Black Lives & Black Loans Matter

A Strategic Program for the Marshall-Shadeland Neighborhood

Black Lives & Black Loans Should Matter to SSB Bank Through Community Engagement

One Neighbor, One House, and One Business at a Time in Lower Marshall-Shadeland

February 2021

LMSCII

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A vacant house on Shadeland Avenue


The Community Engagement Team in Marshall-Shadeland, September 2020

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Parents Against Violence

In 2018, Rev. Eleanor Williams and Parents Against Violence (PAV), along with the North Side Partnership Project, purchased the closed McNaugher School in Perry North. Since that time, the organization has opened and used the facility to sponsor dance team competitions, provide tutoring for middle and high school students, host sewing and drama clubs, and provide a night gym for area youth.

When the COVID-19 pandemic slowed the economy this spring, the PAV youth sewing club made face masks and the organization distributed food, along with personal and household essentials, to people in need throughout the community. PAV's summer program includes a reading club, an art class for kids, basketball tournaments, and an Underground Railroad STEAM mural project.

PAV collaborates with other community organizations to fulfill neighborhood needs. These partners include the Pittsburgh Project, University of Pittsburgh, Carlow University, CCAC, American Heart Association, and Pittsburgh Community Services, Inc. PAV estimates that in the past two years, it has served more than 2,000 people.

PAV will achieve its neighborhood beautification and housing development successes in partnership with other public and private agencies and organizations. These partners will include the following:

- City of Pittsburgh,
- City, County, State, and Federal elected officials,
- Local financial institutions
- Federal Home Loan Bank of Pittsburgh,
- Housing Authority of the City of Pittsburgh,
- Local Foundations,
- Northside Leadership Conference,
- Residents, PAV Staff, and Volunteers, and
- Urban Redevelopment Authority of Pittsburgh.

Despite the successes of PAV's partnerships and McNaugher School redevelopment, the surrounding neighborhoods remain threatened by the large number of blighted and abandoned properties. These abandoned structures—some privately owned and some owned by the City—place future projects at risk. Unchecked, blight will continue to spread throughout Marshall-Shadeland.

To avoid this, PAV developed its Marshall-Shadeland Development Initiative. The Initiative is a community-intensive effort to inventory abandoned lots and structures. The study makes recommendations, such as restoration, new construction, or open space greenways. Remaining instances of blight need to be addressed to the fullest extent possible to protect the recent investment in the neighborhood. Our initiative is a strategic program that can lead to a formal marketing program through the organization directed at the private market and supported by public and private financing incentives.

Rev. Eleanor Williams speaks with the Reinvestment Team

Lower Marshall-Shadeland Community Improvement Initiative

Parents Against Violence created its affiliate, Lower Marshall-Shadeland Community Improvement Initiative (LMSCII), to control blight and maintain the neighborhood's value and character.

Goals of LMSCII:

- Keep homes in Marshall-Shadeland affordable;
- Safeguard homeowners' investments and improve access to affordable housing; and
- Establish a neighborhood stabilization program focused on tax abatement and homestead exemptions.

Due Diligence

The Marshall-Shadeland Neighborhood Development Initiative is an attempt to address the most blighted properties and vacant lots. LMSCII seeks to work in partnership with the City of Pittsburgh, Urban Redevelopment Authority, Housing Authority of the City of Pittsburgh, and other partners to overcome the challenges presented by these parcels. LMSCIIs approach is modeled on The Lotus Campaign, an affordable housing developer in Charlotte, North Carolina.

The Lotus Campaign finds investment partners to purchase, rehabilitate, and build properties to house people experiencing homelessness and to create affordable workforce housing. The organization also plans to research and pilot new construction techniques and materials to help test and champion innovative ways to build more cost effectively. The end product will be an economically, architecturally, and socially diverse neighborhood that is pedestrian friendly and progressively designed.

LMSCII will exercise all options and due diligence with respect to these abandoned properties. Economic realities prevent LMSCII from acquiring and restoring every abandoned location. In addition, for many of the sites the price of restoration is cost-prohibitive. As a result, LMSCII has identified the majority of abandoned properties, determined ownership, and assessed their condition and restoration potential. LMSCII has also determined which properties should be restored and which lots are eligible for new construction.

LMSCII will contact all private property owners to determine their intentions regarding the use of the abandoned properties. Marshall-Shadeland residents will continue to be informed of LMSCII's strategy. Additional meetings will be held as the plan progresses.

For those properties with architectural or historical integrity that are in fair to good condition, restoration will be pursued. In some cases, the façades or portions of buildings will be preserved as creative alternatives to total demolition, which would leave vacant lots. For those lots that are currently vacant or left vacant as the result of demolition, infill new construction that is compatible with the surrounding structures will be pursued.

Infill new construction will be well designed and attractive to current and potential homeowners. In addition, if vacant properties cannot be developed because of steep slopes or other problems, LMSCII will recommend that the parcel be included in a greenway designation, particularly if it is adjacent to other open space and steep slope parcels.

LMSCII

Black Lives & Black Loans Should Matter to SSB Bank

INTRODUCTION

A vacant lot on Marshall Avenue, one of hundreds in the Marshall-Shadeland neighborhood

A New Perspective on Marshall-Shadeland

In early 2020, Parents Against Violence and its affiliate, Lower Marshall-Shadeland Community Improvement Initiative (LMSCII), embarked on a major community-wide initiative to document physical conditions and resident feedback in the Marshall-Shadeland neighborhood as the first step toward a neighborhood-wide rehabilitation initiative. Despite the Covid-19 pandemic, our work continued throughout the summer and fall. Most notably, LMSCII created an inventory all of the vacant properties in the neighborhood, surveyed residents, and produced a development framework that we believe will revitalize the neighborhood for the benefit of low- and moderate-income people, minorities, and veterans who inhabit Marshall-Shadeland.

This report is divided into three sections: **Part One** details the lending environment for minorities in Pittsburgh and Marshall-Shadeland. We believe that a focused analysis of the private sector is critical to understanding the structural challenges that face residents of Marshall-Shadeland and other minority neighborhoods. The hope is that this analysis can lead to structural *solutions* for private-market investment in Marshall-Shadeland. **Part Two** includes a detailed assessment of community conditions, including an analysis of vacant properties and a summary of the resident survey. **Part Three** is LMSCII's Neighborhood Development Strategy, which includes a conservatorship demonstration program for rehabilitating vacant properties.

Boldly Reimagining Housing

It's time to boldly reimagine how people get housed. For years, solutions to low- and moderate-income housing have almost exclusively relied on government in the form of public housing, affordable housing subsidies, and other social welfare measures. There is a place for state-sponsored support of neighborhood development, primarily in infrastructure development. But what role does the private sector play, namely financial institutions?

Every year, hundreds of thousands of units of affordable housing are financed by the nation's banks. In Pittsburgh alone, over the course of thirteen years, 2007 to 2019, more than 400 financial institutions approved more than 70,000 home mortgage loans. These loans are the lifeblood of community development, enabling thousands of people to achieve the American dream of homeownership or the rehabilitation of existing homes.

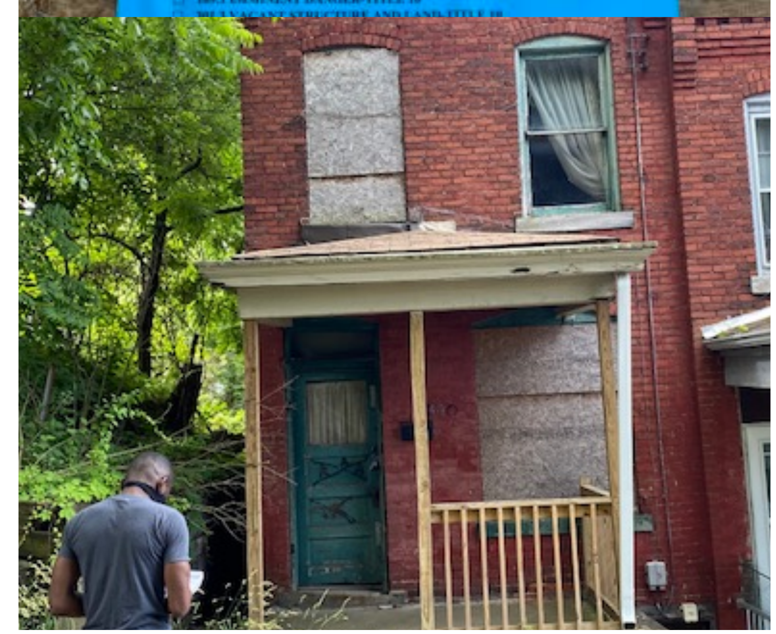
However, for African Americans, homeownership has been elusive and appears to be getting worse. The Urban Institute reports that "In 1960, there was a 27-point gap between black homeownership (38 percent) and white homeownership (65 percent). Today, the gap is even wider. . . The decline in black homeownership threatens to exacerbate racial inequality for decades to come. Homeownership remains the principal way most families build wealth in this country." (Alanna McCargo and Jung Hyun Choi, "Closing the Gaps: Building Black Wealth through Homeownership," Urban Institute Housing Finance Policy Center, November 23, 2020, https://www.urban.org/research/publication/closing-gaps-building-black-wealth-through-homeownership)

According to the Brookings Institution, "At $171,000, the net worth of a typical white family is nearly ten times greater than that of a Black family ($17,150) in 2016." (Kriston McIntosh, Emily Moss, Ryan Nunn, and Jay Shambaugh, "Examining the Black-white wealth gap," Brookings Institution, February 27, 2020, https://www.brookings.edu/blog/up-front/2020/02/27/examining-the-black-white-wealth-gap/) The pandemic has worsened these trends.

