “CRA desert”, an area known to lack credit support and limited retail banking branches.

**Qualified Investments**

CD investments, which include new and prior period investments, combined with grants and donations, total approximately \$11.0 million. NB invested approximately \$2.8 million in 1 new qualified investment, and 6 qualified grants and donations totaling \$74,000 during the review period. The institution also maintains approximately \$8.2 million in 3 prior period investments. Total qualified investments represent 0.8 percent of average total assets and 3.2 percent of average total securities as of the March 31, 2025, Call Report.

The number and total dollar amount of qualified CD investments increased significantly from the previous evaluation when NB had 6 qualified investments totaling \$7.5 million. Total qualified investments declined as a percentage of total average investments from the previous evaluation when total qualified investments represented 8.4 percent of total average securities. However, total qualified investments as a percentage of average total assets remained the same as the previous evaluation. The bank’s performance is slightly below similarly situated institutions. NB’s responsiveness to qualified investment needs is reasonable, as affordable housing and economic development are both credit needs in all of its AAs.

<b>Qualified Investments</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	1	3,563	0	0	2	4,649	0	0	3	8,212
2022	0	0	0	0	0	0	0	0	0	0
2023	0	0	0	0	0	0	0	0	0	0
2024	1	2,763	0	0	0	0	0	0	1	2,763
YTD 2025	0	0	0	0	0	0	0	0	0	0
<b>Subtotal</b>	<b>2</b>	<b>6,326</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>4,649</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>10,975</b>
Qualified Grants & Donations	0	0	3	63	3	11	0	0	6	74
<b>Total</b>	<b>2</b>	<b>6,326</b>	<b>3</b>	<b>63</b>	<b>5</b>	<b>4,660</b>	<b>0</b>	<b>0</b>	<b>10</b>	<b>11,049</b>
<i>Source: Bank Data</i>										

The preceding table includes a \$2.8 million investment in a mortgage-backed security that supports affordable housing initiatives for low- moderate-income (LMI) borrowers in the Boise, Seattle, and Portland AAs. This includes \$1.2 million in Boise, \$727,354 in Seattle, and \$701,354 in Portland.

**Community Development Services**

NB employees provided a total of 996 CD service hours across all rated areas. CD service hours increased from the prior evaluation when bank employees provided a total of 652 CD service hours. This performance is comparable to peer institutions. Most CD service hours were targeted at providing various services for LMI individuals and families, followed by economic development activities that demonstrate responsiveness to identified CD needs.

In addition to the provision of qualified CD service hours, NB has a branch located in a moderate-income CT in the Coeur d'Alene MSA, which increases the accessibility of the bank's retail banking services to LMI individuals. Refer to the following table for a total of qualified CD hours provided by year and purpose.

<b>Community Development Services</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2022	10	73	26	0	<b>109</b>
2023	0	259	110	0	<b>369</b>
2024	56	217	130	0	<b>403</b>
YTD 2025	8	77	30	0	<b>115</b>
<b>Total</b>	<b>74</b>	<b>626</b>	<b>296</b>	<b>0</b>	<b>996</b>
<i>Source: Bank Data</i>					

The preceding table includes service hours provided in the Salt Lake City AA, that benefitted the larger rated area that are not discussed elsewhere in this evaluation. The following are examples of the institution's service hours provided in the Utah rated area.

- In 2024, bank employees provided 13 hours of financial education and technical expertise to small businesses.
- In 2024, a bank employee provided 9 hours of service on the board of an organization that provides scholarships to LMI students.
- In 2024, a bank employee provided 7 hours of service on a financial services committee of an organization that provides health services to LMI seniors.

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Examiners reviewed the bank's compliance with the laws relating to discrimination and other illegal credit practices, including the Fair Housing Act and the Equal Credit Opportunity Act, and did not identify any discriminatory or illegal credit practices.

## OREGON

**CRA RATING FOR OREGON: SATISFACTORY**

**The Lending Test is rated: Satisfactory**

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

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN OREGON

NB operates one full-service branch in the Portland AA. The AA is located in the northwest portion of Oregon and consists of all 87 CTs in Clackamas, 197 CTs in Multnomah and all 134 CTs in Washington Counties in Oregon. Together, these form a portion of the Portland-Vancouver-Hillsboro Multistate MSA. No changes were made to this AA since the previous evaluation.

**Economic and Demographic Data**

According to 2020 U.S. Census Data, the Portland AA contained 11 low-, 86 moderate-, 180 middle-, and 140 upper-income tracts. One tract has no income designation. The following table provides key demographic information for the AA.

<b>Demographic Information of the Assessment Area Portland AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>N/A* % of #</b>
Geographies (Census Tracts)	418	2.6	20.6	43.1	33.0	0.7
Population by Geography	1,837,201	2.7	21.8	44.4	31.0	0.1
Housing Units by Geography	754,595	2.8	21.0	44.8	31.2	0.2
Owner-Occupied Units by Geography	431,794	1.5	17.2	45.5	35.7	0.1
Occupied Rental Units by Geography	285,425	4.6	26.8	43.5	24.8	0.3
Vacant Units by Geography	37,376	3.0	20.9	47.0	28.9	0.3
Businesses by Geography	227,542	2.1	19.5	43.2	35.0	0.3
Farms by Geography	3,622	0.6	8.7	64.2	26.4	0.1
Family Distribution by Income Level	438,308	19.8	17.5	20.8	41.9	0.0
Household Distribution by Income Level	717,219	23.3	16.1	18.1	42.5	0.0
Median Family Income MSA - 38900 Portland-Vancouver-Hillsboro, OR-WA MSA	\$94,727	Median Housing Value		\$ 434,566		
		Median Gross Rent		\$1,370		
		Families Below Poverty Level		6.4%		
<i>Source: 2020 Census And 2024 D&amp;B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.</i>						

According to 2024 D&B data, service industries represented the largest portion of businesses at 31.8 percent; followed by non-classifiable establishments at 25.3 percent, construction at 6.5 percent, and retail trade at 6.4 percent. In addition, 66.0 percent of area businesses have 4 or fewer employees, and 94.3 percent operate from a single location.

