



PUBLIC DISCLOSURE

July 24, 2017

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Capital One Bank (USA), National Association
Charter #24828

4851 Cox Road
Glen Allen, VA 23060

Office of the Comptroller of the Currency

Large Bank Supervision
Constitution Center
400 7th Street S.W.
Mail Stop 8W-1
Washington, DC 20219

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, 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.

Table of Contents

Overall CRA Rating 2

Definitions and Common Abbreviations..... 3

Description of Institution 5

Scope of the Examination..... 6

Discriminatory or Other Illegal Credit Practices Review 6

Description of Assessment Area..... 7

Conclusions about Performance..... 10

Overall CRA Rating:

This institution is rated Outstanding.

The conclusions for the three rating criteria are:

- The bank demonstrates a high level of community development (CD) lending, CD services, and qualified investment activity, particularly investments that are not routinely provided by private investors.
- The bank demonstrates extensive use of complex qualified investments, CD loans, and CD services.
- The bank demonstrates excellent responsiveness to credit and CD needs in its assessment area (AA).

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Assessment Area (AA): A geographic area that consists generally of one or more MSAs (using the MSA boundaries that were in effect as of January 1 of the calendar year in which the delineation is made) or one or more contiguous political subdivisions, such as counties, cities, or towns, in which the bank has its main office, branches, and deposit-taking ATMs.

Benefit to Assessment Area: The OCC considers all qualified investments, community development loans, and community development services that benefit areas within the bank's assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s).

Benefit Outside Assessment Area: The OCC considers the qualified investments, community development loans, and community development services that benefit areas outside the bank's assessment area(s), if the bank has adequately addressed the needs of its assessment area(s).

Census Tract (CT): Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per 10-year census and an average population of 4,000.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

Limited Purpose Institution: An institution that offers only a narrow product line (such as credit cards or automobile loans) to a regional or broader market and for which a designation as limited purpose bank is in effect.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

Net Operating Income: As listed in the Consolidated Report of Condition and Income: Income before income taxes and extraordinary items and other adjustments.

Pass-Through Receivables: Outstanding receivables tied to all accounts issued or owned by the bank. Pass-through receivables include receivables attributable and receivables retained on balance sheet as those terms are used in 12 CFR 8.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings, and minority interests in the equity accounts of consolidated subsidiaries.

Total Assets: Total bank assets as listed in the Consolidated Report of Condition and Income.

Total Income: From the Consolidated Report of Condition and Income: Total Interest Income plus Total Noninterest Income.

Description of Institution

Capital One Bank (USA), National Association (COBNA), headquartered in Glen Allen, Virginia, is a wholly owned subsidiary of Capital One Financial Corporation (COF), a \$357 billion multi-bank holding company headquartered in McLean, Virginia. In addition to COBNA, COF owns Capital One, National Association (CONA). As of December 31, 2016, COBNA held total assets of \$113 billion, of which 74.1 percent were domestic loans and 14.6 percent were securities. COBNA is engaged exclusively in credit card operations and is one of the leading issuers of credit cards in the United States. The bank offers credit cards for both consumers and small businesses.

COBNA also issues credit cards outside of the United States through Capital One (Europe) plc (COEP), an indirect subsidiary of COBNA organized and located in the United Kingdom, and through a branch of COBNA in Canada. These foreign subsidiaries do not have a significant impact on the bank's capacity for meeting CD needs in the United States.

The bank has only one office and is designated as a limited purpose bank for CRA evaluation purposes, based on its overall business strategy, primary focus, and product offerings. The Federal Reserve Bank of Richmond initially designated COBNA as a limited purpose institution for CRA evaluation purposes in April 1996. In February 2008, the bank was designated as a limited purpose institution by the Office of the Comptroller of the Currency (OCC), just prior its March 1, 2008 conversion to a national bank.

There were no mergers or acquisitions by the bank during the evaluation period. There are no known legal, financial, or other factors impeding the bank's ability to help meet the CD needs of its AA.

