



# CRA PUBLIC FILE



There were no written public comments received relating to the bank's performance in helping to meet community credit needs in neither prior quarters in 2025 nor during the calendar years of 2024 or 2023.

# **PUBLIC DISCLOSURE**

May 28, 2024

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

First Internet Bank of Indiana  
Certificate Number: 34607

8701 East 116th Street  
Fishers, Indiana 46038

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Chicago Regional Office

300 South Riverside Plaza, Suite 1700  
Chicago, Illinois 60606

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## INSTITUTION RATING

**INSTITUTION’S CRA RATING:** This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income (LMI) neighborhoods, in a manner consistent with its resources and capabilities.

The bank’s rating is derived from a point allocation system established in the bank’s CRA Strategic Plan, which the FDIC approved in 2021. Examiners used this system to evaluate the bank’s performance for each year of the evaluation period: 2021, 2022, and 2023. Under this system, the bank met the standards for Satisfactory performance in all years evaluated. Given that the bank demonstrated Satisfactory performance in all three years under review, examiners assigned an overall rating of Satisfactory for the entire evaluation period.

Throughout the evaluation period, the bank’s performance was particularly strong with respect to residential lending. Examiners noted inconsistent performance related to small business lending.

The following table summarizes the bank’s performance under the Strategic Plan for each year of the evaluation period. Under the Strategic Plan, the bank must earn at least 24 points in a given year to achieve a Satisfactory rating. Refer to the Conclusions on Performance Criteria section of this evaluation for specific details regarding the bank’s performance under each performance year of the Strategic Plan. A more detailed scoring matrix is included in the Strategic Plan Scoring Matrix appendix.

Strategic Plan Performance by Year		
Year	Points Earned	Rating
2021	26	Satisfactory
2022	24	Satisfactory
2023	28	Satisfactory

## DESCRIPTION OF INSTITUTION

First Internet Bank of Indiana (First Internet Bank) is headquartered in Fishers, Indiana, directly northeast of Indianapolis, Indiana. First Internet Bank is wholly owned by First Internet Bancorp, which is also based in Fishers. The bank was rated Satisfactory at its previous FDIC CRA Performance Evaluation dated April 6, 2021, based on Interagency Strategic Plan Examination Procedures.

The bank does not maintain a traditional branch network, instead using technology to offer banking services online and using the internet as a primary delivery channel. As such, the bank’s consumer and commercial customers are located throughout the entire United States, with a substantial majority outside the Indianapolis metropolitan area. The bank does not maintain any physical branch locations aside from the main office in Fishers. The bank operates one loan production

office in Schaumburg, Illinois; however, the bank provides no consumer loans, deposits, or any other consumer services at that location.

First Internet Bank offers a variety of loan and deposit products through online platforms and digital channels. Loan products include commercial and public finance loans, as well as consumer loans such as credit cards, auto, personal, and student loans. Deposit products include checking, savings, certificates of deposit, individual retirement, and health savings accounts. First Internet Bank also partners with financial technology companies, which develop and offer various financial products and solutions to a broader network of end users.

The bank's assets totaled \$5.3 billion as of March 31, 2024. This figure includes total loans of \$3.9 billion, total deposits of \$4.3 billion, and total securities of \$718.4 million. The bank's total asset size increased by approximately \$1.1 billion, or 25.4 percent, since the previous evaluation. The following table provides a breakdown of the bank's loan portfolio by category.

<b>Loan Portfolio Distribution as of 3/31/2024</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	353,105	9.0
Secured by Farmland	0	0.0
Secured by 1-4 Family Residential Properties	414,571	10.5
Secured by Multifamily (5 or more) Residential Properties	0	0.0
Secured by Nonfarm Nonresidential Properties	1,208,989	30.7
<b>Total Real Estate Loans</b>	<b>1,976,665</b>	<b>50.2</b>
Commercial and Industrial Loans	1,034,359	26.3
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer Loans	392,629	10.0
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	528,740	13.5
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
<b>Total Loans</b>	<b>3,932,393</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income</i>		

Commercial lending is the primary lending focus of the bank. As shown in the table above, commercial real estate loans (i.e., "secured by nonfarm nonresidential properties") and commercial and industrial loans make up the largest percentages of the bank's total loan portfolio at 30.7 and 26.3 percent, respectively. Municipal loans make up almost all loans categorized as "other" and account for 13.5 percent of the loan portfolio. Although residential mortgage lending makes up a relatively small percentage of the bank's total loan portfolio, the bank originated and sold a substantial number of home mortgage loans to secondary market investors during the review period, and the loan portfolio composition does not reflect that activity. For example, the bank reported 2,768 loans totaling \$880.4 million under the Home Mortgage Disclosure Act (HMDA) in 2021. In January 2023, the bank exited the consumer mortgage lending business.

Examiners did not identify any financial, legal, or other impediments that would limit First Internet Bank's ability to meet the credit needs of its assessment area.

## **DESCRIPTION OF ASSESSMENT AREA**

First Internet Bank delineated nine full counties within the Indianapolis-Carmel-Anderson, Indiana Metropolitan Statistical Area (MSA) as its assessment area. This delineation is unchanged from the previous CRA evaluation. The assessment area conforms to the CRA regulatory requirements. It consists of contiguous whole geographies where the bank has its office, does not reflect illegal discrimination, and does not arbitrarily exclude any LMI geographies.

The assessment area includes all of Indianapolis (Marion County) as well as eight surrounding suburban counties: Boone, Hamilton, Hancock, Hendricks, Johnson, Madison, Morgan, and Shelby. The bank's main office is in Hamilton County, directly north of Indianapolis.

### **Economic and Demographic Data**

Examiners used 2011-2015 American Community Survey (ACS) demographic data estimates, which are refreshed every five years, to evaluate the bank's performance in 2021. For 2022 and 2023, examiners evaluated performance using 2020 U.S. Census data, which uses the 2020 Census Demographic and Housing Characteristics file for the majority of population-related fields and 2016-2020 ACS for the remaining fields.

The 2020 U.S. Census substantively revised both the number and income levels for the census tracts in the assessment area. According to 2015 ACS data, the assessment area consisted of 386 census tracts with the following income designations: 67 low-income, 103 moderate-income, 123 middle-income, 91 upper-income, and 2 tracts with no income designation. Based on updated data from the 2020 U.S. Census, the assessment area now consists of 461 census tracts with the following income designations: 58 low-income, 114 moderate-income, 166 middle-income, 114 upper-income, and 9 tracts with no income designation.

The following table details the most recent economic and demographic characteristics of the assessment area.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	461	12.6	24.7	36.0	24.7	2.0
Population by Geography	2,058,839	8.4	21.4	37.9	30.8	1.4
Housing Units by Geography	844,121	10.0	22.8	37.7	28.1	1.3
Owner-Occupied Units by Geography	503,386	4.8	16.6	41.9	35.8	0.9
Occupied Rental Units by Geography	266,641	16.5	32.2	32.0	17.3	2.0
Vacant Units by Geography	74,094	21.4	31.8	29.9	15.0	1.9
Businesses by Geography	314,942	8.5	19.9	34.9	33.7	3.1
Farms by Geography	8,488	5.6	15.6	47.3	30.4	1.1
Family Distribution by Income Level	489,837	20.6	17.9	20.8	40.7	0.0
Household Distribution by Income Level	770,027	23.2	16.4	18.5	41.8	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$80,981	Median Housing Value			\$178,971
			Median Gross Rent			\$959
			Families Below Poverty Level			7.9%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

Approximately 47.5 percent of the assessment area's population resides in Marion County. Besides Indianapolis, other major cities in the assessment area include Carmel, Fishers, Noblesville, and Anderson, all of which have populations of roughly 50,000 to 100,000. According to 2020 U.S. Census data, the assessment area contains 844,121 housing units. Of those, 59.6 percent are owner-occupied, 31.6 percent are occupied rental units, and 8.8 percent are vacant. The median housing value of \$178,971 represents a 24.6 percent increase from the 2015 ACS. Over the same period, the median family income level experienced a 21.2 percent increase, with a corresponding 2.8 percent decline in families below the poverty level.

D&B data from 2023 shows the assessment area contains 314,942 non-farm businesses. Of those businesses, 92.0 percent have revenues of \$1.0 million or less, 59.1 percent employ four or fewer employees, and 94.5 percent operate from a single location. D&B data also shows the largest industries in the assessment area are services (32.4 percent); non-classifiable establishments (29.8 percent); finance, insurance, and real estate (11.1 percent); retail trade (8.1 percent); and construction (6.0 percent). According to February 2024 Moody's Analytics, major employers in the assessment area include Indiana University Health, St. Vincent Hospitals and Health Services, Community Health Network, Eli Lilly and Company, Walmart Inc., The Kroger Company, and FedEx.

Data obtained from the U.S. Bureau of Labor Statistics shows that throughout the assessment area and the State of Indiana, unemployment rates slightly decreased from 2021 to 2022 and then



slightly increased in 2023. Unemployment rates in the assessment area are generally below state levels, with the exception of Madison and Marion Counties. Additionally, assessment area unemployment rates mostly fall below the national average during the evaluation period.

Unemployment Rates			
Area	2021	2022	2023
	%	%	%
Boone County	2.3	2.1	2.5
Hamilton County	2.4	2.2	2.5
Hancock County	2.8	2.6	2.8
Hendricks County	2.8	2.5	2.7
Johnson County	2.9	2.4	2.7
Madison County	4.5	3.4	3.6
Marion County	4.9	3.2	3.3
Morgan County	3.2	2.8	3.0
Shelby County	3.3	2.5	2.8
State	3.9	3.1	3.3
National Average	5.3	3.6	3.6
Source: Bureau of Labor Statistics			

Examiners analyze mortgage lending to borrowers of different income levels using FFIEC-estimated median family income levels for the year in which a loan is originated. The following table presents the low-, moderate-, middle-, and upper-income ranges for the MSA during the evaluation period.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Indianapolis-Carmel-Anderson, IN MSA Median Family Income (26900)				
2021 (\$79,700)	<\$39,850	\$39,850 to <\$63,760	\$63,760 to <\$95,640	≥\$95,640
2022 (\$91,900)	<\$45,950	\$45,950 to <\$73,520	\$73,520 to <\$110,280	≥\$110,280
2023 (\$97,300)	<\$48,650	\$48,650 to <\$77,840	\$77,840 to <\$116,760	≥\$116,760
Source: FFIEC				

## **Competition**

First Internet Bank operates in a highly competitive market for financial services. According to FDIC Deposit Market Share data as of June 30, 2023, 44 FDIC-insured institutions operated 475 offices in the assessment area, with \$84.7 billion in deposits. First Internet Bank ranked 9<sup>th</sup> in market share with 4.6 percent of total deposits. The top three institutions accounted for 46.0 percent of the deposit market share. However, this data inflates the bank's actual deposit market share in the assessment area given that deposits in this data set are distributed among banks' office locations, and all of First Internet Bank's deposits are assigned to its single office location. Therefore, the bank's deposit market share includes deposits from all customers nationwide - not just those

customers within the assessment area. As such, First Internet Bank's true deposit market share within the assessment area would be significantly lower than 4.6 percent. According to bank data, customers located outside of the bank's assessment area hold approximately 75.0 percent of total deposits.

High levels of competition also exist for home mortgage and small business loans in the assessment area from credit unions, non-bank lenders, and regional and national banks. In 2022, 636 lenders reported 65,152 home mortgage loans originated or purchased in the assessment area. First Internet Bank ranked 31<sup>st</sup> with a market share of 1.0 percent by number of loans. The top three lenders accounted for 12.4 percent of all activity by number of loans. With respect to small business lending, 169 lenders reported 45,381 small business loans originated or purchased in 2022. First Internet Bank ranked 49<sup>th</sup> with a market share of 0.1 percent by number of loans. The top three lenders accounted for 51.6 percent of all activity by number of loans.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit and community development opportunities are available.

Examiners reviewed recent contacts with the director of a local housing organization that focuses on LMI housing needs and the director of a state government-sponsored entity that supports small businesses and entrepreneurs. One contact noted the area economy continues to move in the right direction and unemployment remains low; however, inflation continues to pose a significant challenge. The contact also noted small business lending generally has become more restricted as banks become more risk adverse, which has resulted in many small businesses and entrepreneurs to struggle to obtain financing. The contact stated affordable housing remains a significant problem as the housing inventory is low, prices are elevated, and lenders are becoming more restrictive. The contact believed local banks could be more supportive in establishing or expanding community-based lending and felt financial literacy and technical assistance for small businesses continues to be a need. The other contact echoed that affordable housing is a significant need and in high demand as the area continues to experience strong growth and development. Housing production has failed to keep up with this growth, the contacted stated. Additionally, the contact stated there is always a need for grants to nonprofit organizations dedicated to assisting LMI individuals, families, and senior citizens. The contact expressed a desire for banks to have more flexibility in providing grant money and loan terms. The contact also stated a desire for representatives of local banks to be more involved as directors and related roles of local organizations.

### **Credit and Community Development Needs and Opportunities**

Considering information from the community contacts, bank management, and demographic and economic data, examiners determined that affordable housing and small business financing represent primary credit needs in the assessment area. In addition, community development needs include affordable housing assistance, community-based lending, financial literacy, small business technical assistance, LMI housing program grants, and bank management becoming more involved

in leadership roles of local organizations (such as serving as directors). Furthermore, opportunities exist to work with entrepreneurs, as interest and need among potential entrepreneurs remains strong.

## SCOPE OF EVALUATION

Examiners evaluated First Internet Bank's CRA performance using the Interagency Strategic Plan Examination Procedures. Examiners evaluated the bank's performance under the FDIC-approved Strategic Plan covering the period from January 1, 2021 to December 31, 2023.

The Strategic Plan sets forth 12 separate tests to evaluate the bank's CRA performance. The first five tests are residential lending-related tests, the next four tests are small business lending-related tests, and the final three tests are community development activity-related tests. All tests focused only on the bank's activities within the assessment area. The table below provides a brief overview of the 12 individual tests.

Overview of Strategic Plan Performance Criteria	
<b>Residential Lending</b>	
<i>Test 1</i>	Percentage of mortgage loans (#) made in low-income tracts
<i>Test 2</i>	Percentage of mortgage loans (#) made in moderate-income tracts
<i>Test 3</i>	Percentage of mortgage loans (#) made to low-income borrowers
<i>Test 4</i>	Percentage of mortgage loans (#) made to moderate-income borrowers
<i>Test 5</i>	Total mortgage loans (\$) made in LMI tracts and to LMI borrowers as a percentage of prior year total HMDA loans*
<b>Small Business Lending</b>	
<i>Test 6</i>	Total small business loan commitments (\$) as a percentage of prior year-end total assets
<i>Test 7</i>	Percentage of small business loan commitments (\$) made to borrowers with ≤ \$1.0 million in revenue
<i>Test 8</i>	Percentage of small business loan commitments (\$) made in low-income tracts
<i>Test 9</i>	Percentage of small business loan commitments (\$) made in moderate-income tracts
<b>Community Development Activity</b>	
<i>Test 10</i>	Community development loans and new investments as a percentage of prior year-end total deposits
<i>Test 11</i>	Community development investments (existing and new) as a percentage of prior year-end total deposits
<i>Test 12</i>	Service hours per employee who work/reside in the assessment area
<i>Source: Strategic Plan</i> <i>(*) A loan in a LMI tract and to a LMI borrower cannot be counted twice in this calculation</i>	

In evaluating the bank's performance, examiners relied on bank data, publicly available bank financial information, and economic and demographic data. With respect to specific loan data, examiners analyzed home mortgage data the bank reported under the HMDA data collection requirements, as well as small business data reported under CRA data collection requirements. For both home mortgage and small business lending, examiners reviewed data from 2021, 2022, and 2023. The table below provides the total number and dollar volume of home mortgage and small

business loans, both inside and outside the assessment area that the bank reported in 2021, 2022, and 2023.

<b>Total Home Mortgage and Small Business Lending</b>				
<b>Year</b>	<b>Home Mortgage #</b>	<b>Home Mortgage \$(000)</b>	<b>Small Business #</b>	<b>Small Business \$(000)</b>
2021	2,768	880,356	541	163,177
2022	1,743	551,824	369	200,702
2023	175	52,511	602	252,770
<i>Sources: 2021-2023 HMDA and CRA small business loan data</i>				

Of the bank's total home mortgage and small business lending activity, approximately 14.4 percent occurred inside the assessment area. The following table provides the total volume of home mortgage and small business lending by year inside the assessment area. Examiners focused on home mortgage and small business lending inside the assessment area to evaluate the bank's performance under Test 1 through Test 9 of the Strategic Plan.

<b>Home Mortgage and Small Business Lending Inside Assessment Area</b>				
<b>Year</b>	<b>Home Mortgage #</b>	<b>Home Mortgage \$(000)</b>	<b>Small Business #</b>	<b>Small Business \$(000)</b>
2021	730	211,287	101	28,489
2022	669	181,833	53	15,948
2023	73	17,146	63	16,905
<i>Sources: 2021-2023 HMDA and CRA small business loan data</i>				

Additionally, the bank provided data on community development loans, qualified investments, and community development services for 2021, 2022, and 2023.

Examiners evaluated the bank's performance under each test separately for each of the three years covered by the Strategic Plan. The plan sets forth specific, quantitative performance metrics for each test. Based on these metrics, examiners assigned a performance assessment of Outstanding, Satisfactory, Needs to Improve, or Substantial Non-Compliance for each test by year. These assessments corresponded to specific point values: negative two for Substantial Non-Compliance, zero for Needs to Improve, two for Satisfactory, and four for Outstanding. According to the plan, the bank must earn at least 24 points in order to receive an overall Satisfactory rating in a given year and at least 36 points to receive an overall Outstanding rating in a given year.

## **CONCLUSIONS ON PERFORMANCE CRITERIA**

### **RESIDENTIAL LENDING TESTS**

#### **Test 1 – Home Mortgage Lending in Low-Income Census Tracts**

This test measures the percentage of HMDA-reportable loans for purchase, improvement, and refinance by number made in low-income census tracts within the assessment area. The following table outlines the performance ranges and corresponding ratings for this test.

<b>Test 1 – Performance Ranges and Ratings</b>	
<b>% by # of Lending in Low-Income Tracts</b>	<b>Rating</b>
> 4.68	Outstanding
3.12 – 4.68	Satisfactory
1.95 – 3.11	Needs to Improve
< 1.95	Substantial Non-Compliance

The following table details the bank’s performance by year under this test.

<b>Test 1 – Bank Performance</b>				
<b>Year</b>	<b>Total Loans in Low-Income Tracts</b>	<b>% by # of Lending in Low-Income Tracts</b>	<b>Rating</b>	<b>Points Earned</b>
2021	66	9.1	Outstanding	4
2022	84	12.7	Outstanding	4
2023	15	21.7	Outstanding	4

The bank met the standard for Outstanding in 2021, 2022, and 2023.

### **Test 2 – Home Mortgage Lending in Moderate-Income Census Tracts**

This test measures the percentage of HMDA-reportable loans for purchase, improvement, and refinance by number made in moderate-income census tracts within the assessment area. The following table outlines the performance ranges and corresponding ratings for this test.

<b>Test 2 – Performance Ranges and Ratings</b>	
<b>% by # of Lending in Moderate-Income Tracts</b>	<b>Rating</b>
> 17.58	Outstanding
11.72 – 17.58	Satisfactory
7.33 – 11.71	Needs to Improve
< 7.33	Substantial Non-Compliance

The following table details the bank’s performance by year under this test.

<b>Test 2 – Bank Performance</b>				
<b>Year</b>	<b>Total Loans in Moderate-Income Tracts</b>	<b>% by # of Lending in Moderate-Income Tracts</b>	<b>Rating</b>	<b>Points Earned</b>
2021	164	22.7	Outstanding	4
2022	201	30.4	Outstanding	4
2023	29	42.0	Outstanding	4

The bank met the standard for Outstanding in 2021, 2022, and 2023.

### **Test 3 – Home Mortgage Lending to Low-Income Borrowers**

This test measures the percentage of HMDA-reportable loans for purchase, improvement, and refinance by number made to low-income borrowers in the assessment area. The following table outlines the performance ranges and corresponding ratings for this test.

<b>Test 3 – Performance Ranges and Ratings</b>	
<b>% by # of Lending to Low-Income Borrowers</b>	<b>Rating</b>
> 9.85	Outstanding
6.57 – 9.85	Satisfactory
4.11 – 6.56	Needs to Improve
< 4.11	Substantial Non-Compliance

The following table details the bank’s performance by year under this test.

<b>Test 3 – Bank Performance</b>				
<b>Year</b>	<b>Total Loans to Low-Income Borrowers</b>	<b>% by # of Lending to Low-Income Borrowers</b>	<b>Rating</b>	<b>Points Earned</b>
2021	80	11.1	Outstanding	4
2022	145	21.9	Outstanding	4
2023	28	40.6	Outstanding	4

The bank met the standard for Outstanding in 2021, 2022, and 2023.

#### **Test 4 – Home Mortgage Lending to Moderate-Income Borrowers**

This test measures the percentage of HMDA-reportable loans for purchase, improvement, and refinance by number made to moderate-income borrowers in the assessment area. The following table outlines the performance ranges and corresponding ratings for this test.

<b>Test 4 – Performance Ranges and Ratings</b>	
<b>% by # of Lending to Moderate-Income Borrowers</b>	<b>Rating</b>
> 22.27	Outstanding
14.85 – 22.27	Satisfactory
9.28 – 14.84	Needs to Improve
< 9.28	Substantial Non-Compliance

The following table details the bank’s performance by year under this test.

<b>Test 4 – Bank Performance</b>				
<b>Year</b>	<b>Total Loans to Moderate-Income Borrowers</b>	<b>% by # of Lending to Moderate-Income Borrowers</b>	<b>Rating</b>	<b>Points Earned</b>
2021	195	27.0	Outstanding	4
2022	250	37.8	Outstanding	4
2023	26	37.7	Outstanding	4

The bank met the standard for Outstanding in 2021, 2022, and 2023.

### **Test 5 – Total Home Mortgage Lending in LMI Tracts and to LMI Borrowers**

This test measures the total dollar volume of HMDA-reportable loans for purchase, improvement, and refinance made in LMI tracts and to LMI borrowers as a percentage of prior year total HMDA loans within the assessment area. Examiners did not double count loans to LMI borrowers located in LMI tracts. The following table outlines the performance ranges and corresponding ratings for this test.

<b>Test 5 – Performance Ranges and Ratings</b>	
<b>Total Home Mortgage Lending in LMI Tracts + to LMI Borrowers as % of Prior Year Total HMDA</b>	<b>Rating</b>
> 20.95	Outstanding
13.97 – 20.95	Satisfactory
8.73 – 13.96	Needs to Improve
< 8.73	Substantial Non-Compliance

The following table details the bank's performance by year under this test.

<b>Test 5 – Bank Performance</b>				
<b>Year</b>	<b>Total Home Mortgage Lending in LMI Tracts + to LMI Borrowers \$(000)</b>	<b>Total Home Mortgage Lending in LMI Tracts + to LMI Borrowers as % of Prior Year Total HMDA</b>	<b>Rating</b>	<b>Points Earned</b>
2021	\$64,519	28.0	Outstanding	4
2022	\$98,434	46.9	Outstanding	4
2023	\$11,085	6.1	Substantial Non-Compliance	-2

The bank met the standard for Outstanding in 2021 and 2022 and Substantial Non-Compliance in 2023. As previously mentioned, the bank exited the consumer mortgage business in 2023 resulting in a significant decrease in total home mortgage lending as a percentage of prior year total HMDA lending.

### **SMALL BUSINESS LENDING TESTS**

#### **Test 6 – Total Small Business Lending**

This test measures the total dollar volume of small business loans in the assessment area as a percentage of the bank's prior year-end total assets. The following table outlines the performance ranges and corresponding ratings for this test.

<b>Test 6 – Performance Ranges and Ratings</b>	
<b>Total Small Business Lending as % of Prior Year-End Assets</b>	<b>Rating</b>
> 1.13	Outstanding
0.75 – 1.13	Satisfactory
0.47 – 0.74	Needs to Improve
< 0.47	Substantial Non-Compliance

The following table details the bank’s performance by year under this test.

<b>Test 6 – Bank Performance</b>				
<b>Year</b>	<b>Total Small Business Lending \$(000)</b>	<b>Total Small Business Lending as % of Prior Year-End Assets</b>	<b>Rating</b>	<b>Points Earned</b>
2021	\$57,722	1.4	Outstanding	4
2022	\$18,739	0.4	Substantial Non-Compliance	-2
2023	\$31,647	0.7	Needs to Improve	0

The bank met the standard for Outstanding in 2021, Substantial Non-Compliance in 2022, and Needs to Improve in 2023.

#### **Test 7 – Small Business Lending to Borrowers with Revenues of \$1.0 Million or Less**

This test measures the percentage of small business loans by dollar volume in the assessment area made to businesses with gross annual revenues of \$1.0 million or less. The following table outlines the performance ranges and corresponding ratings for this test.

<b>Test 7 – Performance Ranges and Ratings</b>	
<b>% by \$ of Lending to Borrowers with Revenues ≤ \$1.0 Million</b>	<b>Rating</b>
> 37.57	Outstanding
25.05 – 37.57	Satisfactory
15.66 – 25.04	Needs to Improve
< 15.66	Substantial Non-Compliance

The following table details the bank’s performance by year under this test.

<b>Test 7 – Bank Performance</b>				
<b>Year</b>	<b>Total Lending to Borrowers with Revenues ≤ \$1.0 Million \$(000)</b>	<b>% by \$ of Lending to Borrowers with Revenues ≤ \$1.0 Million</b>	<b>Rating</b>	<b>Points Earned</b>
2021	\$7,572	13.1	Substantial Non-Compliance	-2
2022	\$3,811	20.3	Needs to Improve	0
2023	\$9,497	30.0	Satisfactory	2

The bank met the standard for Substantial Non-Compliance in 2021, Needs to Improve in 2022, and Satisfactory in 2023.



### **Test 8 – Small Business Lending in Low-Income Census Tracts**

This test measures the percentage of small business loans by dollar volume made in low-income census tracts within the assessment area. The following table outlines the performance ranges and corresponding ratings for this test.

<b>Test 8 – Performance Ranges and Ratings</b>	
<b>% by \$ of Lending in Low-Income Tracts</b>	<b>Rating</b>
> 13.02	Outstanding
8.68 – 13.02	Satisfactory
5.43 – 8.67	Needs to Improve
< 5.43	Substantial Non-Compliance

The following table details the bank's performance by year under this test.

<b>Test 8 – Bank Performance</b>				
<b>Year</b>	<b>Total Lending in Low-Income Tracts \$(000)</b>	<b>% by \$ of Lending in Low-Income Tracts</b>	<b>Rating</b>	<b>Points Earned</b>
2021	\$5,593	9.69	Satisfactory	2
2022	\$1,130	6.03	Needs to Improve	0
2023	\$3,421	10.81	Satisfactory	2

The bank met the standard for Satisfactory in 2021 and 2023 and Needs to Improve in 2022.

