



PUBLIC DISCLOSURE

March 21, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

USAA Federal Savings Bank
Charter Number: 707975

10750 Robert F. McDermott Freeway
San Antonio, TX 78288-0002

Office of the Comptroller of the Currency

400 7th Street SW
Washington, D.C. 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, 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

Institution's CRA Rating: This Bank is rated Needs to Improve.

The following table indicates the performance level of USAA Federal Savings Bank (USAA or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	USAA Federal Savings Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on an excellent lending activity, adequate geographic distribution, and good distribution of loans among individuals of different income levels. The bank's innovative and flexible lending programs had a positive impact on the overall Lending Test.
- The Investment Test rating is based on an overall excellent level of investments. The bank has a significant level of qualified Community Development (CD) investments and grants across the bank's Assessment Area (AA).
- The Service Test rating is based on service delivery systems that are reasonably accessible to all portions of the Bank's AA and the excellent level of CD services.

Lending in Assessment Area

Based on USAA's delineated AA described under the Scope of Evaluation section, all of the bank's loans are in its AA.

Description of Institution

USAA Federal Savings Bank is an interstate federally chartered stock institution headquartered in San Antonio, Texas that opened in December 1983. USAA is an indirect, wholly owned subsidiary of United Services Automobile Association (insurance organization), a mutual inter-insurance exchange organization that wholly owns USAA Capital Corporation, which wholly owns the bank. The insurance organization was founded in 1922 in San Antonio, Texas by a group of Army officers as a member-

owned reciprocal insurance association whereby members insure each other and share in any profits realized by the insurance organization. As of December 31, 2021, the insurance organization and its subsidiaries reported total assets of \$210.6 billion and approximately 12.7 million members. The insurance organization provides an array of insurance, investment, and retirement options to their membership of military personnel and their families located throughout the United States and the District of Columbia as well as at military installations around the world.

As of December 31, 2021, USAA reported total assets of \$117.4 billion, gross loans of \$38.8 billion, securities of \$66.7 billion, and tier 1 capital of \$9.2 billion. The bank's loan portfolio consists of residential mortgages (one-to four-family) of \$4.8 billion (12.4 percent), credit card loans of \$14.5 billion (37.4 percent), automobile loans of \$15.2 billion (39.2 percent), and other consumer loans of \$4.3 billion (11 percent).

USAA's primary business strategy is to meet the unique needs of the military community and their families by providing a full range of retail deposit and loan products to its membership base. OCC regulations under 12 C.F.R. 195.41(f), allows a bank whose business predominantly consists of serving the needs of military personnel or their dependents who are not located within a defined geographic area to delineate its entire deposit member base as its AA. USAA has elected to be evaluated using its military member base as its AA. See Scope of Evaluation section of this report for more information on this election.

Banking products consist of various traditional deposit and checking accounts, savings accounts, youth banking accounts, and certificates of deposit. Consumer products include mortgages, credit cards, automobile loans, and personal secured and unsecured products.

One of the bank's loan products is the Department of Veterans Affairs (VA) guaranteed mortgage loan program whereby USAA members can use a VA loan to purchase or refinance their primary residence. During the evaluation period, the bank originated 110,791 VA mortgage loans totaling \$31 billion, of which \$4.8 billion were to low- and moderate-income (LMI) borrowers. The bank does not hold all these loans in portfolio.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation (PE) assesses the bank's performance under the large bank Lending, Investment, and Service Tests. The evaluation period for the Lending, Investment, Service Tests is January 1, 2019, through December 31, 2021. CD activities were evaluated for the same evaluation period. For the Lending Test, we analyzed mortgage loans the bank reported under the Home Mortgage Disclosure Act (HMDA) and consumer loan data provided by Management. Consumer loans consist of the combination of automobile and credit card loans.

USAA has elected to be evaluated using the military provision of the CRA, 12 C.F.R. 195.41(f), which allows institutions servicing the needs of primarily military personnel and their dependents to define their AA as the entire deposit member base. The bank has chosen to delineate the 50 United States and

the District of Columbia (50DC) as their AA. Conclusions for this evaluation will be based on performance in the 50DC.

For purposes of this evaluation, at least 20 originated and purchased loans within an AA during the evaluation period are needed for a meaningful analysis. Based on the bank's volume of lending activity, automobile loans, credit cards, and mortgage loans are the bank's primary lending products. USAA purchases credit card loans from an affiliate. USAA does not originate small loans to businesses, small farm loans, or multifamily loans; therefore, no Lending Test analysis or tables will be performed on these loan products.

