



## **PUBLIC DISCLOSURE**

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Country Club Bank  
RSSD# 625654

One Ward Parkway  
Kansas City, Missouri 64112

Federal Reserve Bank of Kansas City  
1 Memorial Drive  
Kansas City, Missouri, 64198

**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 this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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**INSTITUTION’S COMMUNITY REINVESTMENT ACT RATING**

This institution is rated: Outstanding

The following table indicates the performance level of Country Club Bank (the bank) with respect to the lending, investment, and service tests.

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 in determining the overall rating.

**SUMMARY OF THE MAJOR FACTORS SUPPORTING THE RATING**

**Lending Test**

- Lending levels reflect good responsiveness to assessment area (AA) credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- A substantial majority of the bank’s loans are originated within its only delineated AA.
- The bank’s distribution of loans by income level of geography (geographic distribution) is adequate.
- The bank’s distribution of loans among individuals of different income levels, including low- and moderate-income (LMI), and businesses and farms of different sizes (borrower distribution) is adequate.
- The bank is a leader in making community development (CD) loans.

**Investment Test**

- The bank makes an excellent level of qualified CD investments and grants and is often in a leadership position. In addition, the bank makes occasional use of innovative and/or complex investments to support CD initiatives and exhibits good responsiveness to credit and CD needs.

Service Test

- The bank’s delivery systems are accessible to geographies and/or individuals of different income levels in its AA.
- The bank’s record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals.
- The bank is a leader in providing CD services and is responsive to the available service opportunities.

**DESCRIPTION OF INSTITUTION**

The bank is an interstate financial institution headquartered in Kansas City, Missouri. The bank’s characteristics include:

- The bank is a wholly owned subsidiary of CCB Financial Corporation.
- The bank has total assets of \$2.4 billion as of September 30, 2021.
- The bank’s single AA includes 6 of the 14 counties that comprise the Kansas City Missouri-Kansas Metropolitan Statistical Area (Kansas City MSA). The bank operates 20 full-service branches and 5 mobile branches within the AA. All but one of the full-service branches have on-site automated teller machines (ATMs). The bank also has one stand-alone cash-dispensing ATM within the AA.
- The bank’s primary business focus is commercial lending to small- and medium-sized businesses.
- On January 3, 2020, the bank purchased Bank of the Prairie, Olathe, Kansas, and Bank of the Prairie merged with and into the bank effective April 24, 2020.

**Table 1**

<b>Composition of Loan Portfolio as of September 30, 2021</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	95,114	7.9
Farmland	10,201	0.8
1- to 4-Family Residential Real Estate	173,345	14.3
Multifamily Residential Real Estate	69,035	5.7
Non-Farm Non-Residential Real Estate	500,081	41.4
Agricultural	1,024	0.1
Commercial and Industrial	340,429	28.2
Consumer	7,948	0.7
Other	11,387	0.9
<b>Gross Loans</b>	<b>1,208,564</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Outstanding under the Community Reinvestment Act (CRA) at its December 2, 2019 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

## **SCOPE OF EXAMINATION**

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency CRA Examination Procedures for Large Institutions* were utilized to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. Performance was assessed within the bank's Kansas City, Missouri-Kansas Metropolitan AA using a full-scope review. The following data was reviewed:

- The bank's home purchase, home refinance, home improvement, and multifamily loans reported on the bank's 2018, 2019, and 2020 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- The bank's small business and small farm loans reported on the bank's 2018, 2019, and 2020 CRA LARs;
- CD loans originated from January 1, 2019 to December 31, 2020;
- Qualified investments that were made from January 1, 2019 through December 31, 2020, qualified investments made prior to but still outstanding during this period, and qualifying grants, donations, or in-kind contributions of property made during this period; and,
- Retail banking services and CD services from January 1, 2019 through December 31, 2020.

With respect to the lending analysis, more emphasis was placed on small business loans due to the bank's strategic focus on commercial lending. More consideration was also given to the volume of loan originations than the dollar amount, as this represents the numbers of individuals or entities served. Additional emphasis was placed on the bank's performance in relation to aggregate lending data rather than in comparison to relevant demographic figures, as aggregate lending data is considered representative of credit demand. Specifically, aggregate lending data is expected to describe many factors impacting lenders within an AA. Aggregate lending datasets are updated annually and are, therefore, expected to predict more relevant comparisons.

## **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE KANSAS CITY, MISSOURI-KANSAS METROPOLITAN ASSESSMENT AREA**

The bank's Kansas City, Missouri-Kansas Metropolitan AA includes 6 of the 14 counties comprising the Kansas City MSA. The AA is comprised of Johnson, Leavenworth, and

Wyandotte Counties in Kansas, and Cass, Clay, and Jackson Counties in Missouri (see Appendix B for an AA map).