Marshall-Shadeland is currently at a crossroads. The famous Robert Frost poem, "The Road Not Taken," with the last lines–

> "Two roads diverged in a wood, and I–
> I took the one less traveled by,
> And that has made all the difference."

–is a metaphor for choices that financial institutions have at this critical juncture. They can continue doing business the same way and expect the same results–more vacant properties, fewer loans to African Americans and LMI borrowers, while the neighborhood succumbs to speculators and gentrification. Or, they can address community needs in a strategic, comprehensive way, as identified in this report, and reap the benefits from higher stock prices, positive publicity, more customers doing business, an "Outstanding" CRA rating, and a stable, affordable neighborhood for veterans and people of color.



Lending Disparities

How these indicators manifest in Pittsburgh can be seen by a close examination of Marshall-Shadeland, a low- and moderate-income residential community and one of the city's few racially-balanced neighborhoods (Whites comprise 47% of the residents, African Americans, 43%). During the thirteen-year period, 2007 to 2019, more than 134 lenders approved 670 home mortgage loans to Marshall-Shadeland. Of these, 363 loans were approved to Whites (54.2%) and 159 were approved to African Americans (23.7%).

The wealth gap in the neighborhood is stark: 159 loans for African Americans vs. 363 loans for Whites; $9 million for Blacks vs. $21 million for Whites. But when the lending records of banks with branches in or near the neighborhood are examined, the trend is especially troubling. Four banks with branches in or near Marshall-Shadeland—First National Bank of PA, Key Bank, SSB Bank, and Wesbanco—approved 88 loans over the thirteen-year period, 2007 to 2019, or 13% of the 670 total loans all lenders approved over the same period.

Yet, the one bank with deep roots in the neighborhood, SSB Bank, which started in Marshall-Shadeland in 1922, approved just 12 loans in the past thirteen years. Of these, just two loans were approved to African Americans. Imagine this headline: "Home-Grown Bank Ignores Own Neighborhood." We wish it was not true, but sadly, banking regulations allow for such disparities.

The Community Reinvestment Thesis

Community organizing around the Community Reinvestment Act during the late-1980s and early-1990s yielded results. Lenders in Pittsburgh,

This vacant house at 2825 California Avenue is one of 18 on the street. It is a third of a mile from SSB Bank

working in partnership with community organizations, developed innovative loan programs and services. The home mortgage lending figures are the most telling. Between 1991 and 1995, 12 banks approved 2,059 loans to African Americans, 15.1% of all loans (13,633) approved to borrowers in the city of Pittsburgh during that time. Yet, between 2009 and 2018, 23 lenders with bank branches in the city approved just 1,406 loans to African Americans, or 7.0% of all loans (20,230). In other words, twice as many lenders are making half as many loans to African Americans in twice the amount of time.

Since the 1990s, however, a network of financial institutions, real estate agents, insurance companies, and investors—pursued community reinvestment simply in the name of profit—all with regulatory approval. This trend created the "reinvestment thesis" —the idea that all banks are doing the "right thing" by investing in underserved neighborhoods, that financial institutions are meeting their mandated requirements under the Community Reinvestment Act, and that regulators appropriately and accurately reward these reinvestment efforts. It has led to "grade inflation" by financial institution regulators, which gave more than 98% of all banks a passing evaluation (Josh Silver, "The Community Reinvestment Act: Vital for Neighborhoods, the Country, and the Economy," National Community Reinvestment Coalition, June 2016.).

Regulatory Complicity in Lending Disparities

One can see these disparities playing out in the federal regulations and in recent CRA exams. The FDIC's Community Reinvestment Act compliance manual provides for a "a streamlined assessment method" when evaluating a small bank's performance under CRA. While banks may completely ignore their home turf, they may satisfy the regulations by lending to other areas, even if it is far from their branch locations. Given that a small institution like SSB Bank has but two branches—one in Marshall-Shadeland and one in Pittsburgh's North Hills—it is able to achieve a "Satisfactory" rating by lending all over southwestern Pennsylvania, but ignoring its home base. While SSB approved only two loans to African Americans in Marshall-Shadeland between 2007 and 2019, it approved 25 additional loans to African Americans in the city of Pittsburgh over the same period.

Furthermore, SSB Bank's last CRA evaluation performed by the FDIC in 2015 showed that the bank approved just five loans (3.6%) to low-income borrowers in 2013, and only approved seven loans (5.1%) to low-income census tracts in 2013. Yet, the FDIC concluded that "SSB's ability to further penetrate the moderate-income tracts is largely impacted by the presence of much larger financial institutions with expansive loan departments, multiple branches, and closer proximity to the borrowers located in these tracts." That may explain how SSB got beat out in market share in Marshall-Shadeland by large lenders like Dollar Bank and PNC Bank. But what explains the fact that SSB made more loans than Citizens Bank, JP Morgan Chase, Citibank, and Bank of America? In other words, the FDIC agreed that SSB Bank is clearly being out-competed in its own home neighborhood of Marshall-Shadeland with no repercussions or consequences.

Ivy covers a vacant house 1500 Woodland Avenue, less than a half-mile from SSB Bank

Of the 35 financial institutions which approved at least five home loans in Marshall-Shadeland between 2007 and 2019, SSB Bank was ranked 13th for number of loans. Other lenders, including the small institution Fidelity Savings Bank, which had a branch in Woods Run (it was purchased by Wesbanco in 2012) and approved 18 loans over the 13-year period, beat out SSB Bank for market share in its own back yard. Even First Tennessee Bank, NA, approved three loans in Marshall-Shadeland. *First Tennessee.*

It is not clear why a borrower in Marshall-Shadeland would choose a lender like PHH Home Loans, LLC, a New Jersey-based financial institution with a branch in Canonsburg, over the local SSB branch, but PHH approved 23 loans in Marshall-Shadeland, more than twice as many as SSB, over the 13-year period.

Thus, one can conclude that the FDIC may have been complicit in enabling SSB to ignore its own community while making loans elsewhere and still receive a "Satisfactory" CRA rating. It should be no surprise, then, that Marshall-Shadeland has more than 430 vacant properties. What will it take to stitch the community back together, to ensure that homeowners stay, build wealth, and create a sense of ownership over their neighborhood's future?

A Community Revitalization Strategy for Marshall-Shadeland

According to Paul Brophy and Jennifer Vey's study, "Ten Steps to Urban Land Reform" (Brookings, 2002), the first step toward community revitalization is to know the neighborhood. LMSCII set out to document conditions in the community. In the summer of 2020, we walked every street to identify abandoned houses, commercial buildings, institutional spaces, and vacant lots and created an inventory of more than 430 vacant properties. In addition, we surveyed the residents to gauge their opinions (the first community-wide survey since 1976). More than 140 responses reveal that the vast majority of people want to continue living in Marshall-Shadeland due to its proximity to Downtown and other amenities, convenient public transportation, and affordability. At the same time, two-thirds of the residents "think restoring vacant properties should be a high priority for LMSCII." These aren't the sentiments of socialist radicals or communists. These are the aspirations of regular capitalists who just want a square deal and a fair shot at the American Dream of homeownership, social standing, and economic security.

To this end, LMSCII developed a process for revitalizing the neighborhood that relies on obtaining control over the vacant properties, restoring them, and constructing new houses on vacant lots. The objective is to increase the supply of attractive and affordable housing for the residents who live in Marshall-Shadeland. LMSCII has a Community Development Strategy for the Marshall-Shadeland neighborhood, but the private sector needs to step up. Communities cannot, and should not be expected to, be rebuilt from government support alone, especially when there are more than 430 vacant buildings.