In our evaluation of the Lending Test, we considered and concluded upon mortgage loans (including home purchase, home refinance, and home improvement loans) and consumer loans (automobile and credit card loans). Additionally, the bank's innovative and flexible programs were considered and had a positive impact on the overall Lending Test rating. Performance Tables O, P, U and V in Appendix D include data covered by the analysis period 2019 through 2021.

Bank and deposit data are as of June 30, 2021, based on information from the Federal Deposit Insurance Corporation (FDIC). The distribution of bank branches is compared to 2015 U.S. Census American Community Survey (ACS) population estimates.

Banks are not required to report data on consumer loans; therefore, no peer aggregate data was available against which to compare bank consumer lending.

Selection of Areas for Full-Scope Review

The 50DC is the bank's only AA; therefore, it will receive a full-scope review.

Ratings

The bank's overall ratings are based solely on USAA's performance in the 50DC.

When evaluating the bank's Lending Test performance, we combined automobile and credit card loans for the consumer loan analysis. Additionally, we placed greater weight on consumer loans than mortgage loans. Based on the 1.8 million in mortgage and consumer loan originations, consumer loans represented 91.5 percent of loan originations and purchases. No consideration was given to small loans to businesses or small farm loans as the bank does not originate these types of loans.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c), 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 Bureau of Consumer Financial Protection, as applicable.

The OCC found the following nonpublic information regarding non-compliance with the statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution:

The OCC found evidence of 6,477 violations of the Federal Trade Commission Act – Unfair and Deceptive Acts or Practices (UDAP) due to failure to provide promised interest rate discounts on automobile loans. Management did not improve the bank's CRA performance with respect to compliance risk management from the last evaluation in 2018.

The OCC does not have additional public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC considered information that was made available to the OCC on a confidential basis during its consultations.

As a result of these findings, and after consideration of the nature, extent, and strength of the evidence of the practices; the extent to which the institution had policies and procedures in place to prevent the practices; the extent to which the institution has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information, the CRA Performance Evaluation rating was lowered from Satisfactory to Needs to Improve.

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.

State Rating

State of 50DC

CRA rating for the State of 50DC:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to the AA's credit needs.
- The bank exhibits an adequate geographic distribution of loans its AA.
- The bank exhibits a good distribution of loans among individuals of different income levels, given the product lines offered by the bank.
- The bank's innovative and flexible programs had a positive impact on the Lending Test.
- The bank exhibits an excellent level of qualified CD investments and donations, often in a leadership position, particularly those that are not routinely provided by private investors.
- Service delivery systems are accessible to geographies and individuals of different levels in the AA.
- The bank is a leader in providing CD services.

Description of Institution's Operations in 50DC

The bank has chosen to delineate the 50DC as their AA. Conclusions are based on performance in the 50DC AA.

USAA operates one branch and three limited-service financial centers to serve its members. USAA does not rely on a branch network to offer its products and services but rather utilizes alternative delivery systems (ADS) to provide financial services to its members.

During the evaluation period, COVID-19 pandemic (pandemic) restrictions were in place. Some of the bank's markets were subject to government-mandated lockdowns where residents were required to limit activities outside of the home and businesses reduced options. In response, the bank strategically targeted certain CD investments, donations, and services to assist in addressing economic hardships associated with the pandemic mitigation practices. These efforts advanced the bank's equality commitment towards alleviating economic disparities among minorities and low-income in military communities as well as the bank's response to natural disasters such as Winter Storm Uri and Hurricane Ida.

50DC AA

Table A – Demographic Information						
Assessment Area: 50DC						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	73,058	8.1	22.4	42.0	25.8	1.7
Population by Geography	316,515,021	6.7	21.6	43.0	28.3	0.4
Housing Units by Geography	133,351,840	6.5	21.2	44.2	27.8	0.2
Owner-Occupied Units by Geography	74,712,091	2.8	16.5	47.1	33.5	0.1
Occupied Rental Units by Geography	42,214,214	12.4	29.1	38.1	19.9	0.4
Vacant Units by Geography	16,425,535	8.3	22.6	46.3	22.5	0.3
Businesses by Geography	28,160,646	5.3	18.3	38.9	36.9	0.7
Farms by Geography	877,487	2.2	13.6	55.0	29.2	0.1
Family Distribution by Income Level	77,260,546	22.2	17.2	19.6	41.0	0.0
Household Distribution by Income Level	116,926,305	24.6	15.9	17.4	42.1	0.0
					Median Housing Value	\$225,895
					Median Gross Rent	\$989
					Families Below Poverty Level	11.3%
<i>Source: 2015 ACS Census and 2020 Dun & Bradstreet 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>						

