NATIONAL COMMUNITY REINVESTMENT COALITION NCRC

August 31, 2010

RE: Community Reinvestment Act Regulation Hearings

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Federal Reserve Board: Docket No. R-1386
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To Whom it May Concern:

The National Community Reinvestment Coalition (NCRC) testified at the Community Reinvestment Act regulation hearing on July 19 and submitted testimony for that hearing. We are writing a second comment letter in order to elaborate on certain comments and issues raised during the hearings, such as weights on CRA exams.

We also attach to this comment letter a NCRC report on small business lending, which shows a clear association between small business lending and job creation. At the same time, the study reveals that CRA-related small business lending and employment lags in counties with high concentrations of minorities. This finding suggests the need for CRA to include consideration of lending and service to communities of color.

The National Community Reinvestment Coalition is an association of more than 600 community-based organizations that promotes access to basic banking services, including credit and savings, to create and sustain affordable housing, job development, and vibrant communities for America's working families. Our members have submitted over 100 comments during the course of these hearings.

Weights on CRA Exam

In our July 19 testimony for the first CRA hearing, NCRC suggested that weights be assigned to categories of loans, investments, and services based on the affordability and responsiveness to community needs. This letter elaborates on how to weight based on affordability and responsiveness for each of the component tests.

Lending Test

The affordability and suitability of the loans could be based on the definition in the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. Loans that meet the definition of qualified mortgages in Dodd-Frank could be weighted twice as heavily (or some other significant weight) than other loans. Since Congress judges that qualified mortgages are safer and sounder

than other home loans and CRA requires safe and sound lending, the regulatory agencies would be implementing statutory requirements of both Dodd-Frank and CRA by weighting loans in this manner.

A qualified mortgage in Dodd-Frank is defined as a mortgage that does not contain negative amortization or balloon payments. In addition, income verification is required and the ability to repay is based on a fully amortizing schedule and payments for taxes and insurance. For adjustable rate loans, the ability to repay is based on the maximum rate during first five years of the loan. Moreover the loan will not exceed a debt-to-income ratio established by regulation and will provide enough income after debt payments to afford basic necessities. The term of the loan is 30 years and total points and fees of the loan will not exceed 3 percent of loan amount. With these protections, qualified mortgages are likely to be safe and sound in contrast to the high-cost and exotic loans that proliferated in the last several years that did not adequately assess borrower ability to repay, had exorbitant fees, and became rapidly more expensive as initial, teaser rates expired.

For small business loans and consumer loans, the agencies could develop a similar definition of a qualified loan which is a category of loans that have demonstrated the best safety and soundness record. Loan performance data on delinquency and defaults could be used in an aid in developing qualified loans for small business and consumer loans.

The responsiveness of loans to community needs can be established by the needs assessments that Dan Immergluck, the Local Initiatives Support Corporation, and others have suggested. For example, in some metro areas and rural counties, a major need for home lending may be home improvement loans due to the age of the housing stock. In the highest cost markets, rental housing should be emphasized. In areas of the country most in need of home improvement loans, home improvement loans would receive significant weight, and in high cost areas, rental housing would receive significant weight. Of course, this weighting would be adjusted to account for market niches of particular lenders. It would not be appropriate, for example, to fail a bank that is not a significant home lender if the bank specializes in small business lending and performs reasonably in offering loans to low- and moderate-income neighborhoods. This type of weighting to account for banks' market niches already occurs on CRA exams.

Community Development Test

Categories of investments based on affordability could be created and weighted. Patient capital and investments that are made at a below market rate of return could be weighted the most. In addition, more routine activities that do not materially impact the affordability of financing such as purchasing mortgage backed securities (MBS) should receive much less weight. It is probably the case that MBS is not as helpful as other secondary market activities such as those that

support small business lending. The housing market has a better developed secondary market than the small business market, suggesting that investing in mortgage backed securities would not facilitate as much affordable financing as investing in small business loans.

A separate category of grants to nonprofit organizations engaged in community development, housing, and small business should be created and assigned its own weight. In the spirit of CRA sunshine, the grants and the organizations receiving them should be listed on the CRA exams with information about their impact such as the number of homeowners or small business owners counseled.[1] Grants with more documentation regarding benefits should receive more weight.

Community needs assessments could also inform the weight given to various investments and community development loans. In some metropolitan areas and rural counties, job creation may be the most pressing need, while in others, addressing housing stock deficiencies might be the most pressing need. Within categories of housing, small business, and community development, community needs assessments would indicate priorities such as new construction or rehabilitation in the housing category. Weights could be assigned to reflect the priorities identified by the community needs analyses. While not an easy task, weighting to reflect responsiveness to needs could leverage types of financing desperately needed but in short supply.

Service Test

Bank deposits and other services could be weighted based on affordability by using guidelines developed by the regulatory agencies. A current example is the proposed FDIC guidelines on overdraft protection that would include daily limits on customer costs, contacting consumers with several and recurring overdrafts and discussing alternative services, and avoiding check clearing procedures that maximize overdraft fees. Products that comply with these guidelines would receive more weight than others that are more costly and harder for consumers to understand.

Community needs assessments are also valuable for prioritizing different types of services. The FDIC's recent study of the unbanked or underbanked reveals the un- and under-banked populations by metropolitan areas. The areas with the greatest percentages of underbanked populations could be areas particularly targeted for basic banking accounts or debit cards. More weight could be given for products tailored for the un- or under-banked in these areas. At the same time, however, the weighting system should not discourage products for the un- or under-

[1] Listing grants in this manner on CRA exams could replace the bureaucratic and little-used CRA sunshine disclosures required by Gramm-Leach-Bliley. It would be more useful to have thoughtful documentation of grants on CRA exams than documents submitted via reporting requirements, which to our knowledge, do not get used, except in a report conducted by NCRC in 2001 documenting the benefits of CRA.

banked in other areas since the needs will still be pressing for these products. Fine tuning the weighting system would involve giving the priority metropolitan or rural areas a weight in the order of magnitude of 1.5 as opposed to 3 (or some other very high weight) so as to not discourage products for the under- or un-banked populations in other areas. This fine tuning should also be applied regarding priorities identified by community needs assessments in components tests of lending and community development so as not to unduly discourage the use of products in other areas that do not have the priority needs.

As stated in our previous testimony, deposit data is essential to create a meaningful service test. The current absence of this data makes it quite difficult to determine if low- and moderate-income or minority communities are receiving deposit accounts and bank services. Some bank representatives have stated that alternatives to bank branches have been effective in delivering deposit products. It would be inappropriate, however, to provide significant points on CRA exams for these channels if they are not effective in serving low- and moderate-income communities. Only comprehensive deposit data can enable regulatory agencies and community groups to assess if banks with differing delivery channels are actually serving low- and moderate-income communities. Accordingly, NCRC urges the agencies to collect and use this data on CRA exams.

Weighting Activities Beyond Assessment Areas

As discussed in our previous testimony, NCRC is supportive of granting favorable consideration on CRA exams for community development financing such as Low Income Housing Tax Credits outside of assessment areas provided that the bank has first met the needs in their assessment areas. In addition, NCRC is supportive of granting CRA consideration to community development financing in a multi-regional area. It makes the most sense, however, to direct this community development activity to geographical areas most in need.

In order to determine the areas most in need, NCRC reiterates our request for publicly available data on community development lending and investment on a census tract level. This data would enable the bank agencies and the public to compute community development lending or investment per capita on either a neighborhood or county level. The geographical areas with the least amount of community development financing on a per capita basis would be candidates for heightened attention, particularly if other data indicates pressing needs such as a shortage of affordable housing. For example, Low Income Housing Tax Credits (LIHTC) outside of assessment areas could be weighted the most in geographical areas with the most expensive rental housing and with the least amount of LIHTC financing per capita.

Assessment Areas

The CRA hearings have posed the question of how the agencies could conduct CRA exams if assessment areas are considerably expanded to include hundreds of areas for the largest banks. NCRC believes that technological improvements in data manipulation combined with thoughtful analysis makes it possible to rigorously evaluate performance in several areas. Currently, the exams provide repetitive narrative for each full scope assessment area that covers every aspect of each component test. Rather, the CRA exams can focus narrative on selected full-scope assessment areas that explain why performance was strong or weak in certain full-scope areas.

The tables in the exam can provide information, as they do now, on how the banks perform on various indicators. For example, the bank's percentage of loans to low- and moderate-income borrowers is compared against the industry aggregate and the percentage of households that are low- and moderate-income. Likewise, the bank's market share to various income groups is compared. The tables can identify those full scope assessment areas where the bank's performance is the best on these measures and where the bank's performance is worse. For example, the difference between the bank's and industry's percentage of loans to low- and moderate-income borrowers can be computed and the table can list the results in descending order. If the calculation is a bank's percentage minus the industry's percentage, the difference is listed in descending order of assessment area with the highest positive number representing the best performance on this measure. Since more than one loan type and more than one measure will be evaluated, the final comparisons across full scope assessment areas would be the weighted average of the performance measures. The tables would then identify assessment areas where performance is strong, average, and weak. In this manner, the CRA exams would direct attention to areas where banks need to improve.

Qualitative measures are also amenable to a sorting process. In some areas, banks will be offering particularly innovative loans, investments, and services responsive to needs while in others, their offerings will be lacking. Examiners can report upon the assessment areas in a manner that sorts their performance on qualitative measures as well.

Sorting full scope assessment areas into areas where performance is good, average, and weak is a thoughtful method for conducting CRA exams and would allow for a significant expansion of full scope assessment areas. The rationale against expanding assessment areas because it would be time consuming is not convincing, particularly since thoughtful ways of expansion can readily be developed.

Full-scope assessment areas must be the great majority of assessment areas on exams instead of the minority of assessment areas on exams. Moreover, expanding assessment areas to include the

great majority of lending and other bank activity is imperative for CRA exams to accurately measure whether banks are serving the communities in which they do business.

As an illustration of the importance of expanding assessment areas, NCRC finished the analysis started in our July 19th testimony of the percentage of loans covered by CRA exams in the four hearing locations. Our analysis reveals that the percentage of loans made by banks with significant market share (at least one half of one percent) ranges from 47 percent in Chicago to 35 percent in Atlanta using the 2008 HMDA data (recall that the threshold of one half of one percent is contained in H.R. 1479 as discussed in our July 19th testimony). Generally speaking, the institutions with less market share (of under 2 percent) are less likely to have an assessment area in one of the four hearing locations. Excluding these institutions from coverage has resulted in less than half of the loans in these four large metropolitan areas being scrutinized by CRA exams. As the tables below indicate, the majority of the exclusion is attributed to CRA exams not including the metropolitan areas as assessment areas for banks or their affiliates rather than credit unions or independent mortgage companies not being covered by CRA. For example, in the Los Angeles metropolitan area, 15 institutions were either banks or mortgage company affiliates of banks that did not have Los Angeles as an assessment area. In contrast, 10 institutions were not covered by CRA because they were credit unions or independent mortgage companies. This troubling result suggests that more than half the market is not being examined for responsiveness to community needs for safe and sound loans and banking products.

During the hearings, a question was raised about whether banks would pull out of geographical areas if the areas became full-scope assessment areas on CRA exams. Banks and their affiliates enter markets for many reasons, judging that their entry is profitable business. They have expended considerable resources establishing a presence and marketing themselves. Postulating that they would now pull out of a market because they have a requirement to serve communities safely and soundly does not make sense. Banks would not be in business if they did not serve communities in a responsible manner. Moreover, these assertions fail the empirical test. As a whole, CRA regulated institutions have fared quite well, especially recently, in the market compared to their non-CRA regulated entities.

Lending Institutions with Market Share Greater than 0.5 %, DC MSA														
	Count of Institutions					Count of Institutions under CRA Exams						Count of Loans		
Market Share Criteria	Total	Banks	Credit Union	Mortgage Company	Mortgage Company Affiliated with Banks	Total	% of Total	Banks	% of Banks	Mortgage Company	% of Mortgage Company	Total Loans	Loans under CRA Exams	% of Loans under CRA Exams
>= 5%	4	3		1	1	3	75.00%	2	66.67%	1	100.00%	38,035	27,442	72.15%
2 - 4.99%	5	3	2			1	20.00%	1	33.33%	0		18,903	2,908	15.38%
1 - 1.99%	12	6		6	4	3	25.00%	1	16.67%	2	50.00%	21,488	4,678	21.77%
0.5- 0.99 %	17	4	1	12	4	3	17.65%	2	50.00%	1	25.00%	14,312	3,242	22.65%
Total (=>0.5%)	**38**	**16**	**3**	**19**	**9**	**10**	**26.32%**	**6**	**37.50%**	**4**	**44.44%**	**92,738**	**38,270**	**41.27%**

Lending Institutions with Market Share Greater than 0.5 %, Atlanta MSA														
	Count of Institutions					Count of Institutions under CRA Exams						Count of Loans		
Market Share Criteria	Total	Banks	Credit Union	Mortgage Company	Mortgage Company Affiliated with Banks	Total	% of Total	Banks	% of Banks	Mortgage Company	% of Mortgage Company	Total Loans	Loans under CRA Exams	% of Loans under CRA Exams
>= 5%	4	3	0	1	1	2	50.00%	1	33.33%	1	100.00%	40,129	20,317	50.63%
2 - 4.99%	4	2	0	2	0	0	0.00%	0	0.00%	0		15,987	0	0.00%
1 - 1.99%	12	8	0	4	1	5	41.67%	5	62.50%	0		23,962	11,203	46.75%
0.5- 0.99 %	19	7	1	11	4	3	15.79%	3	42.86%	0		17,108	2,822	16.50%
Total (=>0.5%)	**39**	**20**	**1**	**18**	**6**	**10**	**25.64%**	**9**	**45.00%**	**1**	**16.67%**	**97,186**	**34,342**	**35.34%**

Lending Institutions with Market Share Greater than 0.5 %, Los Angeles MSA														
	Count of Institutions					Count of Institutions under CRA Exams						Count of Loans		
Market Share Criteria	Total	Banks	Credit Union	Mortgage Company	Mortgage Company Affiliated with Banks	Total	% of Total	Banks	% of Banks	Mortgage Company	% of Mortgage Company	Total Loans	Loans under CRA Exams	% of Loans under CRA Exams
>= 5%	5	4	0	1	1	2	40.00%	2	50.00%	0	0.00%	58,847	26,462	44.97%
2 - 4.99%	3	3	0	0	0	1	33.33%	1	33.33%	0		10,474	4,840	46.21%
1 - 1.99%	9	3	0	6	3	3	33.33%	2	66.67%	1	33.33%	14,285	5,045	35.32%
0.5- 0.99 %	15	6	1	8	2	1	6.67%	1	16.67%	0	0.00%	11,106	1,006	9.06%
Total (=>0.5%)	**32**	**16**	**1**	**15**	**6**	**7**	**21.88%**	**6**	**37.50%**	**1**	**16.67%**	**94,712**	**37,353**	**39.44%**

