PUBLIC DISCLOSURE

December 7, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Central Bank of Boone County
RSSD #299046

720 East Broadway
Columbia, Missouri 65201

Federal Reserve Bank of St. Louis

P.O. Box 442
St. Louis, Missouri 63166-0442

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, nor should it be construed as, an assessment of the financial condition of the institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.**

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INSTITUTION'S CRA RATING: This institution is rated OUTSTANDING.

The following table indicates the performance level of Central Bank of Boone County (Central Bank) with respect to the Lending, Investment, and Service Tests.

CENTRAL BANK			
Performance Levels	**Performance Tests**		
	Lending Test*	**Investment Test**	**Service Test**
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors supporting the institution's rating include:

- A high percentage of the bank's loans were made in its assessment area.
- The bank's lending levels reflect excellent responsiveness to the credit needs of its assessment area.
- The distribution of borrowers' income/revenue profile reflects adequate penetration among businesses of different sizes and customers of different income levels.
- The geographic distribution of loans reflects good penetration throughout the assessment area.
- The bank exhibits adequate responsiveness to credit and community development needs.
- The bank makes an adequate level of community development loans.
- The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas.
- The bank makes an excellent level of qualified community development investments and grants and is often in the leadership position.
- Delivery systems are accessible to geographies and individuals of different income levels, and services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income (LMI) geographies and/or LMI individuals.
- The bank is a leader in providing community development services.

DESCRIPTION OF INSTITUTION

Central Bank, located in the Columbia, Missouri metropolitan statistical area (MSA), is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is wholly owned by Central Bancompany, Inc., a multibank holding company headquartered in Jefferson City, Missouri. The bank is affiliated with 12 other Central Bancompany, Inc., subsidiary banks that are headquartered throughout Missouri and Oklahoma. Additionally, the bank has three subsidiaries, none of which are credit granting.

The bank's branch network consists of 15 offices (including the main office), all of which are full-service facilities,14 of which have full-service automated teller machines (ATMs) or interactive teller machines (ITMs), and 14 of which also offer drive-up accessibility. The bank also operates one stand-alone ITM and ten stand-alone ATMs, three of which accept deposits. The bank did not open or close any branch offices during this review period. Based on this branch network and other service delivery systems (extended banking hours of operations, weekend banking hours, and full-service online banking capabilities), the bank is well positioned to deliver financial services to the entirety of its assessment area.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its customers, and the bank appeared capable of meeting assessment area credit needs based on its available resources and financial products. As of September 30, 2020, the bank reported total assets of $2.4 billion. As of the same date, loans and leases outstanding were $1.4 billion (57.5 percent of total assets), and deposits totaled $1.8 billion. The bank's loan portfolio composition by credit category is displayed in the following table.

Distribution of Total Loans as of September 30, 2020

Credit Category	Amount ($000s)	Percentage of Total Loans
Construction and Development	$100,688	7.4%
Commercial Real Estate	$441,874	32.3%
Multifamily Residential	$210,966	15.4%
1–4 Family Residential	$254,476	18.6%
Farmland	$23,254	1.7%
Farm Loans	$8,823	0.6%
Commercial and Industrial	$212,645	15.5%
Loans to Individuals	$103,486	7.6%
Total Other Loans	$11,860	0.9%
Less: Unearned Income	($3,910)	(0.3%)
TOTAL	**$1,364,162**	**100%**

As indicated by the table above, a significant portion of the bank's lending resources is directed to commercial real estate loans, loans secured by 1–4 family residential properties, and commercial and industrial loans. The bank also originates and subsequently sells a significant volume of loans related to residential real estate. As these loans are sold on the secondary market shortly after origination, this activity would not be captured in the table.

Due to a significant number of loans originated through indirect lending channels, consumer motor vehicle loans also represent a significant product offering for the bank. However, because consumer loans not related to residential real estate are typically made in smaller dollar amounts relative to other credit products, they do not represent a significant product by dollar volume in the previous table.

The bank received an Outstanding rating at its previous CRA evaluation conducted on March 26, 2018, by this Reserve Bank.

SCOPE OF EXAMINATION

The bank's CRA performance was reviewed using the Federal Financial Institutions Examination Council's (FFIEC's) large bank procedures, which entail three performance tests: Lending, Investment, and Service.

Lending Test

Lending Test Performance Criterion	Products Selected for Review	Time Period
Level of Lending Activity	• Small business loans reported under the CRA • Home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) • Consumer motor vehicle loans	January 1, 2018 – December 31, 2019
Geographic Distribution of Loans		
Loan Distribution by Borrower's Profile		
Assessment Area Concentration		
Community Development Lending Activities	[redacted]	March 26, 2018 – December 6, 2020
Product Innovation[1]	[redacted]	

*Consumer motor vehicle loans were sampled in accordance with CA Letter 01-8, "CRA Sampling Procedures."

As noted above, small business, HMDA, and consumer motor vehicle lending were selected for review, as loan activity represented by these credit products is deemed indicative of the bank's overall lending performance. Based on the bank's strategic focus on commercial and small business lending, small business loans were given more weight than the other two loan products.

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[1] Unlike other large bank CRA performance criteria, a lack of innovative and/or flexible lending practices does not necessarily impact the bank's performance negatively. These activities are largely used to augment consideration given to an institution's performance under the quantitative criteria, resulting in a higher performance rating. This distinction also applies to the use of innovative or complex investments under the Investment Test.

Under the Lending Test criteria, analyses often involve comparisons of bank performance to assessment area demographics and the performance of other lenders based on HMDA and CRA aggregate data. Unless otherwise noted, assessment area demographics are based on U.S. Census data, and business demographics are based Dun & Bradstreet data. When analyzing bank performance, greater emphasis is generally placed on aggregate lending data, which are expected to describe many factors impacting lenders, are updated annually, and expected to predict more relevant comparisons.

Investment Test

All community development investments, including grants and donations made since the previous CRA evaluation, were reviewed and evaluated. In addition, investments made prior to the date of this CRA evaluation, but still outstanding as of this evaluation's review date, were considered. These investments and grants were evaluated to determine the bank's overall level of activity, use of innovative and/or complex investments, and responsiveness to assessment area credit and community development needs.

Service Test

The review period for retail and community development services includes activity from the date of the previous CRA evaluation to the date of the current evaluation. The Service Test considers the following criteria:

- Distribution and accessibility of bank branches and alternative delivery systems.
- Changes in branch locations.
- Reasonableness of business hours and retail services.
- Community development services.

Community Contacts

To augment this evaluation, three community contact interviews were conducted with knowledgeable individuals residing or conducting business in the bank's assessment area. These interviews were used to ascertain specific credit needs, opportunities, and local market conditions. Key details from these community contact interviews are included in the *Description of Assessment Area* section.

DESCRIPTION OF ASSESSMENT AREA

Central Bank has designated one CRA assessment area consisting of Boone and Cooper Counties in Missouri.

General Demographics

The bank's assessment area includes two of three counties (Boone and Cooper) in the Columbia MSA, which has a population of 188,363. The assessment area's population is most heavily concentrated in Boone County, which contains the city of Columbia and has a population of

170,770. The University of Missouri, with an approximate enrollment of 30,000 in 2019, is located in the assessment area in the city of Columbia.