As of the 2015 U.S. Census ACS, there were 73,058 census tracts (CT) in the bank's AA. Throughout the bank's AA, 8.1 percent of the CTs are low-income CTs and 22.4 percent are moderate-income. Additionally, 6.7 percent of the AA population reside in low-income CTs, and 21.6 percent reside in moderate-income CTs.

As of December 31, 2021, the bank geocoded its 12.7 million membership deposit accounts (accounts). The geocoding, based on deposit account holder's addresses, resulted in 315,000 accounts or 2.5 percent of its depositors located in low-income CTs, 1.8 million accounts or 14.2 percent located in moderate-income CTs, 5.2 million accounts or 41.2 percent located in middle-income CTs, and 5.4 million accounts or 42.1 percent located in upper-income CTs.

The June 30, 2021 FDIC Summary of Deposit Report indicates there were 4,954 banks with 81,467 branches located throughout the bank's AA. USAA reported \$101.2 billion in deposits which accounted for 0.6 percent of all deposits in the bank's AA.

According to the FDIC Deposit Market Share Data, as of June 30, 2021, USAA ranked 28th among 4,954 FDIC-insured depository institutions with a market share of 0.6 percent. The five largest bank's deposit market shares include JPMorgan Chase Bank, National Association (NA), with 11.8 percent market share, Bank of America, NA, with 10.9 percent market share, Wells Fargo Bank, NA, with 8.6 percent market share, Citibank, NA, with 4.0 percent market share, and U.S. Bank, NA, with 2.5 percent market share. Of the top five national bank competitors listed, three have trillions of dollars in deposits

which indicates fierce competition. Additionally, strong competition for financial services continues to exist from insured financial institutions, credit unions, payday lenders, Fintech companies, mortgage companies, non-bank finance companies with services offered in brick-and-mortar settings, virtual banks, and from other electronic payment services.

Employment

According to the Bureau of Labor Statistics, the national unemployment rate was 4.0 percent as of January 1, 2019, 3.5 percent as of January 1, 2020, 6.4 percent as of January 1, 2021, and 3.9 percent at the end of the evaluation period on December 31, 2021. At the height of the pandemic, the national unemployment rate reached a peak of 14.7 percent on April 1, 2020, and gradually returned to pre-pandemic levels by the fourth quarter of 2021.

According to the 2020 U.S. Census, the 2019 national poverty rate was 10.5 percent. The national poverty rate increased in 2020 to 11.4 percent, which was the first increase in poverty levels after five consecutive years of annual declines.

Community Contacts

We held one community contact with a Chief Development Officer of a nonprofit organized to assist naval servicemen and their families and one community contact with an Executive Director of a housing development organization. The Chief Development Officer identified 24/7 banking services, financial counseling, and short-term emergency loans as needs. The Executive Director of a local area housing development organization in the San Antonio, Texas area identified partnerships with small businesses that support affordable housing, and mortgages for LMI individuals as needs in the local area.

Scope of Evaluation in 50DC

Utilizing the military provision of the CRA, 12 C.F.R. 195.41(f), which allows institutions servicing the needs of primarily military personnel and their dependents to define their AA as the entire deposit member base, the bank has chosen to delineate the 50DC as their AA. Conclusions will be based on performance in the 50DC AA as all of the bank's loan originations and purchases are located within the assessment area.

For the Lending Test, we will review mortgage and consumer loan products. The consumer loan analysis includes automobile and credit card loans. Furthermore, greater weight was given to consumer loans than mortgage loans as this product represented 91.5 percent of loan originations and purchases. During the evaluation period, the bank makes extensive use of innovative and flexible lending programs to assist its members. These programs had a positive impact on the overall Lending Test rating.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN 50DC

LENDING TEST

The bank's performance under the Lending Test in 50DC is rated High Satisfactory.