Lending Institutions with Market Share Greater than 0.5 %, Chicago MSA														
	Count of Institutions					Count of Institutions under CRA Exams						Count of Loans		
Market Share Criteria	Total	Banks	Credit Union	Mortgage Company	Mortgage Company Affiliated with Banks	Total	% of Total	Banks	% of Banks	Mortgage Company	% of Mortgage Company	Total Loans	Loans under CRA Exams	% of Loans under CRA Exams
>= 5%	4	3	0	1	1	2	50.00%	2	66.67%	0	0.00%	62,814	33,488	53.31%
2 - 4.99%	6	4	0	2	1	5	83.33%	4	100.00%	1		37,480	30,974	82.64%
1 - 1.99%	10	4	0	6	2	0	0.00%	0	0.00%	0	0.00%	31,059		0.00%
0.5- 0.99 %	14	7	0	7	2	5	35.71%	4	57.14%	1	50.00%	20,678	7,657	37.03%
Total (=>0.5%)	**34**	**18**	**0**	**16**	**6**	**12**	**35.29%**	**10**	**55.56%**	**2**	**33.33%**	**152,031**	**72,119**	**47.44%**

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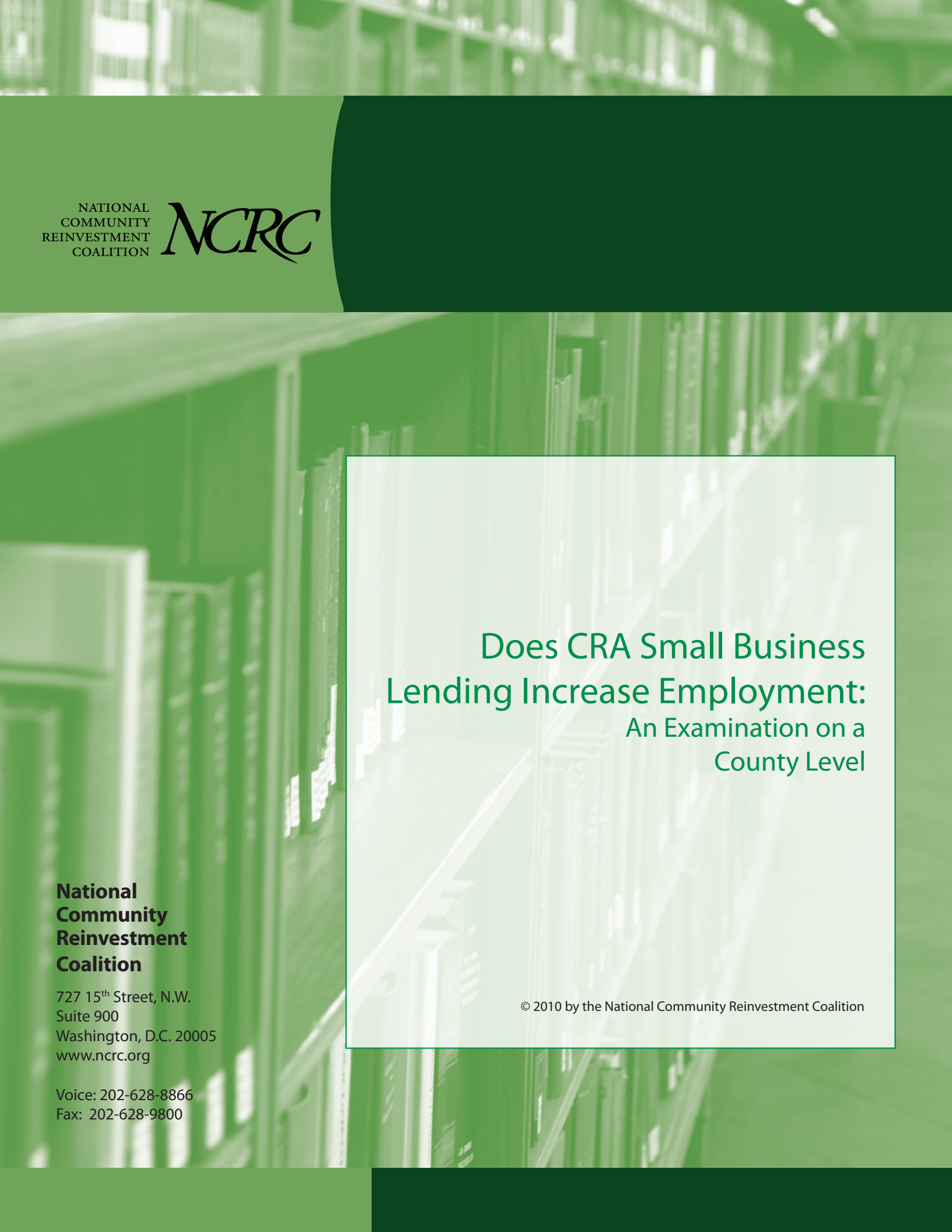
Conclusion

As you undertake these important CRA regulatory reforms, NCRC urges you to enact changes to weighting, assessment areas, data disclosure, treatment of affiliates, fair lending reviews, and other critical aspects of CRA exams in a rigorous manner. These changes would increase the amount of responsible lending, investing, and bank service in traditionally underserved communities. Banks would become stronger and more competitive and underserved communities would be able to rebuild themselves after the devastation caused by non-CRA and lightly regulated lending.

Thank you for considering our views in this important matter. If you have any questions, please feel free to contact me or Josh Silver, Vice President of Research and Policy on 202-628-8866.

Sincerely,

John Taylor
President and CEO



NATIONAL COMMUNITY REINVESTMENT COALITION NCRC

Does CRA Small Business Lending Increase Employment:

An Examination on a County Level

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The National Community Reinvestment Coalition is an association of more than 600 community-based organizations that promote access to basic banking services, including credit and savings, to create and sustain affordable housing, job development and vibrant communities for America's working families. Our members include community reinvestment organizations, community development corporations, local and state government agencies, faith-based institutions, community organizing and civil rights groups, minority and women-owned business associations and social service providers from across the nation. Their work serves primarily low- and moderate-income people and minorities.

The Board of Directors would like to express their appreciation to the NCRC professional staff who contributed to this publication and serve as a resource to all of us in the public and private sector who are committed to responsible lending. For more information, please contact:

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Does CRA Small Business Lending Increase Employment: An Examination on a County Level

Executive Summary

NCRC finds a positive correlation between small business lending, encouraged by the Community Reinvestment Act (CRA), and employment on a county level. While we analyzed lending from 2005 through 2007, the study focuses on lending in 2006 because we wanted to focus on the relationship between employment and small business lending that was intended to finance start-up and expansion rather than providing cash flow needed for surviving a recession. We find a positive relationship between small business lending and employment, and we also uncover racial inequalities in small business lending. Findings of the study include:

- On average, 54 percent of the small businesses in a county received a loan from a CRA-covered bank in 2006. In comparison, credit access was more limited to the smallest businesses: only 32 percent of the smallest businesses with revenues of less than $1 million in year 2006 received a loan.

- Minority communities experience less access to small business loans. Counties with a higher percentage of African-Americans had fewer small business loans and even fewer loans for the smallest businesses under $1 million in revenue. Almost 55 percent of the small businesses received loans in counties with less than 20 percent African Americans but that this ratio declined to 48 percent in counties with 30 percent or more African Americans, on average. In addition, 32.4 percent of the smallest businesses with revenues under $1 million received loans in counties with less than 20 percent African Americans but just 28 percent of the smallest businesses received loans in counties with greater than 30 percent African Americans.

- Our study finds a positive correlation between small business lending and employment; the more small business lending in a county, the higher the employment rate.

- Employment rates are lower in counties with higher percentages of minorities and African-Americans. The average employment rate is 2 percentage points higher for counties with less than 20 percent African Americans than in counties with more than 30 percent African Americans.

- Even when controlling for median income levels, our analysis finds that counties with greater percentages of minorities and African-Americans had lower rates of small business lending and employment.

Our findings suggest that legislative and regulatory strengthening of CRA will further bolster small business lending business expansion and job growth. Bolstering CRA would be an important component of a strategy to end the current severe recession, and ensure sustainable business growth in the future. In addition, CRA must evaluate lending and services to minority communities since our findings reveal less access to small business loans in minority communities. CRA-related data collection should also include the number of applications from and loans to women- and minority-owned small businesses so regulatory agencies and the general public can more precisely measure and encourage lending to these critical businesses. Finally, applying CRA to non-bank financial institutions, including mainstream credit unions, would most likely strengthen the correlation between small business lending and employment.

Introduction

Small businesses, identified by the U.S. Small Business Administration as independent businesses with fewer than 500 employees, play a very important role in the U.S. economy. Out of the estimated 29.6 million businesses in the United States in 2008, 99.9 percent were small businesses. [1] According to the most recent data available at the U.S. Small Business Administration Office of Advocacy as of September 2009, small businesses employed just over half of the country's private sector workforce and created more than half of the nonfarm private gross domestic product (GDP).[2] In addition, these small firms have generated 64 percent of the net new jobs over the past 15 years. Yet, these small businesses experienced limited access to credit and capital markets.[3] As a result, small businesses face considerable hardships at the startup and expansion, both of which effect their long-term survival . [4]

This paper explores whether extending loans to small businesses is positively associated with employment on a county level. In other words, does increased lending to small businesses enable them to grow and hire new workers? Is a higher share of small business lending in any given county associated with higher employment rates?

The Community Reinvestment Act (CRA), a federal law enacted in 1977, encourages banks to lend to small businesses and in low- and moderate-income neighborhoods. A study by Zinman in 2002 found that the CRA regulatory reforms enacted in 1995 increased bank small business lending and that lending increased to a greater extent in regions with more rigorous CRA exams. Moreover, the CRA-related lending was just as profitable as non-CRA lending and did not "crowd out" or reduce the banks' other non-CRA lending.[5]

Few researchers, however, have established the effects of CRA small business lending on employment and firm performance. Ideally, such an analysis would require firm-level information to establish direct benefits of small business lending and employment. Currently, data on firm-level lending and performance information data are not publicly available. Thus, this study is an initial attempt to understand the effect of small business lending and employment. First, this study attempts to understand the association between the level of small business lending and employment at the county-level. Then, using cluster analysis, the paper identifies similar groups of counties based on the level of small business lending, employment rate, and other county-specific characteristics.

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[1] U.S. Small Business Administration Office of Advocacy, Frequently Asked Questions: Advocacy: The Voice of Small Business in Government, September 2009, http://www.sba.gov/advo/stats/sbfaq.pdf.

[2] Source: http://www.score.org/small_biz_stats.html

[3] Allen Berger and G. Udell, '*Small Business Credit Availability and Relationship Lending: The Importance of Bank Organizational Structure"*, Economic Journal 2002.

[4] Ou and Williams, 2009: p.9

[5] Jonathan Zinman, *The Efficacy and Efficiency of Credit Market Interventions: Evidence from the Community Reinvestment Act*, July 2002 (CRA02-2), published by the Joint Center for Housing Studies of Harvard University.

This study finds that a higher ratio of CRA-related small business lending to small businesses is associated with higher levels of county employment and income. While there are stark differences between predominantly minority and predominantly non-minority counties, the above finding remains valid irrespective of the share of minorities in the county. However, the study also finds that there are lower levels of small business lending in counties with high percentages of minorities. Though the focus of the study is not to establish a direct causal-link, it suggests that better access to credit for small business is associated with increased employment opportunities and household income.

Data Used

Data for this study is obtained from several different sources. The small business lending data used in this study was reported in compliance with the Community Reinvestment Act (CRA). Small business (SB) loans are reported in the "Consolidated Reports of Conditions and Income" (Call Reports) and "Thrift Financial Report" (TFR) as loans of $1 million or less secured by nonfarm nonresidential properties. Unfortunately, mid-size banks (institutions with assets of $250 million to $1 billion and an asset range adjusted annually for inflation) are not required to report small business or community development lending data. The tract level small business lending data obtained from CRAwiz software[6] for years 2005, 2006, and 2007 was aggregated to the county level. Small business lending information was available for about 1,276 counties across the United States. The ratio of small business loans was calculated by dividing the total number of small business loans divided by the number of small businesses in a given county.

County specific information such as the total population, race and ethnicity, are obtained from the American Community Survey 3-year average data 2006-2008. The county employment rate information for 2005-2007 is obtained from American Community Survey (ACS) 1-year estimates for 2006-2008. The 1-year estimates are available annually only for geographic areas with a population of 65,000 or more. The employment information was available for only about 604 counties across the nation. County Hispanic population information was available for only about one-third of the counties. To avoid any systematic omission of counties that could bias the estimates as a result of the use of the Hispanic variable in our analysis, a proxy estimate for the minority population was used. The minority population was estimated as the difference between the total county population and the white population. The white population includes both white non-Hispanic and white Hispanic individuals.

We believe that small business lending which is obtained for the purpose of start-up or expansion translates into creation of local employment opportunity after a lag time. We assume that this lag effect in job creation is about one year. Thus, the study will explore the association between the small business lending data for year 2006, employment information of the following year (2007) and several other county specific variables. Though tests indicated similar results were obtained for the association between small business lending in 2005 and employment in 2006 and that of the small business lending in 2007 and employment in 2008, the discussion will focus on the results of association between small business lending in 2006 and employment of 2007. The two main reasons to focus on the small business lending in 2006 and employment of 2007 was

[6] CRAwiz is a custom software that provides CRA compliance data released by the Federal Financial Institutions Examinations Council (FFIEC) such as mortgage lending, small lending, and branch location information.

the modestly stronger association between the variables and also to ensure that the purpose of the loan would be for start-up and/or expansion and not for sustenance during an economic downturn.

Descriptive Statistics

The analysis included about 513 counties with complete information for the variables of interest. The summary statistics for the variables considered in the analysis is provided in Table.1. The ratio of the number of small business loans in 2006 to the number of small businesses in a given county ranged from a minimum of 23.3 percent to 105.5 percent. The maximum percentage is greater than 100 as some businesses might have received more than one loan in a given year. On average, 53.7 percent of the small businesses received a loan in 2006. In comparison, credit access was more limited to the smallest small businesses: only 31 percent of the smallest of the small businesses with revenues of less than $1 million in year 2006 received a small business loan.

