

Public Disclosure

September 18, 2000

Community Reinvestment Act Performance Evaluation

**World Financial Network National Bank
Charter Number: 21739**

**800 Techcenter Drive
Gahanna, Ohio 43230-5318**

**Office of the Comptroller of the Currency
Midwestern District Office
2345 Grand Boulevard, Suite 700
Kansas City, Missouri 64108-2637**

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.

Institution's CRA rating:

This institution is rated "Outstanding".

The conclusions for the three rating criteria are:

- The bank demonstrates a high level of qualified investments and community development services activity.
- The bank demonstrates no use of innovative or complex qualified investments or community development services.
- The bank demonstrates excellent responsiveness to credit and community development needs in its assessment area.

Scope of the Examination

In evaluating the bank's performance under the Community Reinvestment Act (CRA), we reviewed community development activities from December 14, 1996 through September 18, 2000. We reviewed the level and nature of qualified investments and community development services. At the bank's request, we also considered qualified investments and community development services provided by its affiliates. At the prior examination dated December 13, 1996, we rated the bank Satisfactory.

If a bank has adequately addressed its assessment area needs, the OCC considers community development (CD) activities the bank submits that benefit areas outside of its assessment area in the evaluation of its performance. The bank has adequately addressed the needs of its assessment area, and therefore, CD activities (i.e. qualified investments and community development services) outside the assessment area were considered in evaluating its performance.

Description of Institution

World Financial Network National Bank (WFNNB) was chartered on May 1, 1989, as a Competitive Equality Banking Act (CEBA) credit card bank. On March 20, 1996, WFNNB received its designation as a limited purpose institution for CRA purposes. CEBA banks are restricted from participation in most activities common to full service banks and primarily engage in credit card operations. CEBA banks may only accept savings and time deposits in amounts of \$100,000 and greater. Additionally, they may not engage in the business of making or purchasing commercial, residential, or retail oriented loans, with the exception of credit card loans. This prohibition significantly limits WFNNB's ability to help meet community credit needs within its assessment area. See page 13 for a definition of a CEBA bank. WFNNB may only engage in CRA community development activities relating to qualified investments and community development services due to legal restrictions. The

bank's parent companies (i.e. Alliance Data Systems Corporation and The Limited, Inc.) have provided investment avenues for qualified investments and community development services.

WFNNB is a \$364 million financial institution located in Gahanna, Ohio, a suburb of Columbus. It has no branch offices. WFNNB is a wholly owned subsidiary of Alliance Data Systems Corporation (ADSC), which is located in Dallas, Texas. ADSC provides electronic data processing and other related services to WFNNB and other independent CEBA banks. ADSC is 40% and 60% respectively owned by The Limited, Inc. and a New York based venture capital firm. The Limited, Inc. is a Columbus, Ohio based retailer that operates over 2,800 specialty stores across the country. The specialty stores include Express, Lerner New York, Lane Bryant, Limited Stores, Structure, and Henri Bendel. The company also owns approximately 84% of Intimate Brands, Inc., the leading specialty retailer of intimate apparel, beauty, and personal care products through the Victoria's Secret, Bath and Body Works, and White Barn Candle Company brands.

The Public Affairs department within The Limited, Inc. is responsible for making charitable contributions to many organizations and individuals in need. Individuals within this department are able to identify and meet community needs by actively meeting with representatives of different organizations, reviewing newspaper articles, and accepting and screening grant applications.

Table 1 provides financial information relating to WFNNB's financial capacity to help meet the needs of its assessment area. See pages 12 through 14 for definitions of terms. WFNNB's assets are centered in credit card receivables and interest bearing bank balances. WFNNB's primary business focus is the origination of private label credit cards from approximately twenty retailers, from across the fifty states, that are sold to outside investors. WFNNB's primary source of income is derived from the servicing of sold credit card receivables. The average amount of pass through receivables (i.e. \$2.1 billion), detailed below, represents the outstanding balance of all accounts originated, subsequently sold, and presently serviced by WFNNB.