As of December 31, 2021, the bank had 9.5 million members. The membership base includes 1.3 million Core Officers (926,000 separated or retired military) and approximately 3 million in Enlisted servicemembers (1.1 million separated or retired) and 5.2 million associated members. In the armed forces, military personnel are separated between Core Officers (all ranks within the Officer structure) and Enlisted members of the military. Servicemembers, specifically lower ranking servicemembers with low income, live on military bases for economic benefits. Additionally, the military offers Basic Allowance for Housing (BAH) benefits to active-duty personnel, early-career servicemembers in lower pay grades and military servicemembers who relocate numerous times throughout their career. Many of these members utilize BAH benefits to secure rental housing rather than purchasing a home.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the 50DC full-scope AA is good. The innovative and flexible lending programs had a positive impact on the overall Lending Test rating.

Lending Activity

Lending levels reflect an excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
50DC	153,597	0	1,655,982	0	1,809,579	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Consumer	Community Development	Total	%State* Loans	%State Deposits
50DC	41,063,733	0	30,375,815,000	0	30,416,878,733	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

USAA originated an excellent volume of loans in the AA relative to its capacity based on deposits, competition, and market presence. Lending levels reflect excellent responsiveness to credit needs in the AA, considering the number and dollar amount of consumer loans the bank originated to its members.

The following factors support the bank's excellent responsiveness to community credit needs:

- In the Lending Test analysis, based on number of loan originations and purchases, consumer loan represents 91.5 percent of total originations and home mortgage loans represent 8.5 percent of total loans.
- USAA has 0.6 percent deposit market share, which ranks 28th out of 4,954 deposit taking institutions. USAA's deposit market share ranks in the top 1.0 percent of all deposit taking institutions. The top five national banks, with the largest deposit marketing share, hold 37.8 percent of total deposits in the AA.
- USAA has a 0.3 percent market share of home mortgage originations. The bank's mortgage market share ranks 45th out of 4,373 home mortgage lenders. The bank's market share of home mortgage loan originations ranks in the top 1.0 percent of all lenders in the AA.
- Pandemic restrictions stressed the U.S. economy and in the short term, created an environment of heightened and unknown levels of credit risk. In response, the bank tightened credit requirements.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of mortgage and an adequate geographic distribution of consumer loans in its AA when taking into consideration the bank's membership base and business strategy.

Home Mortgage Loans

Refer to Table O in the state of 50DC section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the table and the following considerations, the bank's geographic distribution of home mortgage loans originations and purchases for the evaluation period is good. The following information was taken into consideration when determining the rating:

- USAA home mortgage lending challenges in the AA stem from strong competition in the AA with 4,373 mortgage lenders and a limited supply of owner-occupied housing units in low-and moderate-income CTs, at 2.8 percent and 12.4 percent, respectively.
- As previously mentioned, USAA membership includes approximately 3 million enlisted servicemen (1.1 million separated or retired). Servicemembers, specifically lower ranking servicemembers with low income, live on military bases and utilize BAH benefits and will not need residential mortgage loans.
- The bank's level of lending in low-income geographies was well below the proportion of owner-occupied housing units and below the aggregate distribution of lending in those CTs. The proportion of the bank's mortgage lending in moderate-income geographies was below the proportion of owner-occupied housing units and near to the aggregate distribution of lending in those geographies.

Consumer Loans

Refer to Table U in the state of 50DC section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the table and the following considerations, the bank's geographic distribution of consumer loans is adequate when considering performance context. The following information was taken into consideration when determining the rating:

- USAA's business model and policy are to lend to its membership base. USAA has 2.2 percent of its depositors by tract income living in low-income geographies and 13.9 percent in moderate-income geographies. The proportion of USAA membership is significantly less than the proportion of households.
- The bank's level of consumer lending in low-income geographies was significantly below the proportion of households in low-income geographies. The proportion of consumer loans in moderate-income geographies was below the proportion of households in moderate-income geographies. For consumer loans, aggregate distribution data is unavailable as there are no regulatory requirements for reporting aggregate data.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and consumer loan lending activities to identify any gaps in the geographic distribution of loans. Examiners did not identify any unexplained conspicuous gaps in any of the areas that were reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of mortgage loans and a good distribution of consumer loans among individuals of different income levels given the product lines offered by the bank and taking into consideration the bank's membership base and business strategy.

Home Mortgage Loans

Refer to Table P in the state of 50DC section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the table and the following considerations, the bank's borrower distribution of home mortgage lending is adequate. The following information was taken into consideration when determining this rating:

- The military offers BAH benefits to active duty early-career service members in lower pay grades and military servicemembers who may relocate throughout their career. Many of the bank's deposit members utilize the BAH benefit to secure rental housing instead of pursuing home ownership due to limited time spent in one location before relocating.