According to Moody’s Analytics, the high-tech industry, logistics and manufacturing industries are key strengths in the AA economy. However, there have been significant layoffs at Intel Corporation and Nike, Inc. two of the largest employers in the AA. Providence Health Systems, Oregon Health & Science University and Legacy Health System are also among the largest local employers. The area is noted as having a high quality of living and a low poverty rate. Although housing prices are flat, they are expensive and remain substantially above the median income level making affordable housing challenging for individuals and families.

The unemployment rates varied among each county during the evaluation period and were similar to the state and national averages. See the table on the following page.

<b>Unemployment Rates</b>			
<b>Area</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
	<b>%</b>	<b>%</b>	<b>%</b>
Clackamas County	3.6	3.4	3.9
Multnomah County	3.7	3.5	4.0
Washington County	3.3	3.2	3.7
State of Oregon	3.9	3.8	4.2
National Average	3.6	3.6	4.0

*Source: Bureau of Labor Statistics*

**Competition**

The Portland AA is highly competitive in the market for financial services. According to the FDIC Deposit Market Share data as of June 30, 2025, 27 FDIC-insured financial institutions operated 290 offices within the AA. NB ranked 12<sup>th</sup> among these institutions with 0.7 percent of the total deposit market share. The top three financial institutions consist of large, national associations that have a combined market share of 61.8 percent.

**Community Contact**

Examiners reviewed an existing community contact interview with an organization that supports small businesses in the AA. The contact stated the area has good support from local government sources for small businesses, and that regional banks have been helpful in supporting their mission. The contact stated that some small businesses experience funding gaps that conventional lending cannot fill, and that others have a weakness when it comes to obtaining financing or understanding the pathway to bankability.

**Credit and Community Development Needs and Opportunities**

Considering information from the community contact and key economic and demographic data, examiners determined that small business lending represents a primary credit need for the AA. There are also opportunities to provide financial education for entrepreneurs and small business

startups. The high cost of housing in the AA, and the shortage of available housing stock also indicate a credit need for affordable housing programs. Demographic and economic data support these conclusions.

## SCOPE OF EVALUATION – OREGON

Examiners conducted a full-scope review of the Portland AA in the state of Oregon.

## CONCLUSIONS ON PERFORMANCE CRITERIA IN OREGON

### LENDING TEST

NB is rated “Satisfactory” in the Lending Test for the state of Oregon. The institution’s reasonable performance under the geographic distribution criteria and poor performance under the borrower profile criteria supports this conclusion.

#### Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AA. Lending performance in low-income CTs is significantly higher than demographic data. Lending in moderate-income CTs was comparable to demographic data. These factors reflect reasonable performance.

<b>Geographic Distribution of Small Business Loans Portland AA</b>					
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low					
2024	2.1	3	7.1	880	6.6
Moderate					
2024	19.5	8	19.1	1,415	10.6
Middle					
2024	43.2	15	35.7	3,942	29.5
Upper					
2024	35.0	14	33.3	6,275	47.0
NA					
2024	0.3	2	4.8	850	6.4
<b>Total</b>					
<b>2024</b>	<b>100.0</b>	<b>42</b>	<b>100.0</b>	<b>13,362</b>	<b>100.0</b>
<i>Source: 2024 D&amp;B Data; Bank Data Due to rounding, totals may not equal 100.0%.</i>					

#### Borrower Profile

The distribution of borrowers reflects, given the demographics of the AA, poor penetration among businesses of different revenue sizes. Lending to businesses with gross annual revenues (GARs) of \$1 million or less significantly trailed demographic data. Management attributed the bank’s performance in part to the highly competitive market in the AA. NB’s operations are limited to one

branch and the institution’s total deposit market share is less than 1.0 percent. In addition, the bank’s business growth is primarily from referrals and existing clients. Considering all of these factors, the bank’s performance is poor.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category Portland AA</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<= \$1,000,000					
2024	91.6	9	21.4	4,166	31.2
> \$1,000,000					
2024	2.2	33	78.6	9,196	68.8
Revenue Not Available					
2024	6.2	0	0.0	0	0.0
<b>Total</b>					
<b>2024</b>	<b>100.0</b>	<b>42</b>	<b>100.0</b>	<b>13,362</b>	<b>100.0</b>
<i>Source: 2024 D&amp;B Data; Bank Data Due to rounding, totals may not equal 100.0%.</i>					

## **COMMUNITY DEVELOPMENT TEST**

The institution’s CD performance demonstrated adequate responsiveness to the CD needs in the Portland AA through CD loans, qualified investments, and CD services, as appropriate, considering the bank’s capacity and resources and the need and availability of such opportunities for CD in the institution’s AAs.