Table 1: Financial Information (000s)

	Year-end 1997	Year-end 1998	Year-end 1999	Most Recent Quarter-end 06/30/00	Average for Evaluation Period
Tier 1 Capital	\$159,745	\$200,742	\$198,968	\$192,101	\$187,889
Total Income	\$209,620	\$249,079	\$263,738	**\$286,940	\$252,344
Net Operating Income	\$32,688	\$41,036	\$35,820	**\$46,266	\$38,953
Total Assets	\$362,810	\$378,217	\$393,372	\$364,420	\$374,705
Pass Through Receivables	\$1,900,000	\$2,100,000	\$2,200,000	\$2,200,000	\$2,100,000

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

Description of Assessment Area

WFNNB's assessment area is comprised of all six counties within the Columbus, Ohio metropolitan statistical area (MSA). WFNNB's assessment area complies with CRA regulatory requirements and does not arbitrarily exclude low- and moderate-income areas. WFNNB's assessment area is comprised of both urban and suburban areas.

The Columbus, Ohio MSA is located in central Ohio. It is the third largest MSA within the state. As the state capital, Columbus, is one of the fastest growing cities nationally. That growth is evident not only through the extensive development boom the region has experienced since the early 1980's, but also the number of new businesses that start each year. Local business starts increased from 3,792 in 1990 to 4,708 in 1995 with success rates of more than 88% annually. Home to seven Fortune 500 companies, Columbus thrives on a diverse mix of government, service, retail, and manufacturing. Businesses within WFNNB's assessment area are distributed among the service (40%), retail trade (19%), finance, insurance, and real estate (11%), construction (9%), and other (21%) sectors. This base of industries has given the Columbus MSA economic prosperity and stability. The top five employers by number of employees consist of The State of Ohio (28,000), Greater Columbus Federal Government (16,500), The Ohio State University (15,700), Honda of American Manufacturing, Inc. (13,000), and The Limited, Inc. (10,000).

According to 1990 census information, 36 (10%) of the geographies in WFNNB's assessment area are low-income, 84 (25%) are moderate-income, 148 (43%) are middle-income, 71 (21%) are upper income, and 3 (1%) lack sufficient population to be assigned an income level. As a whole, the assessment area consists of 12% (342) of total Ohio geographies and 12% (1,345,450) of the state's population.

As of 1990, the assessment area had approximately 348,953 families. Nineteen percent of the families were low-income, 18% were moderate-income, 25% were middle-income, and 38% were upper-income. As of 2000, the MSA median family income was \$57,300. Eight percent of families live below the poverty level, which is comparable to the state of Ohio's poverty level. In 1999, 39% of renters in the Columbus MSA paid more than 30% of their income for housing costs. As of 1999, the fair market rent for a two bedroom-housing unit was \$531. An individual would either need to earn 206% of the federal minimum wage (based on a 40-hour work week) or work an eighty-three hour work week to afford the fair market rent of \$531.

The population of Franklin County Ohio (the county in which Columbus is located) has remained fairly stable from 1990 to 1998, with only a 6% increase from 961,000 to 1,022,000 respectively. The Columbus MSAs' unemployment rate of 2.8% is less than the statewide unemployment rate of 4.2%.

WFNNB's assessment area encompasses a federal designated Empowerment Zone (EZ). The EZ consist of a 14 square mile area of central city Columbus and includes the following neighborhoods:

Driving Park, East Columbus Gateway-Krumm Park, Franklinton, Italian Village, Livingston Park, Milo Grogan, Near East Side, Old Oaks, South Linden, University Area, and Weinland Park. Since 1970, the EZ has experienced a 10% decline in the population as compared to a 12% growth rate for the city of Columbus. As of 1990, the population of the EZ was 63,229 or 10% of the city of Columbus's population. The poverty rate within the EZ is 46% (29,000 individuals) as compared to 8% for the Columbus MSA. The unemployment rate for the EZ was 14% as of 1990.