- USAA’s 2021 needs assessment noted that more than 70 percent of personnel on military installations have been on military bases for two years or less. Considering the bank make loans to its members and its membership utilizing BAH, the bank is challenged to receive requests from LMI members. Furthermore, mobility is a requirement for career military servicemen. Therefore, a serviceman or family will likely be moving within short periods of time with few incentives for purchasing a home.
- The proportion of bank loans to low-income borrowers is significantly below the percentage of low-income families and the aggregate. The proportion of bank loans is somewhat below the percentage of moderate-income families and well below the aggregate.

Consumer Loans

Refer to Table V in the state of 50DC section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s consumer loan originations and purchases.

Based on the data in the table and the following considerations, the bank’s borrower distribution of consumer lending is good. The following information was taken into consideration when determining this rating:

- Based on the bank’s data, a large percentage of servicemembers, specifically lower ranking servicemembers with lower income, live on military bases with transportation provided by the military. The bank’s active duty members living on military bases are not seeking to purchase a vehicle, limiting consumer lending opportunities to LMI USAA members.
- During the evaluation period, the supply chain shortages that have resulted from the pandemic created a deficit in available vehicles, both new and used, causing auto prices to rapidly escalate.
- The proportion of consumer loans to low-income borrowers is well below the proportion of low-income households. The proportion of consumer loans to moderate-income borrowers exceeds the proportion of moderate-income households.

Community Development Lending

The bank has made few, if any, CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution’s level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period, the bank did not originate any CD loans. The bank does not offer loans generally qualifying as CD loans as part of its operations, including multifamily housing and small business /commercial lending.

Product Innovation and Flexibility

The bank makes extensive use of innovative and flexible lending practices in order to serve AA credit needs of LMI individuals and individuals located in LMI geographies.

Career Starter Loans

USAA offers the Career Starter Loan, which provides an unsecured low interest rate loan to members early in their careers at one of the military academies or as Reserve Officers' Training Corps (ROTC) members at other colleges. Combined, USAA originated 21,869 Career Starter Loans totaling \$608.6 million during the evaluation period.

There are two types of Career Starter Loans, Academy Loans and Pre-Commission Loans:

- Academy Loans are fixed-rate loans offered to members attending one of the five service academies or to newly commissioned officers. The maximum program loan amount is \$36,000 at 0.75 percent interest rate for 60-months. Payments are deferred until post-graduation. USAA originated 8,079 Academy Loans totaling \$285.8 million during the evaluation period. Based on geographic location the bank originated 719 of its Academy Loans to borrowers located in LMI CTs which totaled \$25.4 million (9 percent of dollar amount).
- Pre-Commission Loans are offered to eligible students participating in an ROTC program or Platoon Leaders Course. Program loan amounts are up to \$25,000 at 2.99 percent interest for 60-months. Similar to Academy Loans, payments are deferred until post-graduation. USAA originated 13,790 Pre-Commission Loans during the evaluation period. Of these, 9,383 totaling \$217.9 million (68 percent of dollar amount) of its Pre-Commission Loans went to LMI borrowers.

Government Shutdown Loans

USAA also offered Government Shutdown Loans to members who are employees of a federal government agency impacted by a government shutdown. Advances on this loan are available only during a government shutdown and are made interest free in an amount equal to the member's after-deduction paycheck. During the 2019 government shutdown, USAA originated 2,518 Government Shutdown Loans totaling \$28.8 million. Of the total funded loans, by dollar amount, 607 loans (24 percent) totaling \$4 million (14 percent) were to LMI borrowers.

COVID-19 Payment Relief

USAA offered its members flexible payment relief options on mortgage loans, consumer loans, and credit cards. The financial benefit for each program is calculated as the monthly payment due multiplied by the number of months of payment relief.

- Mortgage loan forbearance plans could be extended up to 12 months, or longer in some cases. The bank approved mortgage payment relief to 22,015 members loan balances totaling \$214.6 million during the evaluation period. These forbearance plans included 7,062 LMI borrowers that accounted for \$60.1 million or 28 percent of the financial benefit.
- Consumer loan financial relief was initially a 60-day and subsequently a 90-day forbearance plan. The bank approved consumer loan payment relief to 134,972 members totaling \$161.7

million during the evaluation period. The financial relief included 39,197 LMI borrowers that accounted for \$35.6 million or 22 percent of the financial benefit.