- As of the 2015 American Community Survey (ACS), the AA includes 79 low-, 107 moderate-, 149 middle-, 126 upper-, and 18 unknown-income census tracts.
- The bank operates 20 full-service branches in the AA, including one branch in low-, three in moderate-, six in middle-, and ten in upper-income census tracts.
- According to the June 30, 2021 Federal Deposit Insurance Corporation (FDIC) Market Share Report, the bank had a 2.6 percent market share, ranking 9<sup>th</sup> out of 102 FDIC-insured depository institutions operating in the AA.
- Two recently conducted interviews with members of the communities in which the bank operates, conducted as part of the public evaluations of other financial institutions in the AA, were reviewed for relevant information to help gain a better perspective of the local economic conditions, possible credit needs in the area, and the responsiveness of area banks in meeting such needs. One community member was a representative of an area organization that promotes economic development through various urban renewal initiatives. The second community member was a representative of an area organization that provides assistance for housing-related services for LMI individuals and families.

**Table 2**

<b>Population Change</b>			
<b>Assessment Area: Kansas City MO-KS Metropolitan</b>			
<b>Area</b>	<b>2010 Population</b>	<b>2015 Population</b>	<b>Percent Change</b>
Kansas City MO-KS Metropolitan AA	1,773,486	1,817,894	2.5
Johnson County, KS	544,179	566,814	4.2
Leavenworth County, KS	76,227	78,227	2.6
Wyandotte County, KS	157,505	160,806	2.1
Cass County, MO	99,478	100,781	1.3
Clay County, MO	221,939	230,361	3.8
Jackson County, MO	674,158	680,905	1.0
Kansas City, MO-KS MSA	2,009,342	2,055,675	2.3
Kansas	2,853,118	2,892,987	1.4
Missouri	5,988,927	6,045,448	0.9

*Source: 2010 U.S. Census Bureau Decennial Census  
2011 - 2015 U.S. Census Bureau American Community Survey*

- The AA’s population is most heavily concentrated in Jackson County (37.5 percent), which contains the city of Kansas City, Missouri.
- Based on 2020 ACS data, Kansas City is Missouri’s second-largest metropolitan area, with a population of approximately 508,000.
- The University of Missouri-Kansas City, with an approximate enrollment of 16,000 in 2020, is located in the AA in the city of Kansas City, Missouri.

**Table 3**

<b>Median Family Income Change</b>			
<b>Assessment Area: Kansas City MO-KS Metropolitan</b>			
<b>Area</b>	<b>2010 Median Family Income</b>	<b>2015 Median Family Income</b>	<b>Percent Change</b>
Kansas City MO-KS Metropolitan AA	75,589	72,720	(3.8)
Johnson County, KS	98,419	94,850	(3.6)
Leavenworth County, KS	80,028	76,579	(4.3)
Wyandotte County, KS	51,892	47,117	(9.2)
Cass County, MO	73,424	71,696	(2.4)
Clay County, MO	77,325	75,104	(2.9)
Jackson County, MO	64,064	61,076	(4.7)
Kansas City, MO-KS MSA	74,970	72,623	(3.1)
Kansas	67,977	66,389	(2.3)
Missouri	62,790	60,809	(3.2)

*Source: 2006 – 2010 U.S. Census Bureau American Community Survey  
2011 – 2015 U.S. Census Bureau American Community Survey  
Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.*

- The portion of families living below the poverty level in the AA, at 9.3 percent, is similar to the statewide figure for Kansas, at 9.1 percent, but below the statewide figure for Missouri, at 11.1 percent. Wyandotte County had the highest portion of families living below the poverty level, at 19.1 percent, while only 4.0 percent of families in Johnson County were below the poverty line.
- According to the 2015 ACS, 38.8 percent of AA families were LMI, which is below the state of Missouri, at 39.3 percent, but above the state of Kansas, at 36.5 percent.

**Table 4**

<b>Housing Cost Burden</b>						
<b>Assessment Area: Kansas City MO-KS Metropolitan</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Kansas City MO-KS Metropolitan AA	75.1	32.5	40.3	61.6	32.3	17.7
Johnson County, KS	80.6	43.7	36.8	71.8	43.4	15.8
Leavenworth County, KS	72.2	24.4	32.1	56.2	29.8	16.2
Wyandotte County, KS	68.5	22.4	43.7	58.0	24.3	23.1
Cass County, MO	71.8	37.7	39.3	58.9	26.8	16.6
Clay County, MO	80.5	24.3	38.1	64.5	27.5	15.4
Jackson County, MO	74.1	29.5	42.9	58.6	30.6	19.6
Kansas City, MO-KS MSA	74.7	32.1	39.9	61.2	31.7	17.7
Kansas	73.0	33.5	38.8	59.9	28.6	16.3
Missouri	74.0	31.5	40.6	59.9	30.3	18.0