This report is a catalytic model that will create housing-driven solutions for veterans and low- and moderate-income residents by bringing the private, for-profit sector together with the nonprofit sector as invaluable partners to solve an intrinsic social problem. The slogan, "Black Lives & Black Loans Matter," will live on. We will continue to work with area financial institutions, community stakeholders, and community residents to develop products and services that meet the needs of Marshall-Shadeland. We encourage the restoration of every vacant house in the neighborhood. To begin this process, we intend to launch a project in Cluster 1 that demonstrates our objectives. We established a committee on neighborhood revitalization in Marshall-Shadeland to keep the momentum going.

Why should Black Lives and Black Loans matter to SSB Bank? Because products and services that are tailored to the needs of African Americans benefit all Americans, especially those who live in Marshall-Shadeland.

Nature begins to reclaim a vacant house on Central Avenue

About The Neighborhood

"Marshall-Shadeland" was named for Archibald M. Marshall, Irish grocer, dry goods merchant, landscaper of West Park, and a partner in the Marshall-Kennedy Milling Company. A mostly residential area, Marshall-Shadeland is predominately Slovak, with African Americans, Italians, Carpatho-Rusins, Russians, Irish, and Germans also represented. It was annexed by the City of Allegheny in 1870, and became part of the City of Pittsburgh in 1907. Most homes were built between 1880 and 1940.

The neighborhood remains consistently middle-class, with the median home value at $63,109. Marshall-Shadeland is also one of the top city neighborhoods for veterans. Finally, it is a community that is nearly evenly divided between white (47%) and black (43%), rare for Pittsburgh.

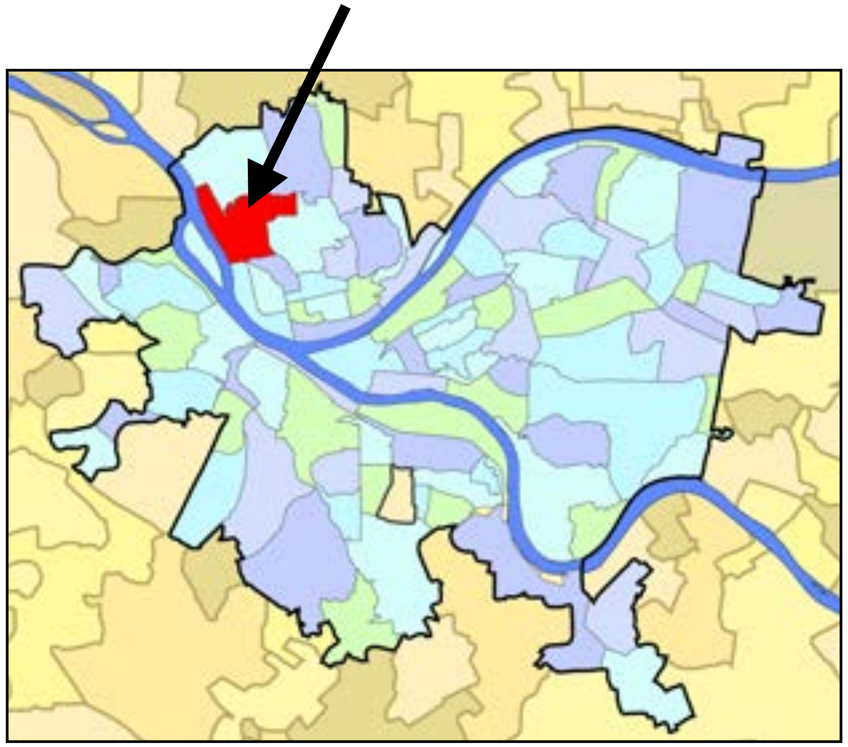
A number of key community assets are near or adjacent to Marshall-Shadeland, which create price pressures and increase demand for affordable real estate in the neighborhood. These assets include:

- Allegheny Hospital, Children's Museum, and the Ted Hazlett Theater;
- East Allegheny, Mexican War Streets, Allegheny West, Manchester - Housing Prices $150K - $2.7M (limited affordable housing);
- Allegheny Commons, PNC Center, and Strip District – Commercial/Housing Developments (limited affordable housing);
- Downtown, Station Square, and Southside Flats/Slopes Commercial/Housing Developments (limited affordable housing);
- PNC Park, Heinz Field, Stage AE, Four Hotels, Three Rivers Casino;
- Proposed $700M Esplanade Development, with 20% Affordable Housing (not guaranteed);
- Twenty-three financial Institutions, including SSB Bank, Keybank, Citizens Bank, PNC Bank, Westbanco, Huntington Bank, and Dollar Bank (the combined financial assets of these institutions exceed $52 billion).

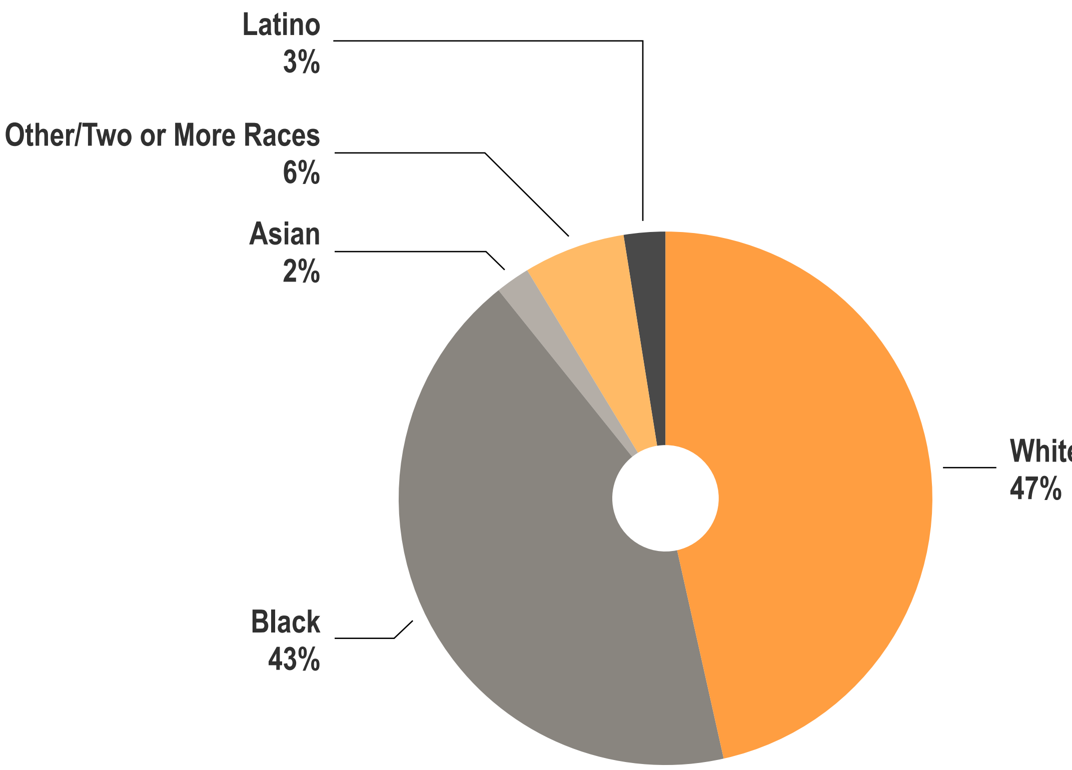
The financial institutions with branches located in the neighborhood include Wesbanco (Woods Run, since 2013), and SSB Bank, on California Avenue at Superior Avenue. Founded in 1922 as Slovak Savings & Loan Association (originally located in the basement of the former St. Gabriel Archangel Church on California Avenue), the institution became SSB Bancorp, Inc. in 2018. SSB's asset size is $202,614,000 (38th largest in Pittsburgh). It is now headquartered at 8700 Perry Highway, near McCandless, but retains its other branch in Marshall-Shadeland.