- Credit card payment relief offers were made under 90-day no payment and no interest programs. This program allows interest to accrue as usual for each cycle during the relief period, with the accrued interest being added to the outstanding balance during each cycle. When the relief period ended, the standard minimum payment due calculation resumed though members did not have to pay a lump sum of accrued interest. The bank approved credit card payment relief to 128,150 members totaling \$41.3 million during the evaluation period. The relief offers included 48,649 LMI borrowers that accounted for \$11.3 million or 27 percent of the financial benefit.

INVESTMENT TEST

The bank's performance under the Investment Test in 50DC is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the 50DC is excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
50DC	197	828,845	506	1,699,863	703	100%	2,528,708	100%	71	259,178

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank has an excellent level of qualified CD investment and donations, often in a leadership position, particularly those that are not routinely provided by private investors.

USAA originated 506 current period investments and donations totaling approximately \$1.7 billion. Additionally, 197 prior period investments totaling \$829 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period investment dollar volume represents 27.4 percent of tier 1 capital. Unfunded commitments totaled \$259 million.

A substantial majority of the dollar volume of the bank's current and prior period investment activities consists of low-income housing tax credits (LIHTC) and mortgage-backed securities (MBS), both of which focus on affordable housing, a primary credit need in the AA. The LIHTCs and MBS support affordable housing initiatives throughout the AA.

Current period investments consist of 36 tax credit investments totaling \$460 million and 46 MBS totaling \$1.1 billion. Of the total tax credit investments, 31 were LIHTCs totaling \$436 million that

support the construction, rehabilitation, or maintenance for over 9,000 affordable housing units throughout the AA.

The bank provided 424 qualified donations totaling \$103.1 million to 182 organizations. Donations consist of 336 to support community service organizations totaling \$84.9 million, 55 for economic development initiatives totaling \$14 million, 25 to nonprofit affordable housing organizations totaling \$2.0 million, and eight for revitalization and stabilization initiatives totaling \$2.2 million.

Prior period investments consist of 108 LIHTCs totaling \$613 million, 88 MBS totaling \$69 million, and a municipal bond of \$146 million. The municipal bond supported revitalization efforts to low-income schools within New York City, NY.

The 71 unfunded commitments total \$259 million, which consists of 17 current period LIHTCs of \$207 million and 54 prior period LIHTCs of \$52 million.

The following examples demonstrate the bank's leadership and responsiveness to the needs of the AA:

- A \$35 million LIHTC investment for construction financing of more than 2,600 affordable housing units across 14 states.
- One Freddie Mac MBS totaling \$195 million secured by 5,860 affordable housing units for LMI individuals residing in Jamaica, NY.
- Two tax credit investments to one organization totaling \$8.4 million for economic development purposes that specifically support a Small Business Recovery Loan Program to assist businesses adversely impacted by pandemic national lockdowns.
- Five donations totaling \$15.7 million to a nonprofit organization that provides hardship grants and community services to low-income veterans including, but not limited to, disaster response assistance, childcare services, and financial counseling/debt management.

SERVICE TEST

The bank's performance under the Service Test in 50DC is rated High Satisfactory. The bank does not rely on a branch network to offer its products and services but uses alternative delivery systems to provide financial services to its members.

Conclusions for Area Receiving a Full-Scope Review

Based on the full-scope review, the bank's performance in the 50DC is good. Due to the unique nature of the membership and the geographic dispersion and mobility of its targeted military member base, the bank primarily utilizes alternative delivery systems to provide members with access to retail banking services and products.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
50DC	100.0	4	100.0	25.0	0.0	50.0	25.0	6.7	21.6	43.0	28.3

**Due to rounding, totals may not equal 100.0*

USAA operates a main branch located in San Antonio, TX and three limited-service financial centers located in Annapolis, MD, Colorado Springs, CO, and West Point, NY to serve its members. Products and services provided at the branch and financial centers include checking, savings, credit card, consumer loans, certificate of deposits, youth savings accounts, career starter loans, property and casualty insurance, notary, signature guarantee, teller checks, access to self-service workstations, remote deposit services, deposit/payment drop box, onsite automated teller machines (ATMs) for deposits and withdrawals, and member eligibility services. Services not provided at the financial centers include safe deposit boxes, interactive teller machines, teller cash services, savings bond redemption and bulk coin redemptions.