*Cost Burden is housing cost that equals 30 percent or more of household income*

*Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy*

- The housing affordability ratio<sup>1</sup> in the AA, at 35.9 percent, was higher than the state of Missouri, at 34.8 percent, but below the state of Kansas, at 39.6 percent. Housing affordability ratios also varied among the six AA counties, ranging from a high of 45.0 percent in Wyandotte County to a low of 35.3 percent in Johnson County.
- The cost burden for renters indicates the most affordable housing options for moderate-income individuals were in Wyandotte County.
- Overall, the cost burden for homeowners in the AA was more comparable to the state of Missouri than the state of Kansas.

**Table 5**

<b>Unemployment Rates</b>					
<b>Assessment Area: Kansas City MO-KS Metropolitan</b>					
<b>Region</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
Kansas City MO-KS Metropolitan AA	4.3	3.8	3.4	3.3	6.2
Johnson County, KS	3.2	3.0	2.8	2.8	5.1
Leavenworth County, KS	4.3	3.9	3.6	3.4	5.8
Wyandotte County, KS	5.5	5.2	4.8	4.3	7.8
Cass County, MO	4.1	3.5	3.1	3.0	5.3
Clay County, MO	3.9	3.6	2.9	2.9	6.1
Jackson County, MO	5.1	4.4	3.8	3.7	7.1
Kansas City, MO-KS MSA	4.3	3.8	3.4	3.3	6.2
Kansas	4.0	3.6	3.3	3.2	5.9
Missouri	4.5	3.8	3.2	3.3	6.1

*Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics*

- The Kansas City Metropolitan area specializes primarily in management of companies and enterprises; professional, scientific, and technical services, and finance and insurance.
- Specifically, within the professional, scientific, and technical services, the Kansas City Metropolitan area is considered an industry leader at the national level, primarily due to the large market presence of Cerner Corporation (health care information).
- Additionally, the area boasts a strong national performance in the architecture and engineering industry with the headquarters of firms such as Black & Veatch, Burns & McDonnell, and Populous.
- Major employers in the AA include the federal government (government), Children’s Mercy Hospital (health services), Cerner Corporation (health care information systems), Honeywell (electronic and mechanical weapons components manufacturing), and Saint Luke’s Health System (health services).

<sup>1</sup> The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.



## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

While conclusions with respect to lending performance were evaluated for all three years, only 2019 and 2020 lending tables for the AA are reflected in the body of this report. The bank's 2018 lending data can be found in Appendix C of this report. The performance evaluation first discusses the bank's overall performance followed by an in-depth analysis of the bank's record of lending, investment, and service activities in the AA. Additionally, an evaluation of multifamily, other purpose line of credit, other purpose closed/exempt, and purpose not applicable loans was not conducted due to limited origination volumes.

### **LENDING TEST**

The bank's overall performance under the lending test is High Satisfactory. For this evaluation, more emphasis was placed on small business loans due to the bank's strategic focus on commercial lending, followed by home mortgage lending. Overall, the bank's lending to LMI borrowers and to small businesses and small farms is adequate. The geographic distribution and dispersion of loans is adequate. Further, the bank is a leader in providing CD loans, which helped bolster the bank's overall lending test rating.

#### **Lending Activity**

This performance criterion evaluates the bank's lending volume considering the bank's resources and business strategy and other information from the performance context. The bank's overall lending activities reflect good responsiveness to AA credit needs. 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 AA needs. Finally, the bank made a substantial majority of its loans inside its AA.

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 2020 reporting, the bank ranked 9<sup>th</sup> of 225 CRA aggregate lenders and 74<sup>th</sup> of 631 HMDA aggregate lenders in loan originations and purchases. Similarly, in 2019, the bank ranked 10<sup>th</sup> of 159 CRA lenders and 97<sup>th</sup> of 624 HMDA lenders. Further, in 2018, the bank ranked 10<sup>th</sup> of 178 CRA lenders and 84<sup>th</sup> of 567 HMDA lenders. Table 8, the Summary of Lending Activity table, shows the bank's HMDA and CRA lending activity from January 1, 2019 to December 31, 2020. The bank's lending activity in 2018 was consistent with the performance in 2019 and 2020.