### **Community Development Loans**

NB’s number and dollar volume of CD loans declined from the prior evaluation when the bank made 41 CD loans totaling \$14.0 million. However, NB’s advances to an affordable housing organization demonstrate the bank’s responsiveness to primary credit needs of the area, specifically affordable housing due to high housing prices. The following table provides details for CD loans by purpose and amount.

<b>Community Development Lending by Assessment Area</b>										
<b>Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Portland	1	5,000	2	1,500	1	660	0	0	4	7,160
Statewide Activities	31	609	0	0	0	0	0	0	31	609
<b>Total</b>	<b>32</b>	<b>5,609</b>	<b>2</b>	<b>1,500</b>	<b>1</b>	<b>660</b>	<b>0</b>	<b>0</b>	<b>35</b>	<b>7,769</b>
<i>Source: Bank Data</i>										

Examples of CD loan activity include the following:

- In 2022, NB originated a \$5.0 million loan to finance the rehabilitation of a deteriorating condominium building that provides affordable housing for LMI seniors.
- In 2023, NB provided \$750,000 in a working line of credit to a community organization that provides services to homeless individuals and families.
- The bank maintains a \$2.0 million line of credit through a consortium loan that provides financing for affordable housing statewide, of which the bank advanced \$609,000 in 31 advances throughout the evaluation period.

**Qualified Investments**

Qualified investments and grants totaled \$763,912. The total is comprised of \$701,354 in the portion of the mortgage-backed security supporting affordable housing discussed at the bank-wide level, and \$62,558 in grants to the Oregon Law Foundation in the form of Interest on Lawyers’ Trust Accounts (IOLTAs). IOLTAs are owned by lawyers who have client money, and higher-than market rate interest is paid on those accounts. The interest from all Oregon IOLTAs is granted to the Oregon Law Foundation, which uses the funds to provide civil legal help for low-income families and individuals. NB provided \$16,303 in 2022, \$19,182 in 2023, and \$27,073 in 2024 under this program.

Oregon’s total qualified investments do not reflect prior period investments, which consist of portions of two regional investments. One investment supports affordable housing initiatives that include the Portland AA and has a balance of approximately \$3.6 million outstanding. The other investment is in a small business investment company that targets economic development initiatives that include the Portland AA and has a balance of \$4.6 million still outstanding. This performance is below the prior evaluation, when NB made \$2.9 million in total qualified investments and grants.

**Community Development Services**

NB employees provided 119 service hours during the evaluation period. The hours provided represent a decrease from the 238 hours reported at the prior evaluation. The following table provides details of CD services by purpose and the number of hours provided.

<b>Community Development Services</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2022	-	40	-	-	<b>40</b>
2023	-	-	-	-	-
2024	44	33	2	-	<b>79</b>
YTD 2025	-	-	-	-	-
<b>Total</b>	<b>44</b>	<b>73</b>	<b>2</b>	<b>-</b>	<b>119</b>

*Source: Bank Data*

The following are examples of CD services provided by bank employees:

- In 2022, a market president of the bank provided 36 hours of community services, serving on the board of a non-profit organization that provides services to LMI individuals. Services include assistance with finding temporary or permanent housing and obtaining healthcare.
- In 2024, a chief executive of the bank provided 21 hours of community services, serving on the board of directors of a non-profit organization that provides services to youth in foster care and going through the adoption process.
- In 2024, several employees of the bank provided a total of 40 hours of affordable housing services, serving a non-profit organization that provides affordable housing to LMI individuals.

## IDAHO

### CRA RATING FOR IDAHO: SATISFACTORY

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN IDAHO

The Idaho rated area consists of two AAs that are comprised of the Boise City MSA AA, which is located in the southwestern part of the state and the Coeur d'Alene MSA AA, which is located in the northern part of the state in the Idaho Panhandle. Refer to each full- and limited-scope review for complete details for each AA. No changes occurred to the Idaho AAs since the prior evaluation.

### SCOPE OF EVALUATION - IDAHO

Based on lending activity, deposit volume and branch distribution, the Boise City MSA AA was reviewed using full-scope procedures and contributes the greatest weight to overall conclusions. The Coeur d'Alene MSA AA was reviewed using limited-scope procedures.

### CONCLUSIONS ON PERFORMANCE CRITERIA IN IDAHO

#### LENDING TEST

NB is rated "Satisfactory" in the Lending Test for the state of Idaho. Reasonable performance under the geographic distribution criteria and poor performance under the borrower profile criteria in the Boise City MSA AA supports this conclusion. NB did not originate any loans in the Coeur d'Alene MSA in 2024. The bank's overall performance in the Coeur d'Alene MSA AA is below the Idaho rated area. However, it did not alter the overall conclusions and rating for the state of Idaho. Refer to each full- and limited-scope review for additional details.

### **Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the AAs. The bank's performance in the Boise City MSA AA is consistent with this conclusion. The bank's performance in the Coeur d'Alene MSA AA is below the overall conclusion for the Idaho rated area.

### **Borrower Profile**

The distribution of borrowers reflects, given the demographics of the AAs, poor penetration among businesses of different sizes. NB's performance in each AA is consistent with this conclusion.

## **COMMUNITY DEVELOPMENT TEST**

The institution's CD performance demonstrated adequate responsiveness to the CD needs in the state of Idaho through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and resources and the need and availability of such opportunities for CD in the institution's AAs. The institution's performance in the Boise City MSA received the greatest weight and is consistent with the overall conclusion for the state of Idaho, while the performance in the Coeur d'Alene MSA is below the overall conclusion. Refer to each full- and limited-scope review for details.