### **Test 9 – Small Business Lending in Moderate-Income Census Tracts**

This test measures the percentage of small business loans by dollar volume made in moderate-income census tracts within the assessment area. The following table outlines the performance ranges and corresponding ratings for this test.

<b>Test 9 – Performance Ranges and Ratings</b>	
<b>% by \$ of Lending in Moderate-Income Tracts</b>	<b>Rating</b>
> 20.96	Outstanding
13.98 – 20.96	Satisfactory
8.74 – 13.97	Needs to Improve
< 8.74	Substantial Non-Compliance

The following table details the bank's performance by year under this test.

<b>Test 9 – Bank Performance</b>				
<b>Year</b>	<b>Total Lending in Moderate-Income Tracts \$(000)</b>	<b>% by \$ of Lending in Moderate-Income Tracts</b>	<b>Rating</b>	<b>Points Earned</b>
2021	\$1,790	3.10	Substantial Non-Compliance	-2
2022	\$2,174	11.60	Needs to Improve	0
2023	\$3,464	10.95	Needs to Improve	0

The bank met the standard for Substantial Non-Compliance in 2021 and Needs to Improve in 2022 and 2023.

## COMMUNITY DEVELOPMENT TESTS

### Test 10 – Community Development Lending and New Investments

This test measures the total dollar volume of community development loans and new community development investments and donations as a percentage of prior year-end total deposits in the assessment area. The following table outlines the performance ranges and corresponding ratings for this test.

Test 10 – Performance Ranges and Ratings	
Community Development Loans + New Investments as % of Total Deposits	Rating
> 9.12	Outstanding
6.08 – 9.12	Satisfactory
3.80 – 6.07	Needs to Improve
< 3.80	Substantial Non-Compliance

The following table details the bank’s performance by year under this test.

Test 10 – Bank Performance				
Year	Total Community Development Loans + New Investments \$(000)	Community Development Loans + New Investments as % of Total Deposits	Rating	Points Earned
2021	\$63,409	7.5	Satisfactory	2
2022	\$70,402	7.5	Satisfactory	2
2023	\$65,310	6.5	Satisfactory	2

The bank met the standard for Satisfactory in 2021, 2022, and 2023. Notable community development loans include a \$12.2 million loan to finance the construction of 60 affordable multifamily units in Noblesville and a \$7.2 million loan allocated to 38 affordable multifamily units as part of a larger mixed-use multifamily/retail project located in downtown Indianapolis. First Internet Bank also pledged a \$10.0 million commitment into a tax credit equity fund in which the contributions will benefit two LMI housing projects located in Noblesville and Indianapolis. Additionally, the bank invested approximately \$150.7 million in mortgage-backed securities in which the underlying loans making up the securities consisted of those to LMI borrowers within the assessment area.

### Test 11 – Total Community Development Investments

This test measures the total dollar volume of new and existing community development investments as a percentage of prior year-end total deposits in the assessment area. Specifically, according to the Strategic Plan, the total dollar volume consists of the annual average of the quarterly fair market value of all community development investments outstanding as of the last day of each quarter. The following table outlines the performance ranges and corresponding ratings for this test.

<b>Test 11 – Performance Ranges and Ratings</b>	
<b>Community Development Investments (New + Existing) as % of Total Deposits</b>	<b>Rating</b>
> 15.00	Outstanding
10.00 – 15.00	Satisfactory
6.25 – 9.99	Needs to Improve
< 6.25	Substantial Non-Compliance

The following table details the bank’s performance by year under this test.

<b>Test 11 – Bank Performance</b>				
<b>Year</b>	<b>Average Total Community Development Investments (New + Existing) \$(000)</b>	<b>Community Development Investments (New + Existing) as % of Total Deposits</b>	<b>Rating</b>	<b>Points Earned</b>
2021	\$96,080	11.3	Satisfactory	2
2022	\$130,094	13.9	Satisfactory	2
2023	\$167,965	16.8	Outstanding	4

The bank met the standard for Satisfactory in 2021 and 2022 and Outstanding in 2023. New and existing investments mostly consisted of mortgage-backed securities comprised of underlying loans to LMI borrowers. Additional investments include securities backed by affordable multifamily housing loans and partially funded commitments in equity funds that support LMI projects.

### **Test 12 – Community Development Services**

This test measures the bank’s community development service hours per employee that either work or reside in the assessment area. The following table outlines the performance ranges and corresponding ratings for this test.

<b>Test 12 – Performance Ranges and Ratings</b>	
<b>Community Development Service Hours Per Employee</b>	<b>Rating</b>
> 3.00	Outstanding
2.00 – 3.00	Satisfactory
1.00 – 1.99	Needs to Improve
< 1.00	Substantial Non-Compliance

The following table details the bank’s performance by year under this test.

Test 12 – Bank Performance					
Year	Full-Time Employees	Total Community Development Service Hours	Community Development Service Hours Per Employee	Rating	Points Earned
2021	225	438	1.95	Needs to Improve	0
2022	240	573	2.39	Satisfactory	2
2023	255	984	3.86	Outstanding	4

The bank met the standard for Needs to Improve in 2021, Satisfactory in 2022, and Outstanding in 2023.

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Examiners reviewed the bank’s compliance with laws relating to discrimination and other illegal credit practices, including the Fair Housing Act and Equal Credit Opportunity Act. Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution’s CRA rating.

## APPENDIX

### STRATEGIC PLAN SCORING MATRIX

The following table provides a breakdown of the points the bank earned under each Strategic Plan test by year. Under each test, First Internet Bank's Strategic Plan sets forth quantitative performance ranges that correspond to specific point values. To demonstrate Satisfactory performance under the plan for a given year, the bank must earn a minimum of 24 points. To demonstrate Outstanding performance for a given year, the bank must earn a minimum of 36 points.

Strategic Plan Point Totals by Year			
Test	2021	2022	2023
<i>Test 1</i>	4	4	4
<i>Test 2</i>	4	4	4
<i>Test 3</i>	4	4	4
<i>Test 4</i>	4	4	4
<i>Test 5</i>	4	4	-2
<i>Test 6</i>	4	-2	0
<i>Test 7</i>	-2	0	2
<i>Test 8</i>	2	0	2
<i>Test 9</i>	-2	0	0
<i>Test 10</i>	2	2	2
<i>Test 11</i>	2	2	4
<i>Test 12</i>	0	2	4
<b>Total Points</b>	<b>26</b>	<b>24</b>	<b>28</b>
<b>Rating</b>	<b>Satisfactory</b>	<b>Satisfactory</b>	<b>Satisfactory</b>

## GLOSSARY

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

**American Community Survey (ACS):** A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**Community Development:** For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

**Community Development Corporation (CDC):** A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

**Community Development Financial Institutions (CDFIs):** CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

**Community Development Loan:** A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
  - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

**Community Development Service:** A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**Distressed Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

**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. Other family 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).

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, 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 do 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; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.



Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

**Low Income Housing Tax Credit:** The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

**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 metropolitan area/assessment area.

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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.

**Micropolitan Statistical Area:** CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

**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 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 and less than 80 percent in the case of a geography.

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area (also known as non-MSA):** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

**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 lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Investment Company (SBIC):** SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

**Small Farm Loan:** 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

**Underserved Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area’s population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.



## Office Locations

### Corporate Headquarters and Full-Service Branch


8701 E 116<sup>th</sup> Street

Fishers, IN 46038

Census Tract 1108.10

Hours of Operation


Monday - Friday 8:00 a.m. - 5:00 p.m.

 Year:  Address:

Matched Address	
Address	8701 E 116th St, Fishers, Indiana, 46038
MSA/MD Code	26900
State Code	18
County Code	057
Tract Code	1108.10
MSA/MD Name	INDIANAPOLIS-CARMEL-GREENWOOD, IN
State Name	INDIANA
County Name	HAMILTON COUNTY

The Census Demographic Data for 2024 is not available yet. This information is updated with the regular release of the FFIEC Census in the summer. However, the state, county, MSA, and census tract information has been updated for 2024.

[Census Demographic Data](#)

A map of Fishers, Indiana, showing the location of the First Internet Bank branch. A red dot marks the address 8701 E 116th St. The map includes labels for several streets: Bryden Dr, Ash Rd, Holland Dr, Regency Dr, Municipal Dr, Maple St, Commercial Dr, E 116th St, South St, Morgan Dr, and Charleston Pkwy. The Fishers Elementary School is also labeled.



**Limited Service**  
**Loan Production Office**  
51 West 3<sup>rd</sup> Street  
Suite 315  
Tempe, AZ 85281  
Census Tract 3187  
Hours of Operation  
Monday - Friday 8:00 a.m. - 5:00 p.m.

Year: 2024 Address: 51 West 3rd Street, Tempe, AZ, 85281, USA

Matched Address	
Address	51 West 3rd Street, Tempe, Arizona, 85281
MSA/MD Code	38060
State Code	04
County Code	013
Tract Code	3187.00
MSA/MD Name	PHOENIX-MESA-CHANDLER, AZ
State Name	ARIZONA
County Name	MARICOPA COUNTY

The Census Demographic Data for 2024 is not available yet. This information is updated with the regular release of the FFIEC Census in the summer. However, the state, county, MSA, and census tract information has been updated for 2024.

Census Demographic Data

☐ User Select Tract



There were neither any branches opened nor closed in neither prior quarters in 2025 nor during the calendar years of 2024 or 2023.



Branch Hours of Operations  
Monday - Friday 8:00 a.m. - 5:00 p.m.

## ***Retail Banking Services***

### ***Current Deposit Products and Services (03/2023)***

#### **Consumer Products**

- Interest and Free Checking – Both come with free mobile and online banking bill pay, electronic bank statements, incoming wires, first order of checks, debit card, incoming ACH transfers, and Zelle payments.
- **Interest Checking** - Checking with optional extras like free mobile and online banking bill payment, overdraft protection, ATM or check card access, and ATM surcharge rebates
- **Free Checking** - Checking with a lower opening deposit requirement and no monthly maintenance fee
- **Money Market Savings** - A high-yield, FDIC-insured savings account
- **Free Savings** - A savings account with a lower opening deposit requirement and no monthly maintenance or minimum balance fees
- **Tomorrow's Tycoons** - No-fee savings account for customers under the age of 18
- **Certificates of Deposit** - Time deposits with high-yield interest rates and mobile and online banking account access
- **Health Savings Account** – Tax-advantaged account used to pay eligible medical and healthcare expenses
- **iScan** – Allows scanning of checks to be deposited and uploaded through mobile and online banking
- **Credit Cards** – Credit card with no annual fee and mobile and online banking account access with rewards and cashback on all purchases
- **Vehicle Loans** - Offering consumer loans to purchase horse trailers, recreational vehicles, autos, and boats
- **Student Loans** - Offered in partnership with Sallie Mae, loans for higher education purposes to serve the needs of undergraduates, graduates students and parents
- **Personal Loans** – Offering loans with no collateral requirement for personal needs.

#### **Business Accounts**

- **Do More Business Checking** - Interest-bearing checking with no minimum balance fee, no monthly service fee, and unlimited transactions
- **Commercial Checking** – Business checking with remote deposit capture, sweep services, ACH, check positive pay, zero balance accounts, and wire services.
- **Money Market Savings** – A business high-yield, FDIC-insured savings account that offers free mobile and online banking tools
- **Regular Savings** - A business savings account with a lower monthly maintenance fee and lower average daily balance requirement than the Money Market Savings account that offers free mobile and online banking tools
- **Certificates of Deposit** - Time deposits with high-yield interest rates and online banking account access
- **SBA Loans** - Offering 7(a), Express, and 504 loan programs
- **Commercial Loans** - Offering term loans and lines of credit to assist businesses with financing needs
- **Commercial Real Estate Loans** - Offering Single Tenant Net Lease financing, Residential Development / Construction Financing, and Commercial Construction / Multi-tenant Financing, and Owner-Occupied Real Estate loans
- **Public Finance** - Financing options for government entities, public schools, municipal utilities, higher educations and not-for-profit institutions, equipment leasing and energy projects
- **Commercial Credit Cards** - three different card programs, one of which offers cash back while all provide online banking access

#### **Treasury Management**

- **Commercial Premium Checking** - Checking with low transaction and maintenance fees
- **Commercial Analysis Checking** - Earnings credit rates help pay for services used
- **Remote Deposit Capture** - Scan business deposits with a desktop scanner or mobile device
- **ACH Origination** - Online electronic funds transfer to collect funds or send funds
- **Wire Origination** - originate wires online using a security token for approval
- **Electronic Data Interchange (EDI)** - a detailed report which arrives along with an ACH deposit
- **Sweep Accounts** - Investment or loan options allow concentration of funds into one account with a minimum target balance on the other
- **Zero Balance Accounts (ZBAs)** – Consolidate cash balances between principal and subsidiary accounts

- **Commercial Bill Pay** - bill pay for business accounts with higher daily limits
- **Positive Pay** - fraud prevention tool used to protect the account from fraudulent checks clearing

**All Accounts**

- Account Access through First IB's telephone, mobile and online banking systems
- Free access to personal financial management tools with FinanceWorks™ through mobile and online banking
- Optional export to Quicken and Money for enhanced financial management
- Free electronic statement and check images
- ATM access through the PLUS™ network





## Personal Accounts

### Fees Common to All Accounts

#### Statements<sup>4</sup>

Electronic Statements	No charge
Account Statements (paper)	\$3.00 per statement
Line of Credit Statements (paper)	No charge
Credit Card Statements (paper)	No charge
All Statement Copies	\$3.00 per copy

#### ATM Transactions<sup>7</sup>

Deposits	No charge
Withdrawals	No charge
Transfers	No charge
ATM, Debit, or Credit Card Replacement	No charge for first replacement card; \$5.00 per additional card
Stop Payments – All Items	\$30.00

#### ACH Items (Initiated by First IB)

ACH Incoming (Credit) Transactions	No charge
ACH Outgoing (Debit) Transactions	\$5.00

#### Wire Transfers<sup>8</sup>

Incoming Transfers	No Charge
Outgoing Transfers – Domestic	\$20.00
Outgoing Transfers – Foreign	\$50.00
Deposit or payments made using a card	3% of amount or \$10.00, whichever is greater
Cashiers Checks <sup>9</sup>	\$5.00
Check Copies	\$5.00 per copy
Checks by Phone	\$5.00 per item
Checks issued for account closure	\$5.00 per item
International Transaction Fee (Applies to all ATM and debit (check) card transactions initiated at any non-US or non-US territory location)	2% of the purchase or cash advance amount (in U.S. Dollars)
Foreign currency check/draft processing charge	\$50.00 per item
Returned Item Fee	\$20.00
Uncollected Funds Fee	\$30.00
Dormant Account Fee	\$5.00 per account per month
Overnight Delivery <sup>6</sup>	\$30.00 (Next business day delivery within the contiguous United States only)
Garnishments, Executions and Levies	\$50.00
Account Research Assistance	\$20.00 per hour (Minimum 1 hour)
Research	\$20.00 per hour (Minimum 1 hour)

<sup>4</sup> CD-only customers will not receive a statement unless an electronic transaction occurs on the account.

<sup>5</sup> ATM owners may assess a surcharge. First IB will rebate up to \$10.00 per month per customer for surcharges. ATM withdrawals performed on Free Checking, Free Savings and Health Savings Accounts are not eligible for the ATM surcharge rebate.

<sup>6</sup> Intermediate banks and/or beneficiary banks, if used, may deduct a fee from the total amount of your outgoing or incoming wires. See our Electronic Funds Transfer Disclosure for details.

<sup>7</sup> If a cashier's check is lost, stolen, or destroyed, you may have to either purchase an indemnity bond or allow 90 days to pass without the original being presented/paid before the check is replaced.

<sup>8</sup> Overnight delivery charge applies to next business day delivery within the contiguous United States only. Additional charges apply for shipments to Alaska, Hawaii, Puerto Rico, or any international location. Additional charges apply for Saturday delivery.

APR = Annual Percentage Rate (Yield assumes interest is reinvested. Fees may reduce earnings on account.)

APY = Annual Percentage Yield

Rates and fees accurate as of 09/03/2024 and subject to change.

Questions? Contact First IB toll-free at 1-888-873-3424 or send email to [bank@firstib.com](mailto:bank@firstib.com).



**FDIC**

## Fees Common to All Accounts

### Statements<sup>1</sup>

<i>Electronic Statements</i>	No charge
<i>Account Statements (paper)</i>	\$3.00 per statement
<i>All Statement Copies</i>	\$3.00 per copy
<i>ATM<sup>2</sup>, Debit, or Credit Card Replacement</i>	No charge for first replacement card; \$5.00 per additional card
<i>Stop Payments – All Items</i>	\$30.00

### ACH Items (Initiated by First IB)

<i>ACH Incoming (Credit) Transactions</i>	No charge
<i>ACH Outgoing (Debit) Transactions</i>	\$0.00

### Wire Transfers<sup>3</sup>

<i>Incoming Transfers</i>	\$15.00
<i>Outgoing Transfers – Domestic</i>	\$20.00
<i>Outgoing Transfers – Foreign</i>	\$50.00

<i>Deposit or payments made using a credit card</i>	3% of amount or \$10.00, whichever is greater
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<i>Cashiers Checks<sup>4</sup></i>	\$5.00
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<i>Checks by Phone</i>	\$5.00 per item
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<i>Checks issued for account closure</i>	\$5.00 per item
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<i>International Transaction Fee</i> (Applies to all ATM and debit (check) card transactions initiated at any non-US or non-US territory location)	2% of the purchase or cash advance amount (in U.S. Dollars)
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<i>Foreign currency check/draft processing charge</i>	\$50.00 per item
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<i>Return Item</i>	\$20.00
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<i>Overnight Delivery<sup>5</sup></i>	\$30.00 (Next business day delivery within the contiguous United States only)
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<i>Garnishments, Executions and Levies</i>	\$50.00
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<i>Dormant Account Fee</i>	\$5.00 per account per month
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<i>Account Research Assistance</i>	\$20.00 per hour (Minimum 1 hour)
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<i>Research</i>	\$20.00 per hour (Minimum 1 hour)
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<sup>1</sup> CD-only customers will not receive a statement.

<sup>2</sup> ATM Card available to sole proprietors only.

<sup>3</sup> Intermediate banks and/or beneficiary banks, if used, may deduct a fee from the total amount of your outgoing or incoming wires. See our Electronic Funds Transfer Disclosure for details.

<sup>4</sup> If a cashier's check is lost, stolen, or destroyed, you may have to either purchase an indemnity bond or allow 90 days to pass without the original being presented/paid before the check is replaced.

<sup>5</sup> Overnight delivery charge applies to next business day delivery within the contiguous United States only. Additional charges apply for shipments to Alaska, Hawaii, Puerto Rico, or any international location. Additional charges apply for Saturday delivery.

APR = Annual Percentage Rate (Yield assumes interest is reinvested. Fees may reduce earnings on account.)

APY = Annual Percentage Yield

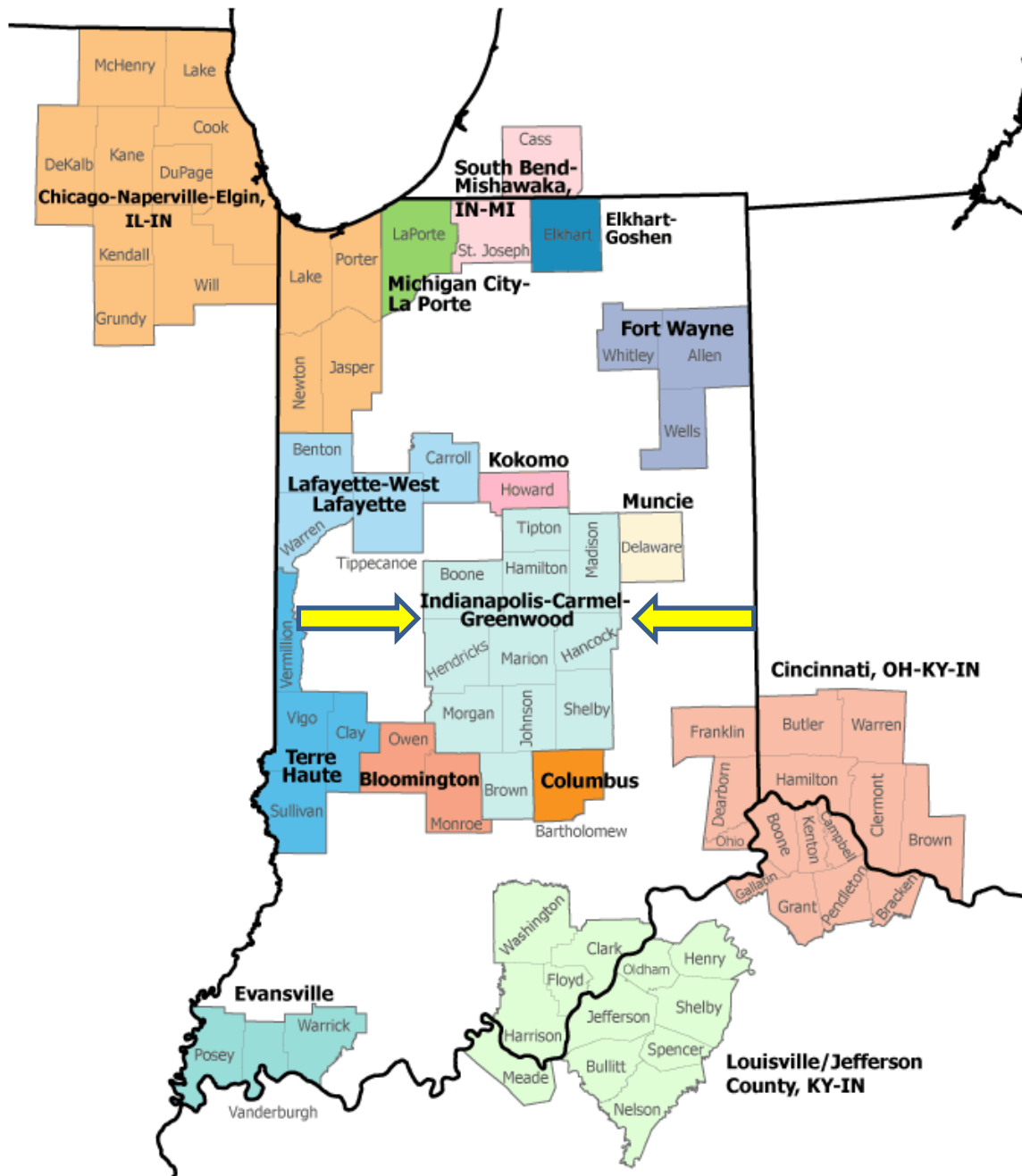
Rates and fees accurate as of 09/03/2024 and subject to change.

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**First Internet Bank Facility-Based Assessment Area and  
Retail Lending Assessment Area  
Indianapolis-Carmel-Greenwood MSA**

**Figure 1: Indiana's metropolitan statistical areas, 2023**



Source: Indiana Business Research Center, using July 2023 definitions from the OMB

2025 FFIEC Census Report - Summary Census Overview Information

MSA/MD: 26900 - INDIANAPOLIS-CARMEL-GREENWOOD, IN

State: INDIANA

County: ALL COUNTIES

All Tracts: 471



State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2025 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IN	BOONE COUNTY	8101.00	Middle	101.14	No	\$109,400	\$81,250	3573	250	7.00	1268	1622
IN	BOONE COUNTY	8102.00	Middle	110.13	No	\$109,400	\$88,477	3657	211	5.77	1200	1497
IN	BOONE COUNTY	8103.00	Upper	130.38	No	\$109,400	\$104,743	6028	593	9.84	2003	2336
IN	BOONE COUNTY	8104.00	Middle	96.07	No	\$109,400	\$77,179	6004	653	10.88	1666	2413
IN	BOONE COUNTY	8105.00	Middle	93.89	No	\$109,400	\$75,429	6814	734	10.77	1877	2403
IN	BOONE COUNTY	8106.01	Upper	132.42	No	\$109,400	\$106,382	8163	1284	15.73	2348	2743
IN	BOONE COUNTY	8106.04	Upper	228.21	No	\$109,400	\$183,333	6486	836	12.89	1972	2028
IN	BOONE COUNTY	8106.05	Upper	152.12	No	\$109,400	\$122,205	7083	1186	16.74	1660	2211
IN	BOONE COUNTY	8106.06	Upper	201.65	No	\$109,400	\$161,999	8339	1008	12.09	2264	2528
IN	BOONE COUNTY	8106.07	Upper	153.37	No	\$109,400	\$123,207	9651	2445	25.33	2371	2620
IN	BOONE COUNTY	8107.00	Middle	94.60	No	\$109,400	\$76,000	5014	477	9.51	1664	2066
IN	BROWN COUNTY	9746.00	Middle	111.90	No	\$109,400	\$89,896	2948	139	4.72	1069	2118
IN	BROWN COUNTY	9747.00	Moderate	73.58	No	\$109,400	\$59,111	3337	237	7.10	1161	1644
IN	BROWN COUNTY	9748.00	Middle	108.52	No	\$109,400	\$87,179	4295	290	6.75	1525	2259

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2025 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IN	BROWN COUNTY	9749.01	Middle	98.20	No	\$109,400	\$78,889	1750	126	7.20	598	743
IN	BROWN COUNTY	9749.02	Middle	93.93	No	\$109,400	\$75,463	3145	220	7.00	1086	1668
IN	BROWN COUNTY	9999.99	Middle	95.22	No	\$109,400	\$76,500	15475	1012	6.54	5439	8432
IN	HAMILTON COUNTY	1101.01	Middle	113.31	No	\$109,400	\$91,033	9078	2642	29.10	1796	2178
IN	HAMILTON COUNTY	1101.02	Middle	100.36	No	\$109,400	\$80,625	4271	294	6.88	1356	1567
IN	HAMILTON COUNTY	1102.01	Middle	100.10	No	\$109,400	\$80,417	4231	324	7.66	1422	1897
IN	HAMILTON COUNTY	1102.02	Middle	87.95	No	\$109,400	\$70,658	6632	520	7.84	2086	2412
IN	HAMILTON COUNTY	1103.01	Upper	131.52	No	\$109,400	\$105,661	9332	1594	17.08	2581	2841
IN	HAMILTON COUNTY	1103.02	Middle	117.39	No	\$109,400	\$94,308	5716	1259	22.03	933	1719
IN	HAMILTON COUNTY	1103.03	Middle	109.89	No	\$109,400	\$88,280	5218	414	7.93	1701	2216
IN	HAMILTON COUNTY	1104.01	Middle	90.01	No	\$109,400	\$72,308	4443	909	20.46	1252	1569
IN	HAMILTON COUNTY	1104.04	Upper	163.77	No	\$109,400	\$131,563	5309	684	12.88	1489	1514
IN	HAMILTON COUNTY	1104.05	Middle	114.18	No	\$109,400	\$91,731	5018	1136	22.64	862	1268
IN	HAMILTON COUNTY	1104.06	Middle	113.31	No	\$109,400	\$91,029	6395	969	15.15	2324	2494
IN	HAMILTON COUNTY	1105.05	Upper	131.02	No	\$109,400	\$105,258	7344	1134	15.44	2465	2744
IN	HAMILTON COUNTY	1105.09	Middle	109.82	No	\$109,400	\$88,229	5469	863	15.78	1778	2025
IN	HAMILTON COUNTY	1105.11	Upper	144.37	No	\$109,400	\$115,982	5688	508	8.93	1796	1837