**Table 6**

SUMMARY OF LENDING ACTIVITY REVIEWED								
Loan Type	2020				2019			
	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Home Purchase	136	42,468	6.6	10.4	79	20,836	8.6	10.7
Home Refinance	249	65,161	12.1	15.9	20	6,743	2.2	3.5
Home Improvement	2	234	0.0	0.0	12	1,051	1.3	0.5
Multifamily	13	37,791	0.1	9.2	8	8,040	0.9	4.1
Other Purpose Closed-End	7	998	0.0	0.0	0	0	0.0	0.0
<b>Total HMDA Loans</b>	<b>407</b>	<b>146,652</b>	<b>19.8</b>	<b>35.9</b>	<b>119</b>	<b>36,670</b>	<b>13.0</b>	<b>18.9</b>
<b>Small Business Loans</b>	<b>1,631</b>	<b>260,628</b>	<b>79.2</b>	<b>63.8</b>	<b>764</b>	<b>153,627</b>	<b>83.5</b>	<b>79.0</b>
<b>Small Farms Loans</b>	<b>22</b>	<b>1,406</b>	<b>1.1</b>	<b>0.3</b>	<b>32</b>	<b>2,141</b>	<b>3.5</b>	<b>1.1</b>
<b>Total Loans</b>	<b>2,060</b>	<b>408,686</b>	<b>100.0</b>	<b>100.0</b>	<b>915</b>	<b>194,438</b>	<b>100.0</b>	<b>100.0</b>

*Note: Percentages may not total 100.0 percent due to rounding.*

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in several industry-recognized government-guaranteed lending programs, displaying flexibility in the way the bank serves its community. Notably, the bank continued to offer a debt restructuring loan program in participation with a local charitable organization. The bank offers a consumer debt restructuring service to individuals who obtained financing from nontraditional lending sources and experienced financial challenges with repayment. Through this program, the bank provides financial education and debt restructuring to facilitate more manageable loan terms, thereby providing financial relief for program participants. The bank also participates in the Small Business Administration's (SBA) 504 and SBA (7a) Loan Programs. The SBA 504 program is a financing instrument that provides small businesses with long-term, fixed-rate financing to acquire major fixed assets for expansion or modernization. The SBA 7(a) program is designed for start-up and existing small businesses to help satisfy capital needs. This program provides small businesses with access to capital with more flexible terms than conventional commercial financing. The bank also participated in the SBA's Paycheck Protection Program (PPP). These loans were originated in 2020 as a response to the nationwide Coronavirus Disease 2019 pandemic (pandemic) and were considered particularly responsive to the financial burden placed on consumers, small businesses, and small farms related to the pandemic. Further, during 2020, the bank modified seven CD loans totaling \$15.9 million (MM) to businesses impacted by the pandemic.

During the review period, the bank originated one SBA 504 loan totaling \$2.2MM and 24 SBA 7(a) loans totaling \$6.5MM. With respect to PPP lending, the bank ranked in the top five of Kansas-City based banks, having originated 1,317 PPP loans totaling approximately \$211.2MM. Specific to the bank's CD lending, 11 PPP loans totaling \$25.1MM qualified for CD credit. Further, from January 1, 2019 to December 31, 2020, the bank originated 27 consumer debt restructuring loans under the program totaling approximately \$27,000.

While many of these loans have been reported by the bank as CD or small business loans, they are examples of the bank using flexible lending products to meet credit needs within its AA and larger statewide areas.

For this evaluation, the total loans in the AA included 565 home mortgage, 2,919 small business, and 74 small farm loans originated during the three-year period between January 1, 2018 and December 31, 2020. The loan products and origination volumes appear consistent with the general credit needs of the AA and align with the bank's strategic focus in the area as a commercial and residential real estate lender.

### **Assessment Area Concentration**

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. A substantial majority of the bank's loans, by number and dollar, were originated inside the bank's AA.

**Table 7**

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Home Purchase - Conventional	259	83.8	70,836	81.9	50	16.2	15,627	18.1
Home Improvement	31	100.0	3,095	100.0	0	0.0	0	0.0
Multi-Family Housing	34	77.3	47,680	59.4	10	22.7	32,602	40.6
Other Purpose Closed-End	8	100.0	1,157	100.0	0	0.0	0	0.0
Refinancing	233	78.7	62,422	79.6	63	21.3	16,045	20.4
<b>Total HMDA related</b>	<b>565</b>	<b>82.1</b>	<b>185,190</b>	<b>74.2</b>	<b>123</b>	<b>17.9</b>	<b>64,274</b>	<b>25.8</b>
Small Business	2,919	94.7	521,289	92.9	162	5.3	39,734	7.1
<b>Total Small Business related</b>	<b>2,919</b>	<b>94.7</b>	<b>521,289</b>	<b>92.9</b>	<b>162</b>	<b>5.3</b>	<b>39,734</b>	<b>7.1</b>
Small Farm	74	79.6	3,916	68.2	19	20.4	1,827	31.8
<b>Total Small Farm related</b>	<b>74</b>	<b>79.6</b>	<b>3,916</b>	<b>68.2</b>	<b>19</b>	<b>20.4</b>	<b>1,827</b>	<b>31.8</b>
<b>Total Loans</b>	<b>3,558</b>	<b>92.1</b>	<b>710,395</b>	<b>87.0</b>	<b>304</b>	<b>7.9</b>	<b>105,835</b>	<b>13.0</b>

*Note: Percentages may not total 100.0 percent due to rounding.*

The remaining loan distribution analyses discussed in this performance evaluation will consider only those loans originated within the bank’s AAs.