27th Ward Clean Up Campaign, 1938

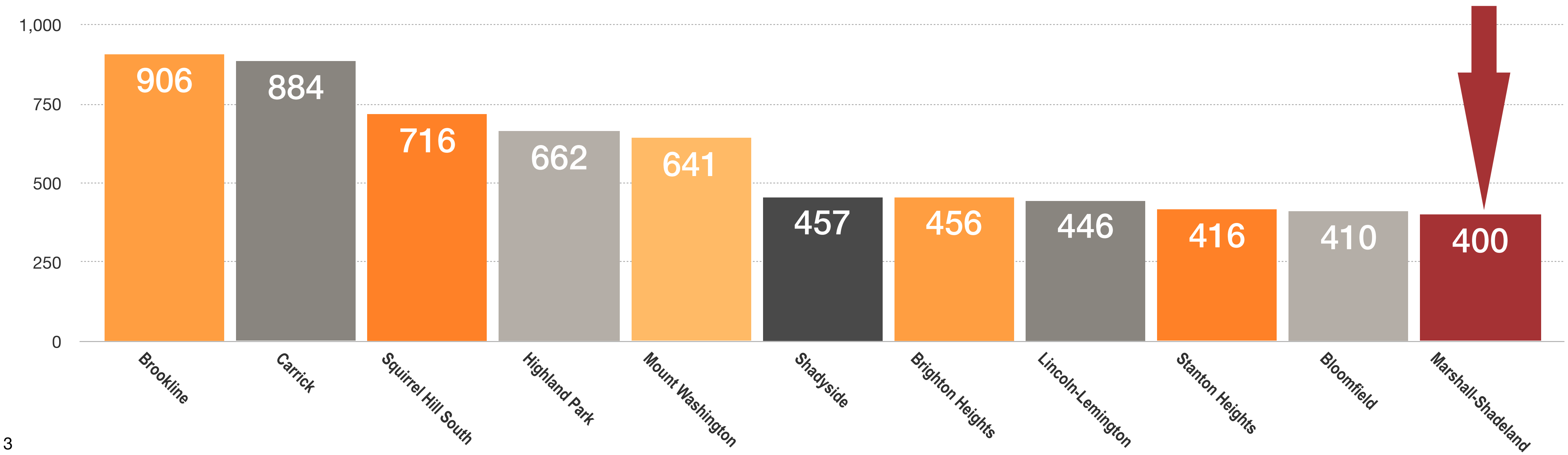
Marshall-Shadeland is Comprised of Two Census Tracts: 2704 & 2715



Racial Composition in Marshall-Shadeland, 2018



Veterans in Marshall-Shadeland, 2017



2018 Income & Housing Data

- Total Population: 5,334
- Race: White, 47%, and Black, 43%
- Median Family Income: $52,709 (2018)
- Families with Incomes Below Poverty: 169 (18.1%)
    - Poverty Status age 18-64: 16.5%
    - Poverty Status under age 18: 27%
    - Poverty Status age 65+: 14.1%
- Opportunity Zone designation
- 2,152 total housing units
- Median Year Structure Built: 1940
- Median Home Value: $63,109
- Average Sales Price (2015): $35,253
- 233 properties are publicly owned in Marshall-Shadeland (#24 out of 90 Pittsburgh neighborhoods)

Two members of the survey team on Hawkins Avenue

- **Marshall-Shadeland has Private Affordable Housing Prices - $20,000 - $60,000 (not much longer)**
- **Allegheny Hospital, Children's Museum, and the Ted Hazlett Theater - Northside Assets Near Marshall-Shadeland**
- **East Allegheny, Mexican War Streets, Allegheny West, Manchester - Housing Prices $150K - $2.7M (limited affordable housing)**
- **Allegheny Commons, PNC Center, and Strip District – Commercial/Housing Developments - $800M (limited affordable housing)**
- **Downtown, Station Square, and Southside Flats/Slopes Commercial/Housing Developments – $1.2 Billion (limited affordable housing)**
- **PNC Park, Heinz Field, Stage AE, Four Hotels, Three Rivers Casino - $1.6 Billion**
- **Proposed Esplanade Development $700M, with 20% Affordable Housing (not guaranteed)**
- **Financial Institutions Include: SSB Bank, Keybank, Citizens Bank, PNC Bank, Westbanco, Huntington Bank, and Dollar Bank**
- **Combined financial assets of these institutions exceed $300 billion**

Pittsburgh Assets Surrounding Marshall-Shadeland

Part I: Bank Lending Trends in Marshall-Shadeland

Statement of the Problem: Too few home mortgage loans are being approved in Marshall-Shadeland, especially among African American homeowners.

The Lower Marshall-Shadeland Community Improvement Initiative, in cooperation with Carnegie Mellon University, analyzed thirteen years of home mortgage lending data (from 2007 to 2019) from financial institutions throughout the city of Pittsburgh, with a particular focus on the Marshall-Shadeland neighborhood. Our analysis focused particularly on African Americans in the city in contrast to Whites to determine if there were discrepancies in lending by race consistent with patterns identified more than 30 years ago.

Home ownership is often the best way to accumulate wealth in America. But for too many African Americans across the country and across the city, too few are being given the opportunity to do so. A recent news article noted the large racial gap in wealth across the United States. For Black families, average net worth is $17,150; for White families, it is $171,000.

The article noted that, "Over a 30-year period stretching from 1984 to 2017, 10% of Black homeowners became renters again compared with 5% of whites, according to new research published in the journal Demography." Furthermore, it found that "The average net worth of a Black homeowner's extended family was roughly $133,000, the report found, while the average net worth of their white counterparts' relatives was $442,000. Additionally, 24% of Black property owners' relatives were living in poverty versus 6% of white homeowners' extended family members." Finally, the article highlighted gains in homeownership among African Americans that could be wiped out with the coronavirus pandemic: "Black families experienced a slight increase in homeownership in the past year, inching up from 41.1% during the first quarter of 2019. But that progress is being threatened by the coronavirus pandemic which is disproportionately affecting both the physical and financial health of Black Americans." (Charles Jones, "Black homeowners twice as likely as whites to lose homes," *USA Today,* Nov. 18, 2020.)

For a neighborhood like Marshall-Shadeland, which is 43% African American, the opportunity to obtain a home mortgage loan to purchase a home or a home improvement loan to fix up a house, is a critical determinant of wealth and community stability. Yet, as our findings show, it has become increasingly difficult for African Americans to accomplish this goal. The lack of mortgage lending is reflected in the high number of vacant properties, recently surveyed at more than 430 in Marshall-Shadeland alone. These vacant properties, coupled with racial lending disparities make it difficult to implement and sustain a durable community development strategy.

Findings

The bank lending data was taken from the Federal Financial Institutions Examination Council's website for years 2007 through 2019 and analyze by Carnegie Mellon University. Neighborhood data was derived from Social Explorer Tables: ACS 2018 (5-Year Estimates) and the U.S. Census Bureau. LMSCII's findings reveal the following conclusions:

All Banks' Lending in Pittsburgh 2009-2018 versus 1991-1995

It appears that lending in the city of Pittsburgh is not getting better for African Americans. LMSCII analyzed the lending trends of financial institutions in recent years (2009 to 2018) and those of the early 1990s (1991 to 1995), when advocacy around the Community Reinvestment Act was relatively new.

- Our findings indicate that 23 banks with branches in the city making loans to African Americans over a ten-year period (2009 to 2018) made just 7% of their total (1,406) to African Americans.
- In contrast, 12 lenders approved 15% of their loans (2,059) to African Americans over a five-year period, 1991 to 1995.

The bottom line: Twice as many lenders approved half as many loans to African Americans over the previous decade than banks did in the early-1990s.

All Banks' Lending in the City of Pittsburgh, 2007 to 2019

- There were more than 400 lenders making loans in the city of Pittsburgh between 2007 and 2019. During this 13-year period, these institutions approved 70,806 home mortgage loans for $11.7 billion.
- Of these loans, just 5,143, or 7.3%, were approved to African Americans. The loan amount approved to African Americans was $417,877,000, or just 3.6% of the total loan dollars approved citywide.
- Meanwhile, banks approved 52,982 loans to Whites (74.8%) for $7.5 billion (64.3%) during the 2007-2019 period.

The bottom line: Just seven percent of loans and less than four percent of loan dollars were approved to African Americans in the city of Pittsburgh by more than 400 banks over a thirteen-year period, 2007 to 2019.

All Banks' Lending in Marshall-Shadeland, 2007 to 2019

- More than 50 lenders approved 670 loans for $13,517,000 in Marshall-Shadeland during a 13-year period, 2007 to 2019.
- Of these 670 loans, just 159 (23.7%) for $9,191,000 (21.8%) were approved to African Americans.
- Meanwhile, lenders approved 363 loans (54.2%) for $21,550,000 (51.1%) to Whites during the 13-year period.

The bottom line: less than a quarter of all loans approved in Marshall-Shadeland were approved to African Americans over a thirteen-year period, 2007 to 2019.

Lending by Four Banks in Marshall-Shadeland

LMSCII analyzed the lending trends of four financial institutions with branch locations in or near Marshall-Shadeland over the period 2007 to 2019. These four have bank branches within close proximity: SSB Bank, which started in Marshall-Shadeland in 1922, is the closest, with a branch at California and Superior avenues, right in the heart of the neighborhood; Wesbanco (formerly Fidelity Savings Bank), whose branch is on Woods Run Avenue, is the next closest; First National Bank of PA, whose branch is on Perrysville Avenue, in Observatory Hill; and finally, there is Key Bank (formerly First Niagara Bank), which has a branch in Manchester.