CD activities are originated by COBNA, CONA, and their subsidiaries. The following legal vehicles provided affiliate CD activities throughout the review period:

- Capital One Community Development Corporation (CD investments)
- Capital One Community Development Corporation II (CD loans)
- Capital One Foundation, Inc. (CD grants)
- Capital One Multifamily Finance, LLC (CD loans)
- Capital One MR New Markets, LLC (CD loans)
- Capital One NMTC Manager, Inc. (CD loans)
- Capital One N.A. Low Income Housing Tax Credit, Inc. (CD investments)
- Capital One Municipal Funding, Inc. (CD loans)
- COCRF Investor I, II, IV, V, VII-XVII, 19-28, 30-48, 50, 51, and 59-76, LLC (CD loans)

The following table provides a high level summary of financial information for the bank. This information is intended to provide a perspective on the bank's capacity to help meet the needs of its AA.

Table 1: Financial Information (000s)

	Year-end CY2014*	Year-end CY2015*	Year-end CY2016*	Average for Evaluation Period**
Tier 1 Capital	\$8,502,546	\$10,643,713	\$11,567,775	\$10,238,011
Total Income	\$13,054,932	\$14,218,147	\$16,027,116	\$14,433,398
Net Operating Income	\$4,389,154	\$4,047,189	\$3,799,455	\$4,078,599
Total Assets	\$90,652,741	\$102,172,065	\$113,152,757	\$101,992,521
Pass-Through Receivables	\$63,919,200	\$73,030,231	\$81,050,289	\$72,666,573

Source: Consolidated Report of Condition and Income and bank reported data. * Actual data reported.

**The Average for Evaluation Period is the average of the numbers in the three columns.

Scope of the Examination

In evaluating the bank's performance under the CRA, the OCC reviewed CD activities from January 1, 2014 through December 31, 2016. We reviewed the level and nature of qualified investments, CD lending, and CD services. At the bank's request, the OCC also considered qualified investments, CD lending, and CD services provided by its affiliates. At the prior examination, dated December 31, 2013, we rated the bank Satisfactory. The bank's performance under the three rating criteria would have been Outstanding; however, the prior evaluation rating was lowered to Satisfactory due to Unfair and Deceptive Acts and Practices and violations of the Servicemembers Civil Relief Act, which resulted in Consent Orders with regulatory authorities.

The bank has adequately addressed the needs of its AA, and therefore, the OCC considered qualified investments, CD loans, and services outside of the AA and the broader statewide or regional area that includes the bank's AA, in evaluating the bank's performance.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate of which loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution or any affiliate of which loans have been considered as part of the institution's lending performance has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation, in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Description of Assessment Area

COBNA has designated all of Henrico County, Goochland County, Chesterfield County, the city of Richmond, Hanover County, and the city of Colonial Heights as its AA. These contiguous areas are part of the Richmond, Virginia MSA and are located in east-central Virginia. This represents an expansion from the prior review period with only Henrico County and the city of Richmond as the designated AA. Because Hanover County and the city of Colonial Heights were added to the AA close to the end of the review period, in September and October 2016, respectively, they are not included in the analysis. The bank's AA meets legal requirements and does not exclude any low- and moderate-income (LMI) areas.

Based on 2010 Census data, the total population of the AA was 849,102 persons. The AA's updated median family income (MFI) totaled \$72,400¹ and there were approximately 10.69 percent of households living below the poverty level within the AA. The AA includes a mix of urban living within the city of Richmond and suburban living in the surrounding areas.

The leading industries within the AA include federal, state, and local government, healthcare, national distributors, energy firms, food and entertainment businesses, and materials producers. Twelve Fortune 1000 companies are headquartered in the MSA, and there is also a presence in the region from large Fortune 500 companies. The area's largest employers include: Virginia Commonwealth University and Health System, HCA Virginia Health System, Bon Secours Richmond Health System, Capital One, Sun Trust Bank, Amazon Fulfillment Services, Fort Lee Army training, Department of Defense Supply, and electric utility Dominion Energy, Inc.