### **Community Development Loans**

NB's number of CD loans increased, while the dollar volume decreased from the prior evaluation where the bank made one CD loan totaling \$15.0 million. Due to NB's participation in a CD loan consortium, both AAs received the benefits of CD lending activity.

<b>Community Development Lending by Assessment Area</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Boise City MSA	-	-	2	129	2	723	-	-	4	852
Coeur d'Alene MSA	-	-	-	-	-	-	-	-	-	-
Statewide Activities	1	96	-	-	-	-	-	-	1	96
<b>Total</b>	<b>1</b>	<b>96</b>	<b>2</b>	<b>129</b>	<b>2</b>	<b>723</b>	<b>-</b>	<b>-</b>	<b>5</b>	<b>948</b>

*Source: Bank Data*

The following is an example of statewide CD loan activity:

- In 2023, NB participated in a CD loan consortium, providing \$96,250 to multi-family affordable housing projects statewide in Idaho, which includes each of the bank’s Idaho AAs.

**Qualified Investments**

NB reported 4 qualified investments, grants and donations totaling \$1.2 million. This total does not include a portion of a prior period investment with a balance of approximately \$3.6 million still outstanding that supports affordable housing initiatives in a regional area, including the Boise City MSA. This performance is significantly above the prior evaluation, when NB made 1 qualified investment totaling \$458,000.

<b>Qualified Investments and Donations by Assessment Area</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Boise City MSA	1	1,200	-	-	3	11	-	-	4	1,211
Coeur d’Alene MSA	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>1</b>	<b>1,200</b>	<b>-</b>	<b>-</b>	<b>3</b>	<b>11</b>	<b>-</b>	<b>-</b>	<b>4</b>	<b>1,211</b>

*Source: Bank Data*

**Community Development Services**

NB staff provided 553 hours of CD service hours during the evaluation period. This performance level is above the prior evaluation’s total of 368 hours. Refer to each full- and limited-scope review for additional details.

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Boise City MSA	12	215	22	-	249
Coeur d’Alene MSA	-	227	56	-	283
Statewide Activities	21	-	-	-	21
<b>Total</b>	<b>33</b>	<b>442</b>	<b>78</b>	<b>-</b>	<b>553</b>

*Source: Bank Data*

The following is an example of service hours the bank provided at a statewide level:

- In 2022, 2023, and 2025, bank staff provided a combined 21 hours of board service to an organization that serves LMI individuals with affordable housing needs in both Idaho AAs.

## BOISE CITY MSA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE BOISE CITY MSA ASSESSMENT AREA

The AA is in the northwestern portion of Idaho and consists of all 129 CTs in Ada County and all 54 CTs in Canyon County, which together form a portion of the Boise City, ID MSA. There were no changes to this AA since the previous evaluation.

#### **Economic and Demographic Data**

According to 2020 U.S. Census Data, the Boise City MSA contained 4 low-, 33 moderate-, 88 middle- and 57 upper-income CTs. One CT has no income designation. The following table provides key demographic data for the AA.

<b>Demographic Information of the Assessment Area Boise City MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>N/A* % of #</b>
Geographies (Census Tracts)	183	2.2	18.0	48.1	31.2	0.6
Population by Geography	726,072	2.3	18.0	49.0	30.5	0.3
Housing Units by Geography	265,439	2.1	18.7	48.9	30.0	0.4
Owner-Occupied Units by Geography	180,553	0.6	15.0	51.1	33.3	0.0
Occupied Rental Units by Geography	74,649	5.4	27.0	44.2	22.2	1.2
Vacant Units by Geography	10,237	4.1	21.8	44.6	29.2	0.4
Businesses by Geography	83,425	2.0	18.1	47.0	32.9	0.1
Farms by Geography	1,466	0.6	15.0	42.9	41.5	0.0
Family Distribution by Income Level	170,224	16.8	19.0	22.9	41.3	0.0
Household Distribution by Income Level	255,202	21.0	17.0	21.1	41.0	0.0
Median Family Income MSA - 14260 Boise City, ID MSA	\$77,090	Median Housing Value				\$ 279,993
		Median Gross Rent				\$998
		Families Below Poverty Level				6.5%
<i>Source: 2020 Census And 2024 D&amp;B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.</i>						

According to 2024 D&B data, service industries represented the largest portion of businesses at 30.3 percent, followed by non-classifiable establishments at 24.7 percent, construction at 8.9

percent, and retail trade at 6.4 percent. In addition, 68.9 percent of area businesses have four or fewer employees, and 94.7 percent operate from a single location.

According to Moody’s Analytics, manufacturing, construction, and healthcare are the main economic drivers. St. Luke’s Regional Medical Center, Ltd., Micron Technology, Inc. (Micron), Saint Alphonsus Regional Medical Center, Inc., and Boise State University are the AA’s largest employers. Boise is one of the fastest growing metros in the nation, spurred by migration and investments from tech companies like Micron and Meta Platforms, Inc.. Boise State University set a record for enrollment in 2024, which maintains a pipeline of highly skilled workers to the healthcare and tech industries. Housing prices have also risen above the national average, leading to issues with affordable homeownership.

Unemployment rates varied slightly between the two counties. The average rates of unemployment for each county were generally comparable to those for the state of Idaho and trended lower than those for the rest of the nation. See the following table for the AA’s unemployment rates.