- In thirteen years, four banks operating in or near Marshall-Shadeland approved 88 loans for $5,932,000 in the neighborhood.
- Of these loans, just 19, or 21.6%, were approved to African Americans.
- During the 2007-2019 period, just $947,000 in loan dollars, or 16% of the total loan dollars, were approved by four lenders to African Americans.
- Meanwhile, these four lenders approved 55 loans (62.5%) for $2,573,000 (43.4%) to Whites from 2007 to 2019.
- SSB Bank, which has maintained a branch in Marshall-Shadeland for nearly 100 years, approved just two loans to African Americans for $44,000 in thirteen years, 2007 to 2019.

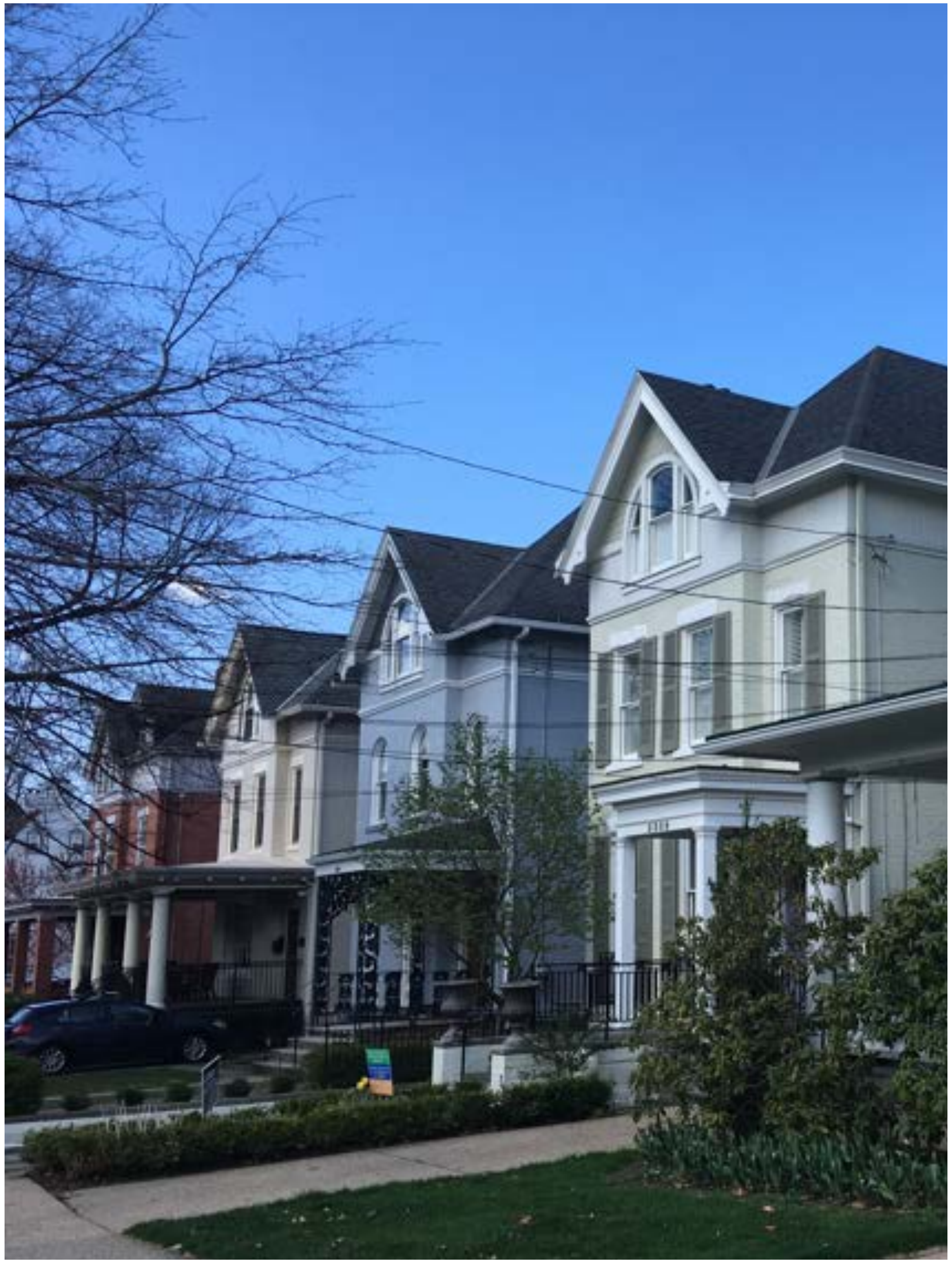
The bottom line: These lending trends suggest that these four banks, and one bank in particular, are disproportionately not lending to African Americans in a neighborhood that is nearly half-African American. This violates the spirit of the Community Reinvestment Act, to encourage equal lending patterns and practices.

The Opportunity: From Vacant Properties to Affordable Homes for Veterans and People of Modest Means

In the summer of 2020, LMSCII surveyed every street in Marshall-Shadeland and discovered that 434 properties were vacant. Imagine for a moment that all 434 of these vacant properties could be purchased, renovated, and sold to low- to moderate-income individuals and veterans. What would the lending figures look like then? LMSCII calculated the projections and came up with the following figures:

- If 434 vacant properties could be turned into affordable homes, there would be 434 more loans and $27,290,827 more loan dollars, a 39.3% increase in lending to Marshall-Shadeland.
- Instead of 670 loans being approved between 2007 and 2019, 1,104 loans would be approved over the period 2007 to 2021 (excluding loans made during 2020).
- Instead of $42 million in loan dollars, $69 million in loan dollars would have flowed into Marshall-Shadeland over a 15-year period.

The bottom line: lenders could be doing nearly 40% more business in Marshall-Shadeland if vacant properties were rehabilitated.



Houses in the high-income white neighborhood of Shadyside, SSB Bank's #1 neighborhood

What Do The Regulations Say?

According to the Federal Deposit Insurance Corporation, the federal Community Reinvestment Act (CRA) encourages depository institutions to help meet the credit needs of the communities in which they operate, including low- and moderate-income (LMI) neighborhoods, consistent with safe and sound banking operations. CRA does not encourage the extension of unsafe or unsound credit. CRA requires that each insured depository institution's record in helping meet the credit needs of its entire community be evaluated periodically by one of the federal bank regulatory agencies.

Small Institutions (institutions with less than $290 million in total assets) have a streamlined assessment method under CRA. The regulations contain only five performance criteria under the small bank lending test:

Institutions with less than $290 million in total assets have a streamlined assessment method called the Small Bank Lending Evaluation, which includes five performance criteria:

1. Loan-to deposit ratio responsive to credit needs;
2. Percentage of loans/lending-related activity in an institution's assessment area;
3. Geographic distribution of loans, including to LMI areas;
4. Record of lending/lending related activity to borrowers of different income levels and/or businesses and farms of different sizes; and
5. Response to CRA related complaints.

Maintaining a Strong CRA Program includes establishing and communicating goals for CRA performance, understanding the bank's assessment area, and the ability to communicate the competitive, economic, and other demographic landscape of its market to examiners.

1204 **Federal Register** / Vol. 85, No. 6 / Thursday, January 9, 2020 / Proposed Rules

DEPARTMENT OF THE TREASURY

Office of the Comptroller of the Currency

12 CFR Parts 25 and 195

[Docket ID OCC–2018–0008]

RIN 1557–AE34

FEDERAL DEPOSIT INSURANCE CORPORATION

12 CFR Part 345

RIN 3064–AF22

Community Reinvestment Act Regulations

AGENCY: Office of the Comptroller of the Currency, Treasury and Federal Deposit Insurance Corporation.

ACTION: Joint notice of proposed rulemaking; request for comment.

SUMMARY: Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC) propose regulations that could encourage banks to provide billions more each year in Community Reinvestment Act-qualified lending, investment, and services by modernizing the Community Reinvestment Act (CRA) regulations to better achieve the law's underlying statutory purpose of encouraging banks to serve their communities by making the regulatory framework more objective, transparent, consistent, and easy to understand. To accomplish these goals, this proposed rule would strengthen the CRA regulations by clarifying which activities qualify for CRA credit, updating where activities count for CRA credit, creating a more transparent and objective method for measuring CRA performance, and providing for more transparent, consistent, and timely CRA-related data collection, recordkeeping, and reporting.

DATES: Comments must be received on or before March 9, 2020.

ADDRESSES: Comments should be directed to:

OCC: Commenters are encouraged to submit comments through the Federal eRulemaking Portal or email, if possible. Please use the title ''Community Reinvestment Act Regulations'' to facilitate the organization and distribution of the comments. You may submit comments by any of the following methods:

• *Federal eRulemaking Portal—Regulations.gov Classic or Regulations.gov Beta:*

Regulations.gov Classic: Go to *https://www.regulations.gov/.* Enter ''Docket ID OCC–2018–0008'' in the Search Box and click ''Search.'' Click on ''Comment Now'' to submit public comments. For help with submitting effective comments please click on ''View Commenter's Checklist.'' Click on the ''Help'' tab on the *Regulations.gov* home page to get information on using *Regulations.gov,* including instructions for submitting public comments.