The economic performance within the AA is highly correlated with the national economy, given its dependence on government, military, healthcare, and finance sectors. The finance and health care industries experienced positive growth throughout the review period. While federal government growth in the AA slowed, state and local government experienced positive growth which offset the federal decline.

According to the Bureau of Labor Statistics, the December 31, 2016 non-seasonally adjusted unemployment rate for Richmond, Virginia was 3.9 percent, unemployment rate for the state of Virginia was 3.8 percent, and the national unemployment rate was 4.5 percent.

The AA had a total of 355,209 housing units. According to the 2010 Census, approximately 60 percent of the total housing units were owner occupied, 31.3 percent were rental occupied,

¹ 2016 Federal Financial Institutions Examination Council (FFIEC) updated MFI.

and vacant housing units represented 8.7 percent of total housing units. The majority of housing units in the AA were one- to four-family units, representing 77.9 percent of all housing units.

Based on the 2010 Census, the weighted average median (WAM) housing value for the AA was \$239,443. The WAM housing value varied between the three counties and one city that make up the AA. The highest WAM housing value was \$359,532 in Goochland County and the lowest was \$216,848 in the city of Richmond.

The Federal Deposit Insurance Corporation’s deposit market share data, published June 30, 2016, shows COBNA had the largest deposit market share in the AA at 67.7 percent. The bank operates in a highly competitive environment, with 34 other FDIC-insured institutions operating 246 branches in the AA. Four of the country’s largest financial institutions, Bank of America, N.A., Wells Fargo Bank, N.A., SunTrust Bank, and BB&T, operate 129 or 52 percent of the branches within the AA.

The following table provides a summary of AA statistics based on 2010 Census data:

Table 2: Assessment Area Description

	Number	Low	Moderate	Middle	Upper
Tracts	206*	10.68%	24.27%	31.55%	33.01%
Families	208,462	20.74%**	17.32%**	20.44%**	41.49%**
Businesses	78,344	5.53%***	20.71%***	31.92%***	41.71%***

Source: Demographic Data – 2010 U.S. Census. * One census tract is not income categorized. **Represents families by income level. ***Represents businesses by income level of census tract.

Based on recent community contact information and information obtained from bank management, identified CD needs in the AA include the following:

- Affordable housing for LMI households, including special needs populations;
- Housing rehabilitation assistance;
- Community services for the homeless population;
- Housing counseling and financial literacy education;
- Revitalization of blighted and commercial areas;
- Job training for the unemployed and underemployed populations;
- Programs to stimulate small business, and job retention and creation; and
- Funding for CD programs.

In spite of the CD opportunities available within the AA, the presence of 34 competing financial institutions including the four most prominent banks listed in the paragraph above Table 2, create significant competition for the available CD opportunities. The bank is also challenged by the fact that it maintains only one office, only engages in credit card operations, and does not originate commercial loans, unlike the major competitors which have large retail branch presences and offer both consumer and commercial loans. Based on COBNA’s business model, it has less capacity and resources to conduct CD activities compared to the much larger retail institutions operating within the AA.

COBNA's CD strategy is to target opportunities first within its AA, then in the broader statewide or regional areas that include the AA, and finally nationally. As a limited purpose institution, COBNA does not originate CD loans. However, CD loans from affiliated institutions have been considered in this evaluation. COBNA has considerable expertise in LIHTC transactions, and has a large portfolio of prior-period investments in addition to new investments in LIHTC projects in the AA. The bank evaluates all LIHTC opportunities in the AA, including those available in the secondary market, and invests in those that meet its standards.

