



PUBLIC DISCLOSURE

December 3, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Home Savings & Loan Association of Carroll County, F.A.
Charter Number 700508
210 E. 2nd Street
Norborne, MO 64668

Office of the Comptroller of the Currency
7101 College Boulevard, Suite 1600
Overland Park, KS 66210

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

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Overall CRA Rating

The Lending Test is rated Outstanding.

The major factors supporting this rating are:

- Home Savings and Loan Association of Carroll County (HSLA or bank) has an overall excellent record of lending to borrowers of different incomes.
- HSLA's loan-to-deposit (LTD) ratio is more than reasonable.
- A majority of loans are made to borrowers within the bank's assessment area (AA).

Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan/AA.

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

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

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

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

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

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

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

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

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

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

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

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

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

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Description of Institution

HSLA is a federally chartered mutual thrift with total assets of \$86.8 million as of September 30, 2018. Home Savings and Loan Association of Norborne merged with Carroll County Savings and Loan Association on July 1, 2017, with the resulting bank headquartered in Norborne, Missouri and entitled Home Savings and Loan Association of Carroll County, F.A. HSLA operates two full-service offices in Norborne, Missouri and Carrollton, Missouri. Services include mobile banking and Internet banking. The bank does not operate any ATMs.

HSLA has one AA that includes all census tracts in Carroll County, Missouri. The AA does not include a MSA. According to the FDIC Deposit Market Share Report, HSLA ranks second out of the six institutions in the bank's AA with a market share of 20.44 percent. The top five banks have a combined market share of 66.24 percent. The primary competitors in the AA are community banks, including Carroll County Trust Company of Carrollton, MO, Bank 21, and Goppert Financial Bank.

As of September 30, 2018, net loans totaled \$54.8 million, or 63.1 percent of total assets. HSLA's loan portfolio consists of 93 percent real estate loans, five percent consumer loans, one percent commercial loans and one percent agriculture loans by dollar amount. HSLA both purchases and originates home mortgages. Tier 1 capital was \$17.4 million and deposits totaled \$68.2 million.

There are no legal, financial, or other factors impeding HSLA's ability to meet the credit needs of its AA. HSLA received an "Outstanding" rating at the previous CRA examination, dated August 19, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated HSLA's CRA performance using the small bank procedures. HSLA's primary lending products for the evaluation period, by number and dollar, are consumer and home mortgages, respectively. We analyzed a sample of consumer and home mortgages for the period from January 1, 2015 through December 31, 2017. We evaluated samples of consumer and home mortgages separately for the period from January 1, 2015 through December 31, 2016 (2015-16) and the period from January 1, 2017 through December 31, 2017 (2017). We placed greater weight on the performance in 2015-16 since this period represents two full years and a majority of the evaluation period.

Data Integrity

The OCC based this evaluation on accurate data. HSLA is not required to collect, maintain and publicly report data on consumer and home mortgages. Therefore, we used random sampling to obtain data on these loans, including income, revenue, and geographic information.

Selection of Areas for Full-Scope Review

The OCC completed a full-scope review of HSLA's one AA. Refer to appendix A for details.

Ratings

The bank's overall rating is based primarily on those areas that received full-scope reviews.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

Conclusions with Respect to Performance Tests

LENDING TEST

HSLA’s performance under the lending test is rated “Outstanding.” Lending volumes are more than reasonable given the bank’s size, financial condition, and competition. A majority of HSLA’s loans are originated in its AA. The overall distribution of loans to borrowers of different income levels is excellent.

Loan-to-Deposit Ratio

HSLA’s LTD ratio is more than reasonable. Since the last CRA evaluation, HSLA’s quarterly average LTD ratio is 79.3 percent, and ranged from 76.6 percent to 83 percent. This compares to a quarterly average LTD ratio for banks of similar size and operations of 62.6 percent. Among six other similarly situated financial institutions, the quarterly average ratio ranged from 35.1 percent to 87 percent.

There is significant competition in the AA with six institutions in a, rural area with a population of 9,096. Two of the competing institutions have an additional branch in the AA and both are almost double the asset size of HSLA. The other three institutions are larger with multiple intra- and inter-state branches. HSLA is actively making loans with twice as many loans originated in 2017 compared with 2015-16 combined.

Lending in Assessment Area

HSLA originated a majority of loans in the bank’s AAs. HSLA originated a majority of consumer and home mortgage loans by both number and by dollar inside the AA, during the evaluation period.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	43	71.7	17	28.3	60	2,844	62.7	1,694	37.3	4,538
Consumer	49	81.7	11	18.3	60	373	91.6	34	8.4	407
Total	92	76.7	28	23.3	120	3,217	65.1	1,728	34.9	4,945

*Source: Evaluation Period: 1/1/2015 - 12/31/2017 Bank Data
Due to rounding, totals may not equal 100.0*

Lending to Borrowers of Different Incomes

The overall borrower distribution of home mortgage and consumer loans is excellent.

Home Mortgages

The distribution of home mortgages to low- and moderate-income borrowers reflects excellent penetration.

Refer to table P in appendix C for the facts and data used to evaluate the distribution of home mortgages to low- and moderate-income borrowers in the AA.

Overall performance in 2015-2016 was excellent. Performance to low-income borrowers was reasonable with the aggregate lending level being very low and taking into account the family 10.7 percent poverty level and the median housing value at three times the highest level of the low-income bracket. The percentage of loans to low-income borrowers was zero, however, the aggregate lending was just 3.7 percent, see Appendix B for additional details and analysis. Performance to moderate-income borrowers is excellent. The distribution of loans to moderate-income borrowers significantly exceeded both the aggregate industry distribution of loans and demographics. The bank's performance in 2017 was consistent with the performance noted in 2015-2016 with loans to moderate-income borrowers significantly exceeding both demographics and the aggregate.