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2025 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IN	HAMILTON COUNTY	1105.12	Upper	144.85	No	\$109,400	\$116,369	4863	424	8.72	1245	1411
IN	HAMILTON COUNTY	1105.13	Upper	137.97	No	\$109,400	\$110,842	11255	2722	24.18	2063	2705
IN	HAMILTON COUNTY	1105.14	Upper	127.26	No	\$109,400	\$102,237	3181	286	8.99	1391	1498
IN	HAMILTON COUNTY	1105.15	Upper	221.83	No	\$109,400	\$178,206	9520	1182	12.42	2361	2845
IN	HAMILTON COUNTY	1105.16	Upper	121.84	No	\$109,400	\$97,879	10257	1449	14.13	2772	3014
IN	HAMILTON COUNTY	1105.17	Upper	144.86	No	\$109,400	\$116,375	6811	1209	17.75	1871	2154
IN	HAMILTON COUNTY	1105.18	Upper	150.95	No	\$109,400	\$121,267	5151	569	11.05	1232	1462
IN	HAMILTON COUNTY	1106.00	Middle	88.42	No	\$109,400	\$71,036	4175	725	17.37	897	1390
IN	HAMILTON COUNTY	1107.00	Middle	82.79	No	\$109,400	\$66,509	3402	551	16.20	646	1441
IN	HAMILTON COUNTY	1108.05	Upper	192.94	No	\$109,400	\$155,000	7793	1272	16.32	2733	2880
IN	HAMILTON COUNTY	1108.07	Upper	120.27	No	\$109,400	\$96,617	6481	2149	33.16	1442	1717
IN	HAMILTON COUNTY	1108.10	Upper	121.69	No	\$109,400	\$97,765	6832	1274	18.65	1906	2344
IN	HAMILTON COUNTY	1108.11	Middle	107.11	No	\$109,400	\$86,045	4492	1017	22.64	1434	1814
IN	HAMILTON COUNTY	1108.12	Upper	137.01	No	\$109,400	\$110,070	6686	1471	22.00	1757	1930
IN	HAMILTON COUNTY	1108.13	Upper	223.24	No	\$109,400	\$179,341	13901	2962	21.31	3222	3611
IN	HAMILTON COUNTY	1108.14	Upper	159.26	No	\$109,400	\$127,945	11281	2880	25.53	3411	3562
IN	HAMILTON COUNTY	1108.15	Upper	163.58	No	\$109,400	\$131,414	7888	2198	27.87	1584	1956

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2025 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IN	HAMILTON COUNTY	1108.16	Upper	129.40	No	\$109,400	\$103,955	4346	1529	35.18	767	985
IN	HAMILTON COUNTY	1108.17	Upper	159.67	No	\$109,400	\$128,272	7395	1979	26.76	1924	2205
IN	HAMILTON COUNTY	1108.18	Upper	138.19	No	\$109,400	\$111,014	7656	2247	29.35	2002	2652
IN	HAMILTON COUNTY	1108.19	Upper	202.00	No	\$109,400	\$162,273	6086	977	16.05	2140	2286
IN	HAMILTON COUNTY	1108.20	Middle	89.28	No	\$109,400	\$71,724	4146	1277	30.80	885	1149
IN	HAMILTON COUNTY	1108.21	Upper	143.19	No	\$109,400	\$115,033	5000	1249	24.98	1304	1360
IN	HAMILTON COUNTY	1108.22	Upper	220.43	No	\$109,400	\$177,083	5632	1400	24.86	1271	1301
IN	HAMILTON COUNTY	1109.04	Upper	228.04	No	\$109,400	\$183,194	4652	659	14.17	1563	1563
IN	HAMILTON COUNTY	1109.05	Upper	121.69	No	\$109,400	\$97,763	3819	856	22.41	596	1039
IN	HAMILTON COUNTY	1109.06	Upper	169.64	No	\$109,400	\$136,279	6774	985	14.54	2081	2356
IN	HAMILTON COUNTY	1109.07	Upper	232.87	No	\$109,400	\$187,072	5358	805	15.02	1904	1975
IN	HAMILTON COUNTY	1109.09	Upper	256.74	No	\$109,400	\$206,250	6468	1973	30.50	2091	2197
IN	HAMILTON COUNTY	1109.10	Upper	224.06	No	\$109,400	\$180,000	7040	3237	45.98	1947	2102
IN	HAMILTON COUNTY	1109.11	Upper	180.98	No	\$109,400	\$145,391	7308	2161	29.57	1799	2085
IN	HAMILTON COUNTY	1109.12	Upper	192.94	No	\$109,400	\$155,000	5547	1193	21.51	1752	2086
IN	HAMILTON COUNTY	1110.03	Upper	168.65	No	\$109,400	\$135,489	4726	471	9.97	1950	2111
IN	HAMILTON COUNTY	1110.04	Upper	140.74	No	\$109,400	\$113,068	3014	540	17.92	901	1011

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2025 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IN	HAMILTON COUNTY	1110.06	Middle	116.76	No	\$109,400	\$93,798	4171	856	20.52	1441	1919
IN	HAMILTON COUNTY	1110.07	Middle	101.42	No	\$109,400	\$81,477	4030	1189	29.50	642	986
IN	HAMILTON COUNTY	1110.09	Upper	291.19	No	\$109,400	\$233,926	7816	1561	19.97	2390	2417
IN	HAMILTON COUNTY	1110.10	Upper	264.07	No	\$109,400	\$212,136	7044	2486	35.29	1596	1951
IN	HAMILTON COUNTY	1110.11	Middle	82.36	No	\$109,400	\$66,167	3377	858	25.41	828	1015
IN	HAMILTON COUNTY	1110.12	Middle	114.36	No	\$109,400	\$91,875	4564	1594	34.93	386	377
IN	HAMILTON COUNTY	1111.01	Upper	169.47	No	\$109,400	\$136,146	3852	655	17.00	1186	1271
IN	HAMILTON COUNTY	1111.03	Upper	223.94	No	\$109,400	\$179,904	4013	1060	26.41	1381	1420
IN	HAMILTON COUNTY	1111.04	Middle	110.53	No	\$109,400	\$88,796	5520	895	16.21	1856	2319
IN	HANCOCK COUNTY	4101.00	Middle	109.50	No	\$109,400	\$87,969	4151	223	5.37	1414	1646
IN	HANCOCK COUNTY	4102.01	Upper	129.60	No	\$109,400	\$104,118	9321	2100	22.53	2467	2751
IN	HANCOCK COUNTY	4102.02	Middle	99.16	No	\$109,400	\$79,659	6294	652	10.36	1968	2366
IN	HANCOCK COUNTY	4103.01	Middle	94.03	No	\$109,400	\$75,544	5026	372	7.40	1375	1551
IN	HANCOCK COUNTY	4103.02	Middle	112.39	No	\$109,400	\$90,288	8152	662	8.12	2493	2841
IN	HANCOCK COUNTY	4104.01	Moderate	54.83	No	\$109,400	\$44,047	2372	277	11.68	184	498
IN	HANCOCK COUNTY	4104.02	Middle	112.82	No	\$109,400	\$90,634	4708	332	7.05	1639	2111
IN	HANCOCK COUNTY	4105.00	Moderate	70.85	No	\$109,400	\$56,923	3007	282	9.38	724	1215



State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2025 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IN	HANCOCK COUNTY	4106.00	Moderate	76.47	No	\$109,400	\$61,436	5370	437	8.14	1097	1731
IN	HANCOCK COUNTY	4107.00	Upper	132.48	No	\$109,400	\$106,431	5640	267	4.73	2205	2457
IN	HANCOCK COUNTY	4108.01	Upper	122.05	No	\$109,400	\$98,047	4823	496	10.28	1368	1668
IN	HANCOCK COUNTY	4108.02	Upper	159.44	No	\$109,400	\$128,084	4609	248	5.38	1581	1674
IN	HANCOCK COUNTY	4109.01	Middle	107.97	No	\$109,400	\$86,736	4394	1404	31.95	1332	1483
IN	HANCOCK COUNTY	4109.02	Upper	133.73	No	\$109,400	\$107,431	4910	461	9.39	1828	1938
IN	HANCOCK COUNTY	4110.00	Upper	131.32	No	\$109,400	\$105,500	7063	521	7.38	2056	2517
IN	HENDRICKS COUNTY	2101.03	Upper	180.81	No	\$109,400	\$145,253	4832	404	8.36	1465	1492
IN	HENDRICKS COUNTY	2101.05	Upper	142.01	No	\$109,400	\$114,082	8622	1612	18.70	2510	2588
IN	HENDRICKS COUNTY	2101.06	Upper	128.00	No	\$109,400	\$102,831	8087	2170	26.83	2014	2246
IN	HENDRICKS COUNTY	2101.07	Middle	115.14	No	\$109,400	\$92,500	1796	136	7.57	506	562
IN	HENDRICKS COUNTY	2101.08	Upper	148.29	No	\$109,400	\$119,129	6848	2785	40.67	2412	2529
IN	HENDRICKS COUNTY	2101.09	Middle	107.98	No	\$109,400	\$86,750	5979	1361	22.76	1444	1919
IN	HENDRICKS COUNTY	2102.01	Middle	102.97	No	\$109,400	\$82,721	4591	1044	22.74	771	1163
IN	HENDRICKS COUNTY	2102.03	Middle	112.49	No	\$109,400	\$90,368	3420	354	10.35	915	1278
IN	HENDRICKS COUNTY	2102.04	Middle	103.66	No	\$109,400	\$83,281	5210	660	12.67	1583	1921
IN	HENDRICKS COUNTY	2103.00	Upper	131.24	No	\$109,400	\$105,430	6579	593	9.01	2322	2569

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2025 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IN	HENDRICKS COUNTY	2104.00	Middle	105.99	No	\$109,400	\$85,147	5035	253	5.02	1716	2067
IN	HENDRICKS COUNTY	2105.01	Middle	110.76	No	\$109,400	\$88,982	7056	491	6.96	2121	2465
IN	HENDRICKS COUNTY	2105.02	Upper	122.96	No	\$109,400	\$98,780	6095	560	9.19	1271	2059
IN	HENDRICKS COUNTY	2106.07	Middle	87.18	No	\$109,400	\$70,035	6508	2053	31.55	916	1138
IN	HENDRICKS COUNTY	2106.08	Upper	140.15	No	\$109,400	\$112,591	3649	619	16.96	1196	1415
IN	HENDRICKS COUNTY	2106.09	Middle	113.33	No	\$109,400	\$91,042	5359	888	16.57	1428	1892
IN	HENDRICKS COUNTY	2106.10	Upper	154.22	No	\$109,400	\$123,897	5520	752	13.62	1482	1670
IN	HENDRICKS COUNTY	2106.11	Middle	110.31	No	\$109,400	\$88,621	12767	4399	34.46	3119	3523
IN	HENDRICKS COUNTY	2106.12	Upper	169.89	No	\$109,400	\$136,483	5073	565	11.14	1540	1623
IN	HENDRICKS COUNTY	2106.13	Upper	159.97	No	\$109,400	\$128,511	6439	1104	17.15	2042	2201
IN	HENDRICKS COUNTY	2106.14	Middle	93.53	No	\$109,400	\$75,142	7558	3407	45.08	1892	2436
IN	HENDRICKS COUNTY	2106.15	Middle	114.69	No	\$109,400	\$92,135	6166	1852	30.04	1860	1860
IN	HENDRICKS COUNTY	2106.16	Middle	92.21	No	\$109,400	\$74,077	4277	1894	44.28	672	939
IN	HENDRICKS COUNTY	2106.17	Middle	84.91	No	\$109,400	\$68,214	2391	854	35.72	733	889
IN	HENDRICKS COUNTY	2107.01	Upper	128.86	No	\$109,400	\$103,523	6763	1427	21.10	1267	1460
IN	HENDRICKS COUNTY	2107.02	Upper	130.05	No	\$109,400	\$104,476	7097	1001	14.10	1895	2114
IN	HENDRICKS COUNTY	2108.01	Middle	83.44	No	\$109,400	\$67,034	3447	565	16.39	778	1202

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2025 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IN	HENDRICKS COUNTY	2108.02	Middle	108.18	No	\$109,400	\$86,912	4566	562	12.31	1471	1908
IN	HENDRICKS COUNTY	2109.00	Moderate	67.96	No	\$109,400	\$54,598	3393	373	10.99	803	1323
IN	HENDRICKS COUNTY	2110.00	Middle	96.88	No	\$109,400	\$77,829	6055	447	7.38	1989	2389
IN	HENDRICKS COUNTY	2111.00	Middle	110.62	No	\$109,400	\$88,871	3610	229	6.34	1154	1401
IN	JOHNSON COUNTY	6101.01	Middle	100.90	No	\$109,400	\$81,063	6598	2713	41.12	1283	1787
IN	JOHNSON COUNTY	6101.02	Middle	112.95	No	\$109,400	\$90,739	13043	3092	23.71	3300	4315
IN	JOHNSON COUNTY	6102.01	Moderate	75.15	No	\$109,400	\$60,377	4504	790	17.54	1296	1914
IN	JOHNSON COUNTY	6102.03	Middle	113.63	No	\$109,400	\$91,286	6325	1465	23.16	2151	2483
IN	JOHNSON COUNTY	6102.04	Middle	89.62	No	\$109,400	\$72,000	5385	1381	25.65	925	1322
IN	JOHNSON COUNTY	6103.00	Moderate	70.85	No	\$109,400	\$56,918	3540	424	11.98	868	1403
IN	JOHNSON COUNTY	6104.01	Middle	80.13	No	\$109,400	\$64,375	6076	1315	21.64	1125	1363
IN	JOHNSON COUNTY	6104.03	Middle	89.48	No	\$109,400	\$71,890	6096	1146	18.80	851	1836
IN	JOHNSON COUNTY	6104.04	Middle	115.77	No	\$109,400	\$93,007	5036	772	15.33	1501	1859
IN	JOHNSON COUNTY	6105.01	Middle	106.31	No	\$109,400	\$85,404	2805	263	9.38	962	1149
IN	JOHNSON COUNTY	6105.02	Middle	89.17	No	\$109,400	\$71,635	5565	534	9.60	1821	2434
IN	JOHNSON COUNTY	6106.03	Upper	149.71	No	\$109,400	\$120,274	7137	730	10.23	2659	2826
IN	JOHNSON COUNTY	6106.05	Middle	115.01	No	\$109,400	\$92,396	6067	998	16.45	1272	1673

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2025 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IN	JOHNSON COUNTY	6106.06	Middle	102.18	No	\$109,400	\$82,088	6068	770	12.69	1990	2256
IN	JOHNSON COUNTY	6106.07	Upper	144.31	No	\$109,400	\$115,933	6990	894	12.79	1882	2288
IN	JOHNSON COUNTY	6106.08	Middle	107.60	No	\$109,400	\$86,442	1911	120	6.28	635	714
IN	JOHNSON COUNTY	6107.03	Upper	163.22	No	\$109,400	\$131,125	6136	552	9.00	1925	2080
IN	JOHNSON COUNTY	6107.04	Upper	151.63	No	\$109,400	\$121,810	9238	1653	17.89	2023	2342
IN	JOHNSON COUNTY	6107.05	Upper	154.86	No	\$109,400	\$124,408	7034	1058	15.04	1372	1662
IN	JOHNSON COUNTY	6107.06	Moderate	69.60	No	\$109,400	\$55,917	2554	153	5.99	578	879
IN	JOHNSON COUNTY	6108.01	Upper	126.26	No	\$109,400	\$101,431	6873	572	8.32	1933	2385
IN	JOHNSON COUNTY	6108.02	Middle	103.54	No	\$109,400	\$83,183	7591	1042	13.73	2165	2540
IN	JOHNSON COUNTY	6109.00	Moderate	79.55	No	\$109,400	\$63,906	4908	462	9.41	1038	1937
IN	JOHNSON COUNTY	6110.00	Moderate	78.96	No	\$109,400	\$63,438	3682	339	9.21	591	1315
IN	JOHNSON COUNTY	6111.00	Middle	116.26	No	\$109,400	\$93,398	3369	249	7.39	1023	1203
IN	JOHNSON COUNTY	6112.00	Middle	113.97	No	\$109,400	\$91,563	5480	646	11.79	1572	1921
IN	JOHNSON COUNTY	6113.00	Moderate	69.74	No	\$109,400	\$56,027	3810	346	9.08	778	1499
IN	JOHNSON COUNTY	6114.00	Middle	118.70	No	\$109,400	\$95,357	7944	538	6.77	2612	3097
IN	MADISON COUNTY	0003.00	Moderate	51.34	No	\$109,400	\$41,250	2812	749	26.64	382	1259
IN	MADISON COUNTY	0004.00	Low	40.38	No	\$109,400	\$32,446	2307	1297	56.22	444	1042

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IN	MADISON COUNTY	0005.00	Low	38.11	No	\$109,400	\$30,617	2826	1474	52.16	565	1533
IN	MADISON COUNTY	0008.00	Low	47.12	No	\$109,400	\$37,857	1916	657	34.29	192	915
IN	MADISON COUNTY	0009.00	Low	47.20	No	\$109,400	\$37,924	1600	516	32.25	372	903
IN	MADISON COUNTY	0010.00	Moderate	51.39	No	\$109,400	\$41,289	2627	698	26.57	410	1322
IN	MADISON COUNTY	0011.00	Moderate	58.35	No	\$109,400	\$46,875	2449	589	24.05	299	1006
IN	MADISON COUNTY	0012.00	Moderate	57.56	No	\$109,400	\$46,241	2906	459	15.79	1060	1545
IN	MADISON COUNTY	0013.00	Moderate	76.20	No	\$109,400	\$61,215	4695	803	17.10	1339	1818
IN	MADISON COUNTY	0014.00	Moderate	64.97	No	\$109,400	\$52,194	3811	717	18.81	1199	2111
IN	MADISON COUNTY	0015.00	Middle	97.85	No	\$109,400	\$78,611	3941	710	18.02	1139	1454
IN	MADISON COUNTY	0016.00	Middle	102.80	No	\$109,400	\$82,583	2874	343	11.93	1077	1232
IN	MADISON COUNTY	0017.00	Moderate	72.07	No	\$109,400	\$57,900	3861	1693	43.85	1083	1634
IN	MADISON COUNTY	0018.01	Moderate	72.32	No	\$109,400	\$58,102	3577	847	23.68	991	1396
IN	MADISON COUNTY	0018.02	Moderate	69.84	No	\$109,400	\$56,108	1647	333	20.22	354	376
IN	MADISON COUNTY	0019.01	Middle	91.40	No	\$109,400	\$73,429	3159	666	21.08	1004	1563
IN	MADISON COUNTY	0019.02	Low	36.43	No	\$109,400	\$29,272	2661	783	29.43	592	1020
IN	MADISON COUNTY	0020.00	Moderate	67.45	No	\$109,400	\$54,191	4101	894	21.80	1195	2038
IN	MADISON COUNTY	0101.00	Middle	88.08	No	\$109,400	\$70,758	2934	123	4.19	861	1178

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IN	MADISON COUNTY	0102.00	Moderate	66.85	No	\$109,400	\$53,709	4655	423	9.09	1288	2135
IN	MADISON COUNTY	0103.00	Middle	84.97	No	\$109,400	\$68,264	3094	281	9.08	780	1387
IN	MADISON COUNTY	0104.00	Middle	94.31	No	\$109,400	\$75,764	2918	178	6.10	906	1215
IN	MADISON COUNTY	0105.00	Middle	91.02	No	\$109,400	\$73,125	3392	170	5.01	1054	1535
IN	MADISON COUNTY	0106.00	Middle	89.88	No	\$109,400	\$72,208	5385	455	8.45	1485	2532
IN	MADISON COUNTY	0107.00	Moderate	76.43	No	\$109,400	\$61,406	3277	318	9.70	1019	1282
IN	MADISON COUNTY	0108.00	Moderate	78.45	No	\$109,400	\$63,026	3293	282	8.56	936	1298
IN	MADISON COUNTY	0109.00	Middle	81.62	No	\$109,400	\$65,568	2165	151	6.97	643	945
IN	MADISON COUNTY	0110.00	Middle	94.67	No	\$109,400	\$76,058	1954	151	7.73	660	812
IN	MADISON COUNTY	0111.00	Middle	103.32	No	\$109,400	\$83,007	3908	226	5.78	1201	1750
IN	MADISON COUNTY	0112.00	Middle	88.92	No	\$109,400	\$71,434	6291	628	9.98	2488	2712
IN	MADISON COUNTY	0113.00	Moderate	77.69	No	\$109,400	\$62,411	2596	242	9.32	709	1148
IN	MADISON COUNTY	0114.00	Middle	102.98	No	\$109,400	\$82,727	3957	253	6.39	1224	1470
IN	MADISON COUNTY	0115.01	Middle	92.08	No	\$109,400	\$73,977	5598	638	11.40	1662	1946
IN	MADISON COUNTY	0115.02	Middle	116.29	No	\$109,400	\$93,426	4261	424	9.95	1231	1526
IN	MADISON COUNTY	0116.00	Unknown	0.00	No	\$109,400	\$0	2523	1105	43.80	0	0
IN	MADISON COUNTY	0117.00	Middle	108.14	No	\$109,400	\$86,875	2569	162	6.31	719	1162

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IN	MADISON COUNTY	0118.00	Middle	107.41	No	\$109,400	\$86,290	7243	924	12.76	2271	2719
IN	MADISON COUNTY	0119.00	Moderate	50.88	No	\$109,400	\$40,875	1687	542	32.13	245	690
IN	MADISON COUNTY	0120.00	Low	30.37	No	\$109,400	\$24,399	2659	1297	48.78	339	1383
IN	MARION COUNTY	3101.04	Middle	109.13	No	\$109,400	\$87,670	3576	1324	37.02	999	1520
IN	MARION COUNTY	3101.05	Middle	113.43	No	\$109,400	\$91,125	3830	2337	61.02	1017	1354
IN	MARION COUNTY	3101.06	Moderate	56.88	No	\$109,400	\$45,698	4161	2665	64.05	223	686
IN	MARION COUNTY	3101.08	Upper	203.49	No	\$109,400	\$163,472	3597	897	24.94	1298	1548
IN	MARION COUNTY	3101.10	Middle	84.59	No	\$109,400	\$67,955	3125	2092	66.94	507	858
IN	MARION COUNTY	3101.11	Moderate	56.48	No	\$109,400	\$45,380	3771	2669	70.78	489	871
IN	MARION COUNTY	3101.12	Upper	163.88	No	\$109,400	\$131,655	6264	2721	43.44	2364	2439
IN	MARION COUNTY	3101.13	Upper	155.24	No	\$109,400	\$124,714	1228	368	29.97	332	355
IN	MARION COUNTY	3102.01	Middle	87.04	No	\$109,400	\$69,922	4603	3235	70.28	971	1382
IN	MARION COUNTY	3102.03	Middle	83.69	No	\$109,400	\$67,231	5939	4385	73.83	1139	1672
IN	MARION COUNTY	3102.04	Middle	105.60	No	\$109,400	\$84,836	5281	4390	83.13	1196	1652
IN	MARION COUNTY	3103.05	Middle	80.07	No	\$109,400	\$64,327	6588	5834	88.55	766	1450
IN	MARION COUNTY	3103.06	Moderate	54.29	No	\$109,400	\$43,618	6924	6360	91.85	573	1771
IN	MARION COUNTY	3103.08	Moderate	78.68	No	\$109,400	\$63,208	3679	2927	79.56	768	1207

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IN	MARION COUNTY	3103.09	Moderate	66.54	No	\$109,400	\$53,457	3880	3318	85.52	329	958
IN	MARION COUNTY	3103.10	Middle	94.29	No	\$109,400	\$75,754	4550	3399	74.70	1572	1854
IN	MARION COUNTY	3103.11	Middle	86.53	No	\$109,400	\$69,513	5831	4490	77.00	1697	1882
IN	MARION COUNTY	3103.12	Moderate	58.93	No	\$109,400	\$47,345	6203	5344	86.15	1140	1995
IN	MARION COUNTY	3201.05	Middle	106.14	No	\$109,400	\$85,267	4528	2003	44.24	812	1412
IN	MARION COUNTY	3201.06	Unknown	0.00	No	\$109,400	\$0	2526	1072	42.44	514	1230
IN	MARION COUNTY	3201.07	Upper	152.36	No	\$109,400	\$122,396	1808	344	19.03	672	791
IN	MARION COUNTY	3201.08	Moderate	66.84	No	\$109,400	\$53,696	5546	3928	70.83	216	1110
IN	MARION COUNTY	3201.09	Upper	123.54	No	\$109,400	\$99,250	2578	676	26.22	1085	972
IN	MARION COUNTY	3202.02	Upper	138.30	No	\$109,400	\$111,101	4708	613	13.02	1565	1732
IN	MARION COUNTY	3202.03	Middle	82.11	No	\$109,400	\$65,966	3087	1183	38.32	305	875
IN	MARION COUNTY	3202.05	Unknown	0.00	No	\$109,400	\$0	2492	936	37.56	110	218
IN	MARION COUNTY	3202.06	Moderate	68.12	No	\$109,400	\$54,726	2915	1675	57.46	294	1048
IN	MARION COUNTY	3203.01	Upper	159.72	No	\$109,400	\$128,315	3413	427	12.51	1539	1831
IN	MARION COUNTY	3203.03	Middle	83.54	No	\$109,400	\$67,115	3585	1729	48.23	13	182
IN	MARION COUNTY	3203.05	Upper	159.35	No	\$109,400	\$128,015	2963	463	15.63	984	1035
IN	MARION COUNTY	3203.06	Upper	131.46	No	\$109,400	\$105,607	3997	832	20.82	1004	1265