<b>Unemployment Rates</b>			
<b>Area</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
	<b>%</b>	<b>%</b>	<b>%</b>
Ada County	2.5	2.9	3.3
Canyon County	2.9	3.2	3.8
State of Idaho	2.9	3.2	3.7
National Average	3.6	3.6	4.0

*Source: Bureau of Labor Statistics*

**Competition**

The Boise City MSA AA is highly competitive in the market for financial services. According to the FDIC Deposit Market Share data as of June 30, 2025, 23 FDIC-insured financial institutions operated 143 branches within the AA. Of these institutions, NB ranked 12<sup>th</sup> with a 2.1 percent deposit market share. The top three financial institutions are comprised of large, national associations that have a combined market share of 51.7 percent.

**Community Contact**

Examiners reviewed an existing community contact interview with an organization that serves the AA. The organization provides resources for programs that support home improvement and affordable housing within the AA. The contact noted that there has been an influx of population and a housing shortage due to little to no construction of homes. The contact noted that acquiring capital to develop projects can be a struggle, for both single-family and multi-family projects.

**Credit and Community Development Needs and Opportunities**

Considering information from the community contact and key economic demographic data, examiners determined that construction of affordable single- and multi-family projects represents a primary credit need for the AA. In addition, the median housing value is relatively high in comparison to the median family income, further indicating a need for affordable housing.

## CONCLUSIONS ON PERFORMANCE CRITERIA IN BOISE CITY

### LENDING TEST

Lending Test performance in the Boise City MSA is consistent with the state of Idaho’s conclusions.

#### Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AA. NB’s lending performance in low-income CTs exceeded demographic data by a wide margin. In moderate-income tracts, the bank’s performance trailed demographic data slightly, but not by an unreasonable amount. Considering these factors, NB’s performance is reasonable.

<b>Geographic Distribution of Small Business Loans Boise City MSA</b>					
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low					
2024	2.0	2	6.3	1,250	6.5
Moderate					
2024	18.1	5	15.6	1,649	8.6
Middle					
2024	47.0	16	50.0	12,370	64.2
Upper					
2024	32.9	9	28.1	4,008	20.8
NA					
2024	0.1	0	0.0	0	0.0
<b>Total</b>					
<b>2024</b>	<b>100.0</b>	<b>32</b>	<b>100.0</b>	<b>19,277</b>	<b>100.0</b>
<i>Source: 2024 D&amp;B Data; Bank Data Due to rounding, totals may not equal 100.0%.</i>					

#### Borrower Profile

The distribution of borrowers reflects, given the demographics of the AA, poor penetration among businesses of different revenue sizes. NB’s performance of lending to businesses with GARs of \$1 million or less significantly trailed 2024 demographic data. Bank management attributed the lagging performance to challenges in the highly competitive Boise MSA AA, where the bank operates a single branch and maintains only 2.0 percent of the total deposit market share. Considering these factors, NB’s performance is poor.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category Boise City MSA</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<= \$1,000,000					
2024	90.7	5	15.6	3,043	15.8
> \$1,000,000					
2024	2.0	26	81.3	15,895	82.5
Revenue Not Available					
2024	7.4	1	3.1	339	1.8
<b>Total</b>					
<b>2024</b>	<b>100.0</b>	<b>32</b>	<b>100.0</b>	<b>19,277</b>	<b>100.0</b>
<i>Source: 2024 D&amp;B Data; Bank Data Due to rounding, totals may not equal 100.0%.</i>					

## **COMMUNITY DEVELOPMENT TEST**

The institution’s CD performance demonstrated adequate responsiveness to the CD needs in the Boise City MSA through CD loans, qualified investments, and CD services, as appropriate, considering the bank’s capacity and resources and the need and availability of such opportunities for CD in the institution’s AAs.

### **Community Development Loans**

NB originated 4 CD loans totaling \$851,451 in the Boise City MSA. This total does not include the statewide investment discussed at the rated area level. Although the dollar volume decreased from the prior evaluation period when NB made 1 CD loan totaling \$15.0 million, the number of CD loans increased, showing a broader impact to small businesses.

Examples of CD lending include:

- In 2023, NB made 2 SBA 504 loans totaling \$722,500 to a small business to support job growth and to purchase a building for operations.
- In 2024, NB extended a line of credit for \$100,000 to a non-profit organization that provides LMI families and individuals with basic services, including food and shelter.
- In 2024, NB originated a loan totaling \$28,951 to a non-profit organization to refinance a vehicle for an organization that provides various services to LMI families and individuals.

### **Qualified Investments**

NB made 4 qualified investments and donations during the evaluation period totaling \$1.2 million. Included in this amount is the portion of the bank’s regional investment in mortgage-backed securities which are discussed at the bank-wide level that benefited the Boise City MSA. This total does not include a portion of a prior period investment with a balance of approximately \$3.6 million

still outstanding that supports affordable housing initiatives in a regional area, including the Boise City MSA. The total performance level is above the prior evaluation, when NB made \$458,000 in qualified investments.

The following are examples of NB’s CD donations:

- In 2023, the bank made 1 donation to a Community Development Financial Institution for \$1,000.
- In 2023 and 2024, the bank made 2 donations for a total of \$10,000 to an organization that supports small businesses by offering technical assistance and resources for business expansion activities.