According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2020, there are 36 FDIC-insured depository institutions in the assessment area that operate 88 offices. Central Bank ranked first in terms of deposit market share, with 33.3 percent of the total assessment area deposit dollars.

As the assessment area covers a metropolitan area that includes numerous businesses of varying sizes and needs, as well as three colleges, credit needs in the area are diverse and include a blend of consumer and business credit products for individuals and businesses of various income/revenue levels. Community contacts affirmed these needs, noting specific needs for affordable housing for non-student LMI individuals, loans for smaller dollar amounts for both LMIs and small businesses, as well as the need for motor vehicle loans. One contact specifically emphasized the need for motor vehicle loans due to inadequacies of public transportation in Columbia that increases the importance of car ownership, especially for LMIs.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level

Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	3	5	16	7	3	**34**
	8.8%	14.7%	47.1%	20.6%	8.8%	**100%**
Family Population	1,048	4,392	24,646	12,194	297	**42,577**
	2.5%	10.3%	57.9%	28.6%	0.7%	**100%**

As shown above, 23.5 percent of the census tracts in the assessment area are LMI geographies but only 12.8 percent of the family population resides in these tracts. These LMI areas are primarily concentrated in and around the city of Columbia and predominantly include rental property, local universities, and a hospital.

Based on 2015 American Community Survey data, the median family income for the assessment area was $70,217. At the same time, the median family income for the state of Missouri was $60,809. More recently, the FFIEC estimates the 2018 and 2019 median family income for the state of Missouri to be $53,100 and $52,400, respectively. The following table displays population percentages of assessment area families by income level compared to the state of Missouri family population as a whole.

Family Population by Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Assessment Area	8,871	6,941	9,280	17,485	**42,577**
	20.8%	16.3%	21.8%	41.1%	**100%**
Missouri	327,271	274,380	319,267	609,088	**1,530,006**
	21.4%	17.9%	20.9%	39.8%	**100%**

As shown in the table above, 37.1 percent of families within the assessment area were considered LMI, which is slightly lower than LMI family percentage of 39.3 percent in Missouri. In addition, the percentage of families living below the poverty threshold in the assessment area, 9.2 percent, falls below the 11.1 percent level in Missouri. Considering these factors, the assessment area appears slightly more affluent than Missouri as a whole.

Housing Demographics

Based on housing values, median gross rents, and the affordability ratios displayed in the table below, housing in the assessment area is less affordable compared to the state of Missouri.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$165,717	29.8%	$786
Boone County	$169,400	29.5%	$795
Cooper County	$124,000	35.9%	$639
State of Missouri	$138,400	34.8%	$746

The median housing value for the assessment area is $165,717, which is above the figure for the state of Missouri, $138,400. The assessment area housing affordability ratio of 29.8 percent is below the state of Missouri figure of 34.8 percent. Additionally, the median gross rent for the assessment area of $786 per month exceeds the $746 per month for the state of Missouri. Based on these factors, housing in the assessment areas is generally less affordable than in the state of Missouri as a whole, and homeownership is likely out of reach for many LMI residents. Notably, housing in Cooper County is more affordable than Boone County, with median housing values and rents being considerable lower than in Boone County and the state of Missouri. However, Cooper County contains only 9.4 percent of the total housing units in the assessment area and is more rural in nature, despite its inclusion in the MSA.

Community contacts confirmed these trends and stated that the housing stock is currently older, and while there is new construction occurring, it consists primarily of larger and more expensive homes that would be out of reach for LMI individuals. Contacts also stated that student housing, which is most prevalent in and around LMI geographies, is driving housing costs up because property owners can charge students higher rents for available housing.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. County business patterns indicate that there are 81,466 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are healthcare and social assistance (23.0 percent), followed by retail trade (14.8 percent) and accommodation and food services (13.9 percent). The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Missouri as a whole.

Unemployment Data

Dataset	2018	2019	YTD 2020
Assessment Area	2.3%	2.5%	4.7%
Boone County	2.3%	2.4%	4.6%
Cooper County	3.1%	3.7%	6.1%
State of Missouri	3.2%	3.3%	6.7%

As shown in the table above, unemployment levels for the assessment area are lower than the state of Missouri as a whole. Unemployment levels in the assessment area and at the state level were relatively stable in 2018 and 2019, but increased significantly in 2020 as a result of the COVID-19 pandemic. Assessment area unemployment still remains lower than the statewide level for 2020.

While low unemployment figures compared to regional figures are often indicative of positive economic performance, one community contact noted that a large number of service-related jobs provide low wages and have caused a gap between unemployment and poverty rates. Assessment area data indicates a 2.5 percent unemployment rate in 2019; however, 19.2 percent of households are below the poverty level.

Community Contact Information

Three community contact interviews were completed as part of this evaluation. One interview was with an individual specializing in affordable housing; a second interview was with an individual working in small business development; and a third interview was with an individual with valuable insight as to how the assessment area has been affected by the COVID-19 pandemic. Community contact interviews categorized the local economy in Boone County as thriving and outperforming neighboring counties with lower unemployment levels. While the local economy is overall performing well, contacts noted existing challenges present for LMI residents. Two contacts noted a significant gap between the unemployment rate and poverty rate, attributing the gap to a large number of low wage jobs. One contact also stressed the need for affordable housing for LMI individuals, stating that the housing stock is old and that new construction is occurring in the region, but generally for more expensive homes that are out of reach of LMI residents. The contact also indicated that competition with students seeking housing is driving up rental costs in LMI areas, creating further challenges for LMI individuals trying to locate affordable housing. The second contact, who specializes in small business development, stressed the need for loans of smaller dollar amounts for LMI residents and small business owners. The contact stated that LMI individuals often rely on payday lenders that charge higher interest rates because they are more easily accessible and have more relaxed credit standards. The contact also stated that motor vehicle lending represents a specific credit need in the area for LMI residents as a result of inadequate public transportation in the area that can't be relied on for transportation to and from work. Finally, the contact stressed that working capital and low-interest loans to purchase equipment and inventory represent the biggest credit needs for small businesses. Poor credit and lack of assets were mentioned as barriers preventing individuals from getting credit through banks, especially for women- and minority-owned businesses.

The need for financial education programs and services for individuals and small businesses was also mentioned by two community contacts. One contact specifically mentioned ProsperU as being an effective resource for such needs. ProsperU is a program run by Central Bank that regularly offers financial education courses in the community.

As mentioned, one additional community contact discussion was conducted to assess the extent to which the COVID-19 pandemic has impacted the assessment area. Overall, the contact stated that Boone County was doing comparatively better than surrounding rural counties and that various banks have participated in the Paycheck Protection Program and offered loans to many small businesses, as well as supported local initiatives through various grants and services. The contact did note, however, that small local and minority owned businesses have been most affected and that families are experiencing income loss and housing instability due to the pandemic.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

Central Bank's performance under the Lending Test is rated High Satisfactory. The rating reflects performance under the following criteria applicable to large banks.

