



## **PUBLIC DISCLOSURE**

December 10, 2018

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

Security Federal Savings Bank  
Charter Number 707228

301 3<sup>rd</sup> Avenue South  
Jasper, AL 35501-3757

Office of the Comptroller of the Currency  
Birmingham Field Office  
3595 Grandview Parkway  
Suite 655  
Birmingham, AL 35243

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

**This institution is rated Outstanding.  
The Lending Test is rated Outstanding.**

- The level and trend of Security Federal Savings Bank's (Security Federal or Bank) loan-to-deposit (LTD) ratio is reasonable given its size, financial condition, and assessment area (AA) credit needs.
- The Bank originated a substantial majority of its loans inside the AA.
- The distribution of loans to borrowers of different incomes reflects excellent penetration in the AA.
- The geographic distribution of loans reflects excellent dispersion in the AA.
- The Bank did not receive any consumer complaints regarding Community Reinvestment Act (CRA) performance during the review period.

## Definitions and Common Abbreviations

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

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

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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

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

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor

vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement, and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

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

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

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated Area:** A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier One Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## Description of Institution

Security Federal Savings Bank is a \$39 million financial institution located in Jasper, Alabama. The Bank is 100 percent owned by the holding company SE-Fed Bancshares, and has no affiliates. The Bank has a single location from which it offers its services, and operates an Automated Teller Machine (ATM) in that location. No branches have been opened since the preceding CRA Evaluation. The Bank offers online, telephone, and mobile banking.

The Bank is a traditional thrift institution with a loan portfolio mix of 1-4 family residential secured loans and consumer loans. Tier 1 capital totaled \$4.6 million. Security Federal offers an array of deposit products with various features designed to compete with those offered by other local financial institutions. The preceding CRA performance evaluation, dated July 22, 2013, resulted in an Outstanding rating. There are no legal or financial constraints that would prohibit the Bank from meeting AA needs.

Security Federal has one assessment area (AA), made up of Walker County, Alabama. Walker County is located approximately 22 miles northwest of Birmingham, in the north-central part of Alabama. The Walker County AA is part of the Birmingham-Hoover Metropolitan Statistical Area (MSA). The Walker County AA is comprised of 18 census tracts: zero low-income, ten moderate-income, eight middle-income, and zero upper-income. The Bank's only office is located in a middle-income census tract in the City of Jasper, which is the largest municipality in Walker County, as well as the county seat. Walker County is primarily rural in nature and sparsely populated. Major employers in the county are Walker Baptist Medical Center, Beville State College, Marshall Durbin (poultry processing plant), and Wal-Mart.

The Bank's AA meets regulatory requirements and consists of complete political subdivisions that do not arbitrarily exclude low- or moderate-income geographies. The tables in Appendix B show certain demographics of the AA by census tract and income level.

Local banking competition is moderate. In addition to three community banks headquartered in Walker County, there are several larger bank branches serving the area, including Synovus, BBVA Compass Bank, Regions Bank, BB&T, Wells Fargo, First National Bank (Marian County), and Traders & Farmers Bank (Winston County). At June 30, 2018, Security Federal ranked ninth in deposits, out of ten financial institutions in Walker County, AL, with 3.25 percent deposit market share.

AA community contacts identified financial planning, credit counseling, and workforce development as AA financial needs.

## **Scope of the Evaluation**

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

We evaluated Security Federal using the lending test criteria for small bank CRA examinations. The lending test evaluates an institution's record of meeting the credit needs of its AA through lending activities.

The CRA evaluation covers the period since the date of the previous CRA examination, from July 23, 2013 through December 10, 2018. We based our conclusions regarding the Bank's lending performance on a sampling of the Bank's primary loan product, consumer loans, originated between January 1, 2015 and December 31, 2017. The Bank originated 538 loans totaling \$16.3 million over the review period. By number of originations, 461, or 86 percent, were consumer loans. We reviewed 40 consumer loans to draw our lending test conclusions.

Separate analyses were conducted, with 2015 and 2016 combined, and 2017 analyzed separately due to 2015 American Community Survey (ACS) US Census updates that apply to 2017. The 2010 US Census applies to the years 2015 and 2016. Comparative data was different due to the Census change and the change of the income level of some census tracts (CTs).

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

Security Federal has one AA, the entirety of Walker County, Alabama, which received a full-scope review. This county is part of the Birmingham-Hoover MSA. See Appendix A for additional information.

### **Ratings**

The Bank's overall rating is based on our full-scope review of the Walker County AA. We based our conclusions on analysis of consumer loans, as this is the Bank's primary loan product by number of loans originated during the review period.

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

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## Conclusions with Respect to Performance Tests

### LENDING TEST

The Bank's performance under the Lending Test is outstanding.

#### Loan-to-Deposit Ratio

Security Federal's loan-to-deposit (LTD) ratio is reasonable considering bank size and AA credit needs. The Bank's LTD ratio averaged 51.83 percent over the 21 quarters since the preceding CRA examination, with a quarterly high of 55.49 percent and a quarterly low of 47.85 percent. Security Federal's LTD ratio is below the 75.44 percent average of comparable institutions. The peer focuses on commercial credit, while Security Federal makes smaller dollar consumer loans and residential mortgages. Based on Security Federal's business model, the LTD ratio is reasonable.

#### Lending in Assessment Area

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Consumer	30	75.00	10	25.00	40	675	83.75	131	16.25	806
<b>Total</b>	30	75.00	10	25.00	40	675	83.75	131	16.25	806

*Source: 01/01/2015 – 12/31/2017 Bank Data  
Due to rounding, totals may not equal 100.0*

Security Federal originated a substantial majority of loans inside the AA. Based on a sample of consumer loans originated during the evaluation period, Security Federal originated 75 percent of the number, and 83.75 percent of the dollar amount, inside the AA.