Table 1: Summary Statistics

Variable	Mean	Std. Deviation	Minimum	Maximum
% of Small business loans in 2006	53.7	12.89	23.35	105.53
% of Small business lending to business with revenue less than $1M in 2006	31.7	5.76	13.99	62.23
% African American population (2006-08)	10.3	0.111	0.01	65.68
% Minority population (2006-08)	18.9	0.13	2.55	79.86
Gini coefficient (2006-08)	0.431	0.037	0.317	0.599
Total population (2006-08)	322,983	446,965	65,014	5,288,655
Median income (2006-08)	$49,358	$12,229	$26,646	$100,318
Population per small business	15.61	3.29	1.01	26.26
Minority population per small business	4.68	3.28	6.74	30.13
% Employed (2007)	93.78	1.93	86.01	97.64

The selected 513 counties depicted wide differences in terms of the total population, diversity, income, and poverty. The county population ranged from 65,014 to a high of 5.29 million.[7] The average county population was around 323,000. On average, 10.3 percent of the county population was African-American and about 18.9 percent were minority. At the same time, there were counties with a minority population as little as 2.55 percent or as much as 79.9 percent. The poorest county had a median income of $26,646, when the richest had a median income as high as $100,318. Average median income of the counties was $49,358. The gini coefficient, a measure of inequality of income within a county, ranges from 0.317 to 0.599.[8]

[7] The selected counties for the study are the counties with non-missing information and the American Community Survey surveyed only the counties with a population of 65,000 or more.

[8] The gini coefficient can range between 0 and 1; with 0 corresponding to perfect equality and 1 to perfect inequality.

The average county employment rate was at 93.8 percent. The lowest and the highest county employment rates were at 86 percent and 97.6 percent, respectively.

Correlation of Demographic Characteristics with Small Business Lending

The correlations between variables are explored in Table 2. First is an exploration of how the varying degree of small business lending in a county is associated with its demographic characteristics. Then, the association between the county employment rate and the same demographic variables is discussed. While the study does not establish a direct causal-link, these associations reveal several county-specific factors behind higher small business lending and employment. In parenthesis is the level of significance of each correlation coefficient in Table 2. The numbers given in bold in Table 2 represent a strong statistically significant association.

We observe a strong positive correlation between the size of the population and the percent of small business lending. Thus, the more people in a county, the better are the access to small business credit. Probably the increased customer base makes it easier for the businesses to strive and prosper, thus making it easier for them to obtain credit. The access to credit for smallest small businesses (with revenue of less than $1 million) is also positively correlated with the size of the population, though the degree of the association is much smaller.

The same level of access, however, is not enjoyed by businesses in high minority communities as represented by the considerably weaker association. In fact, the smallest businesses with revenues of under $1 million in high minority communities receive fewer loans than those in non-minority communities (as shown by the negative correlation). The higher the percentage of African-American residents in the county, the lower is the ratio of small business loans to small businesses. Table 2a shows that almost 55 percent of the small businesses, on average, received loans in counties with less than 20 percent African Americans but that this ratio declined to 48 percent in counties with 30 percent or more African Americans. In addition, 32.4 percent of the smallest businesses with revenues under $1 million received loans in counties with less than 20 percent African Americans but just 28 percent of the smallest businesses received loans in counties with greater than 30 percent African Americans.

Small businesses in upper income communities have better access to credit opportunities than small businesses in lower income communities. Also, the smallest businesses with revenues under $1 million in communities with high degree of income inequality have less access to credit.

Table.2: Correlation Coefficient

	Correlation coefficient with % of small business loans	Correlation coefficient with % of loans to businesses with revenue less than $1M	Correlation coefficient with % employment rate
% of Small business loans	--	**0.6996** (<.0001)	**0.3237** (<.0001)
Log population	**0.441** (<.0001)	**0.1394** (0.0015)	0.0444 (0.3151)
% minority population	**0.079** (0.0707)	**-0.1397** (0.0015)	**-0.2133** (<.0001)
% African American population	**-0.109** (0.0130)	**-0.2852** (<.0001)	**-0.2858** (<.0001)
Gini coefficient	-0.0259 (0.5576)	**-0.2356** (<.0001)	**-0.1267** (0.0041)
Log median income	**0.6541** (<.0001)	**0.4697** (<.0001)	**0.4394** (<.0001)
% Employment Rate	**0.3237** (<.0001)	**0.3483** (<.0001)	--

Table 2a - Lending & Employment by Minority Level of County	Ave Loan/Small Business	Ave Loan/Smallest Business	Ave Employ Rate
30% and above African-American	48.0%	27.9%	92.0%
20% and above African-America	50.2%	28.7%	92.8%
Below 20% African-American	54.5%	32.4%	94.0%

Correlation between Employment Rate and Small Business Lending

As shown in column 3 of Table 2, counties that received a higher percentage of small business loans also had higher employment rates. The size of the population in a county is not associated with the county employment rate. The high minority counties had lower employment than non-minority counties. Similarly, the greater the African American population, the lower was the employment rate. The average employment rate is 2 percentage points higher for counties with less than 20 percent African Americans than in counties with more than 30 percent African Americans as shown in Table 2a. As high income is an outcome of improved employment opportunities, there was a strong positive correlation between income and employment.

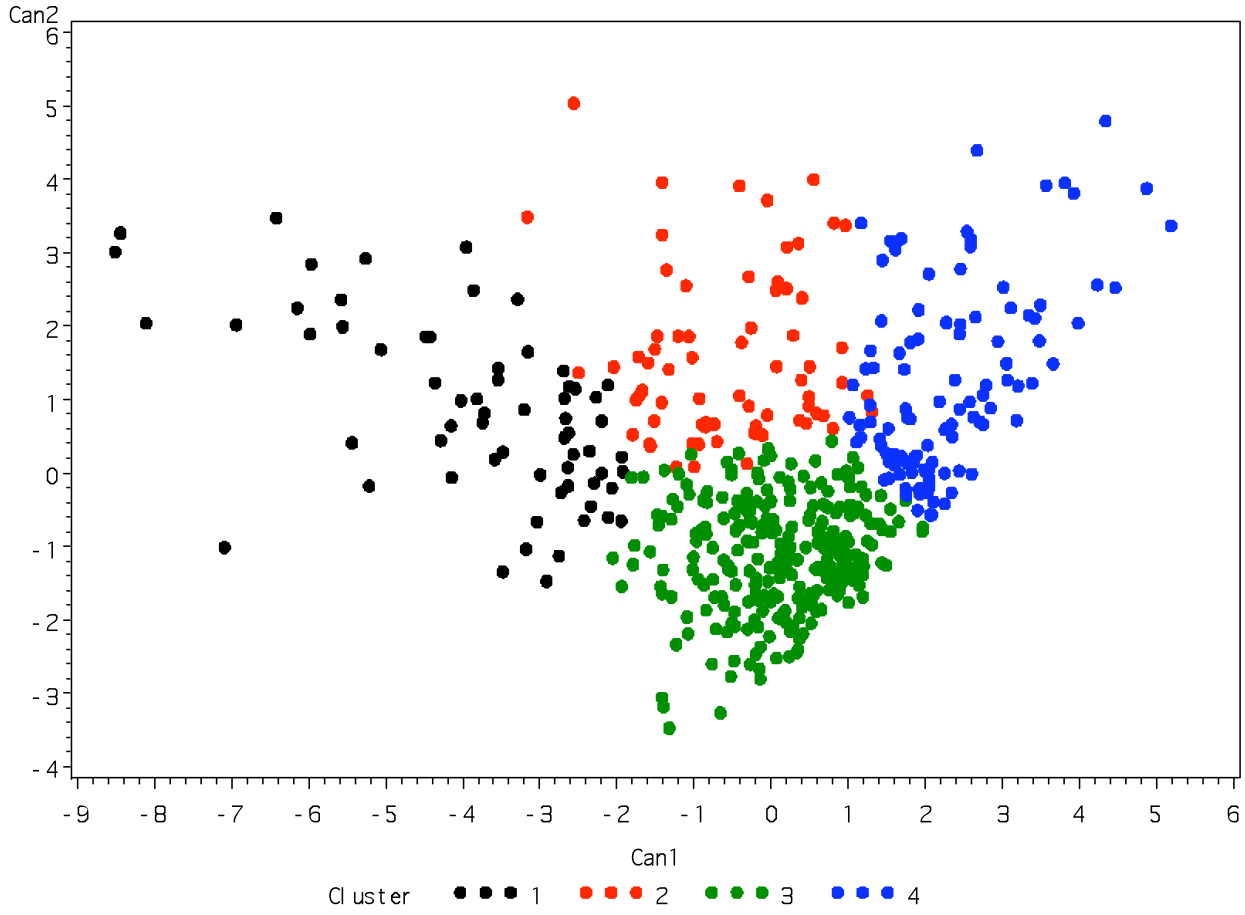
Cluster Analysis

The above observed association between the ratio of small business lending in a county and other county specific demographic characteristics suggests there is a geographical distribution pattern in the percentage of small business lending. To discern this distribution in small business lending we categorize the counties into four main clusters based on six of the above variables/attributes. The clustering uses the K-means algorithm method to classify counties into four groups. The distance measure used here is Euclidean distance L2. The grouping is done by minimizing the sum of squares of Euclidean distances between data and the corresponding cluster centroid. The following attributes were included in the clustering:

1. Total employment rate
2. Percent of small business lending
3. Percent of African Americans population
4. Percent of minorities in population
5. Log median income
6. Percent of small business with 1-4 employees.

Next, canonical discriminant analysis (a dimension reduction method related to principle component analysis) is used to examine the clusters. The scored canonical variables output data set was used to plot pairs of canonical variables in order to aid visual interpretation of group differences in Figure.1. The two dimension scatter plot of can1 versus can2 for the four clusters show that there is very little overlap between the groups.

Figure.1: Two Dimensional Scatter plot of the Four Clusters



The following boxplots represent the distribution of each attribute by cluster.