Lending Test Summary	
Assessment Areas Concentration	High Percentage Inside
Lending Activity	Excellent Responsiveness
Borrower Distribution	Adequate Penetration
Geographic Distribution	Good Penetration
Community Development Loans	Makes an Adequate Level
Product Innovation	Makes Extensive Use

Assessment Area Concentration

For the loan activity reviewed as part of this evaluation, the following table displays the number, dollar volume, and percentage of loans inside and outside the bank's assessment area.

Lending Inside and Outside of Assessment Area ($000s)

January 1, 2018 through December 31, 2019

Loan Type	Inside Assessment Area		Outside Assessment Area		TOTAL	
Small Business	1,510	86.5%	236	13.5	**1,746**	**100%**
	$168,554	78.6%	$45,847	21.4%	**$214,401**	**100%**
HMDA	1,370	88.7%	174	11.3%	**1,544**	**100%**
	$274,684	75.3%	$90,308	24.7%	**$364,992**	**100%**
Motor Vehicle	113	56.8%	86	43.2%	**199**	**100%**
	$2,318	54.9%	$1,908	45.1%	**$4,226**	**100%**
TOTAL LOANS	**2,993**	**85.8%**	**496**	**14.2%**	**3,489**	**100%**
	$445,556	**76.3%**	**$138,063**	**23.7%**	**$583,619**	**100%**

As shown above, Central Bank originated a high percentage of loans inside its assessment area by both number and dollar amount (85.8 percent and 76.3 percent, respectively).

Lending Activity

Combined lending activity for the assessment area from 2018 and 2019 is detailed in the following table and includes the product lines reviewed during this examination.

Summary of Lending Activity
January 1, 2018 through December 31, 2019

Loan Type	#	%	$(000s)	%
Small Business	**1,510**	**50.8%**	**168,554**	**38.1%**
Home Purchase	918	30.9%	179,646	40.6%
Refinancing	384	12.9%	69,967	15.8%
Home Improvement	23	0.8%	1,293	0.3%
Multifamily Housing	24	0.8%	21,155	4.8%
TOTAL HMDA	**1,349**	**45.4%**	**272,061**	**61.4%**
Motor Vehicle	**113**	**3.8%**	**2,318**	**0.5%**
TOTAL LOANS	**2,972**	**100.0%**	**442,933**	**100.0%**

While the total number and dollar amount of loans is one component used to assess lending activity, additional consideration was given to lending performance in light of competitive factors and assessment area needs. The bank's number of small business and HMDA loans was compared against the number of loans made by aggregate lenders in the area during the review period. Based on 2019 reporting, the bank ranked 1st out of 79 CRA lenders and 1st out of 252 HMDA aggregate lenders in loan originations and purchases. Similarly, the bank ranked 1st out of 77 CRA reporters and 1st out of 235 HMDA reporters in 2018.Community contacts noted both loan types as specific credit needs in the area, particularly small business lending, which affirms that the bank takes a leading role in lending in this area. This reflects excellent responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Performance from all three loan categories was reviewed, with more emphasis placed on performance in the small business loan category. Performance demonstrated that the distribution of loans by borrower's profile reflects adequate penetration among businesses of different revenue sizes and customers of different income levels.

Small Business Lending

Overall, the distribution of small business loans by business revenue profile is good. In 2018, the bank originated 72.1 percent of its small business loans to businesses with annual revenues of $1 million or less, which exceeded aggregate lending levels (51.4 percent) but was below the demographic figure (91.2 percent), and is considered good. Similarly, the bank's level of lending in 2019 at 71.8 percent exceeded aggregate lending levels (51.9 percent) but was below the demographic figure (91.8 percent), which is also good. Community contacts indicated a need for loans of smaller dollar amounts for small business owners. The bank originated 68.9 percent of small business loans in 2018 and 71.6 percent of small business loans in 2019 in amounts of $100,000 or less. This reflects the bank's willingness to make smaller dollar loans to meet area credit needs and further supports an overall good level of loans to small businesses.

HMDA Lending

The distribution of HMDA loans by borrower's income level is adequate overall when considering performance in both 2018 and 2019. The bank's percentage of HMDA loans to low-income borrowers in 2018 (10.3 percent) and 2019 (8.0 percent) was in line with aggregate performance (9.2 percent in 2018 and 7.1 percent in 2019) but below the demographic figure (20.5 percent in 2018 and 20.8 percent in 2019), reflecting adequate performance. Community contacts noted a significant gap between the unemployment and poverty rates in the area, which indicates a significant portion of low wage jobs. As a result, homeownership may be further out of reach for many low-income borrowers.

The bank's lending to moderate-income borrowers in 2018 (17.9 percent) was slightly below aggregate lending levels (19.2 percent) but in line with the demographic figure (17.0 percent), which is considered adequate. Similarly in 2019, lending levels at 16.5 percent were slightly below aggregate performance (17.8 percent) but in line with the demographic figure (16.3 percent), and also considered adequate.

Consumer Motor Vehicle Lending

Overall, the distribution of consumer motor vehicle loans is adequate. The bank’s percentage of consumer motor vehicle loans to low-income borrowers in 2018 (13.4 percent) was below the demographic figure (25.9 percent) and considered poor. However, the bank’s lending levels improved in 2019 (21.7 percent) and were slightly below the demographic figure (26.2 percent), which is adequate.

In contrast to the bank’s performance to low-income borrowers in 2018, the bank’s lending to moderate-income borrowers in 2018 (17.9 percent) exceeded the demographic figure (14.9 percent) and is considered good. Lending levels to moderate-income borrowers in 2019 (13.0 percent) were slightly below the demographic figure (15.0 percent) and are considered adequate.

Geographic Distribution of Loans

The bank’s overall geographic distribution of loans in the assessment area is good based on all three loan products reviewed, with greater emphasis being placed on performance in the small business loan category.

Small Business Lending

The geographic distribution of small business loans is good overall. The bank’s percentage of small business loans in low-income geographies in 2018 (9.7 percent) was in line with the 2018 aggregate (9.8 percent) and demographic figure (10.5 percent) and is considered good. In 2019, the bank’s percentage of small business loans in low-income geographies (11.9 percent) exceeded the aggregate (9.3 percent) and is in line with the demographic figure (10.4 percent), and is considered good.

The bank’s percentage of loans in moderate-income geographies in 2018 (13.9 percent) was in line with the 2018 aggregate (15.6 percent) and below the demographic figure (16.9 percent) and is considered adequate. In 2019, the bank’s percentage of small business loans in moderate-income geographies (9.0 percent) is equal to the 2019 aggregate performance (9.0 percent) and in line with the demographic figure (10.6 percent), and is considered good.

Home Mortgage Disclosure Act (HMDA) Lending

The bank’s geographic distribution of HMDA loans in LMI geographies is good overall. The percentage of HMDA loans originated in low-income census tracts in 2018 (1.9 percent) was in line with 2018 aggregate (2.2 percent) and the demographic figure (1.5 percent) and is considered adequate. In 2019, the bank’s lending levels (1.5 percent) exceeded the aggregate (1.3 percent) and was in line with the demographic (1.5 percent) and is considered good.