Table 2 provides additional demographic data for WFNNB's assessment area.

Table 2: Assessment Area Description

	Number	Low	Moderate	Middle	Upper
Tract	342	10%	25%	43%	21%
Families	348,953	19%	18%	25%	38%
Small Businesses	52,671	4%	8%	27%	61%

Source: Demographic Data - 1990 U.S. Census, Dun & Bradstreet Data. 3 Census Tracts (1%) are not income categorized.

The credit and non-credit related needs in WFNNB's assessment area included the following.

- **Affordable Housing**
 - **Public and Rental Assisted Housing:** As of June 1999, there were 6,192 households on the Columbus Metropolitan Housing Authority's waiting list for public housing. An additional 5,537 households were on the waiting list for the U.S. Department of Housing and Urban Development (HUD) Section 8 vouchers and certificates program.
 - **Affordable non-Assisted Rental Housing:** As of 1999, 50,600 low- and extremely low- income Columbus households were paying more than 30% of their income for housing (rent and utilities).
 - **Affordable Single Family Owner Occupied Housing:** In 1995, 18% (24,119) and 6% (7,859) of home owners were paying more than 30% and 50%, respectively, of their income for housing.
 - **Temporary Housing for the Homeless:** In 1999, approximately 618 homeless individuals were unsheltered.
 - **Rehabilitation of rental (single and multifamily) and owner occupied housing units:** In 1995, 18,600 housing units existed with severe or moderate physical problems.
- **Small Business Loans**
 - Working capital loans to existing and start up businesses in amounts of \$50M and less.
- **Social Services to Low- and Moderate-Income Families**
 - Child Care Services
 - Counseling and Job Training

- Credit Counseling
- Food Donation
- Health Care Services
- Infant, Child, and Maternal Health Care Services
- Mental Illness and Substance Abuse Services
- University, College, and Vocational School Scholarships

These community needs were determined by contacting representatives from a local housing and community services agency and a non-profit organization that is the governing body for the Columbus Empowerment Zone. We also reviewed the HUD Consolidated Strategy and Plan for the city of Columbus and Franklin County. HUD Consolidated Strategies and Plans are comprehensive planning documents that identify community needs.

Opportunities for qualified investments, CD loans, and CD services exist within WFNNB's assessment area. These opportunities include low-income housing tax credits, community development corporations, non-profit housing organizations, credit counseling agencies, affordable housing mortgage bonds, and non-profit organizations that provide social services to low- and moderate-income individuals. Overall, opportunities are abundant. However, WFNNB's ability to participate in some of these opportunities is limited due to the unique nature of its operations, as noted above, and immense competition from large full service banks.

Conclusions About Performance

Summary

- WFNNB does not use innovative or complex qualified investments or CD services within its assessment area. However, WFNNB has a high level of qualified investments and CD services, including those from its affiliates ADSC, and The Limited, Inc., given available opportunities, legal restrictions, its financial condition, and the unique nature of its banking operations. WFNNB has made \$5,057,000 in qualified investments that have directly benefited its assessment area or a statewide or regional area that includes its assessment area. See Table 3. Of this amount \$2,235,000 remained outstanding from the prior CRA evaluation period. CD services consisted of performing fund raising, budgeting, marketing, and counseling activities for various organizations.
- WFNNB has exhibited excellent responsiveness to credit and CD needs within its assessment area. WFNNB has donated money for educational scholarships, counseling & job training, mental health & drug abuse counseling, affordable housing, temporary shelter for the homeless, free food

donations, and educational programs for low- and moderate-income individuals in direct response to identified community needs. WFNNB has been able to meet identified community needs through the work of the Public Affairs department of The Limited, Inc.