Figure.2: Boxplot of Total Employment Rate by Cluster

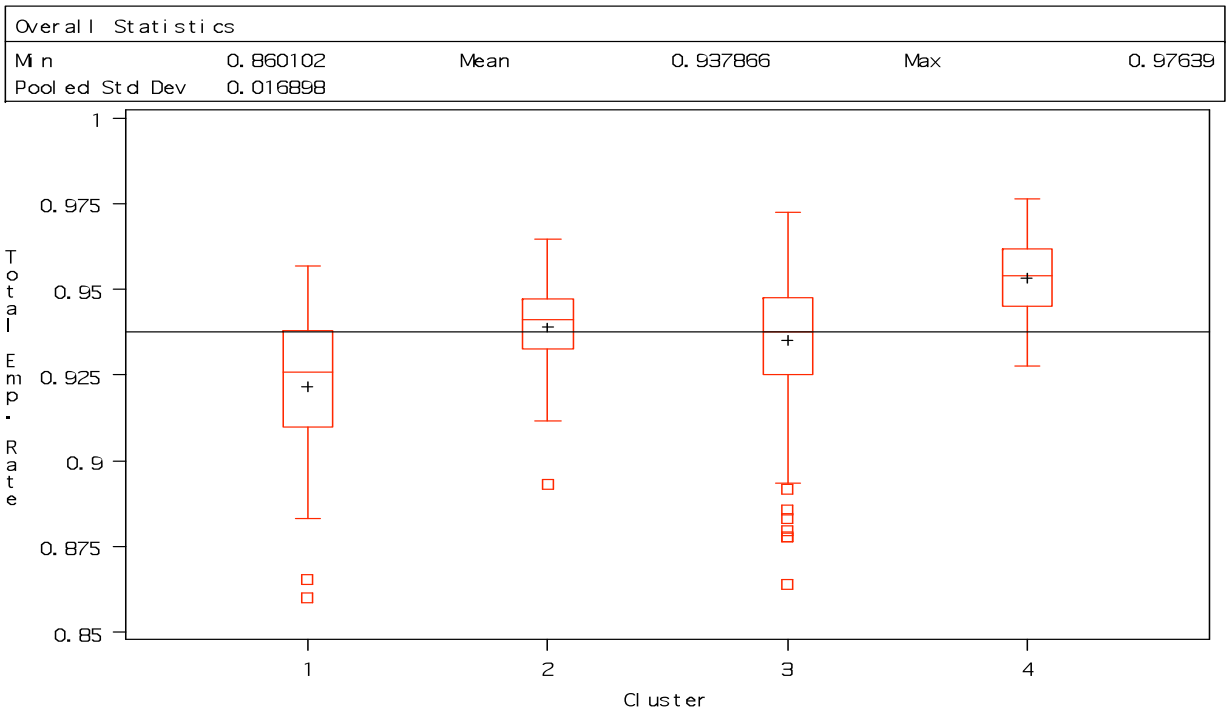


Figure.3: Boxplot of Percentage Small Business Lending by Cluster

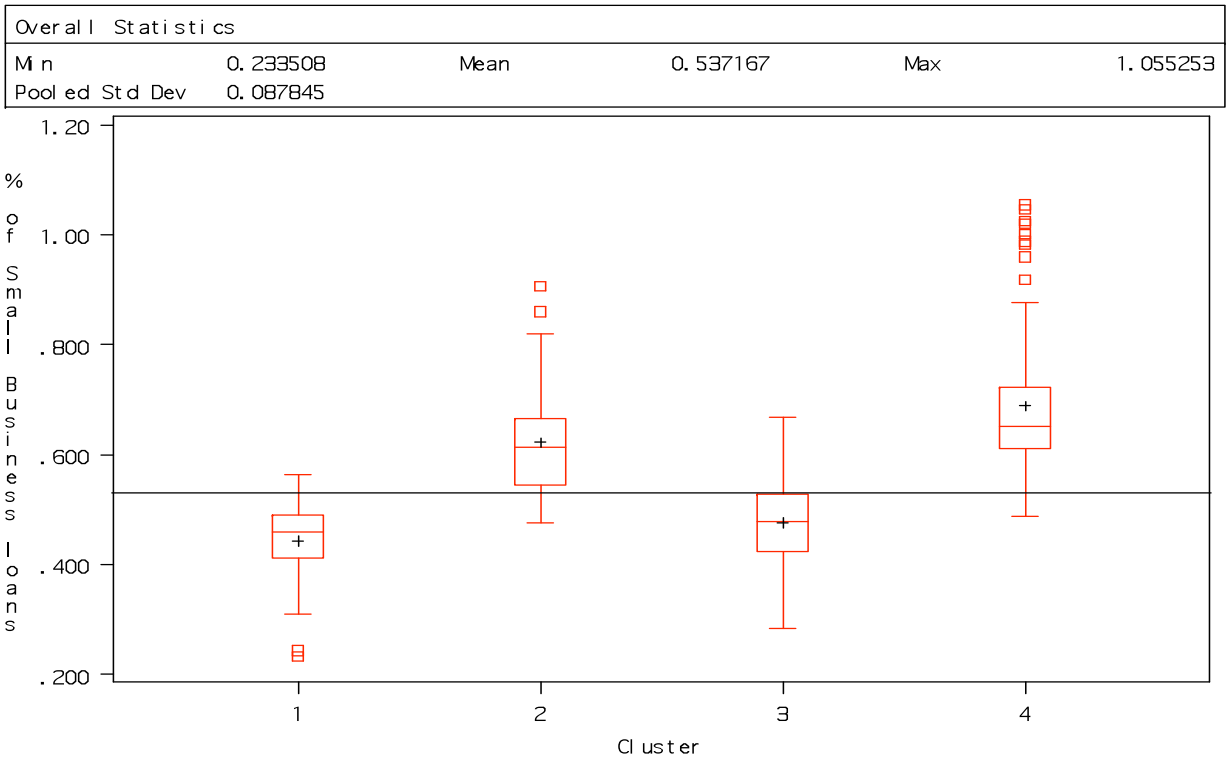


Figure.4: Boxplot of Percent of African American Residents by Cluster

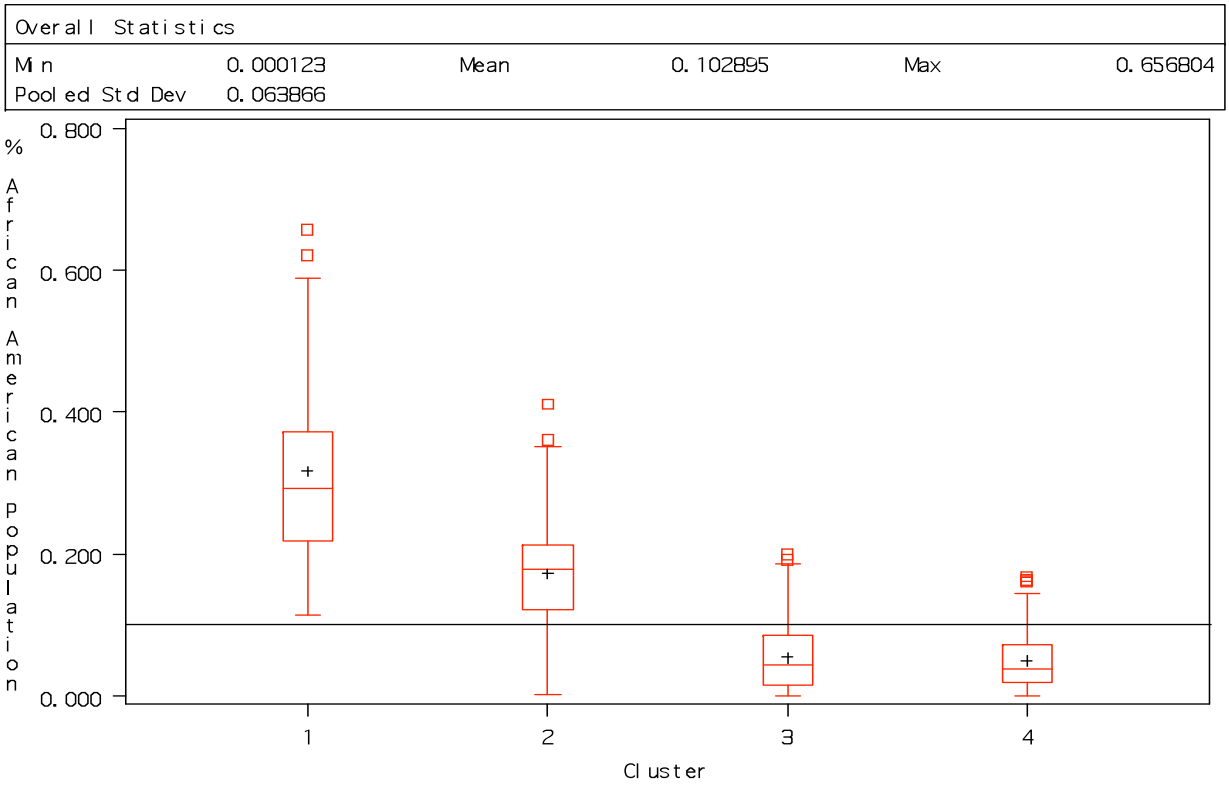


Figure.5: Boxplot of Percent Minority Population by Cluster

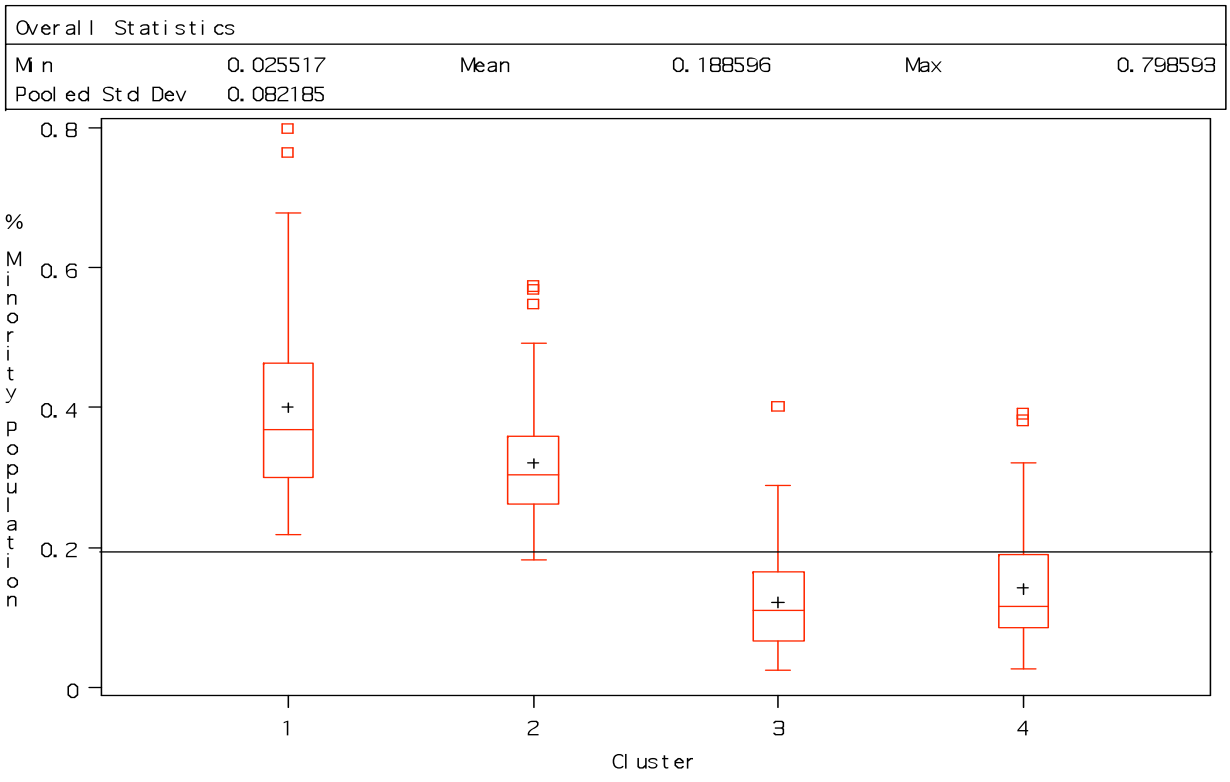
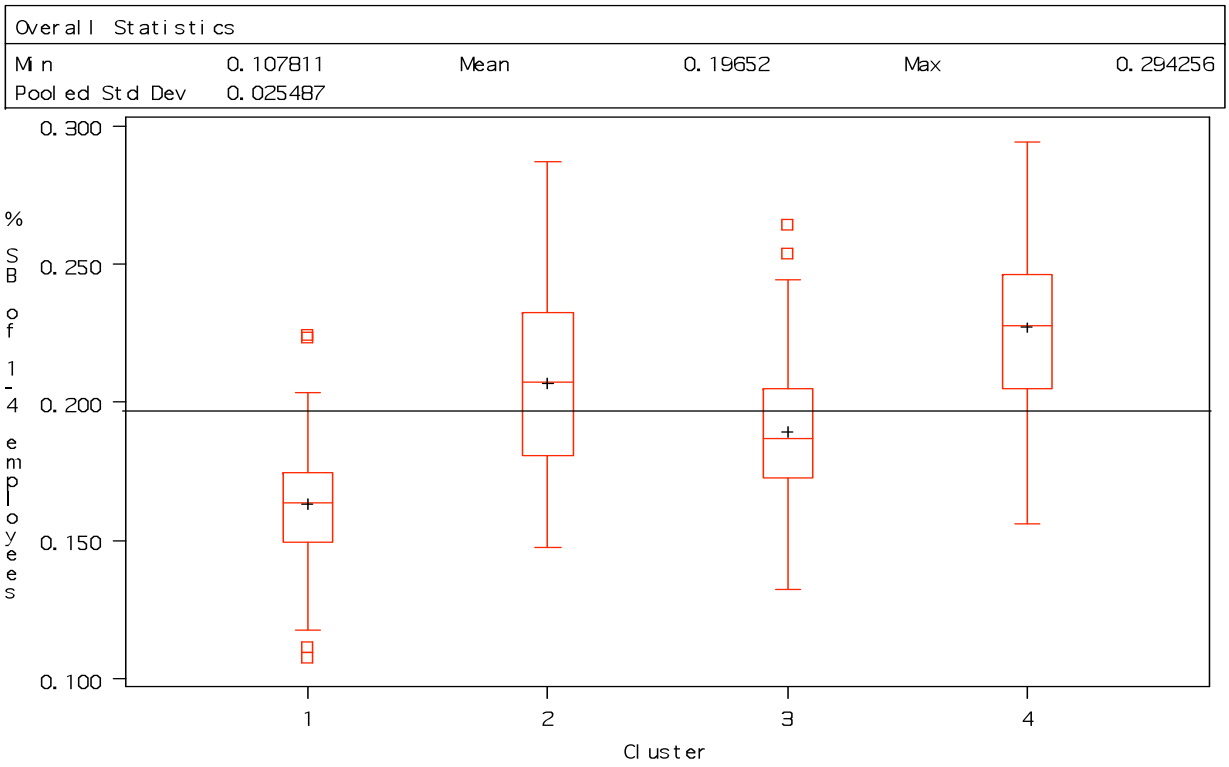


Figure.6: Boxplot of Percentage of Small Business Lending to business by Cluster



All attributes used in the cluster analysis were standardized by standard deviation for the clustering. Thus, all variables are set to have standardized mean of zero (0) and standard deviation 1. A negative number represents a value lower than overall mean, a positive number represent a value higher than overall mean. Table.3 below represents the standardized cluster means and Table.4 provides the unstandardized cluster means.

Table.3: Standardized Cluster Means

Attribute	Cluster 1	Cluster 2	Cluster 3	Cluster 4
% Small Business loans	-0.74	0.66	-0.47	1.17
Total Employment Rate	-0.84	0.06	-0.14	0.80
% Black Population	1.93	0.63	-0.44	-0.47
% Minority Population	1.60	0.99	-0.50	-0.35
Log Median Income	-0.80	0.22	-0.39	1.28
% SB with 1-4 Employees	-1.04	0.32	-0.23	0.96

Table.4: Overall Mean and Cluster Means

Attribute	Overall Mean	Cluster 1	Cluster 2	Cluster 3	Cluster 4
Number of counties	513	64	72	268	109
% Small Business loans	53.7	44.2	62.2	47.6	68.8
Total Employment Rate	0.938	0.922	0.939	0.935	0.953
% Black Population	0.103	0.316	0.173	0.054	0.05
% Minority Population	0.189	0.4	0.32	0.122	0.142
Median Income	$49,358	$40,518	$51,250	$44,441	$65,389
% SB with 1-4 Employees	19.7	16.3	20.7	18.9	22.7

Cluster 1 counties are characterized by a very high minority population (including African-American), below average employment, below average small business lending, below average median income, and very few small businesses with only 1-4 employees. This is the smallest cluster with only 64 counties that belong to cluster 1.

Cluster 2 counties are characterized by an above average minority population (including African-American), above average employment, above average small business lending, above average median income, and above average share of small businesses with only 1-4 employees. There are 72 counties that belong to cluster 2.

Cluster 3 counties are characterized by a below average minority population (including African-American), average level of employment, below average small business lending, below average median income, and below average share of small businesses with only 1-4 employees. This is a largest cluster with 268 counties, more than half of the counties.

Cluster 4 counties are characterized by a below average minority population (including African-American), very high employment, above average small business lending, very high median income, and a very high share of small businesses with only 1-4 employees. This is the second largest cluster is made up of 109 counties.

When comparing clusters, the clusters of counties with higher percentages of minorities have worse economic outcomes. This observation is true when comparing cluster 1 and 3 both with low levels of employment but differing percentages of minority residents or when comparing clusters 2 and 4 with better economic outcomes but differing levels of minority population.

Based on this categorization, we observe low small business lending and low levels of employment in both predominantly minority (cluster 1) and predominantly non-minority counties (cluster 3). While the average ratio of small business loans to small businesses in cluster 1 and cluster 3 counties were below the overall average (see Table.4), the ratio of loans to small businesses in cluster 1 counties was only 44.2 percent compared to the 47.6 percent in cluster 3 counties. The county employment rate in cluster 1 counties was on average at 92.2 percent, when that of cluster 3 counties was at 93.5 percent. Similarly, the median income of cluster 1 counties was only $40,518, when the median income of cluster 3 counties was about $4,000 higher. Among the two clusters of counties with low levels of employment and small business

lending, predominantly minority counties seem to be worse-off than the predominantly non-minority counties.

Above average small business lending and above average employment is visible in both predominantly minority (cluster 2) and predominantly non-minority counties (cluster 4). While the overall average of small business loans to small businesses was at 53.7 percent, that for cluster 2 counties was at 62.2 percent and for cluster 4 counties, even higher at 68.8 percent. The average employment rate in cluster 4 counties was at 95.3 percent while the employment rate in cluster 2 counties was only at 93.9 percent. Also, the average median income of cluster 4 counties ($65,389) was considerably higher than the cluster 2 counties ($51,250). Thus, among these two groups, the cluster 4 counties with predominantly non-minority residents are considerably better-off in terms of all attributes considered.

Another noteworthy point is that, irrespective of the minority percentage, counties with high levels of small business lending have high levels of employment, above average median income, and more small businesses with only a few 1-4 employees. Thus, this suggests a significant association between availability of credit opportunities for small businesses and better economic prospects such as employment opportunity and income.

Conclusion

This study finds that higher levels of small business lending are associated with higher employment levels on a county level. At the same time, we find that counties with greater percentages of African-Americans and minorities are associated with lower levels of employment and small business lending. The findings suggest that CRA has had a beneficial impact on employment growth because CRA holds banks publicly accountable for maintaining and/or increasing small business lending; CRA exams evaluate the level of small business lending by banks and because CRA requires data collection and public dissemination of small business lending activity. In order to bolster the relationship between small business lending and employment, CRA should be strengthened as applied to banks and should be expanded to non-bank financial institutions, including credit unions. Furthermore, requiring CRA exams to consider lending to minority communities would most likely increase access to small business loans and increase employment levels in those counties with high percentages of minorities. CRA data on small business lending should likewise be enhanced to include the race and gender of the small business owner so stakeholders can more precisely measure and encourage lending to women- and minority-owned small businesses.