The bank’s percentage of loans in moderate-income geographies in 2018 (18.7 percent) exceeded the aggregate (16.4 percent) and the demographic figure, and is considered excellent. In 2019, the bank’s percentage of loans in moderate-income geographies (8.8 percent) was in line with the aggregate (9.4 percent) and demographic figure, and is considered adequate.

Consumer Motor Vehicle Lending

The geographic distribution of consumer motor vehicle loans is adequate overall. In 2018, the bank did not originate any loans in low-income tracts, which is poor compared to the percentage of households that live in low-income tracts (4.2 percent). Performance improved in 2019, as the bank originated 2.2 percent of loans in low-income tracts, which is in line with the demographic (4.2 percent) and considered adequate.

In moderate-income tracts in 2018, the bank's lending levels were at 11.9 percent, which was below the demographic (20.7 percent) and considered poor. Performance improved in 2019 in moderate-income tracts (13.0 percent), exceeding the demographic (11.8 percent), and is considered good.

Lastly, based on an analysis of the dispersion of all three loan products, no conspicuous lending gaps were noted. The bank had loan activity in both 2018 and 2019 in all census tracts in their assessment area, including LMI tracts. The dispersion of the bank's loans was consistent with its extensive branch structure in the assessment area and supports the conclusion that the bank's distribution of loans by geography income level is good overall.

Community Development Lending Activity

Central Bank makes an adequate level of community development loans in the assessment area. During the review period, the bank originated or renewed seven community development loans for $13.9 million. While this does represent a decrease in both number and dollar amount since its previous examination, performance is comparable to peers in this category.

Noteworthy community development loans include:

- Two loans totaling $6.6 million were made through the Small Business Administration (SBA) 504 loans program to finance small businesses. These loans supported economic development by helping to create permanent jobs for LMI individuals in the assessment area.

- One loan totaling $4.1 million to purchase and renovate a multifamily apartment complex targeted to LMI individuals.

- One loan totaling $2.8 million were for renovations to a local apartment complex owned by the Columbia Housing Authority of the city of Columbia and entirely occupied by low-income individuals.

Product Innovation

Central Bank makes extensive use of innovative and flexible lending practices in serving the credit needs of its assessment area. Loans originated under these programs are given quantitative consideration under the Lending Test; however, the programs themselves are given qualitative consideration in the evaluation of the bank's CRA performance in relation to the use of flexible lending practices. Community contacts noted a need for affordable housing for LMI individuals and families, as well as a need for financial education in the assessment area. Many of these programs are designed to improve affordable housing opportunities for LMI individuals, with some also providing financial education to borrowers; thus, these programs reflect excellent responsiveness in assisting LMI individuals in transitioning into homeownership. Other programs meet credit needs of small businesses in the assessment area, another area of opportunity noted by community contacts.

- Historic Tax Credit Loan Program: Loans made through this program address affordable housing needs in the area and are underwritten to receive federal and state equity financing separately. During the review period, the bank originated three loans for the purpose of building or renovating affordable housing for LMI individuals totaling $4.1 million through this program.

- Freddie Mac HomePossible Loan Program: This program is targeted to LMI individuals and has lower down payment requirements than traditional conventional loans. Borrowers are also provided financial education as an incident of the provision of credit. The bank originated 21 loans totaling $2.2 million during the review period.

- Federal Home Loan Bank (FHLB) of Des Moines HomeStart Plus Program: This FHLB assistance program provides down payment assistance to LMI individuals funded through direct subsidies from member banks. During the review period, the bank provided direct subsidies totaling $177,500 to 29 individuals through this program. Borrowers are also provided financial education as an incident of the provision of credit.

- Fannie Mae HomeReady Loan Program: This program is targeted to LMI individuals and has lower down payment requirements than traditional conventional loans. Borrowers are also provided financial education prior to closing. The bank originated five loans totaling $593,009 during the review period.

- Farmer Mac Farm Credit System Loan Program: This program offers flexible terms and makes loans available to farmers and ranchers to allow them to improve operations and increase productivity. The bank originated one loan totaling $685,000 during the review period.

- Veterans Affairs Loan Program: This program, which is offered to veterans, provides flexible, long-term home financing to eligible borrowers with low or no down payments. The bank originated 45 loans totaling $11.6 million during the review period.

- Federal Housing Administration Loan Program: This program offers flexible, long-term financing to eligible borrowers and has lower down payment and credit score requirements. The bank originated 106 loans totaling $15.9 million during the review period.

- FHLB of Des Moines Competitive Affordable Housing Program: This program helps secure funds for affordable housing through partnerships with member financial institutions and local housing providers. The bank originated one loan totaling $660,632 during the review period.

- SBA-Certified Development Company (CDC)/504 Loan Program: The CDC/504 Loan Program is a financing instrument that provides small businesses with long-term, fixed-rate financing to acquire major fixed assets for expansion or modernization. During the review period, the bank originated two loans in this product category totaling $4.5 million.

- SBA 7(a) Loan Program: This program is designed to satisfy capital needs for start-up and existing small businesses. This program provides small businesses with access to capital with more flexible terms than conventional commercial financing. During the review period, the bank originated two loans totaling $895,000.

- Missouri Housing Development Commission First Place Loan Program: This program provides home loans that include down payment and closing cost assistance for first-time homebuyers in the assessment area. Assistance is in the form of a second mortgage that is forgivable after ten years. The bank originated 14 loans totaling $72,670 during the review period.

- U.S. Department of Agriculture (USDA), Farm Service Agency (FSA): This loan program offers loans to help farmers and ranchers get the financing needed to start, expand, or maintain a family farm. During the review period, the bank originated two FSA loans totaling $215,000.

- USDA, Rural Development (RD): This loan program is designed to assist LMI individuals in purchasing affordable housing in rural areas. There are no down payment requirements. During the review period, the bank originated two RD loans totaling $246,700.

- City of Columbia Homeownership Assistance Program: This program is targeted to LMI families within the city limits of Columbia. The program is specific to first-time homebuyers with limited incomes and provides up to 10 percent down payment or closing cost assistance. Borrowers are also provided financial education as a requirement of the provision of credit. The bank funded loans of which the city provided $64,250 in down payment assistance to seven borrowers through this program.

INVESTMENT TEST

Central Bank's Investment Test is rated Outstanding. The bank makes an excellent level of qualified community development investments and grants and is often in a leadership position. During the review period, the bank had 6 investments and 20 donations totaling $6.5 million benefitting the assessment area. This performance was above that of other banks of similar capacity operating in the assessment area. Of that total, $5.3 million was a current-period investment, $1.2 million were prior-period investments still outstanding, and $70,767 were in donations to 11 community development organizations. Current-period investments represent an improvement from the previous examination.

The bank also exhibits good responsiveness to credit and community development needs. Most of the investments and donations met general community needs, as well as needs specifically noted by community contacts. Investments and donations deemed most responsive in the assessment area include:

- One current-period investment totaling $5.3 million and one prior-period investment currently valued at $142,914 were made with an organization that invests in affordable housing for LMI individuals and families in the assessment area. These affordable housing initiatives received federal Low-Income Housing Tax Credits and are deemed especially responsive considering that community contacts indicated a need for affordable housing for non-students in the assessment area.