As of December 31, 2021, the distribution systems for banking products and services include the branch and three financial centers, 134 deposit-taking ATMs located in 18 states and 5,000 USAA branded, partner ATMs located in retail/convenience stores. There is also a network of more than 80,000 non-USAA surcharge-free cash withdrawal access ATMs. Other alternative services include mobile banking, online banking, digital payments, and remote deposit capture. USAA also rebates up to \$15 in surcharges a month when members use an ATM owned by a non-affiliated financial institution.

The branch percentage located in low-income areas exceeds the percentage of the population residing in these geographies. The bank did not have a branch or financial center located in moderate-income geographies. There were two financial centers located in middle-income CTs, and one financial center located in an upper-income CT.

The bank did not open or close any branches during the evaluation period.

The percentage of ATMs located in low-income geographies and moderate-income geographies are below the percentages of the population residing in these geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, its AA, particularly LMI geographies and/or individuals. Due to pandemic restrictions, the branch and financial centers lobbies were closed beginning March 16, 2020 and remained closed through the end of the evaluation period. However, the San Antonio, TX branch drive-thru facility remained open to its members. Prior to the pandemic, lobby operations were Monday through Saturday except for West Point, NY, where Saturday lobby operations were eliminated in October 2019.

The bank's hours and services are tailored to the needs of its military member base. Hours and accessibility are similar for all members and do not adversely affect the availability of products and services, particularly to LMI geographies or individuals.

Branch and financial center products and services include checking, savings, and youth account activities as well as Certificates of Deposits, credit card sales, loan applications, notary, signature guarantee, teller checks, self-service workstations, remote deposit capture (RDC), deposit and payment drop box, and full-service bank-owned ATMs. In addition to these services, the branch also offers interactive teller machines, teller cash services, safe deposit box, savings bond redemption and bulk coin redemption.

Some of the bank's alternative services include:

Non-proprietary ATMs – USAA has partnered to brand over 5,000 third-party ATMs that allow unlimited cash-only usage with no surcharge or ATM service fees to its members. The bank also maintains partnerships resulting in a network of more than 80,000 non-USAA branded ATMs that allow up to ten surcharge-free transactions per month and provide rebates up to \$15 in surcharges per month when using an ATM owned by another non-affiliated financial institution.

Mobile Banking - The bank provides mobile banking through the USAA mobile app. The mobile app allows members to access various account balances and history, deposit checks using remote deposit service, transfer funds, bill pay, apply for bank products, track spending, stop payment on checks, and activate or change PINs on ATM/Debit cards. Members can add USAA branded VISA credit and debit cards to Apple Pay, Samsung Pay, and Google Pay digital wallets for ease of payment access at retail and other merchant locations. Moreover, members can establish email or text alerts when deposit balances drop below specified amounts, deposits are credited, and if withdrawals exceed certain dollar amounts.

Internet Banking – This service is provided to members through USAA.com. This website allows members to access information on products and services offered by the bank and perform transactions with the accounts. During the evaluation period, this service was utilized by over 11.2 million accounts.

Digital Payments – The bank partners with a third-party Fintech company to provide person-to-person money transfers through the Zelle network. The Zelle platform is integrated into the Bank's internet banking platform and mobile app for access to the network. This service allows members to send, receive, and request funds from other customers who use the Zelle network. In year 2021, 2.3 million members used this platform to conduct over 39.1 million transactions totaling \$9.7 billion.

RDC - USAA's RDC allows members to make deposits from home or other remote locations through its Deposit@Mobile service. In year 2021, over 35.4 million transactions totaling \$44.1 billion in deposits were made through RDC services.

Community Development Services

The bank is a leader in providing CD services. Employees performed CD Services for organizations across the 50 DC. During the evaluation period, USAA employees provided 69,894 service hours to 868 organizations through qualified CRA and COVID-19 services. CRA qualified services totaled 28,994 hours and COVID-19 services totaled 40,900 hours. Employees performed 65,189 service hours for community service organizations, 4,250 service hours for economic development organizations, 431 service hours for affordable housing organizations, and 24 service hours for revitalization /stabilization organizations.

Service hours include USAA's Management team's utilization of their professional expertise by donating 1,665 hours in leadership positions of nonprofit organizations. One bank employee served 260 hours as Chief Administrative Officer for a charitable organization that works in five key areas: Health Awareness, Educational Services, Humanitarian Relief, Environmental Protection & Preservation, and Community Empowerment. Another bank employee served 180 hours as Chief Operations Officer Financial Planning and Advice for a Family Services organization that fosters mental and physical wellness, stability and independence for LMI individuals and families in crisis from a specific county in Texas.