Regulations.gov Beta: Go to *https://beta.regulations.gov/* or click ''Visit New *Regulations.gov* Site'' from the *Regulations.gov* Classic homepage. Enter ''Docket ID OCC–2018–0008'' in the Search Box and click ''Search.'' Public comments can be submitted via the ''Comment'' box below the displayed document information or by clicking on the document title and then clicking the ''Comment'' box on the top-left side of the screen. For help with submitting effective comments please click on ''Commenter's Checklist.'' For assistance with the *Regulations.gov* Beta site, please call (877) 378–5457 (toll free) or (703) 454–9859 Monday–Friday, 9 a.m.–5 p.m. ET or email *regulations@erulemakinghelpdesk.com.*

• *Email: cra.reg@occ.treas.gov.*

• *Mail:* Chief Counsel's Office, Attention: Comment Processing, Office of the Comptroller of the Currency, 400 7th Street SW, Suite 3E–218, Washington, DC 20219.

• *Hand Delivery/Courier:* 400 7th Street SW, Suite 3E–218, Washington, DC 20219.

• *Fax:* (571) 465–4326.

Instructions: You must include ''OCC'' as the agency name and ''Docket ID OCC–2018–0008'' in your comment. In general, the OCC will enter all comments received into the docket and publish the comments on the *Regulations.gov* website without change, including any business or personal information provided such as name and address information, email addresses, or phone numbers. Comments received, including attachments and other supporting materials, are part of the public record and subject to public disclosure. Do not include any information in your comment or supporting materials that you consider confidential or inappropriate for public disclosure.

You may review comments and other related materials that pertain to this rulemaking action by any of the following methods:

• *Viewing Comments Electronically—Regulations.gov Classic or Regulations.gov Beta:*

Regulations.gov Classic: Go to *https://www.regulations.gov/.* Enter ''Docket ID OCC–2018–0008'' in the Search box and click ''Search.'' Click on ''Open Docket Folder'' on the right side of the screen. Comments and supporting materials can be viewed and filtered by clicking on ''View all documents and comments in this docket'' and then using the filtering tools on the left side of the screen. Click on the ''Help'' tab on the *Regulations.gov* home page to get information on using *Regulations.gov.* The docket may be viewed after the close of the comment period in the same manner as during the comment period.

Regulations.gov Beta: Go to *https://beta.regulations.gov/* or click ''Visit New *Regulations.gov* Site'' from the *Regulations.gov* Classic homepage. Enter ''Docket ID OCC–2018–0008'' in the Search Box and click ''Search.'' Click on the ''Comments'' tab. Comments can be viewed and filtered by clicking on the ''Sort By'' drop-down on the right side of the screen or the ''Refine Results'' options on the left side of the screen. Supporting materials can be viewed by clicking on the ''Documents'' tab and filtered by clicking on the ''Sort By'' drop-down on the right side of the screen or the ''Refine Results'' options on the left side of the screen.'' For assistance with the *Regulations.gov* Beta site, please call (877) 378–5457 (toll free) or (703) 454–9859 Monday–Friday, 9 a.m.–5 p.m. ET or email *regulations@erulemakinghelpdesk.com.* The docket may be viewed after the close of the comment period in the same manner as during the comment period.

• *Viewing Comments Personally:* You may personally inspect comments at the OCC, 400 7th Street SW, Washington, DC 20219. For security reasons, the OCC requires that visitors make an appointment to inspect comments. You may do so by calling (202) 649–6700 or, for persons who are deaf or hearing impaired, TTY, (202) 649–5597. Upon arrival, visitors will be required to present valid government-issued photo identification and submit to security screening in order to inspect comments.

FDIC: You may submit comments, identified by RIN 3064–AF22, by any of the following methods:

• *Agency Website: http://www.fdic.gov/regulations/laws/federal/propose.html.* Follow instructions for submitting comments on the Agency website.

• *Email: Comments@fdic.gov.* Include the RIN 3064–AF22 on the subject line of the message.

• *Mail:* Robert E. Feldman, Executive Secretary, Attention: Comments, Federal Deposit Insurance Corporation, 550 17th Street NW, Washington, DC 20429.

Table 1: All Banks' Lending in the City of Pittsburgh, 1991-1995 & 2008-2018

	City of Pittsburgh	% of City Total
23 Banks' Lending to African Americans in Pittsburgh, 2009-2018 (1)	1,406	7.0%
23 Banks' Total Lending, 2009-2018 (1)	**20,230**	
12 Banks' Lending to African Americans in the City of Pittsburgh, 1991-1995 (2)	2,059	15.1%
12 Banks' Lending to Whites in the City of Pittsburgh, 1991-1995 (2)	11,574	
Total, Both Races	**13,633**	

Notes
1. Calculated from PCRG Lending Study 2020.
2. PCRG Lending Study 1996, 85-86.

Data Source: Home Mortgage Disclosure Act, Federal Financial Institutions Examination Council, 2007-2019.

Table 2: All Banks' Lending in the City of Pittsburgh By Race, 2007-2019						
Demographic Category	**2007-2011**	**2012-2013**	**2014-2016**	**2017-2019**	**2007-2019**	**% of Total**
White Loans	20,596	8,969	11,452	12,346	**53,363**	**74.9%**
White Loan $	$2,543,142,000	$1,247,353,000	$1,735,972,000	$2,094,046,000	**$7,620,513,000**	**64.5%**
Black Loans	1,969	704	1,138	1,343	**5,154**	**7.2%**
Black Loan $	$137,890,000	$53,596,000	$90,456,000	$137,200,000	**$419,142,000**	**3.5%**
Asian Loans	599	301	498	689	**2,087**	**2.9%**
Asian Loan $	$96,298,000	$56,301,000	$106,282,000	$152,652,000	**$411,533,000**	**3.5%**
Islander Loans	47	10	17	19	**93**	**0.1%**
Islander Loan $	$3,927,000	$1,624,000	$1,910,000	$2,773,000	**$10,234,000**	**0.1%**
AmerIndian Loans	43	32	20	58	**153**	**0.2%**
AmerIndian Loan $	$4,386,000	$4,574,000	$2,188,000	$6,467,000	**$17,615,000**	**0.1%**
Missing/NA Loans*	3,577	1,859	2,208	2,758	**10,402**	**14.6%**
Missing/NA Loan $*	$624,359,000	$549,987,000	$1,094,752,000	$1,059,642,000	**$3,328,740,000**	**28.2%**
Total Loans	**26,831**	**11,875**	**15,333**	**17,213**	**71,252**	**100%**
Total Loan $	**$3,410,002,000**	**$1,913,435,000**	**$3,031,560,000**	**$3,452,780,000**	**$11,807,777,000**	**100%**

* For the "Missing/NA" category, HMDA always includes a number of loans that don't have data in some fields. This could be a collection error, a deliberate removal of data, or the applicant not filling everything out. It depends on the particular variable that is examined, but other studies just exclude those loans or include them as their own category, depending on the circumstance.

Table 3: All Banks' Lending to Marshall-Shadeland by Race, 2007-2019

Demographic Category	2007-2011	2012-2013	2014-2016	2017-2019	2007-2019	% of Total
White Loans	150	51	75	87	**363**	**54.2%**
White Loan $	$7,292,000	$3,221,000	$4,358,000	$6,679,000	**$21,550,000**	**51.1%**
Black Loans	65	15	49	30	**159**	**23.7%**
Black Loan $	$3,608,000	$744,000	$2,783,000	$2,056,000	**$9,191,000**	**21.8%**
Asian Loans	0	0	2	3	**5**	**0.7%**
Asian Loan $	$0	$0	$208,000	$285,000	**$493,000**	**1.2%**
Islander Loans	4	0	0	1	**5**	**0.7%**
Islander Loan $	$182,000	$0	$0	$5,000	**$187,000**	**0.4%**
AmerIndian Loans	0	0	0	1	**1**	**0.1%**
AmerIndian Loan $	$0	$0	$0	$85,000	**$85,000**	**0.2%**
Missing/NA Loans	46	20	21	50	**137**	**20.4%**
Missing/NA Loan $	$2,116,000	$1,873,000	$2,229,000	$4,407,000	**$10,625,000**	**25.2%**
Total Loans	**265**	**86**	**147**	**172**	**670**	**100%**
Total Loan $	**$13,198,000**	**$5,838,000**	**$9,578,000**	**$13,517,000**	**$42,131,000**	**100%**

Table 4: Top Lenders in Marshall-Shadeland, 2007-2019 (ranked by number of loans)