- Two donations were made totaling $30,000 to an organization that funds agencies that aim to positively impact educational, health, financial stability, or other basic needs.

- Three donations were made totaling $15,000 to an organization that provides resources and support to women seeking to start or grow a business. These donations are especially impactful, as community contacts noted a variety of barriers present for women seeking to develop or grow a small business.

- Two donations were made totaling $10,000 to a local food bank that serves the homeless and abused.

- Four donations totaling $3,750 were made to an organization that provides emergency shelter and employment assistance to homeless and at-risk veterans.

SERVICE TEST

Central Bank's Service Test is rated Outstanding. The bank's service delivery systems are accessible to the assessment area. Business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals, and the bank did not open or close any branches in the assessment area during the review period. Lastly, the bank is a leader in providing community development services in the assessment area.

Accessibility of Delivery Systems

Central Bank operates 15 branches in the assessment area, 14 of which offer full-service ATMs. In addition, the bank operates 11 stand-alone ATMs, one of which is deposit-taking and located in a moderate income census tract. The following table illustrates the location of the bank's offices by geography income level.

Distribution of Delivery Systems by Income Level of Geography

Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Offices with On-Site ATMs	1	1	9	3	1	**15**
	6.7%	6.7%	60.0%	20.0%	6.7%	**100%**
Stand-Alone ATMs	0	4	2	1	4	**11**
	0.0%	36.4%	18.2%	9.1%	36.4%	**100%**
Census Tracts	8.8%	14.7%	47.1%	20.6%	8.8%	**100%**
Household Population	4.3%	11.8%	53.4%	26.7%	3.8%	**100%**

Delivery systems are accessible to the bank's geographies and individuals of different income levels in the assessment area. As illustrated in the preceding table, 13.4 percent of offices and 36.4 percent of stand-alone ATMs are located in LMI census tracts. Additionally, 23.5 percent of census tracts are considered low- or moderate-income, and 16.1 percent of the assessment area's household population lives in these tracts. The bank also operates one office and four stand-alone ATMs in census tracts that are classified as "unknown" income levels. These census tracts were classified as low- or moderate-income during the previous review period and directly border multiple LMI tracts and thus likely serve and contain LMI individuals. Lastly, the bank currently employs 11 individuals that read, write, and/or speak a second language. While these employees assist all customers, a significant portion of them are located at offices that are either in LMI geographies or serve significant LMI populations.

Changes in Branch Locations

The bank's record of opening and closing offices in this assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and LMI individuals. The bank did not open or close any branches in the assessment area during the review period but did open a stand-alone ITM in a moderate-income tract during the review period.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services do not vary in a way that inconveniences the assessment area, particularly LMI geographies and/or LMI individuals. Offices in the assessment area operate generally consistent lobby hours during the week (9:00 a.m. to 5:00 p.m.), and 14 of 15 office lobbies are open on Saturday (9:00 a.m. to noon). In addition, seven of the bank's offices in this area offer slightly extended lobby hours (9:00 a.m. to 5:30 p.m.), two of which are in LMI census tracts. Four of the bank's offices in the assessment area operate extended drive-thru hours until 6:00 p.m., one of which is in a moderate-income census tract. Moreover, the bank also operates seven ITMs (six are located at branch offices, and one is a stand-alone ITM), three of which are located in LMI census tracts. The bank's ITMs are open Monday through Saturday (7:00 a.m. to 7:00 p.m.).

The bank offers a variety of retail services at all locations, including checking and savings accounts, certificates of deposit, and consumer, commercial, and agricultural loans. Additionally, currency exchange and wire transfer services are offered at all locations.

Community Development Services

The bank is a leader in providing community development services in the assessment area. Bank employees are active in providing community development services throughout the area, including services to a variety of organizations that promote affordable housing, community service and economic development. During the review period, 21 employees provided 1,126 hours of services to 17 different organizations. Noteworthy community development services in the assessment area include:

- Bank employees provided their financial expertise through a program offered by the bank called ProsperU. ProsperU is a program that is targeted to LMI individuals and offers a variety of courses, as well as one-on-one training, over a variety of financial topics including budgeting, retirement planning, starting a business, managing credit, and buying a home. A significant portion of the community development service hours reported were through ProsperU. Both community contacts stressed the need for financial education in the area. Services provided through this organization have been especially impactful on the assessment period in 2020, considering this program was moved completely virtual in March of 2020 to be able to continue to provide financial education services during the pandemic.

- Bank employees provided their financial expertise as members of several organizations that provide services to area LMI youth through schools and programs.

- Bank employees provided their financial expertise to several organizations that specialize in promoting economic development throughout the community, especially for small businesses.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Based on findings from the Consumer Affairs examination, including a fair lending analysis performed under Regulation B – Equal Credit Opportunity and the Fair Housing Act requirements, conducted concurrently with this CRA evaluation, no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