Qualified Investments

WFNNB’s amount of qualified investments within and outside its assessment area totaled \$5,057,000 and \$9,732,000, respectively. See Table 3. This level of qualified investments is high given the nature of WFNNB’s operations, its financial condition, immense competition from large full service banks, and available opportunities. Table 4 details WFNNB’s amount of qualified investments as a percentage of Average Tier 1 Capital, Average Total Income, and Average Pass Through Receivables. Furthermore, WFNNB has exhibited excellent responsiveness to community needs by donating money to approximately ninety different organizations. The number and the wide variety of organizations the bank has contributed to are viewed in a very positive manner. Table 5 depicts the type of donations that were made within and outside its assessment area. It doesn’t include a prior period investment of \$2,235,000 that remains outstanding from the last evaluation period and a \$25,000 originated investment.

Table 3: Qualified Investment Activity (000s)

	Benefits AA	Outside AA	Totals
Originated Investments	\$25	\$0	\$25
Originated Grants	2,797	9,732	12,529
Prior Period Investments that Remain Outstanding	2,235	0	2,235
Totals	\$5,057	\$9,732	\$14,789
Unfunded Commitments*	0	0	0

* “Unfunded Commitment” means legally binding investment commitment that is tracked and recorded by the bank’s financial reporting system.

Table 4: Qualified Investment Percentages

	Benefits AA (%)	Outside AA (%)	Total (%)
Total Investments/Average Tier 1 Capital	2.7%	5.2%	7.9%
Total Investments/Average Total Income	2.0%	3.9%	5.9%
Total Investments/Average Receivables	.24%	.46%	.70%

Table 5: Donations by Type (000s)

TYPE OF DONATION	WITHIN ASSESSMENT AREA(\$000's)	OUTSIDE ASSESSMENT AREA (\$000's)	TOTAL (\$000's)
Affordable Housing	\$115	\$0	\$115
Consumer Credit Counseling	0	\$9,261	9,261
Counseling and Job Training	723	0	723
Educational Activities	113	0	113
Educational Scholarships	322	95	417
Food Donation	192	2	194
Health Care	2	0	2
Mental Health, Domestic Violence, and Drug Abuse Counseling	231	13	244
Other Social Services	54	0	54
Small Business Training Program	90	0	90
Temporary Shelter - Housing	236	1	237
United Way Contribution - General Fund*	686	360	1,046
Youth Program Recreational Activities	33	0	33
Total	\$2,797	\$9,732	\$12,529

*At least 51% of the agencies expenditures went to organizations that have a community development purpose.

A discussion of WFNNB's qualified investments is detailed below.

Affordable Housing - \$2,375,000

- WFNNB donated \$88,000 to a non-profit organization that renovates and builds new homes for rent and sale to low- and moderate-income individuals in the Columbus MSA. The organization also provides down payment assistance and Individual Development Accounts. Since January 1997, the organization has built 688 multifamily units, built 309 single-family residences, rehabilitated 35 multifamily units, and rehabilitated 10 single-family residences.
- WFNNB placed a non-interest bearing \$25,000 certificate of deposit in a CD credit union. The funds were used to extend housing loans to low- and moderate-income individuals.
- WFNNB purchased a multifamily housing revenue bond issued by Franklin County, Ohio in 1994. Bond proceeds were used to renovate a 376-unit apartment complex with more than half of the units reserved for low- and moderate-income individuals. The outstanding balance of the bond is \$2,235,000.

- WFNNB donated \$16,000 to a non-profit organization that refurbishes homes of low- and moderate-income individuals residing in the Columbus MSA. This organization has refurbished more than 80 homes since 1997.
- WFNNB donated \$11,000 to a non-profit organization that constructs and sells new homes to low- and moderate-income individuals residing in the Columbus MSA.