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IN	MARION COUNTY	3204.00	Moderate	76.24	No	\$109,400	\$61,250	3228	1323	40.99	559	1077
IN	MARION COUNTY	3205.00	Middle	104.03	No	\$109,400	\$83,571	3121	753	24.13	756	1188
IN	MARION COUNTY	3206.00	Middle	89.88	No	\$109,400	\$72,204	2554	407	15.94	734	1121
IN	MARION COUNTY	3207.00	Upper	215.50	No	\$109,400	\$173,125	2353	347	14.75	722	730
IN	MARION COUNTY	3208.00	Upper	204.35	No	\$109,400	\$164,167	3225	320	9.92	1124	1172
IN	MARION COUNTY	3209.01	Middle	107.64	No	\$109,400	\$86,471	5883	2416	41.07	1752	2141
IN	MARION COUNTY	3209.02	Moderate	53.12	No	\$109,400	\$42,679	4644	3401	73.23	607	1245
IN	MARION COUNTY	3209.03	Low	38.76	No	\$109,400	\$31,140	4922	4372	88.83	531	1001
IN	MARION COUNTY	3210.01	Middle	85.65	No	\$109,400	\$68,808	2860	2100	73.43	735	1147
IN	MARION COUNTY	3210.02	Middle	116.21	No	\$109,400	\$93,356	4657	2350	50.46	1334	1613
IN	MARION COUNTY	3211.00	Middle	100.78	No	\$109,400	\$80,962	3631	1578	43.46	1186	1445
IN	MARION COUNTY	3212.00	Upper	186.26	No	\$109,400	\$149,632	5071	617	12.17	1634	2085
IN	MARION COUNTY	3213.00	Upper	160.15	No	\$109,400	\$128,661	2619	310	11.84	791	1112
IN	MARION COUNTY	3214.00	Middle	108.19	No	\$109,400	\$86,917	5364	1450	27.03	1395	1789
IN	MARION COUNTY	3216.00	Middle	96.87	No	\$109,400	\$77,823	5024	2823	56.19	1164	1486
IN	MARION COUNTY	3217.00	Upper	148.55	No	\$109,400	\$119,342	4183	797	19.05	1241	1651
IN	MARION COUNTY	3218.00	Upper	230.00	No	\$109,400	\$184,769	3556	461	12.96	1122	1473

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IN	MARION COUNTY	3219.00	Upper	224.58	No	\$109,400	\$180,417	6431	1151	17.90	1062	1337
IN	MARION COUNTY	3220.00	Moderate	79.63	No	\$109,400	\$63,974	3422	1955	57.13	674	1618
IN	MARION COUNTY	3221.00	Upper	147.82	No	\$109,400	\$118,750	2706	1273	47.04	638	1042
IN	MARION COUNTY	3222.00	Upper	138.97	No	\$109,400	\$111,641	2139	633	29.59	636	859
IN	MARION COUNTY	3223.00	Upper	145.07	No	\$109,400	\$116,542	2528	437	17.29	631	1088
IN	MARION COUNTY	3224.00	Middle	95.27	No	\$109,400	\$76,534	2964	1207	40.72	809	1431
IN	MARION COUNTY	3225.00	Low	47.11	No	\$109,400	\$37,852	1651	1075	65.11	199	741
IN	MARION COUNTY	3226.01	Low	14.47	No	\$109,400	\$11,630	2438	2339	95.94	106	505
IN	MARION COUNTY	3226.02	Middle	96.78	No	\$109,400	\$77,750	1356	1052	77.58	295	538
IN	MARION COUNTY	3227.00	Middle	86.87	No	\$109,400	\$69,792	2002	1674	83.62	618	775
IN	MARION COUNTY	3301.03	Middle	96.78	No	\$109,400	\$77,750	4436	1557	35.10	1355	1717
IN	MARION COUNTY	3301.05	Middle	93.10	No	\$109,400	\$74,792	5344	2330	43.60	631	1516
IN	MARION COUNTY	3301.06	Low	45.77	No	\$109,400	\$36,776	4354	2346	53.88	279	1323
IN	MARION COUNTY	3301.07	Upper	124.85	No	\$109,400	\$100,301	5683	1121	19.73	2334	2466
IN	MARION COUNTY	3301.08	Upper	184.58	No	\$109,400	\$148,281	3665	580	15.83	1491	1708
IN	MARION COUNTY	3301.09	Middle	112.20	No	\$109,400	\$90,139	4907	1307	26.64	1936	2201
IN	MARION COUNTY	3302.03	Upper	228.12	No	\$109,400	\$183,261	5418	971	17.92	1942	1979

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IN	MARION COUNTY	3302.04	Upper	156.57	No	\$109,400	\$125,781	6133	3022	49.27	2437	2598
IN	MARION COUNTY	3302.06	Upper	141.07	No	\$109,400	\$113,333	4695	1595	33.97	1599	1840
IN	MARION COUNTY	3302.08	Upper	136.20	No	\$109,400	\$109,420	2879	785	27.27	1134	1244
IN	MARION COUNTY	3302.10	Middle	102.04	No	\$109,400	\$81,977	6309	5026	79.66	1569	1979
IN	MARION COUNTY	3302.11	Low	46.42	No	\$109,400	\$37,293	6010	4902	81.56	632	1566
IN	MARION COUNTY	3302.12	Middle	102.71	No	\$109,400	\$82,518	5032	2993	59.48	1343	1763
IN	MARION COUNTY	3302.13	Upper	138.25	No	\$109,400	\$111,066	4063	1053	25.92	1171	1564
IN	MARION COUNTY	3304.01	Upper	123.36	No	\$109,400	\$99,100	5985	2104	35.15	1705	1727
IN	MARION COUNTY	3305.00	Moderate	75.50	No	\$109,400	\$60,659	6329	4776	75.46	1848	2438
IN	MARION COUNTY	3306.00	Moderate	59.22	No	\$109,400	\$47,574	5267	3112	59.08	939	2000
IN	MARION COUNTY	3307.01	Low	46.30	No	\$109,400	\$37,197	2123	1449	68.25	371	981
IN	MARION COUNTY	3307.02	Moderate	61.52	No	\$109,400	\$49,426	5026	3471	69.06	992	1479
IN	MARION COUNTY	3308.03	Low	43.37	No	\$109,400	\$34,842	3638	3269	89.86	417	1476
IN	MARION COUNTY	3308.04	Moderate	75.93	No	\$109,400	\$61,004	3671	3376	91.96	308	963
IN	MARION COUNTY	3308.05	Low	41.63	No	\$109,400	\$33,446	3089	2337	75.66	298	805
IN	MARION COUNTY	3308.06	Low	31.74	No	\$109,400	\$25,500	4269	3768	88.26	536	1233
IN	MARION COUNTY	3309.00	Low	43.19	No	\$109,400	\$34,699	5686	5138	90.36	674	1688

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IN	MARION COUNTY	3310.00	Moderate	52.85	No	\$109,400	\$42,458	4194	4000	95.37	789	1746
IN	MARION COUNTY	3401.01	Middle	86.29	No	\$109,400	\$69,323	4066	1254	30.84	1622	1855
IN	MARION COUNTY	3401.02	Moderate	62.43	No	\$109,400	\$50,154	4666	3172	67.98	307	586
IN	MARION COUNTY	3401.08	Moderate	52.48	No	\$109,400	\$42,163	3761	3333	88.62	125	534
IN	MARION COUNTY	3401.11	Middle	99.89	No	\$109,400	\$80,250	3870	2231	57.65	863	964
IN	MARION COUNTY	3401.12	Moderate	63.74	No	\$109,400	\$51,210	5108	2801	54.84	1026	1257
IN	MARION COUNTY	3401.13	Moderate	69.02	No	\$109,400	\$55,449	4422	1596	36.09	905	1269
IN	MARION COUNTY	3401.14	Middle	104.00	No	\$109,400	\$83,553	4440	1554	35.00	1121	1466
IN	MARION COUNTY	3401.15	Moderate	63.25	No	\$109,400	\$50,818	6601	5044	76.41	588	1585
IN	MARION COUNTY	3402.01	Moderate	62.43	No	\$109,400	\$50,156	3676	2895	78.75	693	994
IN	MARION COUNTY	3402.02	Moderate	52.54	No	\$109,400	\$42,212	4830	2903	60.10	547	1035
IN	MARION COUNTY	3403.01	Low	47.04	No	\$109,400	\$37,795	3190	2713	85.05	359	989
IN	MARION COUNTY	3403.02	Moderate	53.28	No	\$109,400	\$42,808	4968	4343	87.42	562	1197
IN	MARION COUNTY	3404.00	Moderate	54.82	No	\$109,400	\$44,042	4024	3317	82.43	601	1274
IN	MARION COUNTY	3405.00	Moderate	59.31	No	\$109,400	\$47,647	4932	3459	70.13	384	1127
IN	MARION COUNTY	3406.00	Moderate	61.37	No	\$109,400	\$49,306	5274	4214	79.90	837	1679
IN	MARION COUNTY	3407.00	Moderate	51.34	No	\$109,400	\$41,250	4219	3174	75.23	522	1449

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IN	MARION COUNTY	3408.00	Middle	82.89	No	\$109,400	\$66,591	1751	331	18.90	579	788
IN	MARION COUNTY	3409.01	Middle	97.29	No	\$109,400	\$78,163	4034	2070	51.31	1025	1291
IN	MARION COUNTY	3409.03	Moderate	50.38	No	\$109,400	\$40,479	1742	1208	69.35	94	525
IN	MARION COUNTY	3409.04	Middle	88.99	No	\$109,400	\$71,492	5235	2776	53.03	714	1461
IN	MARION COUNTY	3410.00	Middle	108.25	No	\$109,400	\$86,964	1817	220	12.11	511	756
IN	MARION COUNTY	3411.00	Low	47.91	No	\$109,400	\$38,491	2239	1415	63.20	367	915
IN	MARION COUNTY	3412.00	Low	33.24	No	\$109,400	\$26,706	2535	2323	91.64	341	1110
IN	MARION COUNTY	3416.00	Low	37.69	No	\$109,400	\$30,278	2375	2070	87.16	336	862
IN	MARION COUNTY	3417.01	Low	39.35	No	\$109,400	\$31,615	2906	1954	67.24	352	1022
IN	MARION COUNTY	3417.02	Moderate	70.02	No	\$109,400	\$56,250	1962	725	36.95	352	879
IN	MARION COUNTY	3419.02	Middle	82.57	No	\$109,400	\$66,336	3957	1655	41.82	1228	1440
IN	MARION COUNTY	3419.03	Low	46.35	No	\$109,400	\$37,242	4839	3828	79.11	465	1429
IN	MARION COUNTY	3419.04	Low	49.03	No	\$109,400	\$39,389	2411	1809	75.03	228	449
IN	MARION COUNTY	3420.00	Moderate	74.21	No	\$109,400	\$59,623	6690	3760	56.20	1605	2089
IN	MARION COUNTY	3421.01	Moderate	75.56	No	\$109,400	\$60,707	5575	3114	55.86	1248	1795
IN	MARION COUNTY	3422.00	Moderate	58.48	No	\$109,400	\$46,984	5454	2799	51.32	712	1659
IN	MARION COUNTY	3423.00	Moderate	58.12	No	\$109,400	\$46,691	6860	2193	31.97	1545	2211

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2025 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IN	MARION COUNTY	3424.00	Moderate	72.09	No	\$109,400	\$57,917	1575	443	28.13	326	632
IN	MARION COUNTY	3425.00	Low	46.82	No	\$109,400	\$37,615	5004	2137	42.71	994	1798
IN	MARION COUNTY	3426.00	Low	41.93	No	\$109,400	\$33,684	3490	1722	49.34	589	1499
IN	MARION COUNTY	3501.00	Moderate	54.35	No	\$109,400	\$43,665	1390	1188	85.47	340	732
IN	MARION COUNTY	3503.00	Low	30.26	No	\$109,400	\$24,313	2511	1919	76.42	89	421
IN	MARION COUNTY	3504.00	Moderate	72.54	No	\$109,400	\$58,281	2490	1664	66.83	546	892
IN	MARION COUNTY	3505.00	Low	35.01	No	\$109,400	\$28,125	2395	2286	95.45	464	1212
IN	MARION COUNTY	3506.00	Moderate	50.45	No	\$109,400	\$40,536	4406	4160	94.42	1142	2552
IN	MARION COUNTY	3507.00	Low	37.96	No	\$109,400	\$30,500	1566	1463	93.42	323	893
IN	MARION COUNTY	3508.00	Low	34.88	No	\$109,400	\$28,026	2375	2254	94.91	194	1001
IN	MARION COUNTY	3509.00	Middle	82.46	No	\$109,400	\$66,250	1687	1219	72.26	335	742
IN	MARION COUNTY	3510.00	Low	41.39	No	\$109,400	\$33,250	2555	1778	69.59	679	1207
IN	MARION COUNTY	3512.00	Low	42.01	No	\$109,400	\$33,750	2381	2256	94.75	309	1350
IN	MARION COUNTY	3515.00	Moderate	51.75	No	\$109,400	\$41,574	2023	1403	69.35	265	777
IN	MARION COUNTY	3516.00	Upper	192.94	No	\$109,400	\$155,000	2293	929	40.51	728	1010
IN	MARION COUNTY	3517.00	Middle	95.93	No	\$109,400	\$77,071	2642	1647	62.34	684	1469
IN	MARION COUNTY	3519.00	Moderate	58.23	No	\$109,400	\$46,782	2140	2066	96.54	550	1165

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IN	MARION COUNTY	3521.00	Low	39.52	No	\$109,400	\$31,750	2121	1936	91.28	360	1130
IN	MARION COUNTY	3523.00	Low	40.03	No	\$109,400	\$32,163	1604	1475	91.96	268	708
IN	MARION COUNTY	3524.00	Moderate	51.69	No	\$109,400	\$41,528	3056	1961	64.17	371	1259
IN	MARION COUNTY	3525.00	Low	48.84	No	\$109,400	\$39,239	3003	1119	37.26	856	1793
IN	MARION COUNTY	3526.00	Moderate	53.71	No	\$109,400	\$43,149	3739	2353	62.93	588	1888
IN	MARION COUNTY	3527.00	Moderate	61.07	No	\$109,400	\$49,063	2423	1235	50.97	385	1205
IN	MARION COUNTY	3528.00	Low	46.61	No	\$109,400	\$37,448	1480	1220	82.43	140	473
IN	MARION COUNTY	3533.00	Upper	141.28	No	\$109,400	\$113,500	2717	959	35.30	229	322
IN	MARION COUNTY	3535.00	Middle	88.45	No	\$109,400	\$71,058	2480	1586	63.95	97	469
IN	MARION COUNTY	3536.00	Moderate	51.67	No	\$109,400	\$41,510	2708	2082	76.88	364	1112
IN	MARION COUNTY	3542.01	Upper	169.81	No	\$109,400	\$136,420	4538	1551	34.18	718	524
IN	MARION COUNTY	3542.02	Upper	167.22	No	\$109,400	\$134,338	3206	960	29.94	679	797
IN	MARION COUNTY	3544.00	Middle	112.96	No	\$109,400	\$90,750	1514	388	25.63	423	716
IN	MARION COUNTY	3545.00	Middle	109.18	No	\$109,400	\$87,708	2237	848	37.91	348	1086
IN	MARION COUNTY	3547.00	Moderate	55.39	No	\$109,400	\$44,500	1559	868	55.68	288	806
IN	MARION COUNTY	3548.00	Low	48.69	No	\$109,400	\$39,116	1765	1106	62.66	250	838
IN	MARION COUNTY	3549.00	Low	41.62	No	\$109,400	\$33,438	2651	1597	60.24	314	1477

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IN	MARION COUNTY	3550.00	Low	38.61	No	\$109,400	\$31,019	2325	1361	58.54	386	1059
IN	MARION COUNTY	3551.00	Low	27.83	No	\$109,400	\$22,364	1986	1207	60.78	147	874
IN	MARION COUNTY	3553.00	Low	46.33	No	\$109,400	\$37,222	2588	1120	43.28	346	1097
IN	MARION COUNTY	3554.00	Moderate	64.05	No	\$109,400	\$51,458	2639	1170	44.33	603	1299
IN	MARION COUNTY	3555.00	Moderate	73.03	No	\$109,400	\$58,672	3809	1192	31.29	836	1622
IN	MARION COUNTY	3556.00	Low	40.21	No	\$109,400	\$32,308	2283	1026	44.94	398	977
IN	MARION COUNTY	3557.00	Moderate	50.72	No	\$109,400	\$40,745	2420	986	40.74	433	1215
IN	MARION COUNTY	3559.00	Upper	124.93	No	\$109,400	\$100,368	2258	512	22.67	501	1121
IN	MARION COUNTY	3562.00	Upper	144.98	No	\$109,400	\$116,467	2783	792	28.46	319	471
IN	MARION COUNTY	3564.00	Low	49.13	No	\$109,400	\$39,468	3746	1976	52.75	414	1538
IN	MARION COUNTY	3569.00	Moderate	53.38	No	\$109,400	\$42,885	2188	676	30.90	479	1122
IN	MARION COUNTY	3570.00	Low	32.89	No	\$109,400	\$26,429	2018	467	23.14	420	1162
IN	MARION COUNTY	3571.00	Middle	88.10	No	\$109,400	\$70,781	2111	613	29.04	551	1192
IN	MARION COUNTY	3572.00	Low	42.28	No	\$109,400	\$33,972	3153	1359	43.10	474	1334
IN	MARION COUNTY	3573.00	Moderate	50.82	No	\$109,400	\$40,833	1970	964	48.93	316	955
IN	MARION COUNTY	3574.00	Low	44.81	No	\$109,400	\$36,000	4345	2036	46.86	936	1761
IN	MARION COUNTY	3575.00	Moderate	68.24	No	\$109,400	\$54,824	3917	569	14.53	999	1380



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IN	MARION COUNTY	3576.01	Low	37.79	No	\$109,400	\$30,362	5132	1921	37.43	1014	2136
IN	MARION COUNTY	3576.02	Middle	84.42	No	\$109,400	\$67,820	1694	859	50.71	242	570
IN	MARION COUNTY	3578.00	Moderate	55.51	No	\$109,400	\$44,597	1909	639	33.47	324	806
IN	MARION COUNTY	3579.00	Middle	88.69	No	\$109,400	\$71,250	3840	1111	28.93	830	1606
IN	MARION COUNTY	3580.00	Low	45.12	No	\$109,400	\$36,250	1363	430	31.55	231	582
IN	MARION COUNTY	3581.00	Moderate	57.75	No	\$109,400	\$46,397	2910	1356	46.60	595	1257
IN	MARION COUNTY	3601.01	Moderate	51.93	No	\$109,400	\$41,719	2571	1938	75.38	351	984
IN	MARION COUNTY	3601.02	Low	41.72	No	\$109,400	\$33,521	2826	2521	89.21	419	1295
IN	MARION COUNTY	3602.01	Low	48.87	No	\$109,400	\$39,263	4162	3188	76.60	554	1211
IN	MARION COUNTY	3602.02	Moderate	59.49	No	\$109,400	\$47,791	3179	2525	79.43	725	1201
IN	MARION COUNTY	3603.01	Moderate	51.65	No	\$109,400	\$41,500	4167	2924	70.17	678	1083
IN	MARION COUNTY	3603.02	Low	33.84	No	\$109,400	\$27,188	2706	2217	81.93	289	1087
IN	MARION COUNTY	3604.01	Low	46.42	No	\$109,400	\$37,296	6205	5208	83.93	556	2005
IN	MARION COUNTY	3604.02	Unknown	0.00	No	\$109,400	\$0	2088	1752	83.91	422	1130
IN	MARION COUNTY	3604.05	Middle	82.21	No	\$109,400	\$66,042	6760	5117	75.70	1546	2168
IN	MARION COUNTY	3604.06	Unknown	0.00	No	\$109,400	\$0	4865	4444	91.35	382	1330
IN	MARION COUNTY	3604.07	Moderate	69.80	No	\$109,400	\$56,080	3020	2381	78.84	678	975

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IN	MARION COUNTY	3605.01	Middle	94.00	No	\$109,400	\$75,515	6289	3565	56.69	1624	2598
IN	MARION COUNTY	3605.02	Moderate	66.95	No	\$109,400	\$53,784	5902	3346	56.69	1657	2263
IN	MARION COUNTY	3606.01	Middle	82.46	No	\$109,400	\$66,250	4889	1960	40.09	1603	2001
IN	MARION COUNTY	3606.02	Moderate	50.22	No	\$109,400	\$40,344	5585	2581	46.21	980	1441
IN	MARION COUNTY	3607.00	Middle	108.22	No	\$109,400	\$86,938	1850	395	21.35	760	930
IN	MARION COUNTY	3608.00	Moderate	63.08	No	\$109,400	\$50,682	2485	1169	47.04	334	638
IN	MARION COUNTY	3609.00	Unknown	0.00	No	\$109,400	\$0	5570	2671	47.95	1536	2256
IN	MARION COUNTY	3610.00	Upper	126.70	No	\$109,400	\$101,786	2113	232	10.98	951	1111
IN	MARION COUNTY	3611.00	Middle	97.58	No	\$109,400	\$78,390	3131	611	19.51	966	1309
IN	MARION COUNTY	3612.00	Moderate	75.97	No	\$109,400	\$61,035	3137	711	22.66	717	1461
IN	MARION COUNTY	3613.00	Moderate	58.89	No	\$109,400	\$47,315	2710	690	25.46	802	1143
IN	MARION COUNTY	3614.01	Unknown	0.00	No	\$109,400	\$0	5451	3045	55.86	1405	1936
IN	MARION COUNTY	3614.02	Moderate	69.92	No	\$109,400	\$56,172	5600	1537	27.45	1383	2018
IN	MARION COUNTY	3616.01	Middle	110.28	No	\$109,400	\$88,594	5290	2577	48.71	2067	1978
IN	MARION COUNTY	3616.02	Middle	112.62	No	\$109,400	\$90,472	3640	1360	37.36	1197	1266
IN	MARION COUNTY	3702.01	Moderate	64.14	No	\$109,400	\$51,528	4102	1098	26.77	701	1050
IN	MARION COUNTY	3702.03	Low	37.50	No	\$109,400	\$30,128	4006	1729	43.16	723	1225

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IN	MARION COUNTY	3702.04	Moderate	63.24	No	\$109,400	\$50,809	4035	838	20.77	670	1151
IN	MARION COUNTY	3703.03	Middle	95.69	No	\$109,400	\$76,875	7217	2228	30.87	1669	2146
IN	MARION COUNTY	3703.04	Middle	111.96	No	\$109,400	\$89,946	3440	826	24.01	1003	1213
IN	MARION COUNTY	3703.05	Moderate	71.46	No	\$109,400	\$57,409	3589	1009	28.11	579	948
IN	MARION COUNTY	3703.06	Middle	92.75	No	\$109,400	\$74,514	5664	1255	22.16	1522	1860
IN	MARION COUNTY	3801.01	Upper	150.07	No	\$109,400	\$120,560	7112	1842	25.90	2299	2575
IN	MARION COUNTY	3801.02	Upper	128.51	No	\$109,400	\$103,241	3238	1578	48.73	813	813
IN	MARION COUNTY	3801.03	Middle	97.13	No	\$109,400	\$78,032	9056	3108	34.32	1695	2657
IN	MARION COUNTY	3802.00	Moderate	75.96	No	\$109,400	\$61,027	3291	938	28.50	715	1059
IN	MARION COUNTY	3803.01	Low	44.13	No	\$109,400	\$35,458	1849	708	38.29	444	803
IN	MARION COUNTY	3803.02	Low	45.28	No	\$109,400	\$36,375	4141	1517	36.63	328	880
IN	MARION COUNTY	3804.02	Moderate	78.60	No	\$109,400	\$63,145	4867	1818	37.35	663	1237
IN	MARION COUNTY	3804.03	Middle	80.13	No	\$109,400	\$64,375	4026	603	14.98	1055	1501
IN	MARION COUNTY	3804.04	Moderate	75.77	No	\$109,400	\$60,870	4247	1001	23.57	1112	1653
IN	MARION COUNTY	3805.01	Moderate	61.58	No	\$109,400	\$49,471	2639	982	37.21	553	811
IN	MARION COUNTY	3805.02	Moderate	63.86	No	\$109,400	\$51,307	4695	2051	43.68	489	1618
IN	MARION COUNTY	3806.00	Middle	80.26	No	\$109,400	\$64,482	5383	2562	47.59	1060	1894

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IN	MARION COUNTY	3807.00	Moderate	69.97	No	\$109,400	\$56,211	6221	2888	46.42	1213	1720
IN	MARION COUNTY	3808.00	Moderate	70.58	No	\$109,400	\$56,701	2947	703	23.85	899	1198
IN	MARION COUNTY	3809.01	Middle	80.58	No	\$109,400	\$64,739	5538	1959	35.37	1709	1852
IN	MARION COUNTY	3809.02	Upper	132.94	No	\$109,400	\$106,802	6133	1217	19.84	1969	2099
IN	MARION COUNTY	3810.02	Upper	138.48	No	\$109,400	\$111,250	3258	803	24.65	1177	1338
IN	MARION COUNTY	3810.03	Moderate	65.90	No	\$109,400	\$52,944	4005	2309	57.65	629	957
IN	MARION COUNTY	3810.04	Moderate	74.28	No	\$109,400	\$59,677	4045	2167	53.57	281	763
IN	MARION COUNTY	3811.01	Middle	116.27	No	\$109,400	\$93,409	5939	1749	29.45	1563	1929
IN	MARION COUNTY	3811.02	Middle	86.30	No	\$109,400	\$69,329	7356	3174	43.15	2256	2450
IN	MARION COUNTY	3812.03	Low	39.18	No	\$109,400	\$31,477	3101	1970	63.53	273	769
IN	MARION COUNTY	3812.04	Middle	82.94	No	\$109,400	\$66,630	3539	1446	40.86	151	409
IN	MARION COUNTY	3812.05	Moderate	66.61	No	\$109,400	\$53,516	7687	3148	40.95	1041	1676
IN	MARION COUNTY	3812.06	Middle	94.29	No	\$109,400	\$75,750	4395	1484	33.77	926	1247
IN	MARION COUNTY	3812.07	Middle	93.10	No	\$109,400	\$74,792	3060	655	21.41	1414	1476
IN	MARION COUNTY	3901.02	Moderate	56.79	No	\$109,400	\$45,625	5712	2072	36.27	800	1638
IN	MARION COUNTY	3901.03	Moderate	70.89	No	\$109,400	\$56,950	3437	794	23.10	1070	1230
IN	MARION COUNTY	3901.04	Middle	101.83	No	\$109,400	\$81,806	7020	2254	32.11	1754	2100