Appendix A

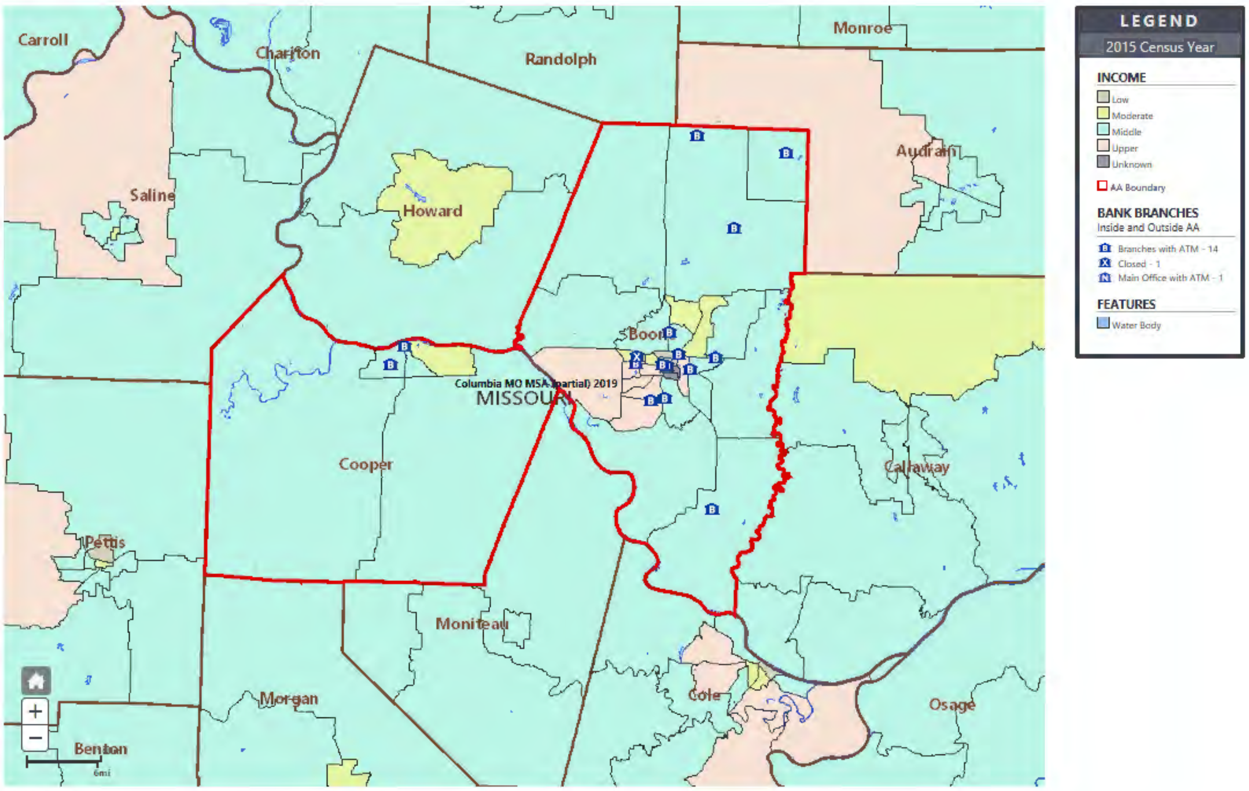
SCOPE OF EXAMINATION TABLES

SCOPE OF EXAMINATION		
TIME PERIOD REVIEWED	January 1, 2018 – December 31, 2019 for HMDA, small business, and consumer motor vehicle lending. March 26, 2018 – December 6, 2020 for community development loans, investments, and service activities.	
FINANCIAL INSTITUTION Central Bank of Boone County Columbia, Missouri		**PRODUCTS REVIEWED** HMDA Small Business Consumer Motor Vehicle
AFFILLIATE(S)	**AFFILIATE RELATIONSHIP**	**PRODUCTS REVIEWED**
N/A	N/A	N/A

Assessment Area	State	# of Offices	Deposits ($000s) (as of September 30, 2020)	Branches Visited	CRA Review Procedures
Partial Columbia MSA	Missouri	15	$1,844,802	0	Full Scope

Appendix B

ASSESSMENT AREA DETAIL



Central Bank of Boone County - Columbia, MO 2020

Columbia MO MSA (partial)

2019 PE Map

LENDING PERFORMANCE TABLES BY ASSESSMENT AREA

Columbia MSA

Small Business Loans by Revenue and Loan Size
Assessment Area: Columbia MSA

Business Revenue and Loan Size			2018						
			Count			Dollars			Total Businesses
			Bank		Aggregate	Bank		Aggregate	
			#	%	%	$ (000s)	$ %	$ %	%
Business Revenue		$1 Million or Less	503	72.1%	51.4%	49,985	62.8%	50.2%	91.2%
		Over $1 Million/ Unknown	195	27.9%	48.6%	29,576	37.2%	49.8%	8.8%
		TOTAL	**698**	**100.0%**	**100.0%**	**79,561**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	481	68.9%	86.9%	16,978	21.3%	24.0%	
		$100,001–$250,000	132	18.9%	6.7%	23,246	29.2%	19.7%	
		$250,001–$1 Million	85	12.2%	6.4%	39,337	49.4%	56.4%	
		Over $1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
		TOTAL	**698**	**100.0%**	**100.0%**	**79,561**	**100.0%**	**100.0%**	
Loan Size	Revenue $1 Million or Less	$100,000 or Less	362	72.0%		11,710	23.4%		
		$100,001–$250,000	91	18.1%		15,360	30.7%		
		$250,001–$1 Million	50	9.9%		22,915	45.8%		
		Over $1 Million	0	0.0%		0	0.0%		
		TOTAL	**503**	**100.0%**		**49,985**	**100.0%**		

Small Business Loans by Revenue and Loan Size
Assessment Area: Columbia MSA

Business Revenue and Loan Size		**2019**						
		Count			**Dollars**			**Total Businesses**
		Bank		**Aggregate**	**Bank**		**Aggregate**	
		#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue	$1 Million or Less	583	71.8%	51.9%	54,651	61.4%	45.7%	91.8%
	Over $1 Million/ Unknown	229	28.2%	48.1%	34,342	38.6%	54.3%	8.2%
	TOTAL	**812**	**100.0%**	**100.0%**	**88,993**	**100.0%**	**100.0%**	**100.0%**
Loan Size	$100,000 or Less	581	71.6%	89.1%	19,359	21.8%	28.2%	
	$100,001–$250,000	135	16.6%	5.8%	22,398	25.2%	18.7%	
	$250,001–$1 Million	96	11.8%	5.1%	47,236	53.1%	53.0%	
	Over $1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	**812**	**100.0%**	**100.0%**	**88,993**	**100.0%**	**100.0%**	
Loan Size **Revenue $1 Million or Less**	$100,000 or Less	434	74.4%		13,034	23.8%		
	$100,001–$250,000	95	16.3%		15,434	28.2%		
	$250,001–$1 Million	54	9.3%		26,183	47.9%		
	Over $1 Million	0	0.0%		0	0.0%		
	TOTAL	**583**	**100.0%**		**54,651**	**100.0%**		

Borrower Distribution of Residential Real Estate (RRE) Loans

Assessment Area: Columbia MSA

Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	$ (000s)	$ %	$ %	%
Home Purchase	Low	46	9.9%	8.8%	4,727	5.4%	5.4%	20.5%
	Moderate	81	17.5%	20.5%	11,183	12.8%	16.4%	17.0%
	Middle	82	17.7%	21.3%	13,841	15.9%	20.0%	21.6%
	Upper	191	41.3%	30.3%	48,239	55.3%	40.8%	40.9%
	Unknown	63	13.6%	19.1%	9,250	10.6%	17.4%	0.0%
	TOTAL	**463**	**100.0%**	**100.0%**	**87,240**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	19	14.4%	11.0%	1,622	7.8%	5.6%	20.5%
	Moderate	25	18.9%	18.3%	2,762	13.2%	13.7%	17.0%
	Middle	23	17.4%	19.6%	3,245	15.6%	17.3%	21.6%
	Upper	53	40.2%	35.9%	11,766	56.4%	47.7%	40.9%
	Unknown	12	9.1%	15.1%	1,455	7.0%	15.7%	0.0%
	TOTAL	**132**	**100.0%**	**100.0%**	**20,850**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	8.3%	0	0.0%	6.8%	20.5%
	Moderate	2	18.2%	11.0%	72	12.5%	7.3%	17.0%
	Middle	1	9.1%	17.9%	135	23.5%	18.8%	21.6%
	Upper	5	45.5%	44.8%	269	46.8%	41.4%	40.9%
	Unknown	3	27.3%	17.9%	99	17.2%	25.7%	0.0%
	TOTAL	**11**	**100.0%**	**100.0%**	**575**	**100.0%**	**100.0%**	**100.0%**
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.5%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.0%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	21.6%
	Upper	0	0.0%	4.8%	0	0.0%	1.4%	40.9%
	Unknown	14	100.0%	95.2%	12,268	100.0%	98.6%	0.0%
	TOTAL	**14**	**100.0%**	**100.0%**	**12,268**	**100.0%**	**100.0%**	**100.0%**
HMDA TOTALS	Low	65	10.3%	9.2%	6,349	5.2%	5.2%	20.5%
	Moderate	113	17.9%	19.2%	14,508	11.9%	14.6%	17.0%
	Middle	107	16.9%	20.2%	17,446	14.3%	17.9%	21.6%
	Upper	256	40.4%	31.5%	60,927	49.8%	39.2%	40.9%
	Unknown	92	14.5%	19.9%	23,072	18.9%	23.1%	0.0%
	TOTAL	**633**	**100.0%**	**100.0%**	**122,302**	**100.0%**	**100.0%**	**100.0%**