Appendix A – County Data

COUNTY	STATE	CLUSTER	POPULATION	MEDIAN INCOME	Loans/Small Business	Loans/Small Biz < $1 mil	Employ Rate	% Minority	% African American
Alachua County, Florida	Florida	1	227,120	$36,899	47.4%	27.9%	95%	28%	20%
Duval County, Florida	Florida	1	837,964	$45,756	48.4%	26.2%	94%	37%	30%
Escambia County, Florida	Florida	1	295,426	$42,535	43.5%	23.3%	91%	30%	22%
Leon County, Florida	Florida	1	245,625	$41,516	44.9%	25.4%	94%	36%	30%
Bibb County, Georgia	Georgia	1	154,903	$36,459	44.7%	31.0%	92%	54%	50%
Carroll County, Georgia	Georgia	1	107,325	$43,138	52.1%	46.9%	90%	22%	17%
Chatham County, Georgia	Georgia	1	241,411	$39,910	44.0%	25.6%	96%	45%	41%
Clarke County, Georgia	Georgia	1	112,787	$30,574	46.3%	27.6%	94%	35%	27%
Clayton County, Georgia	Georgia	1	271,240	$41,968	37.5%	22.1%	91%	77%	62%
DeKalb County, Georgia	Georgia	1	723,602	$50,373	46.5%	25.0%	91%	66%	55%
Douglas County, Georgia	Georgia	1	119,557	$55,860	51.1%	31.9%	91%	39%	34%
Fulton County, Georgia	Georgia	1	960,009	$54,755	51.6%	27.2%	93%	52%	43%
Houston County, Georgia	Georgia	1	127,530	$48,604	43.6%	35.8%	94%	32%	26%
Lowndes County, Georgia	Georgia	1	97,844	$36,282	41.2%	27.6%	94%	38%	34%
Muscogee County, Georgia	Georgia	1	188,660	$41,164	41.2%	27.6%	91%	52%	46%
Newton County, Georgia	Georgia	1	91,451	$49,616	50.4%	32.3%	90%	39%	34%
Richmond County, Georgia	Georgia	1	194,398	$35,062	38.4%	20.9%	92%	58%	52%
Rockdale County, Georgia	Georgia	1	80,332	$54,579	56.4%	32.6%	92%	43%	37%
St. Clair County, Illinois	Illinois	1	260,919	$46,643	48.0%	28.2%	92%	33%	29%
Lake County, Indiana	Indiana	1	494,202	$46,436	44.3%	23.6%	92%	37%	25%
Marion County, Indiana	Indiana	1	865,504	$41,947	43.1%	21.6%	93%	33%	26%
Wyandotte County, Kansas	Kansas	1	155,509	$36,660	40.6%	21.3%	88%	42%	26%
Christian County, Kentucky	Kentucky	1	66,989	$36,757	23.4%	20.6%	93%	30%	21%
Bossier Parish, Louisiana	Louisiana	1	107,270	$47,344	49.9%	27.4%	91%	26%	22%
Caddo Parish, Louisiana	Louisiana	1	253,118	$32,509	48.7%	25.6%	91%	51%	48%
Calcasieu Parish, Louisiana	Louisiana	1	184,524	$40,046	47.0%	26.5%	94%	28%	25%
Iberia Parish, Louisiana	Louisiana	1	75,509	$37,819	48.5%	29.2%	93%	36%	32%
Orleans Parish, Louisiana	Louisiana	1	223,388	$35,859	30.9%	14.0%	88%	63%	59%
Ouachita Parish, Louisiana	Louisiana	1	149,259	$35,252	44.2%	23.6%	94%	38%	35%
Rapides Parish, Louisiana	Louisiana	1	130,201	$34,965	49.1%	33.8%	93%	35%	32%
Tangipahoa Parish, Louisiana	Louisiana	1	113,137	$33,075	46.2%	25.0%	95%	31%	29%
Suffolk County, Massachusetts	Massachusetts	1	687,610	$47,694	52.6%	25.8%	92%	41%	21%
Genesee County, Michigan	Michigan	1	441,966	$41,778	45.8%	24.6%	89%	24%	20%
Saginaw County, Michigan	Michigan	1	206,300	$38,362	39.5%	24.0%	89%	24%	19%
Wayne County, Michigan	Michigan	1	1,971,853	$41,784	51.2%	25.7%	86%	48%	42%
Forrest County, Mississippi	Mississippi	1	76,372	$32,104	31.8%	28.1%	93%	38%	36%
Harrison County, Mississippi	Mississippi	1	171,875	$44,015	33.7%	24.2%	92%	29%	23%
Hinds County, Mississippi	Mississippi	1	249,012	$35,801	35.0%	24.5%	92%	68%	66%
Jackson County, Mississippi	Mississippi	1	130,577	$42,816	31.6%	23.4%	93%	26%	23%
Lauderdale County, Mississippi	Mississippi	1	76,724	$30,401	24.4%	23.1%	87%	43%	41%

Bronx County, New York	New York	1	1,361,473	$31,494	53.2%	23.4%	90%	80%	33%
Durham County, North Carolina	North Carolina	1	246,896	$46,636	49.8%	29.0%	93%	53%	37%
Harnett County, North Carolina	North Carolina	1	106,283	$40,943	48.5%	39.5%	90%	30%	23%
Pitt County, North Carolina	North Carolina	1	145,619	$36,782	51.3%	33.0%	93%	39%	34%
Robeson County, North Carolina	North Carolina	1	129,021	$26,646	32.9%	20.7%	93%	66%	25%
Wayne County, North Carolina	North Carolina	1	113,847	$38,158	48.6%	32.8%	93%	39%	33%
Wilson County, North Carolina	North Carolina	1	76,624	$37,023	51.4%	30.1%	90%	47%	39%
Lucas County, Ohio	Ohio	1	445,281	$42,296	44.3%	26.7%	89%	24%	18%
Montgomery County, Ohio	Ohio	1	542,237	$41,161	42.8%	23.3%	92%	25%	21%
Comanche County, Oklahoma	Oklahoma	1	109,181	$39,591	37.9%	31.8%	93%	36%	19%
Muskogee County, Oklahoma	Oklahoma	1	71,018	$32,975	31.1%	27.0%	94%	35%	11%
Aiken County, South Carolina	South Carolina	1	151,800	$44,128	48.3%	30.7%	94%	30%	25%
Sumter County, South Carolina	South Carolina	1	104,430	$35,461	48.2%	31.2%	93%	51%	49%
Davidson County, Tennessee	Tennessee	1	578,698	$41,994	49.3%	26.8%	95%	35%	28%
Hamilton County, Tennessee	Tennessee	1	312,905	$41,855	47.8%	26.7%	93%	24%	20%
Madison County, Tennessee	Tennessee	1	95,894	$35,216	41.6%	27.8%	94%	36%	34%
Montgomery County, Tennessee	Tennessee	1	147,114	$47,864	43.0%	33.5%	94%	27%	20%
Shelby County, Tennessee	Tennessee	1	911,438	$41,175	49.6%	24.7%	91%	57%	51%
Bell County, Texas	Texas	1	257,897	$43,231	44.1%	26.0%	94%	34%	21%
Bowie County, Texas	Texas	1	91,455	$39,430	42.1%	33.9%	94%	32%	24%
Dallas County, Texas	Texas	1	2,345,815	$44,815	50.4%	27.8%	94%	42%	21%
Gregg County, Texas	Texas	1	117,090	$39,263	41.3%	24.5%	94%	29%	21%
Jefferson County, Texas	Texas	1	243,914	$38,584	47.2%	25.8%	92%	46%	35%
Milwaukee County, Wisconsin	Wisconsin	1	915,097	$41,308	47.5%	29.0%	92%	39%	26%
Kent County, Delaware	Delaware	2	147,601	$47,722	52.1%	31.5%	94%	30%	21%
New Castle County, Delaware	Delaware	2	525,587	$58,043	59.1%	33.2%	95%	30%	23%
Sussex County, Delaware	Delaware	2	180,288	$45,876	63.2%	35.3%	94%	20%	13%
Broward County, Florida	Florida	2	1,787,636	$50,499	61.7%	31.3%	94%	35%	25%
Hillsborough County, Florida	Florida	2	1,157,738	$46,766	54.3%	30.2%	93%	26%	16%
Miami-Dade County, Florida	Florida	2	2,402,208	$41,237	57.6%	29.2%	95%	29%	20%
Orange County, Florida	Florida	2	1,043,500	$48,986	51.0%	27.3%	94%	37%	20%
Palm Beach County, Florida	Florida	2	1,274,013	$51,677	62.0%	30.5%	94%	27%	16%
St. Lucie County, Florida	Florida	2	252,724	$44,974	61.8%	33.4%	92%	23%	17%
Cobb County, Georgia	Georgia	2	679,325	$61,682	55.6%	30.6%	94%	37%	23%
Coweta County, Georgia	Georgia	2	115,291	$62,680	56.8%	42.0%	95%	22%	17%
Gwinnett County, Georgia	Georgia	2	757,104	$63,189	55.2%	32.3%	94%	40%	20%
Henry County, Georgia	Georgia	2	178,033	$60,559	66.0%	37.5%	95%	36%	30%
Cook County, Illinois	Illinois	2	5,288,655	$50,691	67.7%	32.3%	92%	49%	26%
Jefferson Parish, Louisiana	Louisiana	2	431,361	$44,958	53.0%	24.0%	95%	34%	26%

Lafayette Parish, Louisiana	Louisiana	2	203,091	$42,195	61.2%	28.9%	96%	30%	26%
Terrebonne Parish, Louisiana	Louisiana	2	109,348	$45,258	54.2%	27.1%	96%	28%	19%
Baltimore County, Maryland	Maryland	2	787,384	$59,995	67.2%	32.0%	95%	31%	24%
Charles County, Maryland	Maryland	2	140,416	$80,179	63.5%	33.3%	96%	43%	36%
Wicomico County, Maryland	Maryland	2	91,987	$47,540	61.5%	38.5%	92%	29%	24%
Oakland County, Michigan	Michigan	2	1,214,255	$66,483	62.0%	28.6%	93%	21%	12%
Washtenaw County, Michigan	Michigan	2	344,047	$56,817	53.0%	28.6%	93%	24%	12%
Hennepin County, Minnesota	Minnesota	2	1,122,093	$58,272	52.4%	35.6%	94%	22%	11%
Jackson County, Missouri	Missouri	2	664,078	$44,211	53.0%	28.2%	93%	31%	23%
St. Louis County, Missouri	Missouri	2	1,000,510	$53,186	61.4%	35.3%	94%	27%	21%
Douglas County, Nebraska	Nebraska	2	492,003	$48,898	54.8%	33.5%	95%	21%	11%
Clark County, Nevada	Nevada	2	1,777,539	$53,536	72.8%	49.6%	95%	29%	10%
Atlantic County, New Jersey	New Jersey	2	271,620	$52,230	78.2%	37.4%	92%	34%	16%
Camden County, New Jersey	New Jersey	2	517,001	$56,913	72.0%	34.3%	93%	33%	19%
Cumberland County, New Jersey	New Jersey	2	154,823	$47,443	63.5%	32.2%	89%	33%	20%
Essex County, New Jersey	New Jersey	2	786,147	$51,879	81.9%	33.0%	92%	57%	41%
Hudson County, New Jersey	New Jersey	2	601,146	$49,557	82.0%	36.6%	93%	44%	14%
Mercer County, New Jersey	New Jersey	2	367,605	$65,305	77.6%	36.5%	94%	34%	20%
Passaic County, New Jersey	New Jersey	2	497,093	$49,940	90.7%	39.7%	94%	41%	12%
Union County, New Jersey	New Jersey	2	531,088	$62,260	86.0%	34.2%	93%	41%	21%
Bernalillo County, New Mexico	New Mexico	2	615,099	$43,717	64.0%	36.3%	95%	34%	3%
Sandoval County, New Mexico	New Mexico	2	113,772	$54,747	71.9%	44.9%	94%	28%	2%
San Juan County, New Mexico	New Mexico	2	126,473	$40,517	50.6%	32.6%	96%	45%	1%
Santa Fe County, New Mexico	New Mexico	2	142,407	$50,437	64.9%	39.5%	95%	29%	0%
Valencia County, New Mexico	New Mexico	2	68,427	$41,753	53.7%	34.5%	91%	46%	2%
Kings County, New York	New York	2	2,508,820	$40,393	66.0%	32.7%	93%	57%	35%
New York County, New York	New York	2	1,611,581	$60,017	68.9%	28.6%	93%	46%	16%
Queens County, New York	New York	2	2,255,175	$51,190	80.2%	38.1%	93%	55%	19%
Craven County, North Carolina	North Carolina	2	94,875	$42,320	49.7%	35.6%	94%	30%	21%
Forsyth County, North Carolina	North Carolina	2	332,355	$45,792	54.4%	30.6%	95%	34%	25%
Iredell County, North Carolina	North Carolina	2	146,206	$43,307	60.4%	38.2%	94%	18%	12%
Orange County, North Carolina	North Carolina	2	120,100	$46,114	58.5%	34.7%	95%	25%	13%
Wake County, North Carolina	North Carolina	2	786,522	$60,903	56.6%	34.3%	96%	32%	20%
Cuyahoga County, Ohio	Ohio	2	1,314,241	$41,522	54.1%	28.4%	91%	35%	29%
Franklin County, Ohio	Ohio	2	1,095,662	$45,803	47.5%	25.7%	94%	27%	20%
Hamilton County, Ohio	Ohio	2	822,596	$44,652	55.6%	32.1%	93%	29%	24%
Oklahoma County, Oklahoma	Oklahoma	2	691,266	$38,977	53.6%	30.7%	94%	30%	14%
Tulsa County, Oklahoma	Oklahoma	2	577,795	$41,548	55.1%	33.0%	95%	26%	11%