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IN	MARION COUNTY	3902.00	Upper	125.62	No	\$109,400	\$100,919	6766	1852	27.37	1318	1585
IN	MARION COUNTY	3903.00	Upper	120.55	No	\$109,400	\$96,845	6844	1088	15.90	1803	2078
IN	MARION COUNTY	3904.05	Upper	123.99	No	\$109,400	\$99,606	4561	1754	38.46	844	1075
IN	MARION COUNTY	3904.06	Upper	125.93	No	\$109,400	\$101,167	5870	1463	24.92	1599	1804
IN	MARION COUNTY	3904.07	Upper	164.25	No	\$109,400	\$131,949	5632	718	12.75	1781	1816
IN	MARION COUNTY	3904.08	Middle	108.53	No	\$109,400	\$87,188	5703	1218	21.36	1454	1655
IN	MARION COUNTY	3904.09	Upper	120.83	No	\$109,400	\$97,069	8018	1949	24.31	2258	2308
IN	MARION COUNTY	3904.10	Upper	134.44	No	\$109,400	\$108,007	2313	397	17.16	549	549
IN	MARION COUNTY	3904.11	Middle	85.31	No	\$109,400	\$68,533	4395	1194	27.17	964	1327
IN	MARION COUNTY	3905.00	Moderate	53.60	No	\$109,400	\$43,065	2450	2148	87.67	499	1323
IN	MARION COUNTY	3906.01	Low	36.14	No	\$109,400	\$29,035	959	406	42.34	102	562
IN	MARION COUNTY	3906.02	Middle	95.42	No	\$109,400	\$76,659	3157	1747	55.34	472	666
IN	MARION COUNTY	3907.00	Moderate	55.77	No	\$109,400	\$44,803	3951	2737	69.27	606	1281
IN	MARION COUNTY	3908.01	Unknown	0.00	No	\$109,400	\$0	1	1	100.00	0	0
IN	MARION COUNTY	3908.02	Middle	87.13	No	\$109,400	\$70,000	4892	1297	26.51	818	1136
IN	MARION COUNTY	3909.00	Upper	170.38	No	\$109,400	\$136,875	3395	1370	40.35	586	1054
IN	MARION COUNTY	3910.01	Unknown	0.00	No	\$109,400	\$0	2731	957	35.04	42	161

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IN	MARION COUNTY	3910.02	Upper	165.80	No	\$109,400	\$133,194	5931	2076	35.00	504	206
IN	MORGAN COUNTY	5101.01	Middle	110.33	No	\$109,400	\$88,636	5331	520	9.75	1933	2228
IN	MORGAN COUNTY	5101.02	Upper	137.21	No	\$109,400	\$110,227	4860	325	6.69	1698	1950
IN	MORGAN COUNTY	5102.01	Middle	93.80	No	\$109,400	\$75,357	4191	302	7.21	1256	1462
IN	MORGAN COUNTY	5102.02	Middle	91.96	No	\$109,400	\$73,878	4304	316	7.34	1098	1569
IN	MORGAN COUNTY	5103.00	Middle	81.57	No	\$109,400	\$65,530	4921	334	6.79	1255	1934
IN	MORGAN COUNTY	5104.01	Middle	94.09	No	\$109,400	\$75,592	3966	241	6.08	1138	1583
IN	MORGAN COUNTY	5104.02	Middle	115.02	No	\$109,400	\$92,400	5795	419	7.23	1677	2042
IN	MORGAN COUNTY	5105.00	Middle	90.10	No	\$109,400	\$72,386	4243	246	5.80	1341	1626
IN	MORGAN COUNTY	5106.01	Middle	106.81	No	\$109,400	\$85,809	5249	291	5.54	1676	1965
IN	MORGAN COUNTY	5106.02	Middle	87.26	No	\$109,400	\$70,104	3605	209	5.80	1160	1498
IN	MORGAN COUNTY	5107.01	Moderate	71.44	No	\$109,400	\$57,391	3431	224	6.53	912	1352
IN	MORGAN COUNTY	5107.03	Upper	145.64	No	\$109,400	\$117,000	3893	294	7.55	981	1158
IN	MORGAN COUNTY	5107.04	Middle	81.49	No	\$109,400	\$65,469	3032	221	7.29	768	878
IN	MORGAN COUNTY	5108.00	Moderate	66.30	No	\$109,400	\$53,264	3632	259	7.13	906	1672
IN	MORGAN COUNTY	5109.00	Middle	84.94	No	\$109,400	\$68,235	3669	186	5.07	736	1446
IN	MORGAN COUNTY	5110.01	Middle	107.78	No	\$109,400	\$86,587	5623	332	5.90	1929	2263

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2025 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IN	MORGAN COUNTY	5110.02	Moderate	75.55	No	\$109,400	\$60,694	2035	89	4.37	501	818
IN	SHELBY COUNTY	7101.00	Middle	97.04	No	\$109,400	\$77,957	3678	201	5.46	1080	1408
IN	SHELBY COUNTY	7102.00	Middle	96.80	No	\$109,400	\$77,765	5702	381	6.68	1863	2176
IN	SHELBY COUNTY	7103.00	Middle	105.34	No	\$109,400	\$84,625	4753	297	6.25	1661	2133
IN	SHELBY COUNTY	7104.00	Moderate	70.18	No	\$109,400	\$56,380	3198	789	24.67	753	1054
IN	SHELBY COUNTY	7105.00	Middle	82.69	No	\$109,400	\$66,434	5343	1021	19.11	1186	1838
IN	SHELBY COUNTY	7106.01	Moderate	72.15	No	\$109,400	\$57,966	3277	458	13.98	734	1590
IN	SHELBY COUNTY	7106.02	Moderate	70.92	No	\$109,400	\$56,974	3188	437	13.71	601	1153
IN	SHELBY COUNTY	7107.00	Middle	92.56	No	\$109,400	\$74,364	6453	698	10.82	1969	2486
IN	SHELBY COUNTY	7108.00	Middle	97.79	No	\$109,400	\$78,559	4869	236	4.85	1569	1933
IN	SHELBY COUNTY	7109.00	Middle	109.11	No	\$109,400	\$87,656	4594	232	5.05	1684	2033
IN	TIPTON COUNTY	0201.00	Middle	106.58	No	\$109,400	\$85,625	2546	181	7.11	841	1234
IN	TIPTON COUNTY	0202.00	Middle	114.29	No	\$109,400	\$91,818	3393	218	6.42	1258	1424
IN	TIPTON COUNTY	0203.00	Middle	119.76	No	\$109,400	\$96,207	2685	139	5.18	1116	1378
IN	TIPTON COUNTY	0204.01	Middle	86.51	No	\$109,400	\$69,500	4198	259	6.17	1287	1879
IN	TIPTON COUNTY	0204.02	Middle	81.77	No	\$109,400	\$65,694	2537	195	7.69	700	947
IN	TIPTON COUNTY	9999.99	Middle	101.70	No	\$109,400	\$81,705	15359	992	6.46	5202	6862



The 2023, 2022, and 2021 CRA Disclosure Statements pertaining to First Internet Bank, its operating subsidiaries, and its other affiliates, if applicable, may be obtained on the FFIEC's website at:

<https://www.ffiec.gov/data/cra/disclosure-reports>.



To retrieve First Internet Bank of Indiana's HMDA Disclosure reports, go to [HMDA Data Publication \(cfpb.gov\)](https://cfpb.gov) and search by the institution's name as viewed on the below screen:



## Disclosure reports

These reports summarize lending activity for individual institutions, both nationwide and by MSA/MD. They are based on the most recent data submission made in each filing period. To find an institution's IRS (Institution Register Summary), select "Nationwide" from the MSA/MD dropdown after choosing an institution.

To learn about modifications to these reports over the years, visit the [A&D Report Changes](#) page. Looking for other HMDA data? Visit the new [HMDA Data Browser](#) to filter and download HMDA datasets.


1. <b>Year</b>	2. <b>Institution</b>	3. <b>MSA/MD</b>	4. <b>Report</b>
2024	FIRST INTERNET BANK OF INDIANA - 549300B81YWV4GBENI49	Indianapolis-Carmel-Greenwood, IN - 26900	Select a report

Choose a generated report for institution 549300B81YWV4GBENI49 and MSA/MD 26900

Select report...

- 1 - Applications by Tract
- 2 - Loans Purchased by Tract

To retrieve First Internet Bank of Indiana's HMDA Dataset reports, go to [HMDA Dataset Filtering \(ffiec.gov\)](https://ffiec.gov) and search by the institution's name as viewed on the below screen:



HOME   FILING   DATA BROWSER ▾   DATA PUBLICATION ▾   TOOLS ▾

## HMDA Dataset Filtering

You can use the HMDA Data Browser to filter and download CSV files of HMDA data. These files contain all [data fields](#) available in the public data record and can be used for advanced analysis. You can also access the [Data Browser API](#) directly. For questions/suggestions, contact [hmdahelp@cfpb.gov](mailto:hmdahelp@cfpb.gov).

**Data Year**

[2024](#)   2023   2022   2021   2020   2019   2018

Queries for 2024 pull from the [Snapshot](#) dataset. For more info visit the [Static Dataset FAQ](#).

**Step 1: Select Geography**

Start by selecting a geography filter using the dropdown menu below. [View more information on the available filters.](#)

MSA/MD ▾

Select or type the name of one or more MSA/MDs

**Step 2: Select Financial Institution (optional)**

You can select one or more financial institutions by entering the financial institutions LEI or name.

**NOTE:** Only Institutions that operate in the selected geography are available for selection.

Select or type additional LEIs

First Internet Bank of Indiana - 549300B81YWV4GBENI49 ✕

**Step 3: Select a filter (optional)**

Narrow down your selection by filtering on up to two [popular variables](#)

Select a variable

Download Dataset

View Summary Table

Here you can view First Internet Bank's HMDA information in detail. The information is being provided to you as part of the CRA public file. First Internet Bank of Indiana has reviewed the information filed and determined that all lending criteria has been applied in a non-discriminatory manner. All HMDA reports were filed timely and the data accepted by the regulatory agency. First Internet Bank of Indiana will provide a printed copy of the HMDA data, upon request.

The home mortgage loan data published by the FDIC under [§ 345.42\(i\)](#) are available at the FDIC's website.



## **Community Reinvestment Act (CRA) Strategic Plan**

**January 1, 2024 to  
December 31, 2026**

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## **Section 1: Introduction**

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First Internet Bank of Indiana (“First Internet Bank”, the “Bank”, “we”, “us”, or “our”) is a state nonmember commercial bank established in February 1999 that maintains its headquarters in Fishers, Indiana. The Bank is a subsidiary of First Internet Bancorp, a one-bank, publicly-traded holding company also based in Fishers, Indiana, and is regulated at the federal level by the Federal Deposit Insurance Corporation (FDIC). At the state level, the Bank is regulated by the Indiana Department of Financial Institutions (IDFI). As a federally insured depository institution, the Bank is subject to the Community Reinvestment Act (CRA), which requires banks to help meet the credit needs of their entire community, including low- and moderate-income neighborhoods. In light of the Bank’s nationwide direct business model and lack of branches, it has elected to be evaluated under the “Strategic Plan” option as provided in 12 CFR §228.27. The Bank has prepared this new CRA Strategic Plan for 2024-2026 (“Plan”); the Bank’s current CRA Strategic Plan for 2021-2023 expires on December 31, 2023.

### ***Bank Strategy and Product Offerings***

First Internet Bank opened for business in 1999 as an industry pioneer in the branchless delivery of banking services. With assets of \$4.79 billion as of June 30, 2023, the Bank provides consumer and small business deposits, consumer loans and specialty finance services nationally. The Bank also offers commercial real estate loans, commercial and industrial loans, Small Business Administration (“SBA”) financing and treasury management services.

First Internet Bank’s business model is significantly different from that of a typical community bank. The Bank does not employ a conventional brick and mortar branch system to acquire and serve customers; rather, the Bank leverages technology to deliver financial products and services on a nationwide basis. This allows the Bank to have fewer employees. The Bank does not operate a branch network, nor does it own any ATMs. First Internet Bank’s online delivery channels provides a significant cost advantage over other financial institutions, and the Bank passes those savings to customers through favorable deposit rates and lower fees exemplifying the spirit of Community Reinvestment Act.

#### **Small Business Strategy**

Market forces and the economic climate, both driven in part by the post-pandemic recovery, has had a significant impact on the Bank’s strategy. While other lending lines have had strong demand, the combination of housing pricings, housing supply, economic uncertainty and interest rates caused mortgage applications nationally to plunge to their lowest level in 26 years. Due to the steep decline in consumer mortgage volumes, and the negative outlook for consumer mortgage lending over the next several years, the Bank decided to exit its consumer mortgage business during the first quarter of 2023. This included the Bank’s nationwide digital-to-direct mortgage platform that originates residential loans for sale in the secondary market, as well as its local traditional consumer mortgage and construction-to-permanent business.

The interest rate environment continues to have an economic impact on small businesses, as access to credit has become more difficult as small businesses struggle with making loan payments in a rising rate environment. However, while the Bank has exited the consumer mortgage business, we continue to be committed to serving consumers and small businesses on a nationwide basis with loan and deposit products.

This Strategic Plan has a focus on small business lending and community development opportunities. The Bank remains committed to serving its Assessment Area (“AA”) through participating and maintaining relationships with community-based organizations in order to ascertain community needs and identify areas of opportunity in which the Bank can participate in order to meet community needs. As you will see later in the “Ascertainment of Credit Needs” in Section 4 of this Strategic Plan, our assessment shows a strong need for credit among small businesses, particularly those that are unable to secure complete financing from conventional needs.

Specifically, our outreach to community organizations noted that the costs of expert services such as legal, accounting, etc., are out of reach due to financial strains on small businesses. Gap funding is also a challenge for small businesses. A small business may not have funds to begin a job, resulting in the loss of business. These issues coupled with, typical, boot-strapped funding initiatives pose major credit challenges for small businesses located in low- and moderate-income (LMI) communities.

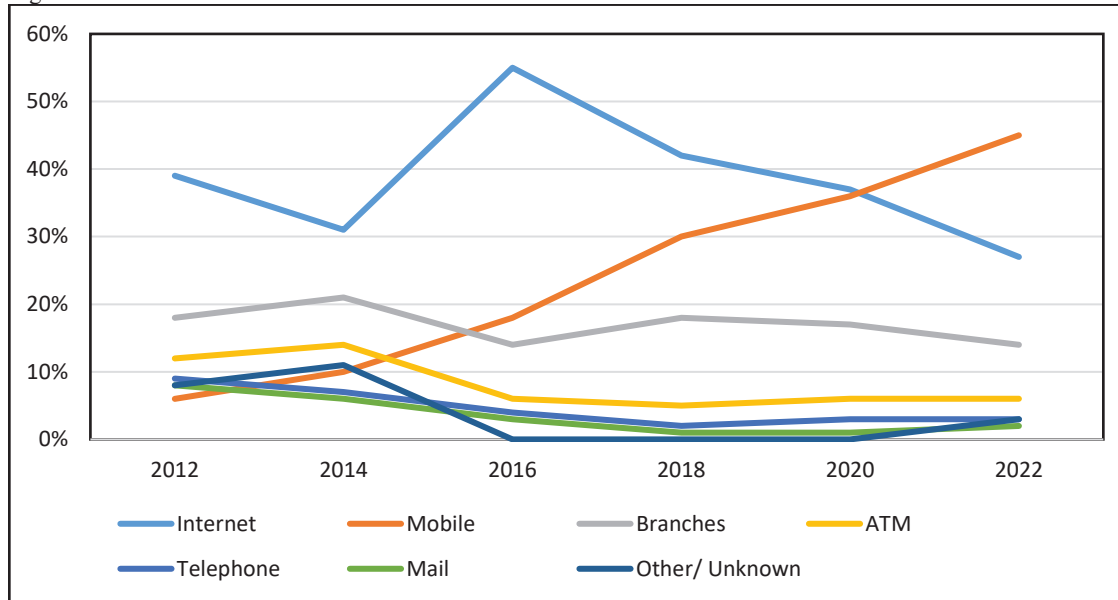
As a result, the Bank offers SBA loans on a nationwide basis. Our small business lending helps small business owners, the backbone of our economy, start and grow their business with advantages that reflect the spirit of CRA. Many of these small businesses include business service organizations that support other small business. Small business lending offers generous term lengths (10-25 years) keeping payments affordable, caps on interest rates, and lower down payment requirements. Nationwide, the Bank is currently one of the fastest-growing preferred SBA lending banks. However, according to US Small Business Administration 7(a) lending reports, within the state of Indiana, First Internet Bank holds 0.68% by number volume (i.e. number of loans) and 1.51% by dollar volume of the market share in 2021. In 2022, First Internet Bank has 0.71% by number volume and 1.84% by dollar volume of the Indiana SBA 7(a) market share.

While our small business lending is successful on a nationwide basis, the Bank hired a Vice President - Community Development loan officer in 2023 to focus on small business lending opportunities in LMI communities in the Bank’s assessment area. Additionally, the Bank hired a Vice President - CRA and Community Development Officer in 2022 in order to strengthen existing relationships and efforts, as well as develop new relationships and identify opportunities to meet community needs.

### Digital Banking

Our research shows consumers and businesses are relying on mobile and online channels as their primary means to access banking services, which is consistent with the foundation of the Bank’s strategy. Surveys conducted by the American Bankers Association make it clear that digital channels (internet and mobile) continue to be preferred over physical channels (branches, ATMs). Combined, internet and mobile access methods have increased from 45% to 72% over the last 10 years. Branch banking, which fell to 10% during the pandemic, increased to 14% in 2022 at the expense of other channels such as ATMs (down to 6%) and telephone calls (down to 3%). The preference for the mobile digital channel continues to increase, and it is still favored over branch banking by over three to one (45% compared to 14%).

Figure 1.1



Source: American Bankers Association

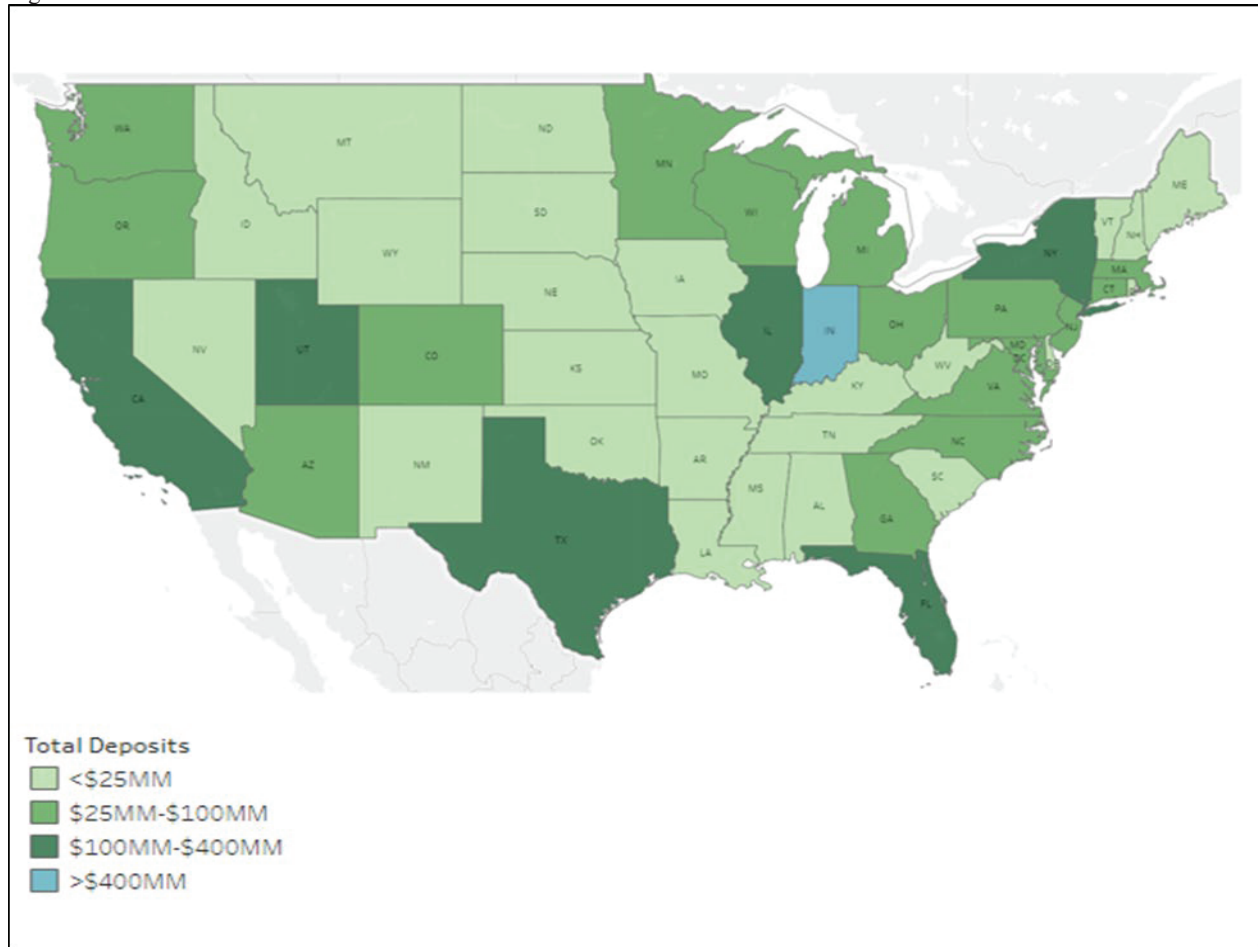
In another recent survey by the American Bankers Association, 84% of respondents stated that innovation and technological improvements are making it easier for all Americans to access financial services, an acknowledgment of the role technology is playing in promoting financial inclusion.

## Deposits

First Internet Bank offers a robust suite of deposit products (checking accounts, savings and money market accounts, and certificates of deposit) and related services to consumers, small-to mid-sized businesses, and other organizations on a nationwide basis. During 2022, the Bank introduced the “Do More Business” checking account designed to help small business owners accomplish more in less time. The Do More Business checking account enables business owners to earn interest and make unlimited transactions, including bill pay, and provides access to a dedicated customer success team. In addition, they can now link multiple financial accounts including their business and personal checking or savings, credit cards, loans and investments. This provides greater day-to-day monetary control, with insight into spending trends by category. Customers use ACH and remote deposit capabilities to fund accounts. Appendix A contains a complete list of deposit products offered by the Bank.

As of December 31, 2022, total deposits at First Internet Bank were \$3.4 billion, a 6.3% increase from 2019 (\$3.2 billion). Assets over the same time frame increased 9.75% (\$4.1 billion to \$4.5 billion). While the Bank counted customers in all 50 states, the largest single deposit concentration of customers came from Indiana, at 28.4% of the customer base. The map below provides a geographic distribution of the deposit base (see Figure 1.2).

Figure 1.2



## Lending

First Internet Bank offers a robust suite of loan products to meet the lending needs of consumers, small- to mid-sized businesses and other organizations on a nationwide basis.

As noted above, the Bank made the decision to exit the consumer mortgage business during the first quarter of 2023. While this delivery channel for consumers was eliminated, the Bank continues to focus its lending efforts on its other consumer loans, as well as loans for small businesses. Appendix B contains a complete list of loan products offered by the Bank. A brief description of each type of product is described below:

**Consumer Lending:** While First Internet Bank offers consumer loans and credit cards to a nationwide consumer base through its website, the majority of consumer loans are acquired through indirect dealer networks — primarily horse trailers and recreational vehicles. Additionally, the Bank offers the Smart Option Student Loan<sup>®</sup> by Sallie Mae<sup>®</sup>.

**Small Business Lending:** The Bank offers SBA loans on a nationwide basis. Our small business lending helps small business owners, the backbone of our economy, start and grow their business with advantages that reflect the spirit of CRA. Small business lending offers generous term lengths (10-25 years) keeping payments affordable, caps on interest rates, and lower down payment requirements. The Bank is currently one of the nation's fastest-growing preferred SBA lending banks.



***Single Tenant Lease Financing:*** Offered on a nationwide basis, the Bank’s single tenant lease financing provides acquisition financing to real estate investors introduced to the Bank through a network of mortgage bankers and national correspondents. Properties financed are generally subject to long-term net lease arrangements with well-known, financially strong, national and regional tenants that include drugstores, quick serve restaurants, convenience stores, office supply stores and other retailers.

***Public Finance Lending:*** Public Finance offers a variety of lending and depository solutions for government and not-for-profit customers across the United States. Options are available for funding capital projects or refinancing existing debt for hospitals, economic development districts, public infrastructure projects, schools, police and fire departments.

***Franchise Finance Lending:*** The Bank has a national strategic partnership with ApplePie Capital, which through their deep relationships with franchise brands provides franchisees with financing options for new franchise units, recapitalizations, expansion, equipment, and working capital.

***Commercial and Industrial (C&I) Lending:*** First Internet Bank’s C&I team provides flexibility to small- to mid-sized business clients throughout Indiana through commercial lines of credit and credit cards to assist with short-term working capital needs to support accounts receivable and inventory. The team also provides term loans to help finance equipment, inventory, debt consolidation, business expansion and owner-occupied real estate.

***Construction and Investor Commercial Real Estate (CRE) Lending:*** The CRE team assists developers and owners in regional project financing activities (e.g. counseling, debt structuring, underwriting, closing and servicing of commercial real estate loans) focused in residential construction and development, office, multi-family, retail and industrial.

Appendix C illustrates the distribution of the Bank’s loan portfolio between consumer and commercial loans.

## **Section 2: Strategic Plan Proposal**

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### **First Internet Bank’s Commitment to CRA**

First Internet Bank welcomes its obligations under the Community Reinvestment Act (“CRA”) to its customers and communities, and has devoted significant effort to complying with both the letter and the spirit of the CRA. The Bank’s Board of Directors and senior management are committed to achieving meaningful impact in its communities. To this end, First Internet Bank has established a comprehensive CRA Program that involves participation from the Bank’s board, senior management, and employees. First Internet Bank has also hired a Vice President of Community Reinvestment Act & Community Development Officer during 2022 to oversee the Bank’s CRA initiatives.

### **Purpose of the Strategic Plan**

First Internet Bank strives to meet the needs of its community in a manner that is consistent with its business strategy, operational focus and constraints, and safety and soundness guidelines. When Congress passed the Community Reinvestment Act in 1977, and even when more recent interagency regulations implementing CRA became effective in 1995, the regulations could not

have contemplated the emergence of branchless banks. Furthermore, the Bank's differentiated product lineup and nationwide footprint challenge the traditional classifications of peers. Traditional banks build their sales and service strategy based on the location of their branches. When they add a branch, additional efforts are put behind it to grow customer relationships in a geographical radius of that branch to justify the cost of the overhead of that branch. While the FDIC's most recent proposed rules, published on June 3, 2022, attempt to modernize the CRA regulations, additional discussions will allow the proposed changes to be effectively introduced.

For these reasons, First Internet Bank has operated under a CRA Strategic Plan since 2000, one year after its launch, and provides this refreshed CRA Strategic Plan. First Internet Bank puts forth updated lending, investment, and service goals based on applicable performance context information for the Bank and the assessment area's needs. We believe these goals adequately consider the realities of the Bank's current and projected business model, operating environment, asset size, and competitive abilities while fulfilling the Bank's obligations under the CRA.

#### **Effective Date and Term of the Plan**

The Plan has an effective date of January 1, 2024, with a term of three calendar years (2024, 2025, and 2026).

#### **Ongoing Review of Performance Goals and Measurement Standards**

First Internet Bank has established performance goals based on projections relating to the Bank's business model and current legal and regulatory assumptions affecting the banking industry, as well as general economic conditions. As these assumptions and conditions are subject to change, the Bank's Board of Directors and management will monitor the Bank's performance in relation to the stated CRA Strategic Plan goals on a minimum of a quarterly basis. Should modification to this Plan be required — for instance, a change in the Bank's operations or business would cause the approved Plan to no longer be commensurate — all such changes will be made in accordance with the requirements under FDIC guidelines.