Rank	Lender Name	Number of Loans	$ Amount
1	DOLLAR BK FSB	61	$3,860,000
2	PNC BK NA	47	$2,407,000
3	FIRST NATIONAL BANK OF PA	27	$1,510,000
4	S&T BK	26	$1,576,000
4	WELLS FARGO BK NA	26	$1,585,000
6	PHH HOME LOANS LLC	23	$1,392,000
7	COUNTRYWIDE HOME LOANS	22	$1,151,000
8	WEST PENN FINANCIAL	21	$1,428,000
9	WESBANCO BK	20	$1,322,000
10	HOWARD HANNA FINANCIAL SERVICE	19	$1,164,000
11	FIDELITY SVG BK (2007 & 2012 only)	18	$818,000
11	QUICKEN LOANS INC.	18	$1,160,000
13	FIRST COMMONWEALTH BK	12	$636,000
13	**SSB BANK (including Slovak Savings Bank)**	**12**	**$1,805,000**
15	CBPA & CBNA (Community Bank of PA, Washington, PA)	11	$577,000
16	ALLEGENT COMMUNITY FEDERAL CREDIT UNION	10	$291,000
16	CITIZENS BK NA	10	$529,000
16	JPMORGAN CHASE BK NA	10	$602,000

Rank	Lender Name	Number of Loans	$ Amount
19	CITIMORTGAGE INC. (Also includes CitiBank and Citi Financial Services)	9	$482,000
19	BANK OF AMERICA NA	9	$491,000
19	NORTHWEST SVG BK	9	$368,000
19	VICTORIAN FINANCE, LLC	9	$747,000
23	NATIONSTAR MORTGAGE LLC	8	$548,000
24	ESB BANK	7	$534,000
24	FIRST NIAGARA BK NA (2009, 2012, & 2015)	7	$339,000
24	FLAGSTAR BK FSB	7	$457,000
24	HUNTINGTON NB	7	$412,000
24	RELIANCE FIRST CAPITAL LLC	7	$623,000
29	EQUITY RESOURCES INC.	6	$517,000
30	ALLEGHENY VALLEY BANK	5	$246,000
30	PITTSBURGH FIREFIGHTERS F.C.U.	5	$307,000
30	RIVERSET CREDIT UNION	5	$37,000
30	STANDARD BK PASB	5	$662,000
30	TAYLOR BEAN & WHITAKER	5	$234,000
30	UNITED AMERICAN SAVINGS BANK	5	$131,000
36	KEYBANK NATIONAL ASSOCIATION (2019 only)	4	$381,000

Table 5: SSB Lending in the City of Pittsburgh by Race, 2007-2019

Demographic Category	2007-2011	2012-2013	2014-2016	2017-2019	2007-2019	% of Total
White Loans	25	32	66	81	**204**	**53.7%**
White Loan $	$4,110,000	$4,714,000	$10,607,000	$12,028,000	**$31,459,000**	**52.3%**
Black Loans	3	6	5	13	**27**	**7.1%**
Black Loan $	$166,000	$496,000	$368,000	$2,357,000	**$3,387,000**	**5.6%**
Asian Loans	0	2	2	3	**7**	**1.8%**
Asian Loan $	$0	$422,000	$420,000	$297,000	**$1,139,000**	**1.9%**
Islander Loans	0	1	0	0	**1**	**0.3%**
Islander Loan $	$0	$34,000	$0	$0	**$34,000**	**0.1%**
AmerIndian Loans	0	0	0	0	**0**	**0.0%**
AmerIndian Loan $	$0	$0	$0	$0	**$0**	**0.0%**
Missing/NA Loans	2	5	50	84	**141**	**37.1%**
Missing/NA Loan $	$142,000	$1,345,000	$10,757,000	$11,927,000	**$24,171,000**	**40.2%**
Total Loans	**30**	**46**	**123**	**181**	**380**	**100%**
Total Loan $	**$4,418,000**	**$7,011,000**	**$22,152,000**	**$26,609,000**	**$60,190,000**	**100%**

Table 6: SSB Bank Lending to Marshall-Shadeland by Race, 2007-2019

Demographic Category	2007-2011	2012-2013	2014-2016	2017-2019	2007-2019	% of Total
White Loans	1	0	1	2	**4**	**33.3%**
White Loan $	$62,000	$0	$75,000	$150,000	**$287,000**	**15.9%**
Black Loans	2	0	0	0	**2**	**16.7%**
Black Loan $	$44,000	$0	$0	$0	**$44,000**	**2.4%**
Asian Loans	0	0	0	0	**0**	**0.0%**
Asian Loan $	$0	$0	$0	$0	**$0**	**0.0%**
Islander Loans	0	0	0	0	**0**	**0.0%**
Islander Loan $	$0	$0	$0	$0	**$0**	**0.0%**
AmerIndian Loans	0	0	0	0	**0**	**0.0%**
AmerIndian Loan $	$0	$0	$0	$0	**$0**	**0.0%**
Missing/NA Loans	0	1	2	3	**6**	**50.0%**
Missing/NA Loan $	$0	$172,000	$716,000	$586,000	**$1,474,000**	**81.7%**
Total Loans	**3**	**1**	**3**	**5**	**12**	**100%**
Total Loan $	**$106,000**	**$172,000**	**$791,000**	**$736,000**	**$1,805,000**	**100%**

Note: SSB Bank changed its name from Slovak Savings Bank in 2018.

Table 7: First National Bank, Key Bank, SSB Bank, and Wesbanco Bank Lending to Marshall-Shadeland by Race, 2007-2019

Demographic Category	2007-2011	2012-2013	2014-2016	2017-2019	2007-2019	% of Total
White Loans (First National Bank)	1	3	7	6	17	
White Loans (Key Bank) (1)	1	0	0	2	3	
White Loans (SSB Bank) (2)	1	0	1	2	4	
White Loans (Wesbanco Bank) (3)	12	6	5	8	31	
Total White Loans	**15**	**9**	**13**	**18**	**55**	**62.5%**
White Loan $ (First National Bank)	$34,000	$165,000	$27,000	$466,000	$692,000	
White Loan $ (Key Bank) (1)	$28,000	$0	$0	$220,000	$248,000	
White Loan $ (SSB Bank) (2)	$62,000	$0	$75,000	$150,000	$287,000	
White Loan $ (Wesbanco Bank) (3)	$511,000	$309,000	$126,000	$400,000	$1,346,000	
Total White Loan $	**$635,000**	**$474,000**	**$228,000**	**$1,236,000**	**$2,573,000**	**43.4%**
Black Loans (First National Bank)	0	1	2	2	5	
Black Loans (Key Bank) (1)	2	1	2	2	7	
Black Loans (SSB Bank) (2)	2	0	0	0	2	
Black Loans (Wesbanco Bank) (3)	2	1	2	0	5	
Total Black Loans	**6**	**3**	**6**	**4**	**19**	**21.6%**
Black Loan $ (First National Bank)	$0	$42,000	$101,000	$127,000	$270,000	
Black Loan $ (Key Bank) (1)	$98,000	$53,000	$118,000	$161,000	$430,000	
Black Loan $ (SSB Bank) (2)	$44,000	$0	$0	$0	$44,000	
Black Loan $ (Wesbanco Bank) (3)	$74,000	$41,000	$88,000	$0	$203,000	
Total Black Loan $	**$216,000**	**$136,000**	**$307,000**	**$288,000**	**$947,000**	**16.0%**

Demographic Category	2007-2011	2012-2013	2014-2016	2017-2019	2007-2019	% of Total
Asian Loans (First National Bank)	0	0	0	0	0	
Asian Loans (Key Bank) (1)	0	0	0	0	0	
Asian Loans (SSB Bank) (2)	0	0	0	0	0	
Asian Loans (Wesbanco Bank) (3)	0	0	0	0	0	
Asian Loans	**0**	**0**	**0**	**0**	**0**	**0.0%**
Asian Loan $ (First National Bank)	$0	$0	$0	$0	$0	
Asian Loan $ (Key Bank) (1)	$0	$0	$0	$0	$0	
Asian Loan $ (SSB Bank) (2)	$0	$0	$0	$0	$0	
Asian Loan $ (Wesbanco Bank) (3)	$0	$0	$0	$0	$0	
Asian Loan $	**$0**	**$0**	**$0**	**$0**	**$0**	**0.0%**
Islander Loans (First National Bank)	0	0	0	1	1	
Islander Loans (Key Bank) (1)	0	0	0	0	0	
Islander Loans (SSB Bank) (2)	0	0	0	0	0	
Islander Loans (Wesbanco Bank) (3)	0	0	0	0	0	
Islander Loans	**0**	**0**	**0**	**1**	**1**	**1.1%**
Islander Loan $ (First National Bank)	$0	$0	$0	$5,000	$5,000	
Islander Loan $ (Key Bank) (1)	$0	$0	$0	$0	$0	
Islander Loan $ (SSB Bank) (2)	$0	$0	$0	$0	$0	
Islander Loan $ (Wesbanco Bank) (3)	$0	$0	$0	$0	$0	
Islander Loan $	**$0**	**$0**	**$0**	**$5,000**	**$5,000**	**0.1%**