### **Community Development Services**

NB staff provided 249 hours of CD services over the evaluation period. The number of hours represents a decrease from 314 hours at the prior evaluation.

The following are examples of CD services:

- In 2023, an officer of the bank provided 34 hours of community service by serving on the board of a foundation that raises, manages, and provides scholarships to underprivileged individuals for higher education.
- In 2023, an officer of the bank provided 19 hours of community service by providing financial education to small business owners, entrepreneurs, and LMI individuals.
- In 2024, an officer of the bank provided 12 hours of affordable housing services by serving on the board and finance committee of an organization that builds low-income and rent controlled housing for LMI individuals.

## **COEUR D’ALENE MSA – Limited-Scope Review**

### **DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE COEUR D’ALENE MSA ASSESSMENT AREA**

This AA is located in the northern Panhandle of Idaho and consists of all 39 CTs in Kootenai County, which forms the Coeur d’Alene MSA. There were no changes to this AA since the previous evaluation.

### **Economic and Demographic Data**

According to 2020 U.S. Census Data, the Coeur d’Alene MSA contained 8 moderate-, 20 middle, and 11 upper-income CTs. The AA has no low-income CTs. The following table provides the demographic data for the AA.

<b>Demographic Information of the Assessment Area Coeur d'Alene MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>N/A* % of #</b>
Geographies (Census Tracts)	39	0.0	20.5	51.3	28.2	0.0
Population by Geography	171,362	0.0	16.1	63.1	20.8	0.0
Housing Units by Geography	72,799	0.0	20.0	55.9	24.2	0.0
Owner-Occupied Units by Geography	45,958	0.0	14.1	60.9	25.0	0.0
Occupied Rental Units by Geography	18,517	0.0	30.5	55.6	13.9	0.0
Vacant Units by Geography	8,324	0.0	29.1	28.4	42.6	0.0
Businesses by Geography	25,268	0.0	17.2	56.7	26.1	0.0
Farms by Geography	455	0.0	13.2	48.6	38.2	0.0
Family Distribution by Income Level	44,873	19.2	19.2	22.1	39.6	0.0
Household Distribution by Income Level	64,475	21.0	17.9	21.7	39.4	0.0
Median Family Income MSA - 17660 Coeur d'Alene, ID MSA		\$72,376	Median Housing Value		\$ 303,446	
			Median Gross Rent		\$1,032	
			Families Below Poverty Level		7.4%	
<i>Source: 2020 Census And 2024 D&amp;B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.</i>						

According to 2024 D&B data, service industries represented the largest portion of businesses at 28.3 percent, followed by non-classifiable establishments at 28.1 percent, construction at 10.0 percent, rental real estate and leasing at 6.1 percent, and retail trade at 5.6 percent. In addition, 65.9 percent of area businesses have four or fewer employees, and 96.5 percent of businesses operate from a single location. These factors indicate that the majority of businesses in the AA are very small.

According to Moody's Analytics, tourism drives the local economy. The metro area's location on Coeur d'Alene Lake and its ski resorts and casinos make it a popular year-round destination. The area is specifically expanding large resorts, and several new hotels are in the building pipeline. These projects help support construction payrolls. The cost of living is above average; however, a high quality of life has made the AA a popular destination for domestic migration in the west, particularly retirees. Limited inventory, higher mortgage interest rates, and an overpriced housing market create limited availability for affordable housing. The top employers are Kootenai Health, Inc., Walmart Inc., North Idaho College, Buck Knives, Inc., and Avista Corporation.

The average rates of unemployment in the AA were generally above both the state and national levels. See the following table for the AA's unemployment rates.

Unemployment Rates			
Area	2022	2023	2024
	%	%	%
Kootenai County	3.5	3.7	4.4
State of Idaho	2.9	3.2	3.7
National Average	3.6	3.6	4.0

*Source: Bureau of Labor Statistics*

## CONCLUSIONS ON PERFORMANCE CRITERIA IN COEUR D’ALENE

### LENDING TEST

The institution’s lending performance in the Coeur d’Alene MSA is below the lending performance in the Boise City MSA that was reviewed using full-scope examination procedures; however, due to the weighting for the overall performance conclusions, it does not change the overall conclusions for the rated area.

The bank did not originate any loans in the Coeur d’Alene MSA in 2024. According to management, the AA remains a competitive market due to the low population compared to the bank’s Boise AA. NB has less than one percent of the AA’s total deposit market share. In 2024, management made a key hire of a relationship manager to address the lack of lending in the AA. The strategic effort is targeted to improve small business lending in the geography through the employee’s extensive knowledge of the local area and connections to existing small businesses. In 2025, management reported two small business loans in the geography.

### COMMUNITY DEVELOPMENT TEST

The institution’s CD performance in the Coeur d’Alene MSA is below the CD performance in the Boise City MSA that was reviewed using full-scope examination procedures; however, it does not change the conclusion for the rated area.

The bank did not originate CD loans in the Coeur d’Alene MSA during the evaluation period; however, the AA benefited from NB’s CD loan activity made in the broader, state-wide area, which is discussed at the rated area level. This performance is similar to the prior evaluation period. NB did not make any qualified investments or donations in this AA during the evaluation period. Bank staff provided 283 hours of CD services, comprised of 227 hours of community service and 56 hours of economic development, which is an increase from the 54 hours reported at the prior evaluation. The performance overall is consistent with the prior evaluation.