Conclusions about Performance

Summary

- COBNA provided a high level of CD qualified investments, grants, loans, and services, when considering its capacity, opportunities, and the highly competitive CD environment in the AA. Of the \$7.95 billion in qualified investments, grants, and loans originated during or outstanding at the end of the evaluation period, \$1.43 billion had a purpose, function, or mandate of serving the AA. COBNA and affiliate employees provided 16 thousand hours of qualifying services to over 40 organizations and programs in the AA and almost seven thousand hours of service to over 50 organizations outside the AA.
- COBNA demonstrates extensive use of complex qualified CD investments and loans. The bank has numerous LIHTC investments, many of which require close coordination among state and local government agencies, nonprofit organizations, other investors, and the bank. These investments illustrate the bank's leadership in complex transactions. Another notable example is COBNA's \$456 million in debt financing in New Markets Tax Credit (NMTC) transactions to support the revitalization and stabilization of LMI geographies and other targeted areas, including \$11.7 million in the AA or broader statewide area that includes the AA. The NMTC transactions are complex and require extensive effort due to the involvement of multiple parties and layers of intricate financing, as well as many regulatory and reporting requirements to maintain compliance for a seven-year period.
- COBNA's qualified CD investments, grants, loans, and services exhibited excellent responsiveness to the credit and CD needs of the AA, especially affordable housing and financial literacy education. The LIHTC investments made during the current evaluation period created over 13 thousand units of affordable housing for LMI families, including 6,493 units within the bank's AA.

Qualified Investments

Qualified investments and grants made during the current evaluation period that had a purpose, function, or mandate of serving the AA totaled \$254.2 million. Additionally, \$293.8 million in investments made in prior evaluation periods remained outstanding at the end of the evaluation period and provide continuing benefit to the AA. The vast majority, 99 percent, of the investments and grants focused on providing affordable housing, which is highly responsive to the identified need for affordable housing within the AA. Investments and grants were particularly responsive to the need for pre-development funding to get affordable housing projects off the ground in the AA. Because the bank was responsive to the CD needs within the AA, we also considered \$331.6 million in current period and \$424.9 million in prior period investments and grants made outside the bank's AA.

Table 3a, below, quantifies the level of qualified investment activity that had a purpose, function, or mandate of serving the AA as well as outside the AA.

Table 3a: Qualified Investment Activity (000s)

	Benefits AA	Outside AA	Totals
Originated Investments	\$248,464	\$314,203	\$562,667
Originated Grants	\$5,745	\$17,437	\$23,182
Prior-Period Investments that Remain Outstanding	\$293,814	\$424,919	\$718,733
Total Qualified Investments	\$548,023	\$756,559	\$1,304,582

Table 4a, below, provides a breakdown of the bank’s investment activity in relationship to its financial capacity in terms of average Tier One Capital, average total income, and average pass-through receivables over the three-year evaluation period.

Table 4a: Qualified Investment Percentages

	Benefits AA (%)	Outside AA (%)	Total (%)
Total Investments/Average Tier 1 Capital	5.35	7.39	12.74
Total Investments/Average Total Income	3.80	5.24	9.04
Total Investments/Average Pass-Through Receivables	0.75	1.04	1.79

Total Investments is found in Table 3a. Average capital, income, and receivables are found in Table 1.

The bank holds many equity investments in funds that invest in LIHTC developments. These transactions are considered complex and provide new or rehabilitated affordable housing units, typically multifamily housing. In all cases, restrictions are in place to ensure that LMI households benefit from the affordable units. COBNA is both the sole investor, for “proprietary” funds, and one of many investors in these funds. Proprietary LIHTC investments are part of a larger transaction that typically include debt financing provided by a COBNA affiliate and require the bank to manage all aspects of the transaction, including collaborating with government entities providing subsidies or other financiers. The multi-investor funds generally involve multiple properties with several layers of financing. The LIHTC investments made during the current evaluation period created 13,269 affordable housing units, including 6,493 units that benefit the bank’s AA.