#### **Election of Alternative Performance Evaluation**

First Internet Bank's Board of Directors and management team are committed to the goals set forth in this Plan. If, through unforeseen circumstances, First Internet Bank is unable to achieve an overall minimum "Satisfactory" rating, the Bank's CRA performance should be assessed under the performance standards for large institutions pursuant to 12 CFR § 345.27(f)(4).

### **Section 3: Assessment Area**

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#### **Area Defined**

FDIC regulations require banks to delineate one or more assessment areas within which the FDIC evaluates the Bank's record of helping to meet the credit needs of its community (12 C.F.R. § 345.41). The assessment area must consist of whole geographies, which may consist of one or more MSAs, or one or more contiguous political subdivisions, such as counties, cities, or towns, in which the bank has its main office, branches, and deposit-taking ATMs.

First Internet Bank has elected an eleven-county area in central Indiana, the Indianapolis-Carmel-Greenwood, IN MSA as its assessment area.

- This is the Metropolitan Statistical Area for the Bank's prior strategic plan, effective January 1, 2021 through December 31, 2023; however, this strategic plan's MSA now includes Brown and Tipton Counties.
  - Due to this change, data and tables presented in this strategic plan may not align with the prior strategic plan.
- This area includes the Bank's main office. The Bank has no other branches, though operates a Limited-Service Loan Production Office in Schaumburg, Illinois.
- The Bank does not own or operate any deposit-taking ATMs.
- This area represents a strong concentration of the Bank's customers given an otherwise national customer base:
  - As of June 30, 2023, the eleven-county assessment area represented 96.7% of total Indiana deposits. Overall, deposits based in the AA represent 39.5% of the Bank's total deposits.
- Further, this area includes the strongest concentration of the Bank's employees' places of residence, making it the most feasible footprint from which the Bank can fulfill its community service requirements.

The counties include Boone, Brown, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and Tipton. A map of the assessment area is included as Appendix D to the Plan.

It is noteworthy that a significant number of financial institutions operate in this eleven-county area. According to the FDIC's 2023 Summary of Deposits, there are 47 different banking institutions (excluding credit unions), operating 490 offices, servicing this eleven-county assessment area. Furthermore, there are 13 other banks headquartered within the Bank's assessment area. Among them, they operate 102 branches within the MSA. The six most prominent financial institutions account for 65.03% of the total deposit share. With a business model designed for nationwide consumption and low overhead, First Internet Bank has only one location within the assessment area. The saturation of financial institutions in the area creates demonstrable intense competition for visibility within the Bank's marketplace.

### **Area Demographics**

Demographic data is compiled by the United States Census Bureau and provides population and housing information in groupings for individuals and families and by age and race, among others. As detailed in Table 3.1 the total population of the Indianapolis-Carmel-Greenwood MSA assessment area is 2,089,673, the total number of families in the assessment area is 499,388, and the total number of businesses in the assessment area is 285,468. It is noted that the Indianapolis MSA was updated to the Indianapolis-Carmel-Greenwood MSA following the June 30 FDIC reporting and that Median Family Income (MFI) data is, currently, not available. The FFIEC reported an estimated MFI of \$97,300 for the Indianapolis-Carmel-Anderson, IN MSA (2023). Based on this figure, family incomes for 2023 are classified as follows:

- Low-income (below 50% of the median family income) < \$48,650
- Moderate-income (50% to below 80% of the median family income) \$48,650 to < \$77,840
- Middle-income (80% to below 120% of the median family income) \$77,840 to < \$116,760
- Upper-income (120% and above the median family income) ≥ \$116,760

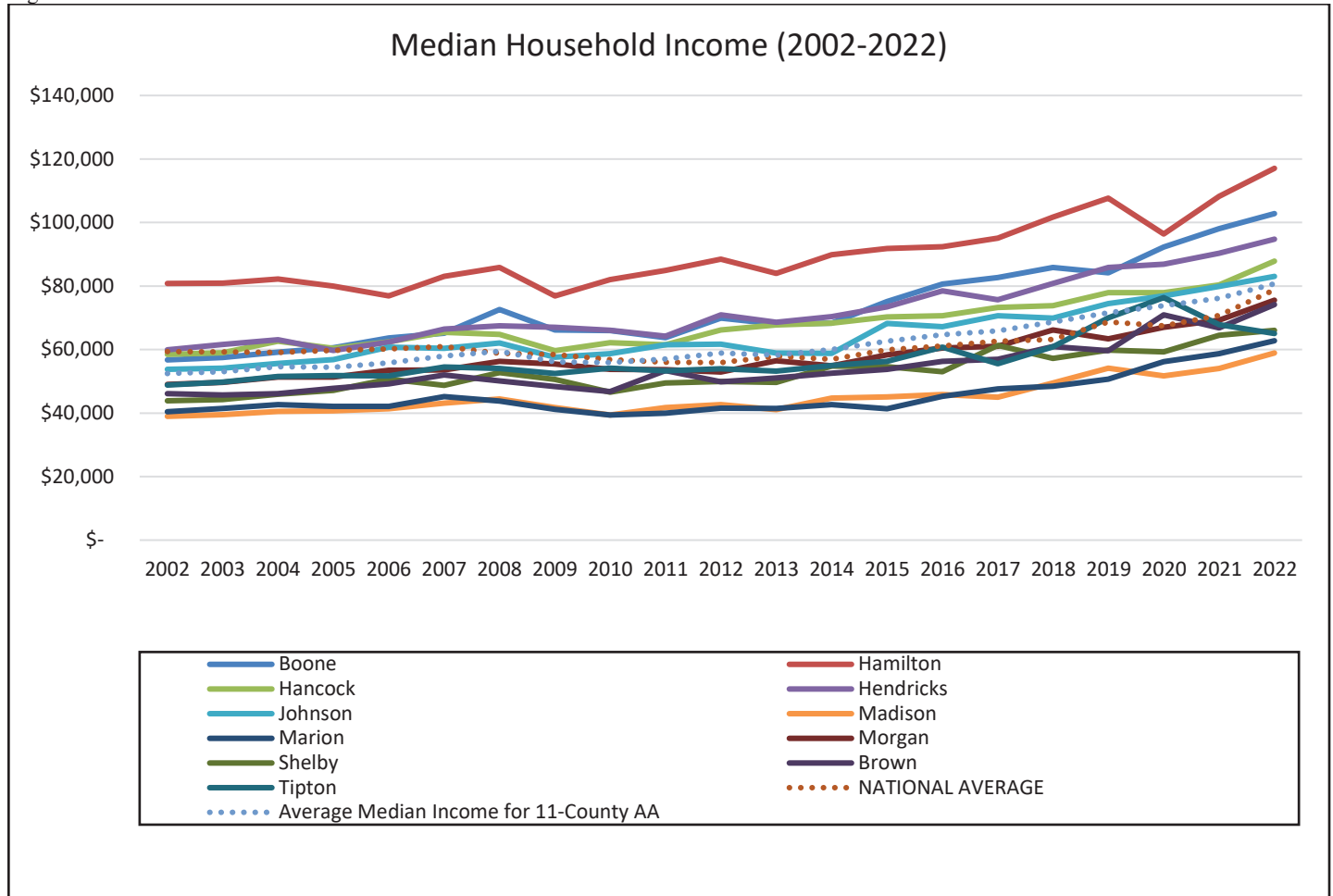
The above tract income levels are based on the tract median family income percentages. As defined in the FFIEC census demographic information, a family is two or more related persons living in the same residence. It is noted that the census tract geographies have changed from the prior to current strategic plan as shown in Table 3.1. Overall, the percentage of LMI census tracts in 2021 to 2023 decreased from 43.21% to 36.73%. With the change in census tracts, there are even less opportunities for the bank to lend in LMI areas.

Table 3.1

Demographic Information of the Assessment Area						
Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Prior Strategic Plan Geographies (2021 Census Tracts)	398	16.83%	26.38%	33.42%	22.86%	0.50%
Geographies (Census Tracts) New 2024 INDY MSA	471	12.31%	24.42%	36.52%	24.84%	1.91%
Population by Geography	2,089,673	8.32%	21.28%	38.28%	30.78%	1.35%
Housing Units by Geography	859,878	9.79%	22.62%	38.20%	28.08%	1.30%
Owner-occupied Units by Geography	514,027	4.74%	16.47%	42.24%	35.69%	0.86%
Occupied Rental Units by Geography	268,732	16.39%	31.98%	32.34%	17.29%	2.00%
Vacant Units by Geography	77,119	20.52%	31.02%	31.67%	14.97%	1.82%
Businesses by Geography	285,468	8.23%	19.86%	35.32%	33.56%	3.02%
Family Distribution by Income Level	499,388	20.58%	17.82%	20.80%	40.80%	0.00%
2023 Est Median Family Income MSA-26900 Indianapolis-Camel-Anderson, IN MSA		\$97,300	MSA Median Owner-occupied Housing Value			\$197,600
			MSA Median Gross Rent			\$1,081
			MSA Families Below Poverty Level			7.89%
Source: 2023 FFIEC Demographic Data Source: RATA Comply Source: data.census.gov - 2022 ACS 5 year estimate (median gross rent) Risk Exec source: **Note the Families by Income Level and Household by Income levels are the counts of the families in each income level, not the counts of families in each tract income level Sources: 2020 Census Data with 2020 ACS-5 Updates and 2023 FFIEC/ACS-1 Updates, 2022 Dun & Bradstreet (As of 01/04/2023). Business and farm counts are provided directly from Dun and Bradstreet for RiskExec reports. <a href="https://data.census.gov/table/ACSDT5Y2022.B25031?q=median%20gross%20rent&amp;g=310XX00US26900">https://data.census.gov/table/ACSDT5Y2022.B25031?q=median%20gross%20rent&amp;g=310XX00US26900</a>						

The chart below shows the trending of median household income, which includes the income of all residences, even those for single people or unrelated groups of two or more. On average, the estimated median income continues to steadily rise in the eleven-county assessment area as illustrated within Figure 3.1.

Figure 3.1



Source: U.S. Census Bureau, Estimate of Median Household Income retrieved from FRED, Federal Reserve Bank of St. Louis

Release: Small Area Income and Poverty Estimates

Units: Dollars, Not Seasonally Adjusted

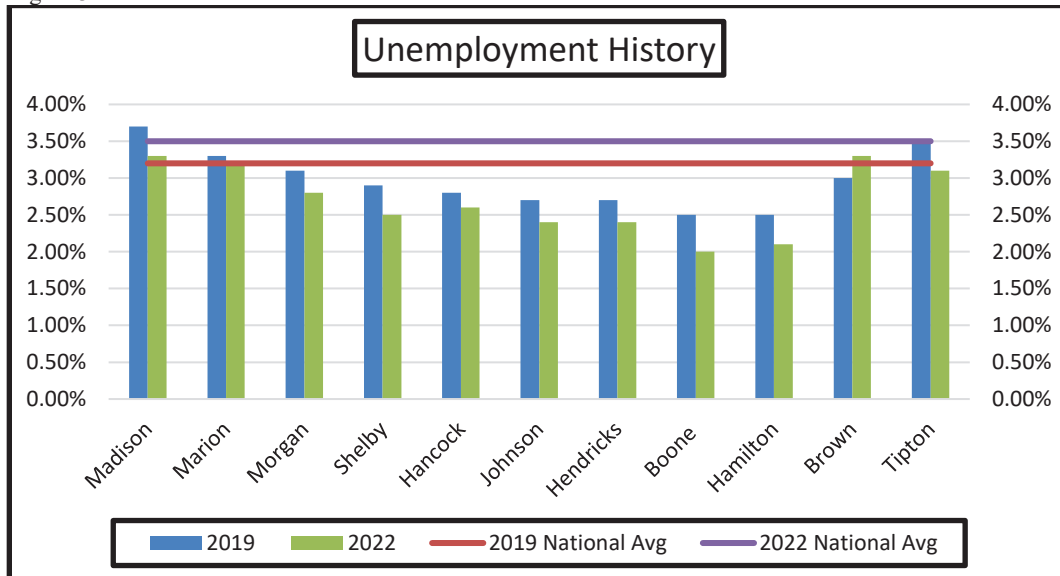
Frequency: Annual

The U.S. Census Bureau provides annual estimates of income and poverty statistics for all school districts, counties, and states through the Small Area Income and Poverty Estimates (SAIPE) program. The bureau's main objective with this program is to provide estimates of income and poverty for the administration of federal programs and the allocation of federal funds to local jurisdictions. In addition to these federal programs, state and local programs use the income and poverty estimates for distributing funds and managing programs.

Household income includes income of the householder and all other people 15 years and older in the household, whether or not they are related to the householder. Median is the point that divides the household income distributions into two halves: one-half with income above the median and the other with income below the median. The median is based on the income distribution of all households, including those with no income.

The unemployment rate for the eleven-county assessment area (Figure 3.2) over the previous three years (excluding 2020 due to the COVID-19 pandemic) has been at or below the national average of 3.5% as of December 2022.

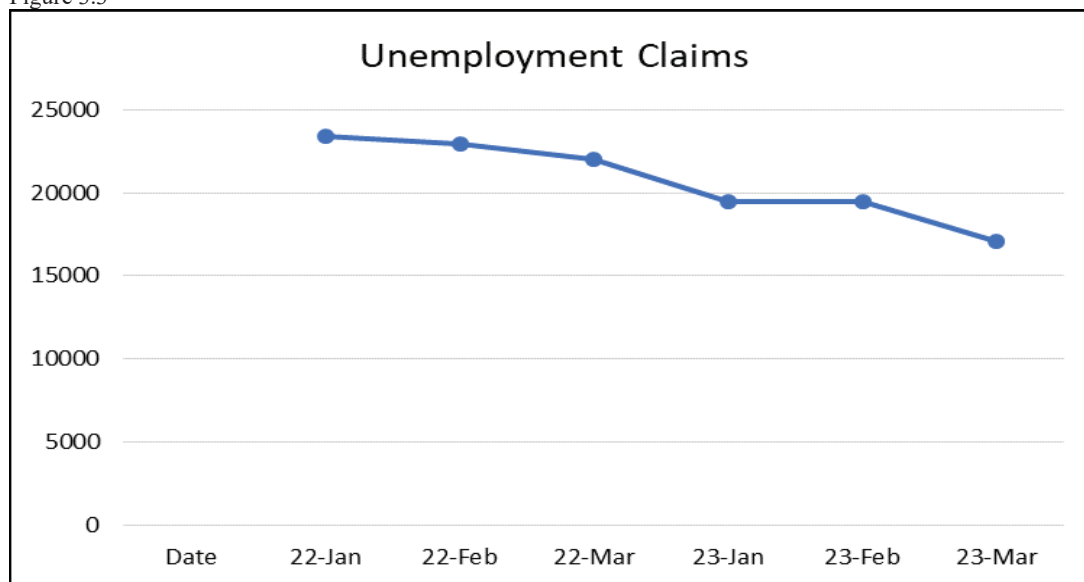
Figure 3.2



Source: United States Bureau of Labor

The number of unemployment claims has decreased 22% during the first quarter of 2023 as compared to the same time period in 2022.

Figure 3.3



Source: Indiana Workforce Development

## Section 4: Performance Context

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### *Ascertainment of Credit Needs*

In addition to considering the demographic and institution information highlighted earlier, First Internet Bank maintains involvement with community organizations to determine the credit needs of the assessment area.

### *Public Participation*

In developing the Plan, First Internet Bank obtained input from several agencies and community development groups on the needs of our community and how First Internet Bank might best support those needs. The following organizations were contacted:

- Cambridge Capital Management Corp.
- Community Alliance of the Far Eastside (“CAFÉ”)
- Habitat for Humanity of Greater Indianapolis
- Indy Chamber
- Indianapolis Urban League
- Indianapolis Neighborhood Housing Partnership (“INHP”)
- Local Initiatives Support Corporation – Indianapolis (“LISC”)
- Region 5 Department of Workforce Development (“DWD”)
- The PATH School
- United Way of Central Indiana (“UWCI”)

These organizations provided comments and insight into the local community that assisted in developing this Strategic Plan. The following were some of the consistent themes noted in the conversations:

**Affordable Housing** – Issues relating to housing cost-burdens and home affordability are experienced in the Indianapolis-Carmel-Greenwood MSA. Housing cost-burden relates to households paying more than 30% of household incomes on housing costs. Home affordability relates to the relationship between median housing costs and household incomes. According to a June 2022 report from the Indianapolis Neighborhood Housing Partnership, based on the American Community Survey data available for Indiana counties, seven counties in the MSA (Brown, Marion, Madison, Hendricks, Hancock, Boone, and Shelby) include 35% or more of renters who are housing cost-burdened. Of the homeowners, six counties in the MSA (Marion, Brown, Madison, Morgan, Boone, and Hancock) have 15% or more of homeowners who experience housing cost-burdens. According to the same report, three counties in the MSA (Brown, Madison, and Marion) include 30% or more of renters and nine counties (Marion, Brown, Hancock, Boone, Hamilton, Johnson, Morgan, Hendricks, and Shelby) include 30% or more of homeowners that experience home affordability challenges.

In short, due to these challenges and the rise in inflation, affordable housing has been affected by a:

- Shortage of affordable housing as the price of houses has drastically increased and salaries have not increased at the same rate;
- Greater need for rental, utility, and housing assistance;
- Reduction of craftsmen within skilled trades to complete housing renovations and construction;
- Builders reducing production (some quote labor shortages while others appear to be preserving cash);
- Materials costs are volatile and rising;
- Implications on tax-credit pricing and execution is uncertain.



**Economic Development** – Small business needs are more strained now than ever. Organizations assisting small businesses have to become creative in addressing the needs. Lending rates have increased with the increase of the prime rate that has caused small business lending to be less attainable for some. Challenges are as follows:

- Small businesses need coaching, financial education and industry training;
- Increased lending rates have caused decreased profitability which makes small business lending less attainable;
  - Gap funding is a challenge for small businesses. If a small business is able to obtain a contract they, oftentimes, do not have the funds to begin the job; although, they have means to be reimbursed at a later time.
- Costs of expert services (legal, accounting, etc.) are out of reach due to financial strains in other areas. In effect, small businesses are cutting corners and going without experts in these industries;
- Labor shortages have increased with the cost of living increases as higher incomes are required; with smaller profit margins, organizations have less funds to put towards employment wages.

**Neighborhood Revitalization/Stabilization** – Throughout conversations with Community Development organizations, the Chamber, and CDFIs, issues pertaining to neighborhood revitalization/stabilization were mentioned. Vacant lots and business façade issues are present in portions of the Indianapolis-Carmel-Greenwood MSA. LMI neighborhoods also experience higher (violent and property) crime rates which decrease home values.

**Community Service** – Organizations are working closely with individuals to address the community needs. While every community organization has a certain population/community in which they focus, there were some common themes that continued to resurface. Groups provided comments and insight into the local communities that ultimately helped shape the Strategic Plan. Including housing challenges mentioned above, input centered on the following:

- Food and nutrition security as some LMI neighborhoods are in food deserts and residents experience low-access to grocery stores with limited vehicle access;
  - According to the United States Department of Agriculture, a food desert is a census tract in which at least 100 households are located more than one-half mile from the nearest supermarket and have no vehicle access
- Lack of reliable transportation as the bus systems in Marion County do not support surrounding counties nor do they cover all LMI neighborhoods;
- Financial literacy needs, including budgeting and credit counseling;
- Access to low or no-cost banking services, along with education on the banking system;
- Sustainable job security, including un/under-employment with economic mobility challenges
  - Workforce development needs to train the workforce in industry specialized skillsets;
- Access to healthcare and mental health assistance;
- Affordable and reliable childcare challenges;
- Pre-K Education to prepare toddlers for Kindergarten;
- Concerns about standardized testing (iLearn and iRead) and tutoring needs;
- School attendance challenges following the school-from-home COVID years;
- Quality of life initiatives;
- Social determinants of health.

Several Bank employees are actively engaged within the community, through board, committee,



and volunteerism, to regularly obtain information and inform the community of banking services that are available at First Internet Bank. These activities are detailed below in the Service Activities section of this Plan.

### ***Credit Needs of the Assessment Area***

First Internet Bank has determined that, in spite of the number of financial institutions serving the assessment area, there continues to be a need to facilitate continued community services for LMI families/communities pertaining to affordable housing, community services, economic development, and revitalization and stabilization of low and moderate income (LMI) geographies. There is a need for financial education, credit counseling, and low- or no-cost banking services. In the arena of community services for LMI families in crisis, there is a need to access basic food and nutritious supplements, as well as other community services outlined above. While the Bank has discontinued its consumer mortgage lending activity, the Bank continues to support affordable housing initiatives through community development contributions and services. These are outlined in the Performance Goals section below.

Our assessment also shows a need for credit among small businesses unable to secure complete financing from conventional sources. Additionally, small businesses have a need for business coaching to become bank-ready and less stringent underwriting criteria. First Internet Bank's performance goals are tailored to address the credit needs identified in a way that is complementary to our business model.

## **Section 5: Performance Goals and Measurement Standards**

FDIC guidelines for CRA Strategic Plans call for a bank to specify measurable goals that constitute "Satisfactory" performance (C.F.R. § 345.27).

First Internet Bank has established specific goals in the areas of Small Business Lending and Community Development. Each category includes criteria required to achieve the goal. The section entitled "Determination of Rating," later in this document, outlines the process by which the overall performance rating for the Bank under the Plan will be determined.

First Internet Bank's Board of Directors and management team are committed to achieving the performance goals during the term of the Plan.

### ***Small Business Lending Activities***

Small business products and services are important to the Bank's ability to be a full-service bank for all customers and provide diversity within our portfolio. In line with the Bank's nationwide footprint and geographically diverse portfolio, First Internet Bank has commercial lending initiatives that reach a number of small businesses. The Bank's formation of an SBA Lending group to support nationwide SBA lending, a partnership with fintech partner ApplePie Capital which offers franchise lending on a nationwide basis, and the addition of a local Community Development Lender which will support lending in the local assessment area, are examples of initiatives that support small business loans.

In addition to internal originations, the Bank currently, or continues, to participate in these loan programs designed to facilitate small business financing to entities that do not have access to traditional financing. The programs include:

- *Indiana Community Business Credit Corporation (“ICBCC”).* ICBCC was formed to meet the need for medium- and long-term growth financing for promising firms that could not qualify for conventional loans. ICBCC manages a pool of risk capital provided by more than 30 Indiana banks to supplement conventional financing with additional growth capital. ICBCC steps in with mezzanine funding when a lender is not in a position to offer a conventional loan package that meets the borrower’s needs. ICBCC project guidelines are to provide financing between \$200,000 and \$500,000, which is in line with First Internet Bank’s small business loan definition of credit of \$1 million or less. First Internet Bank began participating in ICBCC in December 2004 to extend its capabilities related to serving the community. The Bank has pledged a line of credit for more than \$952,820.
- *Grameen America.* Grameen is a 501(c)(3) entity founded by Nobel Peace Prize recipient Muhammad Yunus. Grameen America is dedicated to transforming communities and fighting poverty. Grameen helps local women who live in poverty build small businesses to create better lives for their families by offering microloans (under \$1,500), training and support. The effort further works to establish savings relationships and credit histories for these new entrepreneurs. The Bank began partnering with Grameen in 2012 and has subsequently increased the line of credit to \$500,000 and provided a maturity extension in 2022. This partnership is supporting Grameen’s efforts in the local market.
- *Grow Indianapolis Fund, LLC.* Grow Indianapolis was established to provide growth capital to companies located in distressed qualified census tracts based on the poverty rate, unemployment rate and the level of median family income. Entities applying for funding with Grow Indianapolis must be eligible for Local Initiative Support Corporation (LISC) services. Eligibility is certified by New Market Support Company (NMSC), as a subsidiary of LISC. First Internet Bank began a partnership with Grow Indianapolis Fund, LLC in 2017 with a \$3 million line of credit that has since been increased to \$6.2 million and renewed in 2021.

### ***Small Business Lending Measurement***

First Internet Bank has determined that there continues to be a need to facilitate economic development, and revitalization and stabilization of low and moderate income (LMI) geographies. There is also a need for credit among small businesses unable to secure complete financing from conventional sources.

Locally based small business lending remains a highly competitive market, in which a significant level of personal service is expected. The staffing along with geographical presence needed to be competitive in the marketplace does not align with First Internet Bank’s branchless banking model. However, mid-year 2023, First Internet Bank hired a Community Development Lender with a focus on small businesses in LMI communities in the assessment area.

The Bank examined lending data originated in our assessment area in the aggregate, as well as, the Bank’s historical performance was examined to develop an accurate assessment of the Bank’s small business lending.

In order to establish small business lending goals to small businesses as a whole (including SBA loans over \$1 million), as well as with annual revenue of less than or equal to \$1 million and within LMI tracts in its assessment area, First Internet Bank reviewed demographic, as well as, aggregate and First Internet Bank historic data, as provided in Tables 5.1 – 5.8. The data reflects the aggregate and Bank lending performance to small businesses (including SBA loans over \$1

million), small businesses with annual revenue of less than or equal to \$1 million, and aggregate and Bank lending performance within low- and moderate-income tracts. As previously demonstrated, of the 285,468 businesses in the assessment area, 8.23% (23,491) are in low income tracts and 19.86% (56,706) are in moderate income tracts. The Bank's small business lending performance with respect to aggregate data is in alignment.

Table 5.1

First Internet Bank Deposit Data \$000				
	2021	2022	2023	Rolling 3-year Average
Deposit Market share per FDIC AA %	4.20%	3.85%	4.51%	4.19%
Deposit Market share per FDIC State %	1.79%	1.63%	1.93%	1.78%
Deposit \$ (all considered in AA per FDIC as deposits taken)	\$3,233,893	\$3,185,830	\$3,866,604	\$3,428,776
Deposit % in AA per internal (not market share)	22%	23%	40%	28%
First Internet Bank AA Deposits	\$702,813	\$734,583	\$1,535,136	\$990,844
AA Adjusted Deposit Market Share	0.91%	0.89%	1.79%	1.20%
Source: FirstIB internal reporting and FDIC Summary of Deposits. AA adjusted deposit market share is calculated utilizing First Internet Bank's AA deposits, net of brokered and internal deposits, divided by the Bank's total deposits, as reported by the FDIC, then multiplied by the Bank's FDIC June 30th Summary of Deposits market share percentage.				