## WASHINGTON

**CRA RATING FOR WASHINGTON: SATISFACTORY**

**The Lending Test is rated: Satisfactory**

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

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN WASHINGTON

The Washington rated area consists of one AA. NB operates one full-service branch in the Seattle AA which is located along Puget Sound in the northwestern portion of Washington and consists of all 495 CTs in King County in Washington. King County represents a portion of the Seattle-Bellevue-Kent, WA MSA. No changes were made to this AA since the previous evaluation.

#### **Economic and Demographic Data**

According to the 2020 U.S. Census Data, the AA contained 34 low-, 101 moderate-, 188 middle-, 158 upper-income tracts. Fourteen tracts have no income designation. The following table provides key demographic information for the AA.

<b>Demographic Information of the Assessment Area Seattle AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>N/A* % of #</b>
Geographies (Census Tracts)	495	6.9	20.4	38.0	31.9	2.8
Population by Geography	2,269,675	6.9	21.0	38.2	31.9	2.1
Housing Units by Geography	952,344	6.9	19.2	39.0	32.7	2.2
Owner-Occupied Units by Geography	508,346	3.7	17.6	41.3	36.7	0.7
Occupied Rental Units by Geography	391,715	11.0	21.2	36.1	27.5	4.2
Vacant Units by Geography	52,283	7.5	18.8	38.5	32.5	2.8
Businesses by Geography	286,465	7.7	17.8	39.1	34.3	1.2
Farms by Geography	1,930	3.4	11.6	49.8	34.6	0.6
Family Distribution by Income Level	534,762	21.7	17.6	20.5	40.3	0.0
Household Distribution by Income Level	900,061	24.2	16.3	17.7	41.7	0.0
Median Family Income MD - 42644 Seattle-Bellevue-Kent, WA MD	\$123,939	Median Housing Value		\$ 627,268		
		Median Gross Rent		\$1,705		
		Families Below Poverty Level		5.1%		

*Source: 2020 Census And 2024 D&B Data (\*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.*

According to 2024 D&B data, service industries represented the largest portion of businesses at 30.6 percent, followed by non-classifiable establishments at 29.2 percent, healthcare and social assistance at 7.0 percent, and construction at 5.9 percent. In addition, 61.9 percent of area businesses have four or fewer employees, and 94.6 percent operate from a single location. These factors indicate that the majority of businesses in the AA are very small.

According to Moody’s Analytics, the AA’s main economic drivers are manufacturing, high-tech, and logistics. Tacoma also benefits from a nearby military base. The metropolitan area is a global center for cloud computing and software development, having a highly trained and well-educated workforce, and a relatively high per capita income. However, weaknesses such as the tech industry’s exposure to discretionary spending and high business costs compared to emerging tech hubs limit growth. The top employers are Amazon.com, Inc., The Boeing Company, Microsoft Corporation, University of Washington, and Providence Health & Services. Housing costs are very high in comparison to median family incomes and shortages in stock continue to be an issue for affordable homeownership.

King County’s average unemployment rates were lower than the average rates for the state and varied compared to those for the nation. See the following table for the AA’s unemployment rates.

<b>Unemployment Rates</b>			
<b>Area</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
	<b>%</b>	<b>%</b>	<b>%</b>
King County	3.5	3.9	4.1
State of Washington	4.1	4.2	4.5
National Average	3.6	3.6	4.0

*Source: Bureau of Labor Statistics*

**Competition**

The Seattle AA is highly competitive in the market for financial services. According to the FDIC Deposit Market Share data as of June 30, 2025, 41 FDIC-insured financial institutions operated 444 offices within the AA. NB ranked 19th among all institutions with 0.3 percent of the deposit market share. Large, national associations claim the top three spots with a combined market share of 58.6 percent.

**Community Contact**

Examiners reviewed an existing community contact interview with an organization that promotes business growth among underbanked small businesses. The contact stated that the primary credit needs are start-up capital, as well as working capital, especially for small businesses that struggle with cash flows.

**Credit and Community Development Needs and Opportunities**

Considering information from the community contact and key economic and demographic data, examiners determined that small business lending; particularly small dollar business lending, represents a primary credit need for the AA. The high cost of housing in the AA, and the shortage of available housing stock also indicate a credit need for affordable housing programs. Demographic and economic data support this conclusion.

## SCOPE OF EVALUATION – WASHINGTON

Examiners conducted a full-scope review of the Seattle AA in the state of Washington.

### CONCLUSIONS ON PERFORMANCE CRITERIA IN WASHINGTON

#### LENDING TEST

NB’s Lending Test performance is rated “Satisfactory” for the state of Washington. The bank’s reasonable lending performance under the geographic distribution criteria and poor lending performance under the borrower profile criteria supports this conclusion.

#### Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AA. Lending in low-income CTs by number of loans was below demographic data; however, lending by dollar volume exceeded demographic data. Lending in moderate income CTs by number of loans was below demographic data but was more closely aligned with demographic data by dollar volume of loans. In addition, the bank has identified small business lending opportunities within LMI geographies and is actively conducting outreach efforts. Considering these factors, the bank’s performance is reasonable.