**Geographic Distribution of Loans**

The geographic distribution of lending reflects adequate penetration throughout the AA. The bank’s home mortgage lending reflects good penetration among geographies of different income levels, while small business and small farm lending reflect adequate penetration.

Home Mortgage Lending

The geographic distribution of home mortgage lending is good. The distribution of 2020 home mortgage loans among low-income census tracts is comparable to aggregate lending data but below the percentage of owner-occupied units in such tracts (the demographic figure). The penetration of home mortgage lending in moderate-income census tracts is also comparable to aggregate lending data and below the demographic figure. It is noted that lending in moderate-income census tracts had a significantly larger volume, which had a positive impact on the overall conclusion for this product, as well as the analysis for each of the bank’s home mortgage lending sub-products.

The bank’s lending performance for 2018 and 2019 reflected penetration levels above that of 2020, with a distribution of loans generally above aggregate lending data.

Furthermore, the bank’s loan dispersion among geographies of different income levels revealed some gaps, but they did not impact the overall conclusion. Specifically, in 2020, the bank did not originate loans in 73 of 79 (92.4 percent) low-income census tracts and 85 of 107 (79.4 percent) moderate-income census tracts. However, the bank faces strong competition in the metropolitan market, with 631 HMDA-reporting institutions vying for home mortgage loans.

### Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The distribution of 2020 home purchase loans among low-income census tracts is below aggregate lending data and the demographic figure. Lending in moderate-income census tracts is comparable to aggregate lending data and the demographic figure.

The bank's lending performance for 2019 reflected penetration levels consistent with that of 2020, with a distribution of loans in moderate-income census tracts comparable to aggregate lending data. Conversely, the bank's performance in 2018 reflected penetration levels above that of 2020, with a distribution of loans generally above aggregate lending data.

Furthermore, the bank's loan dispersion among geographies of different income levels revealed some gaps, but they did not impact the overall conclusion.

### Home Refinance Loans

The geographic distribution of home refinance lending is adequate. The distribution of 2020 home refinance loans among low-income census tracts is comparable to aggregate lending data but below the demographic figure. Similarly, lending in moderate-income census tracts is comparable to aggregate lending data but below the demographic figure.

The bank's lending performance for 2019 reflected penetration levels that were above that of 2020. However, lending performance in 2018 was more consistent with the penetration levels of 2020.

Furthermore, the bank's loan dispersion among geographies of different income levels revealed some gaps, but they did not impact the overall conclusion.