Table 5.2

First Internet Bank Small Business Lending in AA/Aggregate AA Small Business Lending				
	2020	2021	2022	Rolling 3 year
First Internet Bank Small Business Loan Totals in AA	\$32,497	\$28,489	\$16,498	\$25,828
Small Business Aggregate Loan Totals in AA	\$3,096,627	\$2,338,695	\$1,462,962	\$2,299,428
First Internet Bank % of Aggregate	1.05%	1.22%	1.13%	1.12%
First Internet Bank Small Business Loans in AA $\leq$ 1MM (gross annual revenue)	\$6,457	\$7,572	\$4,211	\$6,080
Small Business Aggregate $\leq$ \$1MM (gross annual revenue) in AA	\$733,345	\$667,474	\$413,526	\$604,381
First Internet Bank Small Business Loans in Low Income Census Tracts	\$6,457	\$5,567	\$1,130	\$4,385
Aggregate AA Small Business Loans in Low income Census Tracts	\$332,820	\$243,782	\$233,653	\$270,088
First Internet Bank Small Business Loans in Moderate Income Census Tracts	\$6,264	\$1,790	\$2,174	\$3,409
Aggregate AA Small Business Loans in Moderate Income Census Tracts	\$542,030	\$406,988	\$341,655	\$430,224
Source Rata Comply/FFIEC/CRA submissions: Goals are calculated utilizing adjusted market share which sources the summary of deposits as reported by the FDIC as of June 30 of the previous year. Aggregate data is as per the most recent data available as of 12/18/2023 with 2022 utilizing 2021 distribution numbers for Total aggregates.				

Table 5.3

Small Business Aggregate Lending Data for Assessment Area - Revenue ≤ \$1MM						
	Small Business Loans Originated in AA (#)	Small Business Loans Originated in AA (\$000)	Loans to Businesses with Gross Annual Revenues ≤ \$1MM (#)	Loans to Businesses with Gross Annual Revenues ≤ \$1MM (\$000)	Percentage of Aggregate Lending (#) to Small Businesses ≤ \$1MM in Revenue in AA	Percentage of Aggregate Lending (\$) to Small Businesses ≤ \$1MM in Revenue in AA
2019	34,692	\$1,713,816	16,213	\$504,196	46.73%	29.42%
2020	42,245	\$3,096,627	15,589	\$733,345	36.90%	23.68%
2021	46,622	\$2,338,695	21,508	\$667,474	46.13%	28.54%
Totals	123,559	\$7,149,138	53,310	\$1,905,015	43.15%	26.65%

Source: RATA/FFIEC.gov/CRA>Aggregate>MSA>County (Table 1-1)

Table 5.4

First Internet Bank - Small Business Lending Data for Assessment Area - Revenue ≤ \$1MM								
	Small Business & SBA Loans in AA (#)	Small Business & SBA Loans in AA (\$000)	SBA Loans >\$1MM with GAR ≤ \$1MM in AA (#)	SBA Loans >\$1MM with GAR ≤ \$1MM in AA (\$000)	Loans to Businesses with GAR ≤ \$1MM (#)	Loans to Businesses with GAR ≤ \$1MM (\$000)	Percentage of Aggregate Lending (#) to Small Businesses with GAR ≤ \$1MM in AA	Percentage of Aggregate Lending (\$) to Small Businesses with GAR ≤ \$1MM in AA
2020	142	\$45,887	1	\$1,117	42	\$7,207	29.58%	15.71%
2021	105	\$57,696	0	\$0	19	\$7,572	18.10%	13.12%
2022	57	\$19,289	0	\$0	13	\$4,211	22.81%	21.83%
Totals	304	\$122,872	1	\$1,117	74	\$18,990	24.34%	15.46%

Source: First Internet Bank end of calendar year data  
GAR - Gross Annual Revenues  
\*With origination amounts >\$1MM, in 2020, there are 7 SBA loans, totaling \$13,389,770. With origination amounts >\$1MM, in 2021, there are 4 SBA Loans, totaling \$29,207,000. With origination amounts >\$1MM, in 2022, there are 2 small business SBA loans, totaling \$2,791,000.

Table 5.5

Small Business Aggregate Lending Data for Assessment Area - Low Income Tracts						
	Small Business Loans Originated in AA (#)	Small Business Loans Originated in AA (\$000)	Small Business Loans Originated in Low Income Tracts (#)	Small Business Loans Originated in Low Income Tracts (\$000)	Percentage of Aggregate Lending (#) to Low Income Tracts in AA	Percentage of Aggregate Lending (\$) to Low Income Tracts in AA
2019	34,692	\$1,713,816	2,804	\$185,200	8.08%	10.81%
2020	42,245	\$3,096,627	3,339	\$332,830	7.90%	10.75%
2021	46,622	\$2,338,695	3,833	\$243,782	8.22%	10.42%
Totals	123,559	\$7,149,138	9,976	\$761,812	8.07%	10.66%

Source: RATA/FFIEC.gov/CRA>Aggregate>MSA>County (Table 1-1)

Table 5.6

First Internet Bank - Small Business Lending Data for Assessment Area - Low Income Tracts								
Year	Small Business & SBA Loans in AA (#)	Small Business & SBA Loans in AA (\$000)	SBA Loans >\$1MM with GAR ≤ \$1MM in AA (#)	SBA Loans >\$1MM with GAR ≤ \$1MM in AA (\$000)	Loans to Businesses with GAR ≤ \$1MM (#)	Loans to Businesses with GAR ≤ \$1MM (\$000)	Percentage of Aggregate Lending (#) to Small Businesses with GAR ≤ \$1MM in AA	Percentage of Aggregate Lending (\$) to Small Businesses with GAR ≤ \$1MM in AA
2020	142	\$45,887	0	\$0	22	\$6,647	15.49%	14.49%
2021	105	\$57,696	0	\$0	16	\$5,567	15.24%	9.65%
2022	57	\$19,289	0	\$0	5	\$1,130	8.77%	5.86%
Totals	304	122,872	0	\$0	43	13,344	14.14%	10.86%
Source: First Internet Bank end of calendar year data								
*With origination amounts >\$1MM, in 2020, there are 7 SBA loans, totaling \$13,389,770. With origination amounts >\$1MM, in 2021, there are 4 SBA Loans, totaling \$29,207,000. With origination amounts >\$1MM, in 2022, there are 2 small business SBA loans, totaling \$2,791,000.								

Table 5.7

Small Business Aggregate Lending Data for Assessment Area - Moderate Income Tracts						
	Small Business Loans Originated in AA (#)	Small Business Loans Originated in AA (\$000)	Small Business Loans Originated in Moderate Income Tracts (#)	Small Business Loans Originated in Moderate Income Tracts (\$)	Percentage of Aggregate Lending (#) to Moderate Income Tracts in AA	Percentage of Aggregate Lending (\$) to Moderate Income Tracts in AA
2019	34,692	\$1,713,816	5,788	\$312,871	16.68%	18.26%
2020	42,245	\$3,096,627	6,988	\$542,030	16.54%	17.50%
2021	46,622	\$2,338,695	7,749	\$406,988	16.62%	17.40%
Totals	123,559	\$7,149,138	20,525	\$1,261,889	16.61%	17.65%
Source: RATA/FFIEC.gov/CRA>Aggregate>MSA>County (Table 1-1)						

Table 5.8

First Internet Bank - Small Business Lending Data for Assessment Area - Moderate Income Tracts								
	Small Business & SBA Loans in AA (#)	Small Business & SBA Loans in AA (\$000)	SBA Loans >\$1MM with GAR ≤ \$1MM in AA (#)	SBA Loans >\$1MM with GAR ≤ \$1MM in AA (\$000)	Loans to Businesses with GAR ≤ \$1MM (#)	Loans to Businesses with GAR ≤ \$1MM (\$000)	Percentage of Aggregate Lending (#) to Small Businesses with GAR ≤ \$1MM in AA	Percentage of Aggregate Lending (\$) to Small Businesses with GAR ≤ \$1MM in AA
2020	142	\$45,887	0	\$0	20	\$5,514	14.08%	12.02%
2021	105	\$57,696	0	\$0	8	\$1,790	7.62%	3.10%
2022	57	\$19,289	0	\$0	6	\$2,174	10.53%	11.27%
Totals	304	122,872	0	\$0	34	9,478	11.18%	7.71%
Source: First Internet Bank end of calendar year data								
*With origination amounts >\$1MM, in 2020, there are 7 SBA loans, totaling \$13,389,770. With origination amounts >\$1MM, in 2021, there are 4 SBA Loans, totaling \$29,207,000. With origination amounts >\$1MM, in 2022, there are 2 small business SBA loans, totaling \$2,791,000.								

First Internet Bank is committed to maintaining its performance in small business lending. The Bank has created the following small business lending tests by which its CRA performance shall be measured. The section entitled “Determination of Rating”, later in this document, outlines the process by which the overall performance rating for the Bank under the Plan will be measured.

### **Small Business Lending Tests:**

Small business lending performance will be evaluated with four different tests, including an overall lending goal, lending to small businesses with revenue of \$1 million or less, and lending to small businesses in LMI tracts within the Bank’s AA. As previously mentioned, the decrease in LMI census tracts in 2021 to 2023, respectively, from 43.21% to 36.73%. provides less opportunities for the Bank to lend in LMI areas.

Small business loans and lines are defined as those reported in the Call Report RC-C part II schedule reported under CRA large institution lending requirements, or as otherwise defined as small business lending under applicable CRA regulations, and all SBA loans originated in the AA. In addition, for all small business lending performance tests, small business loans incorporate all SBA loans purchased or originated in the AA, including those over \$1 million.

The Bank has elected not to utilize the FDIC Market Share percentage for the Bank as it is not reflective of the deposits actually taken by the Bank in the AA. Since the Bank only has one location to accept deposits, for all small business tests, the Bank will utilize the AA adjusted deposit market share to determine goals. The Bank utilizes this figure to ensure that the Bank has a similar presence in its AA to the deposits, as determined by address of depositors, taken in from the AA. The AA adjusted deposit market share is calculated utilizing the First Internet Bank’s AA deposits, net of brokered and internal deposits, divided by the Bank’s total deposits, as reported by the FDIC, and then multiplied by the Bank’s FDIC June 30<sup>th</sup> Summary of Deposits market share percentage (note: this deposit data from the FDIC lags one year behind the target year). This figure then uses a three-year rolling average of the AA adjusted deposit market share that will be updated annually to determine all small business lending performance. The three-year rolling AA adjusted deposit market share will then be utilized to determine each of the four small business lending goal tests as noted below.

The calculation for the small business tests noted below are based on the three-year rolling average AA aggregate small business data published by the FDIC. This small business loan data lags two years behind the current target year.

### **Lending Test 1: Overall Lending Goal**

The basis for Small Business Lending Test 1 captures the Bank’s overall commitment to small business lending. This goal applies the Bank’s three year rolling average AA adjusted deposit market share percentage, as explained in the “Small Business Lending Test” section above, multiplied by the three-year rolling average of the AA small business aggregate lending to create a target lending level. Also, as mentioned above, goals will be updated annually based on the updated FDIC data. and as applicable aggregate small business data is released.

Small business loans included in this test will be comprised of all SBA loans, the small business line of credit commitments, and the loan origination amounts to businesses within the AA. Originations, renewals and purchases completed in the review year will be included in performance goals. Additionally, participation in lending programs designed to provide funding to small businesses that would otherwise not have access to traditional financing will count toward the Bank’s goal, even if the total commitment to the program exceeds \$1 million dollars. In the past, the Bank has participated in various programs such as Grow Indianapolis LLC, a New Markets Tax Credit loan fund. While the Bank’s commitment may exceed \$1 million in total, the line of



credit is for individual small business financing. The full line of credit will be considered only under Test 1 and the individual loans originated under the program will not be included in any other lending test.

### **Lending Test 2: Lending to Small Businesses with Revenues < \$1 Million**

The basis for Small Business Lending Test 2 captures the Bank's commitment to lending to small businesses with annual revenue  $\leq$  \$1 million in our AA. To arrive at the target goal for each year of the plan, the Bank's three-year rolling average of the AA adjusted deposit market share percentage, as explained in "Small Business Lending Test", is multiplied by the three-year rolling average of the AA small business aggregate lending to businesses with revenues  $\leq$  \$1 million to create a target lending level for the AA. Small business loans included in this test will be comprised of all SBA loans, the small business line of credit commitments, and the loan origination amounts to businesses with gross annual revenues of \$1 million or less originated within the AA. Originations, renewals and purchases completed in the review year will be included in performance goals. Also, as mentioned above, goals will be updated annually. The most recent FDIC aggregate AA business lending will be utilized, which lags two years behind the goal year.

### **Lending Test 3: Lending to Small Businesses in Low-Income Census Tracts**

The basis for Small Business Lending Test 3 captures the Bank's commitment to small businesses in Low-Income census tracts in proportion to our deposit market share in our AA. To arrive at the target goal for each year of the plan, the Bank's three-year rolling average of the AA adjusted deposit market share percentage, as explained in "Small Business Lending Test", is multiplied by the three-year rolling average of the AA small business aggregate lending to businesses in low-income census tracts to create a target lending level for the AA. Small business loans included in this test will be comprised of all SBA loans, the small business line of credit commitments, and the loan origination amounts to businesses within the AA. Originations, renewals and purchases completed in the review year will be included in performance goals. Goals will be updated annually. As previously mentioned, lending in low-income census tracts is limited based on the decreased percentage of census tracts.

### **Lending Test 4: Lending to Small Businesses in Moderate-Income Census Tracts**

The basis for Small Business Lending Test 4 captures the Bank's commitment to small businesses in Moderate-Income census tracts in proportion to our deposit market share in our AA. To arrive at the target goal for each year of the plan, the Bank's three-year rolling average of AA adjusted deposit market share percentage, as explained in "Small Business Lending Test," is multiplied by the three-year rolling average of the AA small business aggregate lending to businesses in moderate-income census tracts to create a target lending level for the AA. Small business loans included in this test will be comprised of all SBA loans, the small business line of credit commitments, and the loan origination amounts to businesses within the AA. Originations, renewals and purchases completed in the review year will be included in performance goals. Also, as mentioned above, goals will be updated annually.

The Small Business Lending scorecard is outlined below:

Table 5.9

Criteria	Period Ending 12/31/XX	Substantial Non-Compliance	Needs to Improve	Satisfactory	Outstanding
<b>CRA Lending Measurement - Small Business Lending</b>					
Test 1: Small Business Lending Test Dollar volume of Small Business & SBA Commitments in AA	Calendar Year 2024-2026	< 50% of Target	50% - <80% of Target	80% - <120% of Target	≥120% of Target
Test 2: Small Business (Revenue) Test Dollar volume of Small Business & SBA Commitments to Businesses with Revenues ≤ \$1MM in AA	Calendar Year 2024-2026	< 50% of Target	50% - <80% of Target	80% - <120% of Target	≥120% of Target
Test 3: Geographic Distribution Dollar volume of Small Business & SBA Commitments to Businesses with Revenues in Low-Income Census Tracts in AA	Calendar Year 2024-2026	< 50% of Target	50% - <80% of Target	80% - <120% of Target	≥120% of Target
Test 4: Geographic Distribution Dollar volume of Small Business & SBA Commitments to Businesses with Revenues in Moderate-Income Census Tracts in AA	Calendar Year 2024-2026	< 50% of Target	50% - <80% of Target	80% - <120% of Target	≥120% of Target
*AA Adjusted Deposit Market Share – This is calculated utilizing First Internet Bank's AA deposits, net of brokered and internal deposits, divided by the Bank's total deposits, as reported by the FDIC, and then multiplied by the Bank's FDIC June 30th Summary of Deposits market share percentage. This figure then uses a 3-year rolling average of the AA adjusted deposit market share that will be adjusted annually to determine all small business lending performance.					

The small business lending dollar targets for the 2024 proposed scorecard are noted below in Table 5.10:

Table 5.10

Criteria	Substantial Non-Compliance	Needs to Improve	Satisfactory	Outstanding
<b>CRA Lending Measurement – Small Business Lending</b>	<b>0</b>	<b>2</b>	<b>4</b>	<b>6</b>
Test 1: Small Business Lending Test Dollar volume of Small Business & SBA Commitments in AA	< \$13,762	\$13,762 - < \$22,020	\$22,020 - < \$33,030	≥ \$33,030
Test 2: Small Business (Revenue) Test Dollar volume of Small Business & SBA Commitments to Businesses with Revenues ≤ \$1MM in AA	< \$3,617	\$3,617 - < \$5,788	\$5,808 - < \$8,682	≥ \$8,682
Test 3: Geographic Distribution Dollar volume of Small Business & SBA Commitments to Businesses with Revenues in Low-Income Census Tracts in AA	< \$1,617	\$1,617 - < \$2,586	\$2,596 - < \$3,880	≥ \$3,880
Test 4: Geographic Distribution Dollar volume of Small Business & SBA Commitments to Businesses with Revenues in Moderate-Income Census Tracts in AA	< \$2,575	\$2,575 - < \$4,120	\$4,135 - < \$6,180	≥ \$6,180
Goals use a three-year rolling average of the AA adjusted deposit market share that will be updated annually to determine all small business lending performance goals. AA Adjusted Deposit Market Share is calculated utilizing First Internet Bank's AA deposits, net of brokered and internal deposits, divided by the Bank's total deposits, as reported by the FDIC, and then multiplied by the Bank's FDIC June 30th Summary of Deposits market share percentage. This percentage is then				



*multiplied by the three-year rolling average of the AA small business aggregate lending as determined by the FDIC (which lags two years behind the goal year). The calculation above utilizes the FDIC data for 2022 AA Aggregate Small Business Loans.*

To determine goals, a Satisfactory Rating (4 points) is attained by reaching 80% to less than 120% of the target dollar goal. More or less points are attained based on how much the Bank exceeds or falls short of the target goal. Substantial Non-Compliance is less than 50% of the target goal (0 points), Needs to Improve is 50.00% to less than 80% of the target goal (2 points), and an Outstanding rating is attained by reaching greater than or equal to 120% of the target goal (6 points). All deposit market share calculations are taken from the FDIC Deposit Market Share Report of the Indianapolis-Carmel-Anderson, IN MSA as reported of June 30th each year: <https://www7.fdic.gov/sod/sodMarketRpt.asp?barItem=&sCounty=all>. Internal Geocoding at the county level from deposit accounts determines actual deposits collected within the Bank's Assessment area (matching June 30th to FDIC report).

## **Conclusion**

First Internet Bank is a branchless bank which supports lending on a nationwide basis for the majority of its small business offerings. First Internet Bank was founded on the idea of an online only bank with a national footprint, and that remains our strategic objective. The Bank does not have a branch network to provide visibility within the assessment area, and advertising is conducted through a nationwide platform across all markets. However, the Bank continues in its commitment to its AA, as the Bank recently added a local Community Development Lender which will support lending in the local assessment area.

The Bank's performance goals are reflective of its historical performance and business model, with a commitment to reaching small businesses and small businesses in low- and moderate-income tracts. Performance goals consider the proportion of deposits to the aggregate performance in the Bank's assessment area, as well as, the Bank's historical performance.

First Internet Bank has adopted loan goals that allow us to address the credit needs of the assessment area. The Bank recognizes that inclusion of these tests within the Plan is representative of its commitment to small business lending within the organization.

## ***Community Development Activities***

First Internet Bank has determined that there continues to be a need to facilitate ongoing economic development, and revitalization and stabilization of low and moderate income (LMI) geographies. Additionally, there is a need for financial literacy training, credit counseling, and low- or no-cost banking services. In the arena of social services for LMI families in crisis, there is a need for access to basic shelter and food supplements. Community Development Activities consist of Community Development Loans, Investments, and Services. The Bank's performance goals for community development activities were developed to account for the Bank's historical performance as the Bank's differentiated product lineup and nationwide footprint challenge the traditional classifications of peers. Only qualified lending, investment, service activities, as defined by the CRA regulation, rendered to such organizations, will receive CRA credit.

## **Community Development Lending Activities**

Loans and lines originated and renewed by First Internet Bank, as well as, participations and purchases of community development loans or lines within each year of review that are made within the assessment area or benefiting the assessment area will be considered under this test.

Indianapolis Neighborhood Housing Partnership (INHP) is the city's preeminent community development catalyst for successful homeownership and sustainable neighborhoods. The mission of INHP is to increase safe, decent, affordable housing opportunities that foster healthy, viable neighborhoods through classroom instruction and financial coaching designed to help homebuyers through each step of the home-buying process. INHP among other programs, provides home loans to select graduates of its program, using funds pledged by local financial institutions. First Internet Bank is a long-time participant in the INHP Loan Pool fund, providing a \$2,000,000 line of credit to enable the organization to fund mortgage loans for program participants.

The Bank also has a partnership with the Greater Indy Habitat for Humanity. Greater Indy Habitat unites the community with people in need to provide the life-changing opportunity to purchase and own simple, quality, affordable homes. Currently, First Internet Bank has a \$16 million commitment to purchase loans from Greater Indy Habitat through year-end 2025. This commitment enables the organization to maintain greater liquidity to purchase land and building materials for new homes. This commitment, along with the INHP fund noted above and others of a similar nature, would count toward the Community Development Activities performance goal.

First Internet Bank may also move to support other emerging programs that demonstrate innovation and responsiveness to community development needs. Only qualified lending activities, as defined by the CRA regulation, rendered to such organizations, will receive CRA credit.

### **Community Development Investment Activities**

First Internet Bank will make CRA-qualified community development investments in or to various organizations within the Bank's assessment area. Only qualified investment activities, as defined by the CRA regulation, rendered to such organizations, will receive CRA credit. Investment activities may include, but are not limited to:

- Investment Funds, such as the Centerfield Capital Fund IV, Centerfield Capital Fund V, and Merchants Capital LIHTC Fund V, which offers investments in specific qualified projects within the assessment area. The earmarked investment is assessed to determine its innovativeness, complexity and responsiveness to credit and community development needs within the Bank's assessment area.
- Stock in community development and CRA lending corporations like the Indiana Community Business Credit Corporation. ICBCC provides credit to Indiana small businesses. An investment would represent an equity/ownership investment in a qualified company and would be different from participating in programs by providing various types of financing.
- Agencies that sell community development purpose mortgage-backed securities.
- Donations to community organizations that provide services to support a community development purpose, such as:
  - Indianapolis Neighborhood Housing Partnership (INHP)
  - Coalition for Homelessness Intervention and Prevention (CHIP)
  - Salvation Army – Indiana
  - Junior Achievement of Central Indiana

First Internet Bank may also pursue other qualified investments that demonstrate innovation and responsiveness to community needs within the Bank's assessment area.

### **Community Development Service Activities**

Supporting the volunteer efforts of First Internet Bank employees is a key part of our community

support and corporate culture.

In order to serve all customers in a manner that is fair, with services that are available to substantially all consumers across the country, First Internet Bank continues to:

- Offer account access 24 hours a day, 7 days a week, through its digital banking services
- Accept deposits through the US mail, direct deposit/ACH, wire transfers, remote and mobile deposit capture technology, and a deposit-taking ATM network
- Offer checking account services with maintenance fees that compare favorably with the national average
- As captured in and consistent with the Bank's 2021-2023 CRA Strategic Plan, First Internet Bank supports its communities by providing technical assistance on financial matters to nonprofit, universities and/or government organizations serving low- and moderate- income populations and neighborhoods. These efforts focus on affordable housing, economic development (small business support), and community development organizations through Board/Committee services, providing technical assistance using associate's expertise, and providing financial education for organizations that primarily serve LMI communities/residents and/or small businesses in the assessment area.
- First Internet Bank relies on its officers and employees living and working in the assessment area to meet the Bank's performance goal. The Bank encourages employee participation within the community by offering paid volunteer time off to employees participating in service-oriented activities occurring during typical business hours.

Several Bank employees are actively engaged within the community, through boards/committees, with community organizations with a mission or programs that primarily serve LMI populations/communities. Examples of these community outreach efforts include:

- Serving on the Board of the Indianapolis Neighborhood Housing Partnership
- Serving on the Board of Greater Indy Habitat for Humanity
- Serving on the Board of Near North Community Development Corporation
- Serving on the Board of the Central Indiana Corporate Partnership (CICP)
- Serving on the Board of Central Indiana Community Foundation (CICF)
- Serving on the Board of the Hamilton County Community Foundation (HCCF)
- Serving on the Board of the OneZone Chamber
- Serving on the Board of ACE Prep Academy
- Serving on the Board of Junior Achievement of Central Indiana
- Serving on Marian University's 21<sup>st</sup> Century Scholar Board of Visitors
- Serving on the Finance Committee of the Indiana Department of Workforce Development – Region 5

In addition, associates provide and support financial and workforce development training, on behalf of the Bank, using their expertise. Only qualified service activities as defined by the CRA regulation, rendered to such organizations, will receive CRA credit. The following provides additional details and examples in which employees have rendered such community services:

- Pitchfeast empowers BIPOC entrepreneurs and business owners who use their personal skills and creativity to generate income and make a difference in their community. The objective is to Give BIPOC entrepreneurs an equal opportunity by contributing to the education and development of their business. This is done by providing entrepreneurs with essential business development support, technical training, and various other services needed to contribute to the

development of entrepreneurial projects and ventures. Pitchfeast holds a semi-annual event, sponsored by First Internet Bank. During each event, 10 entrepreneurs receive the opportunity to showcase their business or startup to a group of investors and compete for a chance to receive startup capital that will help the business grow. The investments are being awarded in the form of low-interest loans. First Internet Bank has committed to being the title sponsor for three years (2023, 2024, and 2025) and the Bank's CEO serves as a guest speaker and Pitchfeast contest judge.

- Purposeful Design (PD) exists to help rebuild lives of individuals who have struggled with addiction, homelessness, incarceration and other obstacles; to equip them with valuable work skills; and to provide the gift of work. First Internet employees have facilitated financial education and workforce development sessions for PD's Advance! Program. Programming takes place at PD, Dove Recovery House, and the Hamilton County Jail.
- Marian University's 21st Century Scholar Tuition Scholarship is an incredible opportunity for students who want a high-quality private university experience. The 21<sup>st</sup> Century Scholarship is based on income eligibility and pays up to 100% of tuition at an Indiana college/university. At Marian University, up to 50 incoming students are awarded this financial need-based scholarship each year, which is funded through a combination of federal, state, and university aid. First Internet Bank partnered with Marian University's 21<sup>st</sup> Century Scholar Summer Camp to host 60 high school students/college mentors and Marian staff onsite for a workforce development and financial education initiative. First Internet Bank was innovative in creating a half-day program for students consisting of a professional career panel with associates from banking and non-banking careers working in the bank industry, facilitating the FDIC MoneySmart "Halls of Knowledge" session to discuss paying for college, and providing students with a free lunch and opportunity to network with professionals.
- First Internet Bank employees participate in area school programs and Junior Achievement programs, including career days, Biztown and JobSpark, targeted to students from schools in which greater than 50% of the student population qualify for free and reduced lunch. The Bank has successfully participated in, developed, and delivered financial- or workforce-oriented programs. The Bank partnered with Junior Achievement of Central Indiana to create a career navigation activity to facilitate for Biztown's summer camp. These sessions were facilitated by Bank employees for each summer camp session.

### *Community Development Measurements*

#### **Lending and Investment Measurement**

In order to develop a more accurate assessment of the Bank's community development lending and investment activities, we reviewed the Bank's historical performance as there are no similarly-situated banks. The Bank's differentiated product lineup and nationwide footprint challenge the traditional classifications of peers. First Internet Bank strives to meet the needs of its community in a manner that is consistent with its business strategy, operational focus and constraints, and safety and soundness guidelines.