<b>Geographic Distribution of Small Business Loans Seattle AA</b>					
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low					
2024	7.7	1	4.0	1,000	9.9
Moderate					
2024	17.8	3	12.0	1,440	14.2
Middle					
2024	39.1	12	48.0	4,886	48.3
Upper					
2024	34.3	8	32.0	2,290	22.6
NA					
2024	1.2	1	4.0	500	4.9
<b>Total</b>					
<b>2024</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>10,116</b>	<b>100.0</b>
<i>Source: 2024 D&amp;B Data; Bank Data Due to rounding, totals may not equal 100.0%.</i>					

**Borrower Profile**

The distribution of borrowers reflects, given the demographics of the AA, poor penetration among businesses of different sizes. The bank’s performance of lending to businesses with GARs of \$1 million or less significantly trailed demographic data. NB operates from a single branch and has limited market share in the AA. Loan growth is also dependent on referrals and lending to existing customers, which hampered lending performance. According to management, these factors present challenges for lending to small businesses. Considering these factors, the bank’s performance is poor.

Distribution of Small Business Loans by Gross Annual Revenue Category Seattle AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<= \$1,000,000					
2024	91.9	4	16.0	850	8.4
> \$1,000,000					
2024	2.4	21	84.0	9,266	91.6
Revenue Not Available					
2024	5.7	0	0.0	0	0.0
<b>Total</b>					
<b>2024</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>10,116</b>	<b>100.0</b>
<i>Source: 2024 D&amp;B Data; Bank Data Due to rounding, totals may not equal 100.0%.</i>					

**COMMUNITY DEVELOPMENT TEST**

The institution’s CD performance demonstrated adequate responsiveness to the CD needs in the Seattle AA through CD loans, qualified investments, and CD services, as appropriate, considering the bank’s capacity and resources and the need and availability of such opportunities for CD in the institution’s AAs.

**Community Development Loans**

NB originated 6 CD loans totaling approximately \$25.8 million in the AA during the evaluation period. This level represents a substantial increase in the number and dollar volume from the prior evaluation when the bank made 1 CD loan totaling \$3.7 million. The following table details the breakdown of CD loans by purpose.

<b>Community Development Lending by Assessment Area</b>										
<b>Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Seattle	2	5,944	0	0	1	1,260	0	0	3	7,204
Statewide Activities	0	0	0	0	2	689	1	18,000	3	18,689
<b>Total</b>	<b>2</b>	<b>5,944</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>1,949</b>	<b>1</b>	<b>18,000</b>	<b>6</b>	<b>25,853</b>
<i>Source: Bank Data</i>										

The following are examples of the bank’s CD loans:

- In 2022, NB originated a \$18.0 million loan for the revitalization of a deteriorating office building in an opportunity zone, an economically distressed community where new investment provides economic development and job creation.
- In 2022, NB originated a \$15.7 million construction loan. Of that loan, \$3.1 million was allocated for the construction of 27 affordable housing units. The building is located in a low-income CT.
- In 2024, NB originated a \$2.8 million loan for the construction of 17 affordable housing units through a non-profit organization.

**Qualified Investments**

During the evaluation period, NB made 1 new qualified investment that benefited the Seattle AA. The investment is a portion of the bank’s regional investment in mortgage backed securities discussed at the bank-wide level. Of this investment, \$727,354 was applied to the Seattle AA, and provides affordable housing to LMI individuals and families.

The total qualified investments do not reflect prior period investments, which consist of portions of two regional investments. One investment supports affordable housing initiatives that include the Seattle AA and has a balance of approximately \$3.6 million outstanding. The other investment is in a small business investment company that targets economic development initiatives that include the Seattle AA and has a balance of \$4.6 million still outstanding. This performance is consistent with the prior evaluation.

**Community Development Services**

NB staff provided 290 hours of CD services, which is a significant increase from the prior evaluation when bank employees provided 46 hours of service. The following table details CD services by year and purpose.

<b>Community Development Services</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2022	5	-	22	-	<b>27</b>
2023	-	40	60	-	<b>100</b>
2024	-	37	93	-	<b>130</b>
YTD 2025	-	3	30	-	<b>33</b>
<b>Total</b>	<b>5</b>	<b>80</b>	<b>205</b>	<b>-</b>	<b>290</b>
<i>Source: Bank Data</i>					

The following are examples of CD services:

- In 2023, a relationship manager at the bank provided 34 hours of economic development services by serving on the board and loan committee of a community organization focused on financial training and economic development lending for minority-owned businesses, entrepreneurs, and LMI individuals.
- In 2023 and 2024, bank employees provided a total of 48 hours of community service by providing financial education to LMI youths through a non-profit organization.
- In 2025, a bank officer provided 30 hours of board service for an organization that promotes small business development.

## APPENDICES

### INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

#### **Lending Test**

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

#### **Community Development Test**

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

## SUMMARY OF RATINGS FOR RATED AREAS

<b>Rated Area</b>	<b>Lending Test</b>	<b>Community Development Test</b>	<b>Rating</b>
OREGON	Satisfactory	Satisfactory	Satisfactory
IDAHO	Satisfactory	Satisfactory	Satisfactory
WASHINGTON	Satisfactory	Satisfactory	Satisfactory

## 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/assessment area.

**American Community Survey (ACS):** A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**Community Development:** For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

**Community Development Corporation (CDC):** A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

**Community Development Financial Institutions (CDFIs):** CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

**Community Development Loan:** A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
  - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

**Community Development Service:** A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

**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.

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**Distressed Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

**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. Other family 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).

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that 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 applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited-scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, 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.

**Low Income Housing Tax Credit:** The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

**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.

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area** (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

**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 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.

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Investment Company (SBIC):** SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

**Small Farm Loan:** 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

**Underserved Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.