**Table 8**

<b>Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography</b>													
<b>Assessment Area: Kansas City MO-KS Metropolitan</b>													
<b>Geographic Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Owner Occupied Units %</b>
	<b>2019</b>						<b>2020</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	<b>#</b>	<b>%</b>	<b># %</b>	<b>\$ (000)</b>	<b>\$ %</b>	<b>\$ %</b>	<b>#</b>	<b>%</b>	<b># %</b>	<b>\$ (000)</b>	<b>\$ %</b>	<b>\$ %</b>	
<b>Home Purchase Loans</b>													
<b>Low</b>	1	1.4	3.6	140	0.8	1.7	1	0.9	4.0	80	0.2	2.0	6.3
<b>Moderate</b>	13	18.6	17.3	1,106	6.0	10.6	19	17.1	17.1	2,095	6.1	10.7	18.0
<b>Middle</b>	27	38.6	38.7	4,434	24.2	34.1	31	27.9	37.9	5,492	16.0	33.4	37.9
<b>Upper</b>	29	41.4	40.2	12,617	69.0	53.5	60	54.1	40.8	26,614	77.6	53.8	37.7
<b>Unknown</b>	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0.2
<b>Tract-Unk</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	70	100.0	100.0	18,297	100.0	100.0	111	100.0	100.0	34,281	100.0	100.0	100.0
<b>Refinance Loans</b>													
<b>Low</b>	0	0.0	1.8	0	0.0	1.0	3	1.6	1.3	854	1.7	0.8	6.3
<b>Moderate</b>	6	33.3	11.6	557	8.7	7.0	14	7.4	9.2	1,748	3.5	5.5	18.0
<b>Middle</b>	1	5.6	36.5	150	2.3	30.8	48	25.3	34.3	11,342	22.9	28.5	37.9
<b>Upper</b>	11	61.1	49.9	5,711	89.0	61.0	125	65.8	55.1	35,658	71.9	65.0	37.7
<b>Unknown</b>	0	0.0	0.2	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	0.2
<b>Tract-Unk</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	18	100.0	100.0	6,418	100.0	100.0	190	100.0	100.0	49,602	100.0	100.0	100.0
<b>Home Improvement Loans</b>													
<b>Low</b>	2	16.7	2.9	201	19.1	2.0	0	0.0	2.7	0	0.0	1.6	6.3
<b>Moderate</b>	3	25.0	11.0	211	20.1	7.9	2	100.0	9.7	234	100.0	6.5	18.0
<b>Middle</b>	6	50.0	34.3	564	53.7	29.8	0	0.0	32.0	0	0.0	28.3	37.9
<b>Upper</b>	1	8.3	51.7	75	7.1	60.3	0	0.0	55.5	0	0.0	63.5	37.7
<b>Unknown</b>	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.2
<b>Tract-Unk</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	12	100.0	100.0	1,051	100.0	100.0	2	100.0	100.0	234	100.0	100.0	100.0
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
<b>Low</b>	2	28.6	17.5	2,114	33.7	9.1	2	25.0	18.2	937	7.5	15.7	15.6
<b>Moderate</b>	1	14.3	33.5	1,354	21.6	22.5	2	25.0	31.9	2,338	18.7	15.3	26.5
<b>Middle</b>	3	42.9	32.7	598	9.5	42.3	3	37.5	31.3	2,201	17.6	47.0	35.0
<b>Upper</b>	1	14.3	15.2	2,200	35.1	25.8	1	12.5	18.2	7,000	56.1	21.9	21.2
<b>Unknown</b>	0	0.0	1.1	0	0.0	0.2	0	0.0	0.3	0	0.0	0.1	1.7
<b>Tract-Unk</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	7	100.0	100.0	6,266	100.0	100.0	8	100.0	100.0	12,476	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
<b>Low</b>	5	4.7	3.0	2,455	7.7	2.1	6	19	2.5	1,871	19	19	6.3
<b>Moderate</b>	23	21.5	14.9	3,228	10.1	10.2	37	11.6	12.6	6,415	6.6	8.0	18.0
<b>Middle</b>	37	34.6	37.5	5,746	17.9	33.4	86	27.0	35.7	19,489	20.0	31.3	37.9
<b>Upper</b>	42	39.3	44.5	20,603	64.3	54.1	189	59.4	49.1	69,816	71.5	58.6	37.7
<b>Unknown</b>	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0.2
<b>Tract-Unk</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	107	100.0	100.0	32,032	100.0	100.0	318	100.0	100.0	97,591	100.0	100.0	100.0

Source: 2020 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table 9**

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Kansas City MO-KS Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %	
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%		\$%
<b>Other Purpose LOC</b>													
Low	0	0.0	1.5	0	0.0	1.2	0	0.0	1.6	0	0.0	0.8	6.3
Moderate	0	0.0	10.1	0	0.0	5.8	0	0.0	11.2	0	0.0	6.7	18.0
Middle	0	0.0	31.0	0	0.0	25.3	0	0.0	31.2	0	0.0	24.5	37.9
Upper	0	0.0	57.3	0	0.0	67.6	0	0.0	55.8	0	0.0	67.7	37.7
Unknown	0	0.0	0.0	0	0.0	0.1	0	0.0	0.2	0	0.0	0.3	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>													
Low	0	0.0	4.1	0	0.0	2.5	0	0.0	4.1	0	0.0	2.1	6.3
Moderate	0	0.0	17.3	0	0.0	10.6	0	0.0	13.5	0	0.0	6.3	18.0
Middle	0	0.0	36.3	0	0.0	29.6	4	57.1	37.6	454	45.5	26.2	37.9
Upper	0	0.0	42.3	0	0.0	57.2	3	42.9	44.6	544	54.5	65.2	37.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>998</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>													
Low	0	0.0	7.0	0	0.0	3.9	0	0.0	4.7	0	0.0	2.5	6.3
Moderate	0	0.0	25.7	0	0.0	17.5	0	0.0	25.0	0	0.0	16.6	18.0
Middle	0	0.0	43.8	0	0.0	43.7	0	0.0	42.3	0	0.0	41.5	37.9
Upper	0	0.0	23.5	0	0.0	34.7	0	0.0	28.0	0	0.0	39.3	37.7
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Small Business Lending**

The geographic distribution of small business lending is adequate. The distribution of 2020 small business loans among low-income census tracts is comparable to aggregate lending data and the percentage of businesses (the demographic figure). Lending in moderate-income census tracts is also comparable to aggregate lending data and the demographic figure.