Table 5.11

First Internet Bank - Community Development Lending and Investments									
	Deposits in AA (net of brokered and internal deposits) (000's)	CD Loans		New CD Investments		Percentage of Avg CD Lending and New Investments to Deposits \$(000)	Existing and New CD Investments		Percentage of Avg CD Lending and All Investments to Deposits
		#	\$ (000's)	#	\$ (000's)		#	\$ (000's)	
2021	\$553,500	0	\$0	19	\$53,454	9.66%	65	\$93,657	16.92%
2022	\$585,803	5	\$22,358	20	\$40,529	10.74%	79	\$117,333	20.03%
2023	\$1,253,570	3	\$7,400	30	\$57,471	5.17%	108	\$164,710	13.14%
Average	\$797,624	3	\$7,440	23	\$50,485	8.52%	76	\$125,233	16.70%
Source: First Internet Bank; FDIC Summary of Deposit adjusted to the bank's proposed CRA AA*									
*First Internet Bank Deposits were determined by geocoding the Bank's deposits to identify those within the Bank's assessment area to arrive at "Deposits in AA".									

Table 5.12

First Internet Bank - Community Development New Investments (Donations)	
Year	CD Investments (Donations)
2021	\$260,000
2022	\$17,450
2023	\$169,025
Three Year Rolling Average	\$148,825
Source: First Internet Bank	

### **Lending and Investment Tests:**

Consistent with our current strategic plan, new community development lending and investment activities will be evaluated on the origination amount for loans, the commitment amount for lines, and the purchase price for new CRA-qualified investments, including securities and funds, as a percentage of the Bank's FDIC Summary of Deposits in the assessment area. The test includes, but is not limited to, loans and lines originated and renewed by First Internet Bank, as well as, participation and purchases of Community Development loans or lines within each year of review. Investment Activities will also be measured on a cumulative basis as follows: The annual average of the quarterly fair market value of all CRA qualified investments outstanding as of the last day of each quarter, as a percentage of FDIC Summary of Deposits in the assessment area. Only activities within the assessment area or benefiting the assessment area will be considered under this test. However, qualified CRA community development loans, investments, financial services and technical assistance to Minority Depository Institutions will also be considered in accordance with the CRA rules and regulations.

For Test 5, the Bank's average performance for the rolling three-year period was 8.52% as shown in Table 5.11. The goals were determined by calculating the lower thresholds for the Need to Improve and Satisfactory ratings, and the upper threshold for the Satisfactory rating, by multiplying the average performance by 50%, 80% and 120%, respectively. Any SBA or other loans over \$1 million that were included in Tests 1, 2, 3, and 4 will not be included in Test 5.

For Test 6, the average CRA-qualified investments of First Internet Bank from 2021-2023 of the average FDIC Summary of Deposits in the assessment area was 16.7%. To determine the goals, we calculated the lower thresholds for the Need to Improve and Satisfactory ratings and the upper threshold for the Satisfactory rating by multiplying the average performance by 50%, 80% and 120%, respectively.

This approach to evaluating qualifying activities allows for setting a measurable goal in assessing a bank's community development lending and investment performance in the Bank's assessment area.

#### **CRA-Qualified Community Development Specific Investments:**

First Internet Bank recognizes a gap between assessment area community development services, low- and moderate-income housing, neighborhood revitalization and small business development community needs. This goal is designed to bridge that gap. The Bank is committed to making investments in community services, affordable housing and to support small businesses in the assessment area. Investments earmarked for this specific goal cannot also be considered in the overall CRA investment goals established earlier in the plan under Tests 5 or 6.

As previously mentioned and identified through community contacts, several possible investment opportunities that aim to support community development needs exist within the AA and statewide. Only opportunities that support CRA-qualified community development initiatives in the assessment area and statewide will be considered under these goals. These opportunities include, but are not limited to, investments (in-kind donations, donations, sponsorships, in-kind, etc.), loan pool purchases, and low-income tax credit projects to non-profits. Opportunities assisting non-profits, credit counseling centers, small business development organizations, educational institutions, Community Development Financial Institutions exist, and those organizations/programs primarily serving LMI residents/communities exist and will be considered in these tests.

For Test 7, using the Bank's historical performance, the three-year rolling average dollar amount of CD investments is \$148,825. CD investments (donations, in-kind donations, sponsorships, etc.) supporting identified community services, affordable housing, neighborhood revitalization/stabilization, and economic development were considered. The goal was determined by calculating the lower thresholds for the Need to Improve and Satisfactory ratings, and the upper threshold for the Satisfactory rating, by multiplying the three-year rolling average performance by 50%, 80% and 120%, respectively. This goal will be updated annually, based on the rolling three-year average.

For Test 8, the Bank considered assessment area affordable housing investments through loan pool purchases in 2023 which totaled approximately \$6 million dollars. With the Bank's decision to exit the consumer mortgage business in the first quarter of 2023, First Internet remains committed to supporting affordable housing initiatives within the AA. Throughout the year, the Bank continued to provide support to Habitat for Humanity through many avenues, including loan pool



purchases. Using this volume as a factor, it was determined that an additional \$6 million dollars would assist to bridge the gap between the Bank's historical performance and that of the HMDA reportable lenders operating in the AA. The goals were determined by calculating the lower thresholds for the Need to Improve and Satisfactory ratings, and the upper threshold for the Satisfactory rating, by multiplying the 2023 performance by 50%, 80% and 120%, respectively.

Based on the analysis of the information presented above, the community development loans and investments scorecard is located below in Table 5.13:

Table 5.13

Criteria	Period Ending 12/31/XX	Substantial Non-Compliance	Need to Improve	Satisfactory	Outstanding
<b>Community Development Measurements - Lending and Investments</b>					
Test 5: Community Development Loans and New Investments per Deposit in AA.	Calendar Year 2024-2026	< 50% of Target	50% - <80% of Target	80% - <120% of Target	≥120% of Target
Test 6: Community Development Investments (Existing+New) per Deposit in AA	Calendar Year 2024-2026	< 50% of Target	50% - <80% of Target	80% - <120% of Target	≥120% of Target
Test 7: Community Development New Investments (Donations) per Rolling 3-Year Average	Calendar Year 2024-2026	< 50% of Target	50% - <80% of Target	80% - <120% of Target	≥120% of Target
Test 8: Community Development Affordable Housing Specific Investments	Calendar Year 2024-2026	< 50% of Target	50% - <80% of Target	80% - <120% of Target	≥120% of Target

The performance targets proposed for 2024 are below in Table 5.14:

Table 5.14

Criteria	Period Ending 12/31/XX	Substantial Non-Compliance	Need to Improve	Satisfactory	Outstanding
<b>Community Development Measurements - Lending and Investments</b>					
Test 5: Community Development Loans and New Investments per Deposit in AA.	Calendar Year 2024-2026	<4.26%	4.26% - <6.82%	6.82% - <10.22%	≥10.22%
Test 6: Community Development Investments (Existing+New) per Deposit in AA	Calendar Year 2024-2026	<8.35%	8.35% - <13.36%	13.36% - <20.04%	≥20.04%
Test 7: Community Development New Investments (Donations) per Deposit in AA.	Calendar Year 2024-2026	< \$74,413	\$74,413 - < \$119,060	\$119,060 - <\$178,590	≥\$178,590
Test 8: Community Development Affordable Housing Specific Investments.	Calendar Year 2024-2026	<\$3.05 MM	\$3.05 MM - <\$4.9 MM	\$4.9 MM - <\$7.32 MM	≥\$7.32 MM
Tests 5 and 6 are based on the percentage of average CD lending and investments, applicable to those tests, to deposits using the rolling three-year average. Test 7 is based on the rolling three-year average of donations and will be updated annually. Test 8 is based on the Bank's 2023 loan pool purchases.					

To determine goals, a Satisfactory Rating (4 points) is attained by reaching 80% - <120% of the target dollar goal. More or less points are attained based on how much the Bank exceeds or falls short of the target goal. All deposit market share calculations are taken from the FDIC Deposit Market Share Report of the Indianapolis-Carmel-Anderson, IN MSA as reported of June 30 each year.

### **Service Measurement**

Consistent with the Bank's nationwide business model and growth, as the Bank's employee base grows, the Bank hires some employees located outside the assessment area; those employees have no opportunity to contribute meaningful CRA qualified community development service hours to the assessment area and are, therefore, excluded from the service hour per employee calculation. Over the three-year period from 2020 – 2023, 82% of the Bank's employees work and/or reside within the previous nine county assessment area. The Bank has chosen to use the service hours for the number of employees who are positioned to impact its assessment area.



Table 5.15 represents the most recent three-year history of CRA qualified community development service hours.

Table 5.15

Community Service History			
Year	Community Service Hours	Number of Employees*	Service Hours/Employee
2020	514	248	2.07
2021	564.5	225	2.51
2022	580	240	2.42
<p>* The number of employees is as of the prior year-end and includes employees who work and reside in the assessment area. Source: First Internet Bank</p>			

### Service Test

First Internet Bank will be evaluated on the number of qualifying service hours per employee who work and reside in the assessment area at the end of the previous year.

Table 5.16

Criteria	Period Ending 12/31/XX	Substantial Non-Compliance	Need to Improve	Satisfactory	Outstanding
Test 9:  Service hours per employee who work/reside in AA at prior year-end	Calendar Year 2024-2026	< 1.00	1.00 - < 2.00	2.00 - < 3.00	≥ 3.00

### Conclusion

First Internet Bank is a branchless bank lending on a nationwide basis and its headquarters and the majority of its staffing resides within the eleven-county assessment area. First Internet Bank was founded on the idea of an online only bank with a national footprint, and that remains our strategic objective. The Bank does not have a branch network to provide visibility within the assessment area, and advertising is conducted through a nationwide platform across all markets.

The Bank's performance goals are reflective of the historical performance and business model, with a commitment to focusing on community development in the area in which our associates reside and a significant percentage of our deposits are gathered. The performance goals consider both the average performance of similarly situated banks and the Bank's historical performance.

First Internet Bank has adopted community development goals that allow us to address the needs of the assessment area. The Bank recognizes that inclusion of these tests within the Plan is representative of its commitment to the community in which we reside.

## ***Determination of Rating***

First Internet Bank has established specific goals in the areas of Lending and Community Development. Each category includes criteria to achieve a “Satisfactory” and an “Outstanding” rating. Each rating achieved receives a point allocation. Performance will be assessed each calendar year and an overall Institution rating will be determined based on points allocated from each test’s performance. This is illustrated in the chart below, Table 5.17:

Table 5.17

<b>Criteria</b>	<b>Substantial Non- Compliance</b>	<b>Need to Improve</b>	<b>Satisfactory</b>	<b>Outstanding</b>
<b>CRA Lending Measurement – Small Business Lending</b>				
Test 1: Dollar volume of Small Business and SBA Loan and Commitments in the AA	0	2	4	6
Test 2: Dollar volume of small business & SBA loans and commitments with ≤ \$1MM in revenue in the AA	0	2	4	6
Test 3: Dollar volume of small business & SBA loans and commitments (\$) in AA made in low-income tracts	0	2	4	6
Test 4: Dollar volume of small business and SBA loans and commitments (\$) in AA made in moderate-income tracts	0	2	4	6
<b>Community Development Activity</b>				
Test 5: Community Development Loans and New Investments per Deposit in AA	0	2	4	6
Test 6: Community Development Investments (Existing + New) per Deposit in AA	0	2	4	6
Test 7: Community Development New Investments (Donations) per Deposit in AA.	0	2	4	6
Test 8: Community Development Affordable Housing Specific Investments	0	2	4	6
Test 9: Community Development Service Hours per Employee in AA	0	2	4	6
Total Overall Bank Rating	< 16	16-30	32-50	> 50

If First Internet Bank does not meet the minimum guidelines to achieve a “Satisfactory” rating overall, the Bank shall be evaluated under the Large Bank guidelines for CRA performance.

## Performance Tracking

The Bank will monitor performance quarterly throughout the year and present to the Board the year-to-date performance. The CRA performance results and overall institution rating will be presented to the Board using the chart in Table 5.18 below.

Table 5.18

Criteria	Substantial Non-Compliance	Need to Improve	Satisfactory	Outstanding
<b>CRA Lending Measurement – Small Business Lending</b>				
Test 1: Percentage of small business and SBA loan commitments (\$) in AA to % of deposit market share in AA	< 50% of Target	50% - <80% of Target	80% - <120% of Target	≥120% of Target
Test 2: Percentage of small business and SBA loan commitments (\$) in AA made to borrowers with ≤ \$1MM in revenue to % of deposit market share in AA	< 50% of Target	50% - <80% of Target	80% - <120% of Target	≥120% of Target
Test 3: Percentage of small business and SBA loan commitments (\$) in AA made in low-income tracts to % of deposit market share in AA	< 50% of Target	50% - <80% of Target	80% - <120% of Target	≥120% of Target
Test 4: Percentage of small business and SBA loan commitments (\$) in AA made in moderate-income tracts to % of deposit market share in AA	< 50% of Target	50% - <80% of Target	80% - <120% of Target	≥120% of Target
<b>Community Development Activity</b>				
Test 5: Community Development Loans and New Investments to % of deposit market share in AA	< 50% of Target	50% - <80% of Target	80% - <120% of Target	≥120% of Target

Test 6: Community Development Investments (Existing + New) to % of deposit market share in AA	< 50% of Target	50% - <80% of Target	80% - <120% of Target	≥120% of Target
Test 7: Community Development New Investments (Donations) per Rolling 3 Year Average	< 50% of Target	50% - <80% of Target	80% - <120% of Target	≥120% of Target
Test 8: Community Development Affordable Housing Specific Investments	<\$3.05 million	\$3.05 million - <\$4.9 million	\$4.9 million - <\$7.32 million	≥\$7.32 million
Test 9: Community Development Service Hours per Employee in AA	<1.00	1.00 - <2.00	2.00 - <3.00	≥3.00

## **Appendices**

- Appendix A: First Internet Bank Deposit Product List
- Appendix B: First Internet Bank Lending Product List
- Appendix C: First Internet Bank Lending Product Portfolio Distribution
- Appendix D: Map of Indiana Assessment Area
- Appendix E: Published Public Notice

## **Appendix A: First Internet Bank Deposit Products**

<b><u>Consumer Deposit</u></b>	<b><u>Commercial Deposit</u></b>
Interest Checking Accounts	Do More Business Checking (interest checking) Accounts
Free Checking Accounts	Commercial Checking Accounts
Health Savings Accounts	Money Market Savings Accounts
Savings Accounts	Regular Savings Accounts
Money Market Savings Accounts	Certificates of Deposits
Certificates of Deposits	
Deposit products have associated services such as Remote Deposit Capture, Sweep Account options, Checking Positive, Pay Zero Balance Accounts, as well as ACH and wire services.	

**Appendix B: First Internet Bank Lending Products**

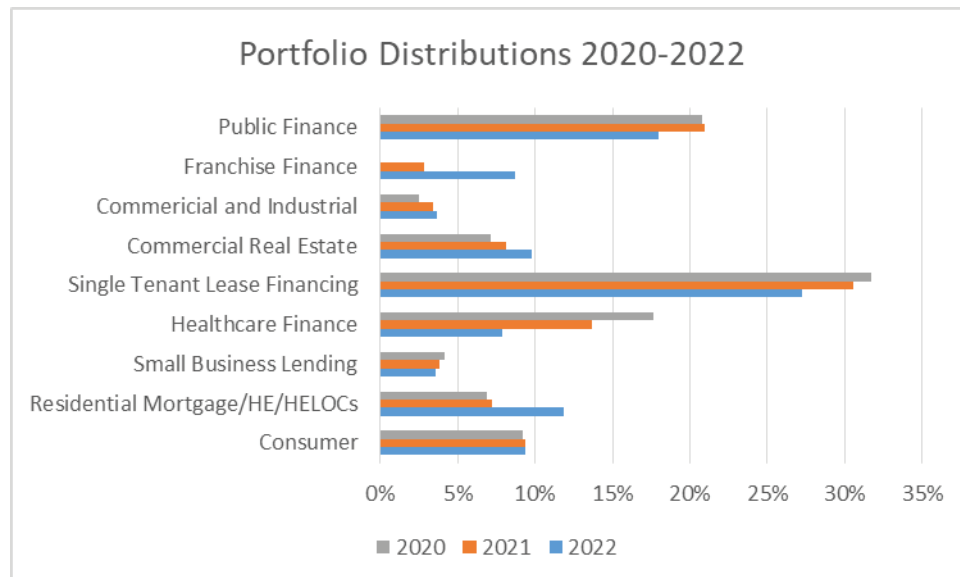
<b>Consumer Lending</b>	<b>Commercial Lending</b>
Horse Trailer Loans	Small Business Lending
RV Loans	Construction and Investor Commercial Real Estate
Credit Cards	Single Tenant Lease Financing
Automobile Loans	Public Finance
	Franchise Finance Lending
	Commercial and Industrial (“C&I”) Lending

## **Appendix C: First Internet Bank Lending Portfolio Distribution**

Portfolio distributions (in dollars) from 2020 through year-end 2022

<u>Dollars in thousands</u>	<u>2022</u>	<u>2021</u>	<u>2020</u>
<b><u>Commercial Loans</u></b>			
Commercial and Industrial	\$ 126,108	\$ 96,008	\$ 75,387
Owner-occupied commercial real estate	61,836	66,732	89,785
Investor commercial real estate	93,121	28,019	13,902
Construction	181,966	136,619	110,385
Single tenant lease financing	939,240	865,854	950,172
Public finance	621,032	592,665	622,257
Healthcare finance*	272,461	387,852	528,154
Small business lending	123,750	108,666	125,589
Franchise finance	299,835	81,448	-
Total Commercial Loans	2,719,349	2,363,863	2,515,631
<b><u>Consumer Loans</u></b>			
Residential Mortgage*	\$ 383,948	\$ 186,770	\$ 186,787
Home Equity*	24,712	17,665	19,857
Other Consumer	324,598	265,478	275,692
Total Consumer Loans	733,258	469,913	482,336
Net deferred loan fees, premiums, discounts	46,794	53,886	61,264
<b>Total Loans</b>	<b>3,499,401</b>	<b>2,887,662</b>	<b>3,059,231</b>
*Products no longer offered			

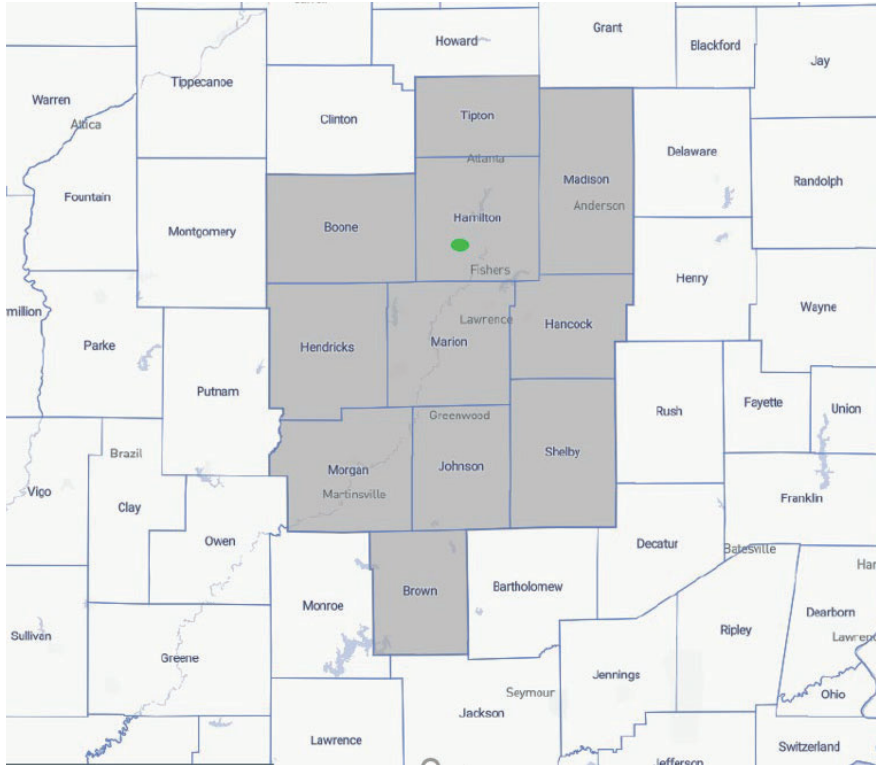
Portfolio distributions from 2020 through year-end 2022





## **Appendix D: Map of Indiana Facility-Based Assessment Area**

Map of First Internet Bank's Indiana Assessment Area: Boone, Brown Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and Tipton Counties.



### **Appendix E: Published Public Notice**

See Following Pages

August 8, 2023 - Pursuant to §12 C.F.R. 345.27, First Internet Bank (Bank), 8701 E. 116<sup>th</sup> St., Fishers, IN 46038, hereby gives notice that it has completed a draft of a Community Reinvestment Act (CRA) Strategic Plan (Plan) to establish lending and community development goals and measures for compliance with the CRA. Any person who desires to comment on the Plan must file his or her comment(s) in writing to the Bank at the address above by September 7, 2023 (30 days from date of publication). All comments will be reviewed and considered in preparing the final version of the Plan. The Plan is available for review at the Bank's main office at said address from 8:00 am – 5:00 pm ET, Monday – Friday. A copy of the plan will be mailed upon written request. Electronic copies of the plan are available upon e-mail requests sent to [bank@firstib.com](mailto:bank@firstib.com). All written comments will be submitted with the Plan to the FDIC Regional Office in Chicago, IL. The Bank is an Equal Housing Lender, Member FDIC.

**NOTICE TO BIDDER**

RFP-CST202300003

Notice is hereby given that Request for Proposals for Blue Ribbon Pavilion Roof Replacement will be received by the Indiana State Fair Commission at 1202 East 38th Street, Indianapolis, IN.

Bid Due: September 8, 2023 by 2:00PM EST to [contracts@indianastatefair.com](mailto:contracts@indianastatefair.com)

Pre-Bid Meeting: August 7, 2023 - 10AM Administration Building (Optional)

Pre-Bid Q&A: The Commission will receive pre-bid questions via email at [contracts@indianastatefair.com](mailto:contracts@indianastatefair.com) until 3:00PM, September 1, 2023.

The RFP solicitation document can be found on the Indiana State Fair's Website at:

<http://www.indianastatefair.com/meetings-notices/>

Telephone calls concerning any solicitation and/or bid cannot be accepted

INI - 8/8, 8/15/2023 - 0005790735 hspaxlp

**LEGAL NOTICE OF PUBLIC HEARING**

INDIANA DEPARTMENT OF REVENUE DOCKET NO: 431367  
IN THE MATTER OF THE APPLICATION OF BMBIM NEMTRANSPORT LLC, INDIANAPOLIS, INDIANA, FOR A CERTIFICATE TO OPERATE MOTOR VEHICLES AS A COMMON CARRIER OF PASSENGERS, INTRASTATE.

Notice is hereby given that Indiana Department of Revenue has set the above matter for an initial hearing to be held at:

MOTOR CARRIER SERVICES DIVISION  
INDIANA DEPARTMENT OF REVENUE  
7811 MILHOUSE RD SUITE M  
INDIANAPOLIS, INDIANA 46241

Time: 9:00 A.M. EST on September 21, 2023

Public participation is requested. However, this hearing is subject to continuance.

Therefore, it is strongly advised that you notify the Department of your intent to attend.

Neither the parties nor their counsel are required to appear in person for the hearing. A procedural agenda will be issued by the presiding Hearing Officer and served on counsel for the parties by first class U.S. mail.

If an accommodation is required to allow an individual with a disability to participate in this meeting, please contact the Motor Carrier Services Division of the Indiana Department of Revenue at 317/615-7295 or TTD at 317/232-4952 at least 48 hours before the meeting.

INDIANA DEPARTMENT OF REVENUE  
BY: SARAH KAMM

ASSISTANT GENERAL COUNSEL LEGAL SERVICES  
(INI - 8/8/23 - 5791052) hspaxlp

STATE OF INDIANA } IN THE MARION CIRCUIT COURT  
COUNTY OF MARION } SS:  
CAUSE NO.: 49C01-2307-M-026705

IN RE THE CHANGE OF NAME: }

Emma-Li Kissinger  
Petitioner }

**ALIAS NOTICE OF HEARING FOR PUBLICATION**

Notice is hereby given that Petitioner filed a Verified Petition for Change of Name on July 7, 2023, requesting a name change from Emma-Li Kissinger to Emmali Kissinger.

The Petition is scheduled for hearing in the Marion Circuit Court on October 26, 2023 at 1:30 p.m., which is more than (30) days after the third notice of publication. Any person has the right to appear at the hearing and to file written objections on or before the hearing date.

This hearing will be held in-person at the Marion Circuit Court, located at the Community Justice Center, 675 Justice Way, Indianapolis, IN 46203.

SO ORDERED: July 12, 2023

/s/ Amber Collins-Gebrehiwet  
JUDGE, Marion Circuit Court

INI - 08/01, 8/8, 8/15/2023 - 0005784853 hspaxlp

RE-BID  
Indiana Archives and Records Administration Building  
Indianapolis, IN

Notice is hereby given that Pepper Construction Company of Indiana, LLC will receive re-bids for the Indiana Archives and Records Administration Building project in Indianapolis, IN.

Bid packages included in the Re-bid: BP-14: Firestopping & Acoustical Sealants and BP-28: Lab Casework & Equipment.

All bidders are required to be prequalified with the IDOA, Division of Public Works and Pepper Construction prior to the bid submission deadline.

All diverse trade partners are highly encouraged to submit bids for this project.

Bids are due electronically: Thursday, August 24, 2023, 2:00 PM ET. Request prequalification and bidding documents electronically by emailing Caitlin Poe at [cpoe@pepperconstruction.com](mailto:cpoe@pepperconstruction.com)

INI - 8/8, 8/10, 8/14, 8/16/2023 - 0005791532 hspaxlp

August 8, 2023 - Pursuant to §12 C.F.R. 345.27, First Internet Bank (Bank), 8701 E. 116th St., Fishers, IN 46038, hereby gives notice that it has completed a draft of a Community Reinvestment Act (CRA) Strategic Plan (Plan) to establish lending and community development goals and measures for compliance with the CRA. Any person who desires to comment on the Plan must file his or her comment(s) in writing to the Bank at the address above by September 7, 2023 (30 days from date of publication). All comments will be reviewed and considered in preparing the final version of the Plan. The Plan is available for review at the Bank's main office at said address from 8:00 am - 5:00 pm ET, Monday - Friday. A copy of the plan will be mailed upon written request. Electronic copies of the plan are available upon e-mail requests sent to [ban.k@firstib.com](mailto:ban.k@firstib.com). All written comments will be submitted with the Plan to the FDIC Regional Office in Chicago, IL. The Bank is an Equal Housing Lender. Member FDIC.