Many of the COVID-19 service hours consist of assistance at food banks and food distribution sites (20,581 hours), blood/plasma/platelet donations (4,138 hours), assistance at COVID-19 vaccination clinics (2,868 hours), and mental health/crisis support (2,732 hours). The following are examples of some of the CD qualified services provided by employees:

- Various bank employees performed over 2,500 service hours to a USAA financial readiness training program that delivers financial training in support of pre-commission military personnel, spouses, and national guard communities. Through online financial advice tools and content to assist members in managing their financial goals.
- Various bank employees performed over 1,400 service hours for a USAA internal program that provides soldiers and their families with enhanced access to information about Fort Carson Army Post and available services including financial and medical services.
- Various bank employees performed over 1,100 service hours for an organization whose mission is to ease the transition from military to civilian workforce. The organization engages in national corporate career counseling for returning veterans and spouses of active duty military member.

The following are examples of COVID-19 services provided by employees:

- Thirty-two bank employees provided 473 hours of technical assistance and support to a nonprofit organization that provides food distribution services to LMI seniors, disabled, and other vulnerable populations in the greater Tampa Bay area.
- Two bank employees provided 132 hours of support services to two nonprofit organizations that specialize in mental health services and crisis intervention for LMI individuals.

- Eight bank employees provided 173 hours of technical expertise and support to a nonprofit organization that provides health and community services to veterans, victims of natural disasters, and individuals impacted by the pandemic.

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 MSAs and non-MSAs 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”.

Time Period Reviewed:	01/01/19 - 12/31/21	
Bank Products Reviewed:	Home Mortgage loans Consumer Loans including Automobile and Credit Card loans Community Development Investments and Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
USAA Capital Corporation USAA Finance Company, LLC USAA Financial Services Corp. UGSS, LLC USAA Investment Corporation USAA Investment Services Corp.	Affiliate	CD Investments and CD Services
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA		
None		None
STATE		
50 DC	Full-Scope	50 states and the District of Columbia

Appendix B: Summary of State Ratings

RATINGS USAA, FSB				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
USAA, FSB	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State:				
50DC	High Satisfactory	Outstanding	High Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in 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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Community Development (CD): 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; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, 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, other secured consumer loans, and other unsecured consumer loans.

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

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (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), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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

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

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/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. The median is the point at which half of the families have income above, and half below, a range of incomes. 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, and half below, a range of incomes.

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.

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.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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 1 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.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, 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 the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

- Table O. Assessment Area Distribution of Home Mortgage 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 owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage 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 families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- 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 in 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 MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts					
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate			
50DC	153,597	41,063,733	100.0	17,212,427	2.8	1.6	2.0	16.5	12.5	12.7	47.1	45.2	42.6	33.5	40.6	42.6	0.1	0.1	0.1			
Total	153,597	41,063,733	100.0	17,212,427	2.8	1.6	2.0	16.5	12.5	12.7	47.1	45.2	42.6	33.5	40.6	42.6	0.1	0.1	0.1			

Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers					
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate			
50DC	153,597	41,063,733	100.0	17,212,427	22.2	1.8	4.6	17.2	10.0	14.7	19.6	20.2	20.5	41.0	39.2	41.9	0.0	28.8	18.2			
Total	153,597	41,063,733	100.0	17,212,427	22.2	1.8	4.6	17.2	10.0	14.7	19.6	20.2	20.5	41.0	39.2	41.9	0.0	28.8	18.2			

Source: 2015 ACS Census ; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2019-2021	
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	
50DC	1,655,982	30,375,815,000	100.0	6.3	2.4	21.0	14.0	43.9	42.2	28.6	40.9	0.2	0.4	
Total	1,655,982	30,375,815,000	100.0	6.3	2.4	21.0	14.0	43.9	42.2	28.6	40.9	0.2	0.4	

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2019-2021	
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	
50DC	1,655,982	30,375,815,000	100.0	24.6	14.8	15.9	18.7	17.4	22.6	42.1	43.8	0.0	0.0	
Total	1,655,982	30,375,815,000	100.0	24.6	14.8	15.9	18.7	17.4	22.6	42.1	43.8	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*