The bank's lending performance for 2018 and 2019 reflected penetration levels that were consistent with 2020.

Furthermore, the bank’s loan dispersion among geographies of different income levels revealed some gaps, but they did not impact the overall conclusion. Specifically, in 2020, the bank did not originate small business loans in 49 of 79 (62.0 percent) low-income census tracts and 63 of 107 (58.9 percent) of moderate-income census tracts. However, the bank faces strong competition in the metropolitan market, with 225 CRA-reporters in the AA vying for small business loans.

**Table 10**

<b>Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography</b>													
<b>Assessment Area: Kansas City MO-KS Metropolitan</b>													
<b>Geographic Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Total Businesses %</b>
	<b>2019</b>						<b>2020</b>						
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Low</b>	45	6.1	7.2	12,465	8.6	9.3	136	8.9	7.1	29,011	12.1	9.1	7.8
<b>Moderate</b>	110	14.9	17.6	21,430	14.8	18.9	282	18.4	18.5	41,661	17.3	19.5	19.7
<b>Middle</b>	239	32.4	30.6	51,737	35.7	27.9	481	31.4	30.7	72,807	30.3	28.8	33.7
<b>Upper</b>	324	43.9	41.0	51,131	35.3	37.3	603	39.3	40.7	86,932	36.1	36.3	36.8
<b>Unknown</b>	20	2.7	2.4	7,990	5.5	6.1	32	2.1	2.6	10,244	4.3	6.0	2.0
<b>Tract-Unk</b>	0	0.0	1.2	0	0.0	0.4	0	0.0	0.3	0	0.0	0.3	
<b>Total</b>	738	100.0	100.0	144,753	100.0	100.0	1,534	100.0	100.0	240,655	100.0	100.0	100.0

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Small Farm Lending**

The geographic distribution of small farm lending is adequate. The distribution of 2020 small farm loans among low-income census tracts is below aggregate lending data and the percentage of farms (the demographic figure), although the numbers of small farms in these tracts is very low. Lending in moderate-income census tracts is also below the aggregate lending data and the demographic figure.

The bank’s lending performance in 2019 and 2018 reflected penetration levels above that of 2020, particularly in moderate-income census tracts.

Furthermore, the bank’s loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses. Specifically, the bank’s performance in low-income census tracts is largely due to the relatively low number of small farms operating in those tracts (19 small farms) and the high concentration of banks in the market competing for business.



**Table 11**

Distribution of 2019 and 2020 Small Farm Lending By Income Level of Geography													
Assessment Area: Kansas City MO-KS Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Low</b>	0	0.0	1.9	0	0.0	0.3	0	0.0	1.8	0	0.0	0.7	2.0
<b>Moderate</b>	2	8.7	6.4	300	24.6	4.8	0	0.0	2.9	0	0.0	2.0	7.8
<b>Middle</b>	17	73.9	61.0	759	62.2	60.7	15	83.3	62.2	753	77.3	59.8	51.8
<b>Upper</b>	4	17.4	30.3	162	13.3	33.9	3	16.7	33.2	221	22.7	37.5	38.2
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.2
<b>Tract-Unk</b>	0	0.0	0.4	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	23	100.0	100.0	1,221	100.0	100.0	18	100.0	100.0	974	100.0	100.0	100.0

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Lending to Borrowers of Different Income Levels and to Businesses and Farms of Different Sizes**

The bank’s lending has an adequate penetration among individuals of different income levels (including LMI) and businesses and farms of different sizes. The bank’s small farm lending reflects excellent penetration levels, followed by adequate penetration for small business lending and poor penetration for home mortgage lending.

Home Mortgage Lending

The borrower distribution of home mortgage lending is poor. The penetration of 2020 loan originations to low-income borrowers is below aggregate lending data and the percentage of families (the demographic figure). Similarly, lending to moderate-income borrowers also is below aggregate lending data and the demographic figure.

The bank’s lending performance in 2018 and 2019 was consistent with that of 2020, with a distribution of loans to LMI borrowers generally below aggregate lending data.

Additional performance context considered in the overall rating for this product included the number of loans to individuals with unknown incomes, the bank’s strategic focus on commercial lending, and lack of bank products specifically tailored to LMI individuals, such as Federal Housing Administration loans with low down payment requirements and first-time home buyer programs. A review of the bank’s 2020 HMDA data revealed 61 of 80 loans reported with unknown incomes (76.3 percent) were also reported as investment properties. In 2019, 50 of 53 loans reported with unknown incomes (94.3 percent) were reported as investment properties.