Described below are some of the most significant qualified investments and grants:

- A \$1.7 million LIHTC investment to rehabilitate a historic building in Richmond, Virginia and construct five new buildings to create a 52-unit affordable housing development. The investment included a grant of \$80 thousand to support pre-development activities, which were critical to the developer's ability to secure the LIHTC allocation. The development will provide affordable housing in a low-income geography, close to shopping, public transportation, and community services.
- An \$11.6 million LIHTC investment to support the construction of a 152-unit affordable housing property located in a low-income geography in Richmond, Virginia and within the bank’s AA.

- Grants totaling \$155 thousand to a nonprofit organization with the purpose of creating, supporting, and sustaining the biotechnology startup community in Central Virginia and ultimately stimulate job growth. The bank's investment provides important early stage seed funding and facilitates meaningful connections between investors, founders, technologists, service providers, and established corporations.
- Two LIHTC investments, totaling \$8 million, to support the renovation of an existing 160-unit affordable housing property within the bank's AA. All units are reserved for LMI households. The renovation provides residents with high-quality amenities and the property is located within walking distance of a shopping center.
- A \$7.34 million LIHTC investment to support the construction of senior housing in Richmond, Virginia, creating 77 units of affordable housing for the senior population.
- A grant totaling \$175 thousand to support a community development organization dedicated to providing hunger relief within the AA.
- Grants totaling \$2.3 million to support educational programs for LMI youth across the country. A total of \$253 thousand supported programs for students that attended majority LMI student schools within the bank's AA.
- Grants totaling \$1.8 million to support a program operated by a national organization to support LMI veterans. This program helps veterans, transitioning service members, and military spouses find employment opportunities across the U.S.
- A total of \$520 thousand in grants to support the programs of a national nonprofit organization that helps local CDFIs improve LMI communities. Of this amount, \$120 thousand supported programs in the bank's AA, including financial education and employment coaching for LMI individuals.

Community Development Lending

COBNA has only one office and, as a designated limited purpose institution for CRA evaluation purposes, is engaged exclusively in credit card operations for consumers and small businesses. Given the nature of the institution and its limited purpose designation, COBNA relies on CD loans originated by affiliates that have a purpose, function, or mandate of serving the AA. During the evaluation period, COBNA affiliates extended eight CD loans in the bank's AA totaling \$76.5 million that had a purpose, function, or mandate of serving the AA. Approximately 76.28 percent of the dollar volume of lending focused on revitalization and stabilization activities, 10.35 percent on community services, 9.52 percent on affordable housing, and 3.85 percent on economic development. In addition, the bank made \$802 million in loans benefiting the greater statewide or regional area including the AA, of which 66.10 percent focused on affordable housing, 31.20 percent on community services, 2.55 percent on economic development, and 0.14 percent on revitalization and stabilization. As such, these loans are responsive to the needs identified within the AA. Because the bank was responsive to the CD needs in the AA, we also considered \$5.77 billion in CD loans (including \$91.5 million in CD leases and letters of credit) made outside the AA.

Table 5a: Community Development Lending Percentages

	Benefits AA (%)	Outside AA (%)	Total (%)
Total CD Lending/Average Tier 1 Capital	8.58	56.34	64.92
Total CD Lending/Average Total Income	6.08	39.96	46.05
Total CD Lending/ Average Pass-Through Receivables	1.21	7.94	9.15

Note: Total CD lending equals the current period CD lending activity (excluding binding CD loan commitments); average capital, income, and receivables are found in Table 1. Total CD Lending/Average Pass-Through Receivables would not be included in the table if not applicable.