#### Lending to Borrowers of Different Incomes

Overall, lending to borrowers of different incomes reflects excellent penetration and meets the standard for outstanding performance. Refer to Table V in appendix C for the facts and data used to evaluate the borrower distribution of the Bank's consumer loans.

#### Consumer Loans

Security Federal's distribution of consumer loans reflects excellent penetration among AA households of different income levels. For 2015-2016, the percentage of consumer loans to low-income borrowers is 16.67 percent, below the percentage of low-income households at 32.4 percent. The percentage of consumer loans to moderate-income borrowers, at 41.67 percent, significantly exceeds the percentage of moderate-income

households of 18.4 percent. For 2017, the percentage of consumer loans to low-income borrowers is 38.89 percent, exceeds the percentage of low-income households at 35.7 percent. The percentage of consumer loans to moderate-income borrowers, at 33.33 percent, significantly exceeds the percentage of moderate-income households of 17.6 percent.

### **Geographic Distribution of Loans**

Overall, the geographic distribution of consumer loans reflects excellent dispersion among borrowers in moderate-income census tracts, meeting the standard for outstanding performance. There are no low-income census tracts within the Bank's AA. Refer to Table U in appendix C for the facts and data used to evaluate the geographic distribution of the Bank's consumer loans.

#### *Consumer Loans*

The geographic distribution of consumer loans reflects excellent dispersion among borrowers in moderate-income census tracts. In 2015-2016, the Bank originated 75 percent of consumer loans in the moderate-income census tract, significantly exceeding the percentage of households in the AA, at 62.9 percent. In 2017, the Bank originated 55.5 percent of consumer loans in the moderate-income census tract, exceeding the percentage of households in the AA, at 55.3 percent.

### **Responses to Complaints**

Security Federal did not receive any CRA-related complaints during the review period.

## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 1/1/2015 – 12/31/2017	
<b>Financial Institution:</b>		<b>Products Reviewed:</b>
Security Federal Savings Bank 301 3 <sup>rd</sup> Ave., Jasper, AL		Consumer loans
<b>Affiliate(s) None</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Walker County Assessment Area Birmingham-Hoover MSA #13820 Alabama	Full Scope	

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

Table A – 2015-2016 Demographic Information of the Assessment Area						
Assessment Area: Walker County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	0.0	66.7	33.3	0.0	0.0
Population by Geography	67,023	0.0	64.1	35.9	0.0	0.0
Housing Units by Geography	31,293	0.0	64.3	35.7	0.0	0.0
Owner-Occupied Units by Geography	20,036	0.0	63.7	36.3	0.0	0.0
Occupied Rental Units by Geography	5,764	0.0	60.4	39.6	0.0	0.0
Vacant Units by Geography	5,493	0.0	70.4	29.6	0.0	0.0
Businesses by Geography	2,866	0.0	49.5	50.5	0.0	0.0
Farms by Geography	82	0.0	69.5	30.5	0.0	0.0
Family Distribution by Income Level	18,314	30.6	20.9	20.4	28.1	0.0
Household Distribution by Income Level	25,800	32.4	18.4	17.0	32.2	0.0
Median Family Income MSA - 13820 Birmingham-Hoover, AL MSA		\$59,532	Median Housing Value			\$87,676
			Median Gross Rent			\$542
			Families Below Poverty Level			14.7%
<p>Source: 2010 U.S. Census and 2016 D&amp;B Data                      Due to rounding, totals may not equal 100.0                      (*) The NA category consists of geographies that have not been assigned an income classification.</p>						

<b>Table A – 2017 Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Walker County 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>NA* % of #</b>
Geographies (Census Tracts)	18	0.0	55.6	44.4	0.0	0.0
Population by Geography	65,923	0.0	55.2	44.8	0.0	0.0
Housing Units by Geography	30,673	0.0	55.9	44.1	0.0	0.0
Owner-Occupied Units by Geography	18,943	0.0	53.8	46.2	0.0	0.0
Occupied Rental Units by Geography	6,659	0.0	59.7	40.3	0.0	0.0
Vacant Units by Geography	5,071	0.0	58.6	41.4	0.0	0.0
Businesses by Geography	2,863	0.0	43.1	56.9	0.0	0.0
Farms by Geography	85	0.0	57.6	42.4	0.0	0.0
Family Distribution by Income Level	17,977	33.0	20.3	20.3	26.4	0.0
Household Distribution by Income Level	25,602	35.7	17.6	16.7	29.9	0.0
Median Family Income MSA - 13820 Birmingham-Hoover, AL MSA		\$62,204	Median Housing Value			\$84,889
			Median Gross Rent			\$575
			Families Below Poverty Level			17.0%
<i>Source: 2015 ACS Census and 2017 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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

**Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households throughout those geographies.

**Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** – Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MA/assessment area.

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2015-16</b>	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Walker County AA	12	539,409	100	0.0	0	62.9	75	37.1	25	0.0	0	0.0	0	
<i>Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data.                      Due to rounding, totals may not equal 100.0</i>														

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2017</b>	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Walker County AA	18	136,025	100	0.0	0	55.3	55.5	44.7	44.44	0.0	0	0.0	0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data.                      Due to rounding, totals may not equal 100.0</i>														

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2015-16</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Walker County AA	12	539,409	100	32.4	16.67	18.4	41.67	17.0	25.00	32.2	16.67	0.0	0	
<i>Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data.                      Due to rounding, totals may not equal 100.0</i>														

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2017</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Walker County AA	18	136,025	100	35.7	38.89	17.6	33.33	16.7	16.67	29.9	11.11	0.0	0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data.                      Due to rounding, totals may not equal 100.0</i>														