Demographic Category	2007-2011	2012-2013	2014-2016	2017-2019	2007-2019	% of Total
AmerIndian Loans (First National Bank)	0	0	0	0	0	
AmerIndian Loans (Key Bank) (1)	0	0	0	0	0	
AmerIndian Loans (SSB Bank) (2)	0	0	0	0	0	
AmerIndian Loans (Wesbanco Bank) (3)	0	0	0	0	0	
AmerIndian Loans	**0**	**0**	**0**	**0**	**0**	**0.0%**
AmerIndian Loan $ (First National Bank)	$0	$0	$0	$0	$0	
AmerIndian Loan $ (Key Bank) (1)	$0	$0	$0	$0	$0	
AmerIndian Loan $ (SSB Bank) (2)	$0	$0	$0	$0	$0	
AmerIndian Loan $ (Wesbanco Bank) (3)	$0	$0	$0	$0	$0	
AmerIndian Loan $	**$0**	**$0**	**$0**	**$0**	**$0**	**0.0%**
Missing/NA Loans (First National Bank)	1	1	1	1	4	
Missing/NA Loans (Key Bank) (1)	1	0	0	0	1	
Missing/NA Loans (SSB Bank) (2)	0	1	2	3	6	
Missing/NA Loans (Wesbanco Bank) (3)	0	0	1	1	2	
Total Missing/NA Loans	**2**	**2**	**4**	**5**	**13**	**14.8%**
Missing/NA Loan $ (First National Bank)	$30,000	$170,000	$32,000	$68,000	$300,000	
Missing/NA Loan $ (Key Bank) (1)	$42,000	$0	$0	$0	$42,000	
Missing/NA Loan $ (SSB Bank) (2)	$0	$172,000	$716,000	$586,000	$1,474,000	
Missing/NA Loan $ (Wesbanco Bank) (3)	$0	$0	$466,000	$125,000	$591,000	
Total Missing/NA Loan $	**$72,000**	**$342,000**	**$1,214,000**	**$779,000**	**$2,407,000**	**40.6%**

Demographic Category	2007-2011	2012-2013	2014-2016	2017-2019	2007-2019	% of Total
Total Loans (First National Bank)	2	5	10	10	**27**	**31%**
Total Loans (Key Bank) (1)	4	1	2	4	**11**	**13%**
Total Loans (SSB Bank) (2)	3	1	3	5	**12**	**14%**
Total Loans (Wesbanco Bank) (3)	14	7	8	9	**38**	**43%**
Total Loan $ (First National Bank)	$64,000	$377,000	$160,000	$666,000	**$1,267,000**	**21%**
Total Loan $ (Key Bank) (1)	$168,000	$53,000	$118,000	$381,000	**$720,000**	**12%**
Total Loan $ (SSB Bank) (2)	$106,000	$172,000	$791,000	$736,000	**$1,805,000**	**30%**
Total Loan $ (Wesbanco Bank (3)	$585,000	$350,000	$680,000	$525,000	**$2,140,000**	**36%**
Total Loans, All Four Banks	**23**	**14**	**23**	**28**	**88**	
Total Loan $, All Four Banks	**$923,000**	**$952,000**	**$1,749,000**	**$2,308,000**	**$5,932,000**	

Notes:
1. Keybank Merged with First Niagara Bank in 2016. Totals before then include both First Niagara and Key Bank.
2. SSB Bank changed its name from Slovak Savings Bank in 2018.
3. Wesbanco merged with Fidelity Bancorp in 2012. Totals from 2007 to 2012 include both Wesbanco and Fidelity. Totals after 2012 include only Wesbanco.

Table 8: SSB Bank Top Neighborhoods, 2007-2019 (by Number of Loans)

SSB Neighborhood Rank	Neighborhood	Total Loan $	Total Number of Loans
1	Brighton Heights	$2,420,000	23
2	Shadyside	$6,279,000	20
3	Central Lawrenceville	$3,613,000	19
4	Central Northside	$3,382,000	17
5	South Side Slopes	$2,383,000	16
5	South Side Flats	$2,475,000	16
7	Mount Washington	$1,126,000	13
7	East Allegheny	$2,643,000	13
7	Brookline	$868,000	13
10	**Marshall-Shadeland**	**$1,805,000**	**12**
11	Perry North	$1,380,000	11
12	Hazelwood	$938,000	10
12	Carrick	$1,327,000	10
12	Manchester	$1,907,000	10
12	Highland Park	$1,711,000	10

Table 9: SSB Bank Top Neighborhoods, 2007-2019 (by Loan Dollars)

SSB Neighborhood Rank	Neighborhood	Total Loan $	Total Number of Loans
1	Shadyside	$6,279,000	20
2	Central Lawrenceville	$3,613,000	19
3	Central Northside	$3,382,000	17
4	East Allegheny	$2,643,000	13
5	South Side Flats	$2,475,000	16
6	Brighton Heights	$2,420,000	23
7	South Side Slopes	$2,383,000	16
8	Manchester	$1,907,000	10
9	**Marshall-Shadeland**	**$1,805,000**	**12**
10	Highland Park	$1,711,000	10
11	Perry North	$1,380,000	11
12	Carrick	$1,327,000	10
13	Mount Washington	$1,126,000	13
14	Hazelwood	$938,000	10
15	Brookline	$868,000	13

Table 10: Neighborhoods Where SSB Has Approved Loans to African Americans, 2007-2019 (ranked by loan dollars)

No.	Neighborhood (Majority African American are shaded)	Number of Loans	Loan Dollars
1	Crawford-Roberts	1	$1,005,000
2	Upper Hill	6	$567,000
3	Central Northside	2	$540,000
4	Highland Park	2	$215,000
5	Squirrel Hill North	1	$182,000
1	Beechview	1	$155,000
2	Bloomfield	1	$125,000
3	Westwood	1	$122,000
4	Perry South	3	$121,000
5	Lincoln Place	2	$97,000
6	Homewood North	2	$70,000
7	Mount Oliver	1	$65,000
8	**Marshall-Shadeland**	**2**	**$44,000**
9	Sheraden	1	$40,000
10	California-Kirkbride	1	$39,000
	Totals	**27**	**$3,387,000**
	Majority African American neighborhoods are highlighted in grey.		

Table 11: Lending Projections for Marshall-Shadeland by Race, 2021

Demographic Category	2007-2011	2012-2013	2014-2016	2017-2019	2021	2007-2019	2007-2021	% of Total
White Loans	150	51	75	87	**204**	**363**	**567**	**51.4%**
White Loan $	$7,292,000	$3,221,000	$4,358,000	$6,679,000	**$12,826,689**	**$21,550,000**	**$34,376,689**	**49.5%**
Black Loans	65	15	49	30	**187**	**159**	**346**	**31.3%**
Black Loan $	$3,608,000	$744,000	$2,783,000	$2,056,000	**$11,735,056**	**$9,191,000**	**$20,926,056**	**30.1%**
Asian Loans	0	0	2	3	**9**	**5**	**14**	**1.2%**
Asian Loan $	$0	$0	$208,000	$285,000	**$545,817**	**$493,000**	**$1,038,817**	**1.5%**
Islander Loans	4	0	0	1	**30**	**5**	**35**	**3.2%**
Islander Loan $	$182,000	$0	$0	$5,000	**$1,910,358**	**$187,000**	**$2,097,358**	**3.0%**
AmerIndian Loans	0	0	0	1	**4**	**1**	**5**	**0.5%**
AmerIndian Loan $	$0	$0	$0	$85,000	**$272,908**	**$85,000**	**$357,908**	**0.5%**
Missing/NA Loans	46	20	21	50	**0**	**137**	**137**	**12.4%**
Missing/NA Loan $	$2,116,000	$1,873,000	$2,229,000	$4,407,000	**$0**	**$10,625,000**	**$10,625,000**	**15.3%**
Total Loans	**265**	**86**	**147**	**172**	**434**	**670**	**1,104**	**100%**
Total Loan $	**$13,198,000**	**$5,838,000**	**$9,578,000**	**$13,517,000**	**$27,290,827**	**$42,131,000**	**$69,421,827**	**100%**
				No. of vacant properties	434	**More Loans:**	**434**	**39.3%**
		Avg. loan size	$62,882	vacant props. X avg. loan size	$27,290,827	**More Loan $:**	**$27,290,827**	**39.3%**