Described below are some of the most significant examples of CD lending:

- A \$6.1 million construction loan for renovation of a multifamily residence in Richmond, Virginia containing 77 units, all for low-income senior citizens. This loan was made in conjunction with the \$7.34 million LIHTC investment discussed on page 12.
- A \$4.5 million loan to finance the renovation and rehabilitation of affordable apartments in Roanoke, Virginia. This project is part of a LIHTC deal, in which all 144 units will be income- and rent-restricted under a LIHTC regulatory agreement.
- A loan of \$180 million for the acquisition of 28 skilled nursing and independent living facilities located in five states, including the AA. Of the \$180 million, \$7.9 million is for a facility located in the bank’s AA. A majority of the revenue for these facilities is derived from Medicaid payments.
- A \$1 million loan to enable a local Community Development Financial Institution (CDFI) to offer below market financing for affordable housing and community facilities in rural areas of Maryland, Virginia, and Delaware, including the bank's AA.
- A total of \$11.7 million in NMTC lending and related financing that supports revitalization and stabilization of LMI geographies in the statewide area that includes the AA.

Community Development Services

COBNA and affiliate employee activities are highly responsive to the CD needs both inside and outside of the AA. They are involved on boards and committees of primarily affordable housing and community service organizations, often serving in leadership roles, delivering financial literacy education, and providing technical expertise and other financial services. Twenty four bank associates held Board of Directors or committee positions for 21 CD organizations in the AA, and their services were primarily to community service and affordable housing organizations. Additionally, COBNA and affiliate employees provided 14,650 hours of service to 32 CD organizations and programs that benefit LMI individuals, families, and communities in the AA. In addition to being responsive to the needs of the AA, COBNA and

affiliate employees provided almost seven thousand hours of services to over 50 CD organizations outside of the AA, including 653 hours of board and committee services.

Table 6: Community Development Service Activities

CD Service	Benefits AA	Outside AA
1,772 Hours Serving on Board or Committee for 21 CD Organizations	X	
653 Hours Serving on Board or Committee for 8 CD Organizations		X
14,650 Hours of Community Services to 32 CD Organizations and Community Programs	X	
6,240 Hours of Community Services to 48 CD Organizations and Community Programs		X

X means yes; Blank means No

Described below are some of the most significant CD services:

- A bank executive served on the Board of Directors of a nonprofit affordable housing developer in the bank's AA. This service builds on a longstanding relationship between the bank and the community organization in an effort to have continuous impact within the AA.
- A bank executive served on the Board of Directors of a nonprofit organization that focuses on providing solutions to affordable housing and eliminating homelessness in the AA. In addition, bank employees provided over 40 hours of service by designing the organization's website.
- A bank employee served on the Board of Directors as Vice Chair and Treasurer for a nonprofit organization that provides emergency and ongoing services to LMI women and children in the AA.
- A bank executive and bank employee served on the Board of Directors of a nonprofit organization that provides services to improve the quality of life for children from LMI families in the AA.
- A bank employee served on the Board of Directors as Secretary and Vice President for a nonprofit organization that assists homeless families in the AA to obtain permanent housing.
- Bank employees provided over 4,500 hours of financial literacy education to schools within the bank's AA. The activities served schools in which the majority of students are from LMI families. The education provides the youth with knowledge of banking, money management, financial planning, and decision making skills.
- One employee served on the Board of Directors as President and Governance Committee Chair, and two employees serves as Governance Committee Chairs for a nonprofit organization that revitalizes neighborhoods and provides affordable housing in the AA.

- Bank employees provided 190 hours of services to local nonprofit organizations through a consulting event where they provided technical expertise and social media strategy support.
- Bank employees provided over 7,000 hours of financial education, mentoring, and training for high school students coming from LMI households to provide exposure to the college experience through a business internship program.
- A bank employee served consecutive terms throughout the review period as Secretary and Committee Chair on the Board of Directors for a nonprofit organization, outside the AA, that provides community services to the area's LMI population.
- An employee served as President of the Board of Directors for a nonprofit community organization with the primary purpose of providing community services to LMI individuals outside the AA.
- Four employees served on Boards of Directors for local chapters of a community organization which provides affordable housing to LMI families and individuals outside of the AA.