Dauphin County, Pennsylvania	Pennsylvania	2	254,176	$49,093	51.8%	30.5%	95%	25%	17%
Delaware County, Pennsylvania	Pennsylvania	2	555,996	$55,005	67.4%	32.9%	94%	25%	18%
Monroe County, Pennsylvania	Pennsylvania	2	165,685	$50,173	66.8%	33.8%	91%	19%	13%
Horry County, South Carolina	South Carolina	2	238,493	$40,816	76.5%	62.2%	95%	19%	14%
York County, South Carolina	South Carolina	2	199,035	$45,739	55.0%	35.0%	93%	23%	19%
Bexar County, Texas	Texas	2	1,555,592	$42,860	61.7%	31.9%	94%	33%	7%
Fort Bend County, Texas	Texas	2	493,187	$75,202	79.3%	43.0%	95%	46%	21%
Galveston County, Texas	Texas	2	283,551	$52,993	53.7%	25.9%	94%	27%	14%
Harris County, Texas	Texas	2	3,886,207	$47,129	60.6%	29.6%	94%	42%	19%
Hays County, Texas	Texas	2	130,325	$52,703	66.1%	41.5%	93%	31%	4%
Potter County, Texas	Texas	2	121,328	$32,582	62.5%	33.2%	94%	31%	10%
Smith County, Texas	Texas	2	194,635	$41,090	52.6%	33.4%	94%	29%	18%
Tarrant County, Texas	Texas	2	1,671,295	$51,813	54.0%	32.1%	94%	32%	14%
Travis County, Texas	Texas	2	921,006	$50,777	63.8%	36.8%	95%	38%	9%
Victoria County, Texas	Texas	2	86,191	$45,542	59.4%	38.3%	92%	31%	6%
Chesterfield County, Virginia	Virginia	2	296,718	$67,570	66.0%	33.9%	96%	27%	21%
Henrico County, Virginia	Virginia	2	284,399	$57,195	61.4%	30.7%	95%	36%	27%
Spotsylvania County, Virginia	Virginia	2	119,529	$72,453	68.5%	35.6%	92%	22%	14%
Pierce County, Washington	Washington	2	766,878	$53,923	58.6%	31.4%	94%	22%	7%
Bay County, Florida	Florida	3	163,505	$45,098	47.8%	25.2%	96%	17%	11%
Brevard County, Florida	Florida	3	534,359	$46,335	50.6%	28.1%	94%	15%	9%
Charlotte County, Florida	Florida	3	154,438	$44,166	55.8%	31.4%	93%	10%	6%
Citrus County, Florida	Florida	3	138,143	$34,973	52.2%	32.3%	92%	6%	3%
Clay County, Florida	Florida	3	178,899	$60,450	48.9%	28.8%	93%	15%	9%
Collier County, Florida	Florida	3	314,649	$55,888	59.6%	28.7%	95%	16%	6%
Hernando County, Florida	Florida	3	165,409	$40,347	52.8%	32.0%	92%	9%	4%
Indian River County, Florida	Florida	3	130,100	$43,685	55.4%	28.6%	92%	13%	8%
Lake County, Florida	Florida	3	290,435	$41,871	52.5%	29.1%	94%	17%	9%
Lee County, Florida	Florida	3	571,344	$48,553	56.9%	30.3%	93%	15%	7%
Manatee County, Florida	Florida	3	313,298	$45,272	53.9%	31.1%	94%	16%	9%
Marion County, Florida	Florida	3	316,183	$40,062	52.3%	29.0%	93%	17%	11%
Martin County, Florida	Florida	3	139,393	$50,939	57.9%	28.2%	92%	12%	6%
Okaloosa County, Florida	Florida	3	180,291	$54,422	43.7%	24.6%	96%	17%	10%
Osceola County, Florida	Florida	3	244,045	$44,951	46.5%	26.4%	95%	29%	10%
Pasco County, Florida	Florida	3	450,171	$41,939	59.1%	33.5%	92%	9%	4%
Pinellas County, Florida	Florida	3	924,413	$41,945	58.0%	31.4%	95%	16%	10%
Polk County, Florida	Florida	3	561,606	$41,150	46.4%	25.2%	94%	24%	14%
Santa Rosa County, Florida	Florida	3	144,561	$53,086	50.0%	29.2%	92%	10%	5%
Sarasota County, Florida	Florida	3	369,535	$48,416	53.0%	30.1%	94%	9%	5%
Seminole County, Florida	Florida	3	406,875	$56,757	52.3%	27.7%	94%	22%	11%
Volusia County, Florida	Florida	3	496,575	$40,881	51.8%	28.3%	94%	15%	10%

Bartow County, Georgia	Georgia	3	91,266	$45,894	53.7%	35.8%	96%	16%	10%
Floyd County, Georgia	Georgia	3	95,322	$37,882	43.2%	32.8%	94%	20%	13%
Hall County, Georgia	Georgia	3	173,256	$44,668	50.4%	31.6%	95%	14%	7%
Whitfield County, Georgia	Georgia	3	92,999	$40,375	43.6%	27.0%	91%	24%	4%
Bonneville County, Idaho	Idaho	3	94,630	$45,325	45.3%	31.8%	96%	5%	0%
Canyon County, Idaho	Idaho	3	173,302	$41,804	53.5%	34.3%	93%	9%	1%
Kootenai County, Idaho	Idaho	3	131,507	$40,346	52.1%	33.4%	95%	4%	0%
Champaign County, Illinois	Illinois	3	185,682	$43,290	52.9%	33.2%	94%	23%	12%
DeKalb County, Illinois	Illinois	3	100,139	$51,055	54.6%	32.6%	93%	15%	6%
Kankakee County, Illinois	Illinois	3	109,090	$50,507	39.4%	21.8%	93%	19%	14%
LaSalle County, Illinois	Illinois	3	113,065	$46,670	41.2%	29.8%	93%	8%	2%
McLean County, Illinois	Illinois	3	161,202	$51,035	51.6%	37.1%	94%	14%	7%
Macon County, Illinois	Illinois	3	109,309	$41,009	45.9%	27.9%	94%	18%	15%
Madison County, Illinois	Illinois	3	265,303	$46,847	52.1%	34.6%	93%	11%	8%
Peoria County, Illinois	Illinois	3	182,495	$45,691	44.2%	27.5%	91%	23%	17%
Rock Island County, Illinois	Illinois	3	147,545	$43,635	39.6%	24.7%	92%	17%	8%
Sangamon County, Illinois	Illinois	3	193,524	$48,430	43.0%	25.3%	92%	14%	10%
Tazewell County, Illinois	Illinois	3	130,559	$49,698	44.0%	32.2%	95%	3%	1%
Vermilion County, Illinois	Illinois	3	81,941	$39,318	42.1%	28.5%	88%	16%	12%
Winnebago County, Illinois	Illinois	3	295,635	$44,776	47.4%	25.3%	91%	18%	11%
Allen County, Indiana	Indiana	3	347,316	$45,630	47.5%	30.2%	94%	18%	11%
Bartholomew County, Indiana	Indiana	3	74,444	$49,838	45.9%	28.6%	93%	7%	2%
Clark County, Indiana	Indiana	3	103,569	$41,719	44.9%	25.6%	94%	11%	7%
Delaware County, Indiana	Indiana	3	114,879	$34,516	40.3%	23.0%	89%	10%	7%
Elkhart County, Indiana	Indiana	3	198,105	$46,710	40.7%	23.3%	93%	16%	6%
Grant County, Indiana	Indiana	3	69,825	$39,219	37.9%	22.9%	93%	11%	8%
Howard County, Indiana	Indiana	3	84,500	$42,055	35.4%	23.0%	94%	11%	7%
LaPorte County, Indiana	Indiana	3	110,479	$47,043	44.9%	25.3%	93%	13%	10%
Madison County, Indiana	Indiana	3	130,575	$40,990	38.1%	22.9%	92%	11%	9%
Monroe County, Indiana	Indiana	3	122,613	$38,264	48.6%	24.3%	94%	12%	3%
Porter County, Indiana	Indiana	3	160,105	$56,710	57.6%	31.3%	94%	7%	2%
St. Joseph County, Indiana	Indiana	3	266,678	$43,691	41.1%	25.5%	94%	19%	12%
Tippecanoe County, Indiana	Indiana	3	156,169	$39,365	44.3%	24.9%	92%	12%	3%
Vanderburgh County, Indiana	Indiana	3	173,356	$38,787	43.8%	26.0%	93%	12%	9%
Vigo County, Indiana	Indiana	3	103,009	$34,815	42.8%	24.3%	93%	10%	6%
Black Hawk County, Iowa	Iowa	3	126,106	$42,111	33.1%	25.2%	93%	12%	8%
Johnson County, Iowa	Iowa	3	118,038	$46,018	53.5%	40.0%	97%	12%	4%
Linn County, Iowa	Iowa	3	201,853	$46,190	54.1%	36.8%	95%	8%	4%
Polk County, Iowa	Iowa	3	408,888	$52,418	45.7%	32.9%	94%	13%	5%
Pottawattamie County, Iowa	Iowa	3	90,218	$46,788	39.5%	28.1%	95%	5%	1%
Scott County, Iowa	Iowa	3	162,621	$46,127	42.2%	29.1%	95%	12%	6%
Story County, Iowa	Iowa	3	80,145	$43,326	48.6%	35.1%	95%	10%	2%

Woodbury County, Iowa	Iowa	3	102,972	$41,475	35.1%	23.2%	93%	13%	1%
Douglas County, Kansas	Kansas	3	112,123	$46,857	49.5%	33.4%	94%	14%	4%
Leavenworth County, Kansas	Kansas	3	74,177	$54,627	40.7%	27.3%	95%	16%	9%
Sedgwick County, Kansas	Kansas	3	470,895	$44,588	45.8%	28.3%	94%	22%	9%
Shawnee County, Kansas	Kansas	3	172,693	$43,436	48.2%	35.2%	94%	19%	9%
Fayette County, Kentucky	Kentucky	3	270,789	$44,211	53.6%	30.7%	96%	21%	14%
Hardin County, Kentucky	Kentucky	3	97,087	$41,263	34.1%	21.1%	94%	16%	11%
Jefferson County, Kentucky	Kentucky	3	701,500	$43,355	44.8%	26.3%	93%	25%	20%
Kenton County, Kentucky	Kentucky	3	154,911	$53,978	47.8%	29.7%	94%	8%	4%
Madison County, Kentucky	Kentucky	3	79,015	$38,117	50.7%	38.8%	93%	8%	3%
Warren County, Kentucky	Kentucky	3	101,266	$43,507	42.6%	29.8%	94%	13%	9%
Lafourche Parish, Louisiana	Louisiana	3	93,554	$40,633	46.2%	23.5%	97%	19%	14%
Livingston Parish, Louisiana	Louisiana	3	114,805	$42,339	54.4%	33.9%	97%	7%	5%
Androscoggin County, Maine	Maine	3	107,552	$37,945	38.7%	31.4%	93%	11%	4%
Aroostook County, Maine	Maine	3	73,008	$32,642	28.2%	30.6%	95%	4%	1%
Kennebec County, Maine	Maine	3	121,068	$44,758	35.3%	28.6%	93%	3%	1%
Penobscot County, Maine	Maine	3	147,180	$39,244	37.7%	30.1%	94%	4%	1%
Allegany County, Maryland	Maryland	3	72,831	$32,984	46.0%	24.4%	94%	8%	5%
Franklin County, Massachusetts	Massachusetts	3	72,183	$51,871	47.8%	31.5%	94%	5%	2%
Hampden County, Massachusetts	Massachusetts	3	460,520	$44,765	58.0%	29.7%	91%	20%	8%
Allegan County, Michigan	Michigan	3	113,501	$50,558	52.2%	36.6%	92%	8%	2%
Bay County, Michigan	Michigan	3	108,390	$41,774	41.3%	28.1%	92%	6%	2%
Berrien County, Michigan	Michigan	3	161,705	$41,875	44.6%	26.9%	93%	21%	15%
Calhoun County, Michigan	Michigan	3	137,991	$43,421	40.5%	23.0%	92%	16%	11%
Clinton County, Michigan	Michigan	3	69,909	$56,637	45.6%	28.2%	93%	5%	1%
Eaton County, Michigan	Michigan	3	107,237	$54,153	38.7%	25.4%	94%	11%	7%
Ingham County, Michigan	Michigan	3	276,898	$43,135	38.8%	22.9%	91%	21%	11%
Isabella County, Michigan	Michigan	3	65,818	$40,126	41.7%	27.6%	88%	10%	3%
Jackson County, Michigan	Michigan	3	163,851	$42,912	48.3%	27.8%	91%	12%	8%
Kalamazoo County, Michigan	Michigan	3	240,720	$44,237	47.5%	28.4%	91%	16%	10%
Kent County, Michigan	Michigan	3	599,524	$46,826	57.0%	34.8%	93%	18%	9%
Lapeer County, Michigan	Michigan	3	93,761	$55,287	51.2%	32.0%	91%	5%	1%
Lenawee County, Michigan	Michigan	3	102,191	$46,901	39.6%	24.7%	91%	8%	2%
Macomb County, Michigan	Michigan	3	832,861	$53,477	64.5%	31.9%	90%	12%	6%
Midland County, Michigan	Michigan	3	83,792	$48,360	41.0%	26.4%	91%	5%	1%
Monroe County, Michigan	Michigan	3	155,035	$54,444	50.9%	36.5%	91%	5%	2%
Muskegon County, Michigan	Michigan	3	175,231	$40,883	44.1%	26.1%	88%	19%	14%
St. Clair County, Michigan	Michigan	3	171,725	$48,354	51.2%	28.4%	89%	5%	2%
Shiawassee County, Michigan	Michigan	3	72,912	$41,813	41.4%	26.3%	89%	3%	1%
Van Buren County, Michigan	Michigan	3	79,018	$42,360	42.0%	26.4%	90%	12%	5%
Ramsey County, Minnesota	Minnesota	3	493,215	$50,777	44.4%	30.2%	93%	24%	10%
St. Louis County, Minnesota	Minnesota	3	196,067	$43,078	40.7%	33.7%	93%	6%	1%