Consumer Loans

The distribution of consumer loans to low- and moderate-income borrowers reflects excellent penetration.

Refer to table V in appendix C for the facts and data used to evaluate the distribution of consumer loans to low- and moderate-income borrowers in the AA.

In 2015-2016, performance to low- and moderate-income borrowers was excellent. The percentage of loans to both low- and moderate-income borrowers significantly exceeded the percentage of such households in the AA and is excellent. The number of consumer loans originated in 2015 and 2016 combined was a little less than the total number of consumer loans originated in 2017. HSLA faces significant competition within the AA with a population of 9,096 and six other financial institutions competing for borrowers. The household poverty level in the AA is at 14.1 percent, limiting the capacity of these individuals to borrow. The bank's performance in 2017 was consistent with performance noted in 2015-2016 as loans to low-income borrowers met demographics for low-income borrowers and significantly exceeded demographics for moderate-income borrowers.

Geographic Distribution of Loans

An analysis of the geographic distribution of loans is not meaningful. There are no low- or moderate-income census tracts in either of HSLA's AAs.

Responses to Complaints

HSLA did not receive any written complaints relating to its CRA performance during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD loans): January 1, 2015 to December 31, 2017	
Financial Institution		Products Reviewed
Home Savings and Loan Association of Carroll County, F.A. Norborne, MO		Consumer and Home Mortgages
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
All census tracts in Carroll County, Missouri.	Full-Scope	See Appendix B.

Appendix B: Community Profiles for Full-Scope Areas

Carroll County, Missouri

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	0.0	66.7	33.3	0.0
Population by Geography	9,096	0.0	0.0	71.3	28.7	0.0
Housing Units by Geography	4,603	0.0	0.0	71.3	28.7	0.0
Owner-Occupied Units by Geography	2,718	0.0	0.0	66.8	33.2	0.0
Occupied Rental Units by Geography	906	0.0	0.0	80.0	20.0	0.0
Vacant Units by Geography	979	0.0	0.0	75.8	24.2	0.0
Businesses by Geography	609	0.0	0.0	75.4	24.6	0.0
Farms by Geography	165	0.0	0.0	52.7	47.3	0.0
Family Distribution by Income Level	2,431	17.7	15.7	18.8	47.8	0.0
Household Distribution by Income Level	3,624	23.5	13.9	15.5	47.0	0.0
Median Family Income Non-MSAs - MO	\$48,553	Median Housing Value		\$75,160		
Households Below Poverty Level: 14.1%	Median Gross Rent		\$520			
	Families Below Poverty Level		10.7%			
<i>Source: 2015 ACS Census and 2017 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The non-MSA AA consists of the three census tracts comprising Carroll County, Missouri. HSLA operates both of its locations in this AA. The AA consists of two middle-income census tracts and one upper-income census tract. Both of the middle-income census tracts are designated as distressed for population loss. Demographic data shows the 2017 FFIEC updated MFI as \$50,800. The AA demographics indicate that 14.1 percent of households and 10.7 percent of families have incomes below the poverty level.

Owner-occupied housing in the AA is at 59 percent, rental-occupied housing is at 19.7 percent and mobile homes constitute 9.4 percent of housing units. Vacant housing units are at 21.3 percent. 10.7 percent of families are below the poverty level. Home affordability is challenging for low income borrowers, who earn at most \$24,276, compared to the median housing value of \$73,600 for 2016.

The primary business industries in the AA include healthcare, education, local government, and manufacturing. Major employers include Carroll County Hospital, Norborne and Carrollton school districts, Carrollton City, Carrollton County, Show-Me Solutions, Mid-MO Tool and Die, and Ray-Carroll Grain Growers. The unemployment rate in the AA is 2 percent, compared to the state of Missouri unemployment rate of 2.3 percent and the national unemployment rate of 3.7 percent.

Competition within the AA is varied and strong; of the 14 other institutions in the market area, the top five competitor institutions have 66.24 percent of the deposit market share.

The primary competitors in the AA are community banks including Carroll County Trust Company of Carrollton, Missouri, Bank 21, and Goppert Financial Bank.

During the examination, we reviewed one community contact within the AA. The contact was with a non-profit, community reinvestment organization that focuses on rural development. The contact stated the local banking needs are being fulfilled by area banks. They identified small business loans as the primary credit need in the AA.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

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

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower – Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/AA. The table also presents aggregate peer data for the years the data is available.

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2015-16
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
2015-16 Carroll County Non MSA	20	1,305	66.7	107	15.2	0.0	3.7	16.3	30.0	16.8	18.1	30.0	26.2	50.4	40.0	35.5	0.0	0.0	17.8
Source: 2010 U.S. Census ; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
2017 Carroll County Non MSA	23	1,539	76.7	108	17.7	4.4	15.7	15.7	26.1	17.6	18.8	21.7	26.9	47.8	47.8	27.8	0.0	0.0	12.0
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0																			

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2015-16
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
2015-16 Carroll County Non MSA	23	175	76.7	21.8	34.8	14.2	26.1	16.1	8.7	47.9	30.3	0.0	0.0	
Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0														

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2017
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
2017 Carroll County Non MSA	26	198	86.7	23.5	23.1	13.9	34.6	15.5	15.4	47.0	26.9	0.0	0.0	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data. Due to rounding, totals may not equal 100.0														