Appendix C (Continued)

Borrower Distribution of RRE Loans Assessment Area: Columbia MSA								
Product Type	**Borrower Income Levels**	**2019**						
		Count			**Dollar**			**Families**
		Bank		**HMDA Aggregate**	**Bank**		**HMDA Aggregate**	
		#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Home Purchase	Low	40	8.8%	7.9%	4,316	4.7%	4.5%	20.8%
	Moderate	75	16.5%	20.0%	10,794	11.7%	15.0%	16.3%
	Middle	98	21.5%	21.4%	17,673	19.1%	20.6%	21.8%
	Upper	156	34.3%	32.1%	46,229	50.0%	42.3%	41.1%
	Unknown	86	18.9%	18.7%	13,394	14.5%	17.7%	0.0%
	TOTAL	**455**	**100.0%**	**100.0%**	**92,406**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	17	6.7%	6.0%	1,510	3.1%	3.1%	20.8%
	Moderate	43	17.1%	14.6%	5,062	10.3%	9.7%	16.3%
	Middle	63	25.0%	19.1%	10,467	21.3%	15.5%	21.8%
	Upper	107	42.5%	36.1%	28,513	58.1%	46.5%	41.1%
	Unknown	22	8.7%	24.2%	3,565	7.3%	25.2%	0.0%
	TOTAL	**252**	**100.0%**	**100.0%**	**49,117**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	1	8.3%	7.6%	16	2.2%	5.3%	20.8%
	Moderate	2	16.7%	17.2%	152	21.2%	12.3%	16.3%
	Middle	2	16.7%	25.5%	60	8.4%	23.3%	21.8%
	Upper	6	50.0%	43.3%	480	66.9%	55.5%	41.1%
	Unknown	1	8.3%	6.4%	10	1.4%	3.6%	0.0%
	TOTAL	**12**	**100.0%**	**100.0%**	**718**	**100.0%**	**100.0%**	**100.0%**
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.8%
	Moderate	0	0.0%	1.6%	0	0.0%	0.0%	16.3%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	21.8%
	Upper	2	20.0%	11.1%	504	5.7%	2.1%	41.1%
	Unknown	8	80.0%	87.3%	8,383	94.3%	97.9%	0.0%
	TOTAL	**10**	**100.0%**	**100.0%**	**8,887**	**100.0%**	**100.0%**	**100.0%**
HMDA TOTALS	Low	58	8.0%	7.1%	5,842	3.9%	3.7%	20.8%
	Moderate	120	16.5%	17.8%	16,008	10.6%	12.0%	16.3%
	Middle	163	22.4%	20.3%	28,200	18.7%	17.2%	21.8%
	Upper	271	37.2%	33.3%	75,726	50.1%	40.6%	41.1%
	Unknown	117	16.0%	21.5%	25,352	16.8%	26.5%	0.0%
	TOTAL	**729**	**100.0%**	**100.0%**	**151,128**	**100.0%**	**100.0%**	**100.0%**

Borrower Distribution of Consumer Motor Vehicle Loans
Assessment Area: Columbia MSA

Borrower Income Levels	2018				
	Count		Dollar		Households
	#	%	$ (000s)	$ %	%
Low	9	13.4%	121	8.4%	25.9%
Moderate	12	17.9%	231	16.1%	14.9%
Middle	16	23.9%	351	24.4%	16.2%
Upper	28	41.8%	690	48.1%	43.0%
Unknown	2	3.0%	42	3.0%	0.0%
TOTAL	**67**	**100.0%**	**1,435**	**100.0%**	**100.0%**

Borrower Distribution of Consumer Motor Vehicle Loans
Assessment Area: Columbia MSA

Borrower Income Levels	2019				
	Count		Dollar		Households
	#	%	$ (000s)	$ %	%
Low	10	21.7%	84	9.5%	26.2%
Moderate	6	13.0%	66	7.5%	15.0%
Middle	13	28.3%	303	34.3%	15.9%
Upper	15	32.6%	361	40.8%	42.9%
Unknown	2	4.3%	70	7.9%	0.0%
TOTAL	**46**	**100.0%**	**884**	**100.0%**	**100.0%**

Geographic Distribution of Small Business Loans Assessment Area: Columbia MSA							
Tract Income Levels	**2018**						
	Count			**Dollar**			**Businesses**
	Bank		**Aggregate**	**Bank**		**Aggregate**	
	#	**%**	**%**	**$ 000s**	**$ %**	**$ %**	**%**
Low	68	9.7%	9.8%	7,910	9.9%	11.6%	10.5%
Moderate	97	13.9%	15.6%	13,801	17.3%	18.5%	16.9%
Middle	310	44.4%	39.1%	32,389	40.7%	38.5%	37.6%
Upper	187	26.8%	30.8%	20,365	25.6%	25.2%	29.4%
Unknown	36	5.2%	4.7%	5,096	6.4%	6.2%	5.6%
TOTAL	**698**	**100.0%**	**100.0%**	**79,561**	**100.0%**	**100.0%**	**100.0%**

Geographic Distribution of Small Business Loans Assessment Area: Columbia MSA							
Tract Income Levels	**2019**						
	Count			**Dollar**			**Businesses**
	Bank		**Aggregate**	**Bank**		**Aggregate**	
	#	**%**	**%**	**$ 000s**	**$ %**	**$ %**	**%**
Low	97	11.9%	9.3%	10,555	11.9%	11.5%	10.4%
Moderate	73	9.0%	9.0%	12,988	14.6%	12.3%	10.6%
Middle	414	51.0%	49.1%	37,396	42.0%	45.9%	47.5%
Upper	193	23.8%	27.8%	24,138	27.1%	25.8%	26.0%
Unknown	35	4.3%	4.8%	3,916	4.4%	4.6%	5.5%
TOTAL	**812**	**100.0%**	**100.0%**	**88,993**	**100.0%**	**100.0%**	**100.0%**