Sherburne County, Minnesota	Minnesota	3	84,995	$68,008	46.2%	37.5%	94%	4%	1%
Stearns County, Minnesota	Minnesota	3	144,096	$48,803	38.7%	31.1%	95%	6%	2%
Wright County, Minnesota	Minnesota	3	114,787	$61,861	44.9%	35.0%	95%	4%	1%
DeSoto County, Mississippi	Mississippi	3	144,706	$53,139	45.3%	33.6%	95%	22%	19%
Rankin County, Mississippi	Mississippi	3	135,830	$49,527	47.7%	39.8%	95%	22%	19%
Boone County, Missouri	Missouri	3	146,048	$42,163	52.1%	35.8%	96%	16%	9%
Buchanan County, Missouri	Missouri	3	84,955	$41,048	47.0%	33.0%	94%	8%	4%
Franklin County, Missouri	Missouri	3	100,067	$43,554	42.9%	26.7%	94%	3%	1%
Greene County, Missouri	Missouri	3	254,779	$39,582	55.3%	36.6%	95%	7%	2%
Jasper County, Missouri	Missouri	3	112,505	$33,729	41.2%	26.6%	94%	9%	1%
Cascade County, Montana	Montana	3	79,385	$39,887	45.2%	28.1%	95%	10%	2%
Missoula County, Montana	Montana	3	101,417	$38,168	57.1%	28.9%	96%	6%	1%
Cheshire County, New Hampshire	New Hampshire	3	77,393	$48,692	50.9%	31.1%	94%	4%	1%
Grafton County, New Hampshire	New Hampshire	3	85,336	$53,501	42.8%	25.4%	96%	4%	1%
Dona Ana County, New Mexico	New Mexico	3	193,888	$33,952	53.2%	36.0%	93%	15%	2%
Albany County, New York	New York	3	297,556	$51,042	48.5%	26.7%	95%	19%	12%
Broome County, New York	New York	3	196,269	$41,545	47.4%	27.0%	94%	11%	4%
Cattaraugus County, New York	New York	3	81,534	$39,066	36.8%	26.9%	92%	6%	1%
Cayuga County, New York	New York	3	81,243	$45,139	48.5%	30.7%	94%	7%	4%
Chautauqua County, New York	New York	3	135,357	$37,950	41.3%	28.6%	93%	5%	2%
Chemung County, New York	New York	3	88,641	$39,683	37.2%	22.0%	94%	10%	5%
Clinton County, New York	New York	3	82,166	$42,406	42.1%	29.8%	94%	6%	3%
Erie County, New York	New York	3	921,390	$42,494	49.2%	29.6%	93%	19%	13%
Jefferson County, New York	New York	3	114,264	$38,195	41.9%	30.8%	93%	10%	5%
Madison County, New York	New York	3	70,197	$47,841	49.4%	32.5%	94%	5%	2%
Monroe County, New York	New York	3	730,807	$47,339	54.4%	30.7%	93%	21%	14%
Niagara County, New York	New York	3	216,130	$44,197	48.0%	32.7%	93%	10%	6%
Oneida County, New York	New York	3	233,954	$40,466	49.0%	32.8%	94%	10%	6%
Onondaga County, New York	New York	3	456,777	$46,060	49.1%	27.0%	94%	16%	10%
Ontario County, New York	New York	3	104,353	$51,237	47.3%	31.2%	95%	6%	2%
Oswego County, New York	New York	3	123,077	$38,264	48.1%	32.0%	92%	4%	1%
Rensselaer County, New York	New York	3	155,292	$53,016	53.0%	32.2%	95%	10%	4%
St. Lawrence County, New York	New York	3	111,284	$38,566	35.3%	29.2%	92%	6%	2%
Schenectady County, New York	New York	3	150,440	$51,584	49.5%	27.7%	94%	18%	9%
Steuben County, New York	New York	3	98,236	$41,541	33.5%	24.4%	93%	4%	2%
Sullivan County, New York	New York	3	76,588	$46,789	48.2%	25.7%	94%	17%	9%
Tompkins County, New York	New York	3	100,407	$45,534	47.2%	33.2%	96%	18%	4%
Wayne County, New York	New York	3	92,889	$47,607	41.8%	28.1%	96%	7%	4%
Burke County, North Carolina	North Carolina	3	90,054	$37,677	48.1%	30.6%	93%	15%	7%

Catawba County, North Carolina	North Carolina	3	153,784	$42,349	53.7%	34.6%	94%	18%	8%
Gaston County, North Carolina	North Carolina	3	199,397	$42,410	48.5%	31.8%	91%	21%	14%
Onslow County, North Carolina	North Carolina	3	150,673	$38,991	46.9%	33.0%	95%	27%	17%
Rowan County, North Carolina	North Carolina	3	136,254	$42,863	47.1%	27.3%	93%	22%	15%
Burleigh County, North Dakota	North Dakota	3	75,384	$48,941	36.7%	28.4%	97%	7%	1%
Cass County, North Dakota	North Dakota	3	132,525	$46,522	49.7%	42.7%	96%	7%	2%
Allen County, Ohio	Ohio	3	105,788	$44,100	42.3%	25.9%	91%	15%	12%
Ashtabula County, Ohio	Ohio	3	102,703	$37,628	37.1%	23.6%	91%	6%	3%
Butler County, Ohio	Ohio	3	354,992	$53,278	52.5%	32.8%	94%	11%	7%
Clark County, Ohio	Ohio	3	141,872	$42,546	47.2%	33.9%	91%	12%	9%
Columbiana County, Ohio	Ohio	3	110,542	$37,791	39.6%	24.0%	92%	5%	2%
Fairfield County, Ohio	Ohio	3	140,591	$55,113	51.8%	30.4%	94%	9%	6%
Greene County, Ohio	Ohio	3	152,298	$55,895	55.3%	36.2%	95%	11%	6%
Hancock County, Ohio	Ohio	3	73,824	$44,433	49.3%	33.2%	95%	6%	1%
Licking County, Ohio	Ohio	3	156,287	$50,386	46.4%	27.0%	93%	5%	3%
Lorain County, Ohio	Ohio	3	301,993	$48,838	52.2%	29.1%	90%	15%	8%
Mahoning County, Ohio	Ohio	3	251,026	$38,393	49.5%	27.5%	93%	19%	15%
Marion County, Ohio	Ohio	3	65,583	$39,585	29.8%	18.9%	94%	9%	4%
Miami County, Ohio	Ohio	3	101,914	$49,086	45.3%	27.9%	94%	6%	3%
Muskingum County, Ohio	Ohio	3	86,125	$36,047	35.5%	25.9%	86%	7%	5%
Portage County, Ohio	Ohio	3	155,012	$43,840	54.1%	28.8%	94%	7%	3%
Richland County, Ohio	Ohio	3	127,010	$38,393	48.3%	29.9%	92%	12%	9%
Ross County, Ohio	Ohio	3	75,556	$37,054	33.4%	22.8%	88%	9%	5%
Scioto County, Ohio	Ohio	3	76,441	$29,821	36.1%	20.9%	89%	5%	2%
Stark County, Ohio	Ohio	3	380,575	$42,332	50.5%	27.6%	93%	10%	7%
Summit County, Ohio	Ohio	3	545,931	$44,747	54.3%	28.1%	93%	18%	14%
Trumbull County, Ohio	Ohio	3	217,362	$42,344	45.5%	27.0%	93%	10%	8%
Tuscarawas County, Ohio	Ohio	3	91,766	$37,560	41.2%	23.8%	95%	3%	1%
Wayne County, Ohio	Ohio	3	113,950	$45,271	47.2%	28.6%	93%	4%	2%
Wood County, Ohio	Ohio	3	124,183	$51,442	50.0%	34.4%	92%	6%	2%
Canadian County, Oklahoma	Oklahoma	3	101,335	$51,293	45.1%	30.1%	96%	14%	3%
Cleveland County, Oklahoma	Oklahoma	3	228,594	$47,580	53.7%	34.1%	95%	19%	4%
Creek County, Oklahoma	Oklahoma	3	69,146	$37,473	34.2%	25.3%	92%	18%	3%
Pottawatomie County, Oklahoma	Oklahoma	3	68,638	$36,411	44.3%	45.1%	94%	22%	3%
Douglas County, Oregon	Oregon	3	105,117	$38,222	53.7%	33.6%	90%	7%	0%
Jackson County, Oregon	Oregon	3	197,071	$40,606	63.7%	36.2%	92%	7%	1%
Josephine County, Oregon	Oregon	3	81,688	$39,993	55.8%	31.2%	91%	7%	0%
Lane County, Oregon	Oregon	3	337,870	$42,127	53.5%	29.2%	94%	11%	1%
Linn County, Oregon	Oregon	3	111,489	$40,782	51.4%	29.4%	94%	8%	1%
Marion County, Oregon	Oregon	3	311,304	$45,270	51.8%	31.9%	92%	16%	1%
Multnomah County, Oregon	Oregon	3	681,454	$45,507	60.4%	39.6%	94%	20%	6%

Umatilla County, Oregon	Oregon	3	72,928	$45,362	47.6%	31.5%	92%	13%	0%
Yamhill County, Oregon	Oregon	3	94,678	$47,805	55.1%	34.5%	91%	15%	1%
Allegheny County, Pennsylvania	Pennsylvania	3	1,223,411	$43,691	55.6%	33.7%	94%	17%	13%
Beaver County, Pennsylvania	Pennsylvania	3	175,736	$42,023	50.3%	27.7%	96%	8%	6%
Berks County, Pennsylvania	Pennsylvania	3	401,149	$50,039	60.3%	35.0%	94%	15%	5%
Blair County, Pennsylvania	Pennsylvania	3	126,494	$40,730	53.0%	31.7%	92%	3%	1%
Cambria County, Pennsylvania	Pennsylvania	3	146,967	$34,387	45.9%	29.4%	92%	5%	3%
Centre County, Pennsylvania	Pennsylvania	3	140,953	$40,886	57.7%	35.7%	96%	10%	3%
Columbia County, Pennsylvania	Pennsylvania	3	65,014	$39,135	53.0%	31.8%	93%	3%	1%
Crawford County, Pennsylvania	Pennsylvania	3	89,389	$35,659	52.5%	35.8%	93%	4%	2%
Erie County, Pennsylvania	Pennsylvania	3	279,811	$39,649	56.5%	38.6%	94%	10%	6%
Indiana County, Pennsylvania	Pennsylvania	3	88,234	$38,735	56.7%	38.2%	93%	4%	3%
Lebanon County, Pennsylvania	Pennsylvania	3	126,883	$49,189	59.4%	33.8%	93%	9%	1%
Luzerne County, Pennsylvania	Pennsylvania	3	313,020	$39,687	62.6%	37.2%	95%	5%	2%
Lycoming County, Pennsylvania	Pennsylvania	3	117,668	$38,907	52.4%	30.0%	90%	7%	4%
Mercer County, Pennsylvania	Pennsylvania	3	118,551	$37,922	47.1%	26.6%	95%	7%	6%
Pickens County, South Carolina	South Carolina	3	114,446	$40,733	48.6%	31.1%	95%	10%	6%
Blount County, Tennessee	Tennessee	3	118,186	$42,909	54.5%	33.9%	94%	6%	3%
Bradley County, Tennessee	Tennessee	3	93,538	$37,185	49.9%	27.0%	91%	8%	5%
Knox County, Tennessee	Tennessee	3	411,967	$44,184	51.4%	29.0%	96%	13%	9%
Rutherford County, Tennessee	Tennessee	3	228,829	$47,254	45.6%	32.4%	92%	19%	12%
Sullivan County, Tennessee	Tennessee	3	153,239	$36,289	55.4%	32.9%	94%	4%	2%
Sumner County, Tennessee	Tennessee	3	149,416	$53,306	58.3%	35.7%	92%	10%	7%
Washington County, Tennessee	Tennessee	3	114,316	$36,551	55.9%	36.3%	94%	6%	4%
Wilson County, Tennessee	Tennessee	3	104,035	$60,278	45.8%	27.9%	95%	10%	7%
Angelina County, Texas	Texas	3	82,524	$40,670	37.2%	20.4%	95%	21%	15%
Brazoria County, Texas	Texas	3	287,898	$56,774	55.0%	30.2%	96%	23%	11%
Brazos County, Texas	Texas	3	159,006	$35,899	55.4%	33.1%	96%	27%	11%
Cameron County, Texas	Texas	3	387,717	$27,672	53.1%	38.3%	94%	12%	0%
Ector County, Texas	Texas	3	127,462	$40,348	47.9%	23.5%	95%	19%	5%
Ellis County, Texas	Texas	3	139,300	$54,370	49.4%	30.3%	95%	23%	9%
El Paso County, Texas	Texas	3	736,310	$32,111	66.7%	39.1%	93%	24%	3%
Grayson County, Texas	Texas	3	118,478	$43,328	44.9%	27.0%	95%	11%	6%
Guadalupe County, Texas	Texas	3	108,410	$53,285	60.1%	35.6%	97%	22%	6%
Hidalgo County, Texas	Texas	3	700,634	$28,660	64.3%	44.8%	91%	40%	1%
Hunt County, Texas	Texas	3	83,338	$36,461	46.9%	29.2%	93%	14%	9%
Johnson County, Texas	Texas	3	149,016	$50,864	53.6%	30.4%	94%	12%	3%
Liberty County, Texas	Texas	3	75,685	$39,310	37.4%	19.8%	92%	20%	13%
Lubbock County, Texas	Texas	3	254,862	$37,863	49.6%	32.3%	94%	23%	7%

McLennan County, Texas	Texas	3	226,189	$36,442	41.1%	24.9%	93%	22%	15%
Midland County, Texas	Texas	3	124,380	$45,437	51.1%	26.2%	96%	16%	7%
Nueces County, Texas	Texas	3	321,457	$36,773	53.6%	30.5%	94%	24%	4%
Orange County, Texas	Texas	3	84,243	$42,210	40.1%	22.4%	92%	13%	8%
Parker County, Texas	Texas	3	106,266	$54,177	57.9%	35.1%	96%	8%	1%
Taylor County, Texas	Texas	3	124,927	$39,825	43.2%	26.6%	97%	27%	7%
Tom Green County, Texas	Texas	3	103,938	$35,187	46.7%	26.7%	96%	20%	5%
Webb County, Texas	Texas	3	231,470	$33,026	65.4%	39.2%	93%	21%	0%
Wichita County, Texas	Texas	3	125,158	$35,754	42.3%	22.5%	96%	20%	10%
Cache County, Utah	Utah	3	98,662	$43,059	42.3%	28.5%	97%	7%	0%
Davis County, Utah	Utah	3	276,259	$61,263	47.0%	31.4%	97%	8%	1%
Salt Lake County, Utah	Utah	3	978,701	$52,879	51.3%	29.8%	96%	15%	1%
Utah County, Utah	Utah	3	464,760	$50,544	50.8%	31.8%	97%	8%	0%
Weber County, Utah	Utah	3	213,247	$49,342	41.9%	25.9%	95%	9%	1%
Chittenden County, Vermont	Vermont	3	150,069	$54,897	49.5%	27.5%	95%	6%	2%
Montgomery County, Virginia	Virginia	3	84,541	$38,496	46.1%	30.6%	95%	11%	4%
Cowlitz County, Washington	Washington	3	99,905	$43,728	44.1%	23.6%	91%	7%	0%
Grant County, Washington	Washington	3	82,612	$36,965	56.1%	32.4%	90%	28%	1%
Lewis County, Washington	Washington	3	73,585	$41,983	42.4%	21.9%	93%	9%	0%
Spokane County, Washington	Washington	3	446,706	$42,408	61.8%	33.9%	93%	9%	2%
Thurston County, Washington	Washington	3	234,670	$52,935	52.8%	25.8%	95%	16%	3%
Whatcom County, Washington	Washington	3	185,953	$43,798	64.5%	34.4%	93%	11%	1%
Yakima County, Washington	Washington	3	233,105	$38,909	56.0%	29.0%	91%	25%	1%
Cabell County, West Virginia	West Virginia	3	93,904	$34,943	40.5%	22.5%	95%	7%	5%
Kanawha County, West Virginia	West Virginia	3	192,419	$36,166	42.9%	23.4%	94%	10%	8%
Brown County, Wisconsin	Wisconsin	3	240,213	$49,978	48.4%	36.7%	95%	12%	2%
Dane County, Wisconsin	Wisconsin	3	463,826	$57,693	45.9%	32.0%	96%	13%	4%
Dodge County, Wisconsin	Wisconsin	3	88,983	$49,266	42.6%	34.6%	94%	6%	3%
Eau Claire County, Wisconsin	Wisconsin	3	94,741	$46,927	33.1%	27.7%	94%	6%	1%
Fond du Lac County, Wisconsin	Wisconsin	3	99,243	$48,551	47.1%	42.8%	94%	5%	1%
Jefferson County, Wisconsin	Wisconsin	3	80,025	$50,852	39.6%	28.7%	94%	3%	1%
Kenosha County, Wisconsin	Wisconsin	3	162,001	$51,941	54.6%	36.9%	94%	16%	6%
La Crosse County, Wisconsin	Wisconsin	3	109,404	$44,785	37.6%	31.2%	95%	6%	1%
Manitowoc County, Wisconsin	Wisconsin	3	81,911	$46,926	31.4%	25.9%	94%	5%	0%
Marathon County, Wisconsin	Wisconsin	3	130,223	$50,443	39.7%	37.5%	94%	7%	0%
Outagamie County, Wisconsin	Wisconsin	3	172,734	$50,265	45.2%	36.3%	95%	8%	1%
Portage County, Wisconsin	Wisconsin	3	67,484	$52,354	42.4%	37.3%	95%	5%	0%
Racine County, Wisconsin	Wisconsin	3	196,096	$50,758	50.1%	33.7%	94%	18%	11%
Rock County, Wisconsin	Wisconsin	3	159,153	$46,190	38.0%	27.8%	93%	9%	4%