Consumer Credit Counseling - \$9,261,000

- WFNNB donated \$9,261,000 to an organization that provides free consumer credit counseling services primarily to low- and moderate-income individuals who reside within the United States. Three of the programs this organization sponsors are as follows.
 - Money and Credit Managing the Flow: Participants learn how to manage the income, expenses, and credit in their lives. They learn skills about budgeting and credit management.
 - Young Adult's Guide to Money & Credit: Designed for the high school audience, this program covers three main points about money management. Participants learn to understand basic budgeting skills, how interest works, and the cost of money.
 - Credit Bureaus and You: Participants learn how to read and understand consumer credit bureau reports and develop a strategy for maintaining a clean credit record. They also learn about the facts and fallacies about credit repair companies and how to correct reporting errors.

Counseling and Job Training - \$723,000

- WFNNB donated \$385,000 and \$158,000 to ten non-profit organizations that provide job training to youths and adults, respectively, who reside within the Columbus MSA. The majority of the individuals receiving the job training skills are low- and moderate-income individuals. These individuals receive basic job training skills, interviewing technique skills, and vocational training.
- WFNNB donated \$155,000 and \$25,000 to thirteen non-profit organizations that provide various counseling services to youths and adults, respectively, who reside within the Columbus MSA. The counseling services teach primarily low- and moderate-income individuals basic life and social skills.

Educational Activities - \$113,000

- WFNNB donated \$113,000 to nine organizations that provide educational activities to low- and moderate-income youths residing in the Columbus MSA. These funds were use to provide preschool, establish reading programs, purchase school supplies, purchase computer equipment, and provide scholarships to private schools.

Educational Scholarships - \$417,000

- WFNNB donated \$398,000 to nine colleges, universities, and other non-profit organizations that provide scholarships for higher education to low- and moderate-income individuals. Of this amount, \$303,000 and \$95,000 went to individuals residing within and outside the Columbus MSA, respectively.
- WFNNB donated \$19,000 to two non-profit organizations that provide vocational scholarships to low- and moderate-income individuals who reside within the Columbus MSA.

Food Donations - \$194,000

- WFNNB donated \$192,000 to six organizations within the Columbus MSA that provide food to low- and moderate-income individuals.
- WFNNB donated \$2,000 to two organizations that provide food to low- and moderate-income individuals living in Dallas, Texas and Lenexa, Kansas.

Health Care - \$2,000

- WFNNB donated \$2,000 to an organization that sponsored a teen health fair for low- and moderate-income youths residing in the Columbus MSA. The youths received free dental and health care at this two day event.

Mental Health, Domestic Violence, and Drug Abuse Counseling - \$244,000

- WFNNB donated \$226,000 to five non-profit organizations that provide domestic and family violence counseling to mostly low- and moderate-income individuals residing in the Columbus MSA. An additional \$10,000 was donated to a non-profit organization in New Mexico that provides domestic violence counseling primarily to low- and moderate-income individuals.
- WFNNB donated \$8,000 to two non-profit organizations that provide drug and mental health counseling primarily to low- and moderate-income individuals. The organizations are located in the Columbus MSA (\$5,000) and in New Mexico (\$3,000).

Other Social Services - \$54,000

- WFNNB donated \$54,000 to ten organizations that provide various other social services to low- and moderate-income individuals residing within the Columbus MSA. These other social services include providing clothing and Christmas gifts to the needy.

Small Business Training Program - \$90,000

- WFNNB donated \$90,000 to a non-profit organization that operates a “Micro Enterprise Training Program” to assist disadvantaged low- and moderate-income Franklin County residents. The program provides a micro enterprise course that allows individuals to evaluate their potential for success with an entrepreneurial venture. The program assists with developing a business plan and marketing research. The Ohio Department of Human Services sponsors this ten-week course. Since the program’s inception in July of 1998, 89 individuals have gone through the program and 48 businesses have either been started or expanded.

Temporary Shelter - Housing - \$237,000

- WFNNB donated \$236,000 to six adult, youth, and family shelters in the Columbus MSA. These shelters provide low- and moderate-income individuals a safe place to stay until they find permanent housing.
- WFNNB donated \$1,000 to a non-profit organization that provides temporary shelter for low- and moderate-income individuals residing in Lenexa, Kansas.