Geographic Distribution of RRE Loans
Assessment Area: Columbia MSA

Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	$ (000s)	$ %	$ %	%
Home Purchase	Low	9	1.9%	2.2%	870	1.0%	1.3%	1.5%
	Moderate	88	19.0%	17.3%	10,561	12.1%	13.0%	13.8%
	Middle	205	44.3%	47.5%	39,455	45.2%	46.7%	49.4%
	Upper	159	34.3%	32.7%	36,123	41.4%	38.8%	34.9%
	Unknown	2	0.4%	0.3%	231	0.3%	0.3%	0.4%
	TOTAL	**463**	**100.0%**	**100.0%**	**87,240**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	1	0.8%	1.5%	68	0.3%	1.1%	1.5%
	Moderate	19	14.4%	13.5%	2,326	11.2%	9.4%	13.8%
	Middle	74	56.1%	52.6%	10,859	52.1%	52.7%	49.4%
	Upper	38	28.8%	31.8%	7,597	36.4%	36.3%	34.9%
	Unknown	0	0.0%	0.7%	0	0.0%	0.5%	0.4%
	TOTAL	**132**	**100.0%**	**100.0%**	**20,850**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	0.7%	0	0.0%	0.4%	1.5%
	Moderate	2	18.2%	15.2%	72	12.5%	12.2%	13.8%
	Middle	4	36.4%	45.5%	200	34.8%	43.9%	49.4%
	Upper	5	45.5%	37.9%	303	52.7%	43.2%	34.9%
	Unknown	0	0.0%	0.7%	0	0.0%	0.3%	0.4%
	TOTAL	**11**	**100.0%**	**100.0%**	**575**	**100.0%**	**100.0%**	**100.0%**
Multifamily	Low	2	14.3%	19.4%	157	1.3%	11.3%	1.5%
	Moderate	7	50.0%	29.0%	5,089	41.5%	28.5%	13.8%
	Middle	1	7.1%	21.0%	433	3.5%	11.9%	49.4%
	Upper	3	21.4%	19.4%	5,824	47.5%	33.8%	34.9%
	Unknown	0	0.0%	11.3%	765	6.2%	14.5%	0.4%
	TOTAL	**14**	**100.0%**	**100.0%**	**12,268**	**100.0%**	**100.0%**	**100.0%**
HMDA TOTALS	Low	12	1.9%	2.2%	1,095	0.9%	1.9%	1.5%
	Moderate	116	18.7%	16.4%	18,048	14.9%	13.3%	13.8%
	Middle	284	45.8%	48.3%	50,947	42.1%	45.6%	49.4%
	Upper	205	33.1%	32.6%	49,847	41.2%	38.0%	34.9%
	Unknown	3	0.5%	0.5%	996	0.8%	1.2%	0.4%
	TOTAL	**620**	**100.0%**	**100.0%**	**120,933**	**100.0%**	**100.0%**	**100.0%**

Geographic Distribution of RRE Loans Assessment Area: Columbia MSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	$ (000s)	$ %	$ %	%
Home Purchase	Low	8	1.8%	1.5%	942	1.0%	0.7%	1.5%
	Moderate	45	9.9%	10.7%	5,668	6.1%	7.7%	8.4%
	Middle	235	51.6%	57.2%	44,460	48.1%	54.9%	60.0%
	Upper	165	36.3%	29.8%	40,985	44.4%	36.1%	29.8%
	Unknown	2	0.4%	0.8%	351	0.4%	0.6%	0.4%
	TOTAL	**455**	**100.0%**	**100.0%**	**92,406**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	2	0.8%	0.8%	160	0.3%	0.4%	1.5%
	Moderate	16	6.3%	6.9%	1,822	3.7%	4.6%	8.4%
	Middle	143	56.7%	56.3%	26,173	53.3%	53.9%	60.0%
	Upper	91	36.1%	34.3%	20,962	42.7%	40.0%	29.8%
	Unknown	0	0.0%	1.7%	0	0.0%	1.1%	0.4%
	TOTAL	**252**	**100.0%**	**100.0%**	**49,117**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	1.3%	0	0.0%	0.3%	1.5%
	Moderate	2	16.7%	6.4%	226	31.5%	3.4%	8.4%
	Middle	4	33.3%	51.6%	251	35.0%	49.8%	60.0%
	Upper	6	50.0%	38.9%	241	33.6%	43.6%	29.8%
	Unknown	0	0.0%	1.9%	0	0.0%	3.0%	0.4%
	TOTAL	**12**	**100.0%**	**100.0%**	**718**	**100.0%**	**100.0%**	**100.0%**
Multifamily	Low	1	10.0%	4.8%	190	2.1%	7.0%	1.5%
	Moderate	1	10.0%	17.5%	100	1.1%	8.3%	8.4%
	Middle	6	60.0%	58.7%	4,093	46.1%	61.8%	60.0%
	Upper	2	20.0%	14.3%	4,504	50.7%	10.5%	29.8%
	Unknown	0	0.0%	4.8%	0	0.0%	12.4%	0.4%
	TOTAL	**10**	**100.0%**	**100.0%**	**8,887**	**100.0%**	**100.0%**	**100.0%**
HMDA TOTALS	Low	11	1.5%	1.3%	1,292	0.9%	1.1%	1.5%
	Moderate	64	8.8%	9.4%	7,816	5.2%	6.7%	8.4%
	Middle	388	53.2%	57.0%	74,977	49.6%	55.1%	60.0%
	Upper	264	36.2%	31.1%	66,692	44.1%	35.4%	29.8%
	Unknown	2	0.3%	1.2%	351	0.2%	1.7%	0.4%
	TOTAL	**729**	**100.0%**	**100.0%**	**151,128**	**100.0%**	**100.0%**	**100.0%**

Geographic Distribution of Consumer Motor Vehicle Loans Columbia MSA 2018					
Tract Income Levels	**Bank Loans**				**% of Households**
	#	**#%**	**$ (000s)**	**$ %**	
Low	0	0.0%	0	0.0%	4.2%
Moderate	8	11.9%	204	14.2%	20.7%
Middle	39	58.2%	809	56.4%	40.7%
Upper	19	28.4%	409	28.5%	30.6%
Unknown	1	1.5%	12	0.9%	3.8%
TOTAL	**67**	**100.0%**	**1,434**	**100.0%**	**100.0%**

Geographic Distribution of Consumer Motor Vehicle Loans Columbia MSA 2019					
Tract Income Levels	**Bank Loans**				**% of Households**
	#	**#%**	**$ (000s)**	**$ %**	
Low	1	2.2%	5	0.6%	4.3%
Moderate	6	13.0%	119	13.4%	11.8%
Middle	33	71.7%	661	74.7%	53.4%
Upper	6	13.0%	100	11.3%	26.7%
Unknown	0	0.0%	0	0.0%	3.8%
TOTAL	**46**	**100.0%**	**885**	**100.0%**	**100.0%**

GLOSSARY

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

Assessment area: One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

Census tract: A small subdivision of metropolitan and nonmetropolitan counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending on population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community contact: Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

Community development: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for LMI individuals; (2) community services targeted to LMI individuals; (3) activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of $1 million or less; (4) activities that revitalize or stabilize LMI geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and geographies.

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.

Demographics: The statistical characteristics of human populations (such as age, race, sex, income, etc.) used especially to identify markets.

Distressed nonmetropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders who do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

Household: One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Housing affordability ratio: Is calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

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

Low-income: Individual 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 area/assessment area.

Median family income: The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Nonmetropolitan statistical area (nonMSA): Not part of a metropolitan area. (See metropolitan area.)

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.

Performance context: The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

Performance criteria: These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

Performance evaluation (PE): A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

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

Small businesses/small farms: A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were $1 million or less.

Small loan(s) to business(es): That is, "small business loans" are included in "loans to small businesses" as defined in the Consolidated Reports of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of $1 million or less and typically are secured by either nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): That is, "small farm loans" are included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Reports 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.

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

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