Sheboygan County, Wisconsin	Wisconsin	3	114,756	$46,375	48.8%	40.7%	95%	11%	1%
Winnebago County, Wisconsin	Wisconsin	3	160,593	$49,043	39.5%	31.9%	95%	6%	2%
Wood County, Wisconsin	Wisconsin	3	74,774	$45,937	31.5%	27.4%	94%	4%	1%
Laramie County, Wyoming	Wyoming	3	85,384	$50,907	38.4%	27.5%	97%	13%	3%
St. Johns County, Florida	Florida	4	169,224	$55,715	65.2%	34.1%	94%	10%	6%
Cherokee County, Georgia	Georgia	4	195,327	$64,416	64.1%	36.2%	94%	15%	6%
Forsyth County, Georgia	Georgia	4	150,968	$83,682	71.1%	40.3%	96%	9%	2%
Ada County, Idaho	Idaho	4	359,035	$53,868	58.4%	37.2%	96%	8%	1%
DuPage County, Illinois	Illinois	4	932,670	$73,677	74.3%	36.0%	95%	19%	4%
Kane County, Illinois	Illinois	4	493,735	$63,741	73.8%	38.0%	94%	22%	6%
Kendall County, Illinois	Illinois	4	88,158	$73,069	82.4%	50.6%	95%	14%	4%
Lake County, Illinois	Illinois	4	713,076	$75,170	72.6%	35.7%	93%	20%	7%
McHenry County, Illinois	Illinois	4	312,373	$71,945	81.1%	44.2%	94%	11%	1%
Will County, Illinois	Illinois	4	668,217	$72,816	79.4%	41.6%	94%	23%	10%
Hamilton County, Indiana	Indiana	4	250,979	$75,410	64.4%	33.7%	97%	10%	3%
Hendricks County, Indiana	Indiana	4	131,204	$60,891	54.6%	30.2%	97%	7%	4%
Johnson County, Indiana	Indiana	4	133,316	$60,977	48.6%	28.8%	96%	4%	1%
Johnson County, Kansas	Kansas	4	516,731	$69,817	68.3%	35.6%	96%	12%	4%
St. Tammany Parish, Louisiana	Louisiana	4	230,605	$58,976	64.4%	30.9%	97%	16%	13%
Cumberland County, Maine	Maine	4	274,598	$51,520	56.1%	35.8%	95%	5%	2%
York County, Maine	Maine	4	202,232	$50,943	56.7%	39.8%	95%	3%	1%
Anne Arundel County, Maryland	Maryland	4	509,300	$79,160	65.6%	31.5%	95%	21%	14%
Carroll County, Maryland	Maryland	4	170,260	$74,106	72.5%	38.8%	96%	6%	2%
Cecil County, Maryland	Maryland	4	99,506	$56,509	59.5%	32.8%	94%	8%	5%
Frederick County, Maryland	Maryland	4	222,938	$74,029	71.2%	34.7%	96%	16%	8%
Harford County, Maryland	Maryland	4	241,402	$69,549	65.1%	33.6%	97%	17%	12%
Howard County, Maryland	Maryland	4	272,452	$94,260	66.6%	32.5%	97%	32%	16%
Montgomery County, Maryland	Maryland	4	932,131	$87,624	69.3%	29.6%	96%	38%	16%
St. Mary's County, Maryland	Maryland	4	98,854	$71,158	61.3%	36.0%	96%	19%	14%
Washington County, Maryland	Maryland	4	143,748	$52,349	61.8%	34.1%	95%	12%	9%
Bristol County, Massachusetts	Massachusetts	4	545,379	$51,769	65.8%	35.4%	93%	11%	3%
Essex County, Massachusetts	Massachusetts	4	735,958	$59,575	68.4%	32.8%	94%	17%	4%
Norfolk County, Massachusetts	Massachusetts	4	654,753	$73,339	68.3%	33.2%	95%	15%	5%
Plymouth County, Massachusetts	Massachusetts	4	493,623	$66,807	68.7%	33.7%	93%	13%	7%
Livingston County, Michigan	Michigan	4	184,511	$70,629	64.5%	35.9%	93%	4%	1%
Ottawa County, Michigan	Michigan	4	257,671	$56,576	62.3%	40.1%	94%	10%	1%
Anoka County, Minnesota	Minnesota	4	327,005	$66,315	65.3%	44.6%	94%	11%	4%
Dakota County, Minnesota	Minnesota	4	388,001	$70,502	52.0%	37.7%	94%	13%	4%
Olmsted County, Minnesota	Minnesota	4	137,521	$61,124	50.2%	39.0%	98%	11%	4%
Scott County, Minnesota	Minnesota	4	124,092	$79,262	54.3%	41.6%	96%	10%	3%

Washington County, Minnesota	Minnesota	4	225,000	$76,380	52.0%	38.7%	96%	11%	3%
Cass County, Missouri	Missouri	4	95,781	$55,223	52.6%	32.8%	95%	8%	3%
Clay County, Missouri	Missouri	4	206,957	$53,448	59.3%	35.0%	95%	10%	4%
Jefferson County, Missouri	Missouri	4	216,469	$53,434	56.5%	35.3%	94%	3%	1%
Platte County, Missouri	Missouri	4	83,061	$62,402	59.4%	34.0%	95%	11%	4%
St. Charles County, Missouri	Missouri	4	338,719	$64,567	64.2%	39.5%	97%	8%	4%
Yellowstone County, Montana	Montana	4	138,213	$43,377	65.1%	35.9%	97%	9%	1%
Lancaster County, Nebraska	Nebraska	4	267,135	$48,564	60.2%	42.7%	95%	11%	4%
Sarpy County, Nebraska	Nebraska	4	142,637	$61,961	60.6%	42.1%	95%	11%	4%
Washoe County, Nevada	Nevada	4	396,428	$52,297	66.5%	43.2%	96%	24%	2%
Bergen County, New Jersey	New Jersey	4	904,037	$75,851	98.8%	43.9%	96%	26%	6%
Burlington County, New Jersey	New Jersey	4	450,627	$68,090	79.9%	36.7%	94%	25%	16%
Gloucester County, New Jersey	New Jersey	4	282,031	$66,759	81.3%	43.2%	93%	15%	10%
Hunterdon County, New Jersey	New Jersey	4	130,783	$93,297	100.0%	43.4%	97%	8%	2%
Middlesex County, New Jersey	New Jersey	4	786,971	$72,669	96.0%	45.6%	95%	39%	9%
Monmouth County, New Jersey	New Jersey	4	635,285	$77,160	106.0%	41.1%	95%	18%	8%
Morris County, New Jersey	New Jersey	4	493,160	$89,587	102.0%	39.5%	96%	16%	3%
Ocean County, New Jersey	New Jersey	4	562,335	$54,820	103.0%	43.7%	94%	9%	3%
Somerset County, New Jersey	New Jersey	4	324,186	$91,688	105.0%	44.3%	97%	25%	9%
Sussex County, New Jersey	New Jersey	4	153,384	$78,488	98.2%	42.4%	95%	6%	2%
Warren County, New Jersey	New Jersey	4	110,919	$62,087	91.8%	47.0%	94%	11%	4%
Dutchess County, New York	New York	4	295,146	$65,965	65.1%	31.6%	94%	20%	8%
Nassau County, New York	New York	4	1,325,662	$85,994	78.6%	34.2%	95%	26%	11%
Orange County, New York	New York	4	376,392	$64,947	65.1%	33.9%	95%	23%	9%
Putnam County, New York	New York	4	100,603	$81,907	85.0%	37.4%	96%	11%	2%
Richmond County, New York	New York	4	477,377	$68,620	84.6%	34.0%	95%	25%	10%
Rockland County, New York	New York	4	294,965	$76,710	83.3%	37.4%	96%	22%	11%
Saratoga County, New York	New York	4	215,473	$57,374	58.9%	33.6%	97%	6%	2%
Suffolk County, New York	New York	4	1,469,715	$76,847	84.1%	36.7%	95%	16%	7%
Ulster County, New York	New York	4	182,742	$52,725	62.2%	32.5%	95%	12%	6%
Westchester County, New York	New York	4	949,355	$75,472	75.0%	31.3%	95%	32%	14%
Union County, North Carolina	North Carolina	4	175,272	$59,125	68.2%	37.8%	95%	18%	12%
Clermont County, Ohio	Ohio	4	192,706	$52,279	61.9%	36.1%	95%	4%	1%
Delaware County, Ohio	Ohio	4	156,697	$79,173	66.2%	35.5%	96%	10%	4%
Lake County, Ohio	Ohio	4	232,892	$51,322	57.9%	31.1%	95%	6%	3%
Warren County, Ohio	Ohio	4	201,871	$66,834	64.7%	40.2%	96%	8%	3%
Clackamas County, Oregon	Oregon	4	374,230	$56,000	63.1%	37.9%	95%	10%	1%
Deschutes County, Oregon	Oregon	4	149,140	$50,637	66.0%	41.4%	95%	5%	0%
Washington County, Oregon	Oregon	4	514,269	$59,481	63.9%	40.1%	94%	21%	2%

Adams County, Pennsylvania	Pennsylvania	4	101,105	$53,932	60.4%	35.8%	95%	8%	1%
Bucks County, Pennsylvania	Pennsylvania	4	623,205	$70,406	79.1%	37.3%	96%	9%	4%
Butler County, Pennsylvania	Pennsylvania	4	182,901	$52,943	61.0%	35.8%	95%	3%	1%
Chester County, Pennsylvania	Pennsylvania	4	482,112	$77,570	72.1%	34.7%	96%	12%	6%
Franklin County, Pennsylvania	Pennsylvania	4	139,991	$50,254	56.3%	34.4%	97%	5%	3%
Lancaster County, Pennsylvania	Pennsylvania	4	494,486	$52,064	65.6%	36.5%	96%	9%	3%
Lehigh County, Pennsylvania	Pennsylvania	4	335,544	$48,469	63.9%	36.4%	95%	18%	5%
York County, Pennsylvania	Pennsylvania	4	416,322	$52,428	60.7%	35.3%	95%	8%	5%
Kent County, Rhode Island	Rhode Island	4	170,053	$59,190	77.8%	39.6%	95%	6%	1%
Newport County, Rhode Island	Rhode Island	4	82,144	$59,758	67.4%	32.0%	96%	8%	3%
Minnehaha County, South Dakota	South Dakota	4	163,281	$49,810	59.3%	45.9%	96%	10%	2%
Williamson County, Tennessee	Tennessee	4	160,781	$81,449	66.7%	37.3%	96%	10%	5%
Collin County, Texas	Texas	4	698,851	$74,051	71.8%	43.4%	96%	23%	7%
Comal County, Texas	Texas	4	101,181	$60,511	71.9%	41.0%	96%	13%	2%
Denton County, Texas	Texas	4	584,238	$66,792	69.3%	41.6%	94%	19%	7%
Montgomery County, Texas	Texas	4	398,290	$60,224	68.1%	34.9%	95%	16%	4%
Williamson County, Texas	Texas	4	353,830	$62,494	64.3%	39.1%	94%	20%	6%
Washington County, Utah	Utah	4	126,312	$45,998	64.4%	37.6%	96%	9%	1%
Albemarle County, Virginia	Virginia	4	92,035	$57,122	61.3%	33.3%	96%	17%	9%
Arlington County, Virginia	Virginia	4	199,776	$87,350	58.7%	28.7%	98%	29%	9%
Fairfax County, Virginia	Virginia	4	1,010,443	$100,318	71.6%	32.9%	97%	32%	10%
Loudoun County, Virginia	Virginia	4	268,817	$99,371	87.6%	41.4%	97%	28%	8%
Rockingham County, Virginia	Virginia	4	72,564	$47,630	62.9%	35.5%	98%	5%	2%
Stafford County, Virginia	Virginia	4	120,170	$85,014	72.1%	36.0%	97%	26%	17%
Benton County, Washington	Washington	4	159,463	$50,688	64.8%	33.6%	94%	17%	1%
Clark County, Washington	Washington	4	412,938	$55,405	62.6%	34.7%	93%	13%	2%
Island County, Washington	Washington	4	81,489	$49,022	68.6%	36.1%	97%	11%	2%
King County, Washington	Washington	4	1,826,732	$63,489	63.8%	33.4%	96%	27%	6%
Kitsap County, Washington	Washington	4	240,604	$55,257	60.4%	31.3%	93%	15%	3%
Skagit County, Washington	Washington	4	115,700	$48,222	62.0%	33.8%	96%	16%	1%
Snohomish County, Washington	Washington	4	669,887	$60,002	66.7%	35.3%	95%	17%	2%
Berkeley County, West Virginia	West Virginia	4	97,534	$54,097	61.0%	35.1%	94%	9%	4%
Walworth County, Wisconsin	Wisconsin	4	101,007	$51,846	55.5%	34.7%	96%	5%	1%
Waukesha County, Wisconsin	Wisconsin	4	380,985	$69,398	60.9%	35.8%	96%	6%	1%