United Way Contributions - \$1,046,000

- WFNNB donated \$686,000 and \$360,000 to United Way agencies that serve the Columbus MSA and areas outside the bank’s assessment area, respectively. At least 51% of the agencies expenditures went to organizations that have a CD purpose. Many of these organizations provide temporary shelter, job training, counseling, educational services, health services, child development services, youth recreational activities, and domestic violence social services primarily to low- and moderate-income individuals.

Youth Program Recreational Activities - \$33,000

- WFNNB donated \$33,000 to six organizations that provide after school or summer programs for disadvantaged youths residing in the Columbus MSA.

Community Development Services

WFNNB has provided a limited number of CD services that were not innovative or complex and had only a modest impact on the bank’s assessment area. A discussion of these CD services is detailed below.

- Two representatives of ADSC are board members of the Communities in School of Columbus, Ohio (CIS). The organization’s mission is to promote academic and life success for low- and moderate-income youth and their families. CIS designed a community-centered process that stabilizes families and revitalizes neighborhoods in the 32 urban schools that they serve within the Columbus public school system. CIS operates the LEAP (learning, educating, and parenting) federal program that is designed to keep teen mothers in school by providing free baby sitting

services and transportation to school. CIS also provides recreational opportunities, health services, employment services, mentors, and tutors to the youth. As board members, the two ADSC employees are involved in program development, marketing, budgeting, and fund raising activities.

- A representative of ADSC is a board member of the Westerville Education Foundation. This organization provides educational support programs for low- and moderate-income students attending school within the Westerville City School District. As a board member, the ADSC representative assists with fund raising activities and is actively involved in the budgeting process.

Additionally, the bank and ADSC have provided CD services to organizations outside the bank's assessment area. An officer of ADSC serves as the Chairman of the Board for the Consumer Credit Counseling Service. As Chairman of the Board, the ADSC representative prepares financial budgets, provides advice on computer systems, approves equipment purchases, establishes guidelines on counseling services, establishes policies and procedures, and directs the overall operation of the organization.

Compliance with Anti-Discrimination Laws and Regulations

An analysis of one year (1999) of public comments and consumer complaint information was performed according to the OCC's risk based fair lending approach. The analysis of the information revealed no basis for the OCC to conduct a comprehensive fair lending examination in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed in November of 1996.

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 by 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 which 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 - A qualified Community Development activity benefits the assessment area if (i) the activity benefits areas within the assessment area, or (ii) the activity benefits a broader statewide or regional area that includes the bank's assessment area. If a bank has adequately addressed the needs of its assessment area, then the OCC also considers activities submitted by the

bank that benefit areas outside of its assessment area.

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. The United States Census Bureau has established BNAs in conjunction with state agencies.

CEBA - Competitive Equality Banking Act of 1987 which permitted corporations to form limited purpose credit card banks, whose operations are restricted to credit card activities, without the corporation becoming subject to the limitations of a “bank holding company” under the Bank Holding Company Act. A CEBA credit card bank engages only in credit card operations, does not accept demand deposits or savings or time deposits of less than \$100M (other than to secure extensions of credit), maintains only one office and does not engage in the business of making commercial loans.

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

Community Development (CD) - Affordable 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 the size eligibility standards of the Small Business Administration’s Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies.

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 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 or a block numbering area 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. A limited-purpose institution continues to meet the narrow product line requirement if it only infrequently provides other types of loans.

Median Family Income (MFI) - The median income determined by the United States 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.

Low-Income Family or Geography - An income level that is less than 50% of the MFI.

Moderate-Income Family or Geography - An income level that is at least 50% and less than 80% of the MFI.

Middle-Income Family or Geography - An income level that is at least 80% and less than 120% of the MFI.

Upper-Income Family or Geography - An income level that is 120% or more of the MFI.

Metropolitan Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

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 regardless of the balances of those receivables being carried on the bank's books or sold to another entity. The bank provides this information.

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.