These loans are for rental or investment properties, which are business-purpose loans. Further, when factoring out loans with unknown incomes from both bank lending and aggregate lending data for 2020, 15.7 percent of the bank's lending was to LMI borrowers, compared to 29.1 percent for aggregate lenders. For 2019, this recalibration resulted in bank lending to LMI borrowers at 16.1 percent compared to 31.3 percent. Therefore, given the bank's comparatively low performance for this evaluation, coupled with a downward trend since the previous evaluation, the bank's performance is considered poor.

#### Home Purchase Loans

The borrower distribution of home purchase lending is poor. The penetration of 2020 loan originations to low-income borrowers is below aggregate lending data and the demographic figure. Lending to moderate-income borrowers is below aggregate lending data but comparable to the demographic figure.

The bank's lending performance for 2018 and 2019 was consistent with that of 2020, with a distribution of loans to LMI borrowers generally below aggregate lending data.

#### Home Refinance Loans

The borrower distribution of home refinance lending is poor. The penetration of 2020 loan originations to low-income borrowers is below aggregate lending data and the demographic figure. Lending to moderate-income borrowers is also below aggregate lending data and the demographic figure.

The bank's lending performance for 2018 was consistent with that of 2020, with a distribution of loans to LMI borrowers generally below aggregate lending data, but in 2019, lending to moderate-income borrowers was comparable to aggregate lending data.

**Table 12**

**Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level  
Assessment Area: Kansas City MO-KS Metropolitan**

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#	\$ (000)	%	\$ %	#	%	#	\$ (000)	%	\$ %	
<b>Home Purchase Loans</b>													
Low	4	5.7	9.7	318	1.7	5.0	4	3.6	10.0	453	1.3	5.2	21.4
Moderate	3	4.3	21.9	581	3.2	16.2	16	14.4	23.2	2,938	8.6	17.5	17.4
Middle	5	7.1	22.8	686	3.7	21.6	12	10.8	22.3	2,874	8.4	21.7	20.3
Upper	24	34.3	33.7	8,596	47.0	46.1	43	38.7	32.1	20,883	60.9	44.1	40.9
Unknown	34	48.6	11.8	8,116	44.4	11.1	36	32.4	12.5	7,133	20.8	11.4	0.0
<b>Total</b>	<b>70</b>	<b>100.0</b>	<b>100.0</b>	<b>18,297</b>	<b>100.0</b>	<b>100.0</b>	<b>111</b>	<b>100.0</b>	<b>100.0</b>	<b>34,281</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	6.7	0	0.0	3.4	5	2.6	4.3	447	0.9	2.1	21.4
Moderate	2	11.1	15.2	179	2.8	10.3	14	7.4	14.9	2,345	4.7	10.2	17.4
Middle	3	16.7	21.0	691	10.8	18.2	37	19.5	21.3	7,368	14.9	18.6	20.3
Upper	8	44.4	38.3	4,835	75.3	49.4	112	58.9	40.7	34,701	70.0	50.2	40.9
Unknown	5	27.8	18.7	713	11.1	18.7	22	11.6	18.8	4,741	9.6	18.9	0.0
<b>Total</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>6,418</b>	<b>100.0</b>	<b>100.0</b>	<b>190</b>	<b>100.0</b>	<b>100.0</b>	<b>49,602</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	6.4	0	0.0	4.3	0	0.0	6.0	0	0.0	3.6	21.4
Moderate	0	0.0	13.7	0	0.0	10.9	0	0.0	12.2	0	0.0	8.7	17.4
Middle	2	16.7	21.1	107	10.2	18.2	0	0.0	21.2	0	0.0	17.9	20.3
Upper	2	16.7	53.6	188	17.9	59.3	0	0.0	55.8	0	0.0	63.2	40.9
Unknown	8	66.7	5.2	756	71.9	7.3	2	100.0	4.9	234	100.0	6.6	0.0
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>1,051</b>	<b>100.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>234</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	4	4.0	8.2	318	1.2	4.4	9	2.9	6.4	900	1.1	3.3	21.4
Moderate	5	5.0	18.5	760	2.9	13.6	30	9.7	17.6	5,283	6.2	12.9	17.4
Middle	10	10.0	21.7	1,484	5.8	19.9	51	16.5	21.3	10,492	12.3	19.6	20.3
Upper	34	34.0	36.7	13,619	52.9	47.6	159	51.3	37.3	56,263	66.1	47.5	40.9
Unknown	47	47.0	14.8	9,585	37.2	14.5	61	19.7	17.4	12,177	14.3	16.7	0.0
<b>Total</b>	<b>100</b>	<b>100.0</b>	<b>100.0</b>	<b>25,766</b>	<b>100.0</b>	<b>100.0</b>	<b>310</b>	<b>100.0</b>	<b>100.0</b>	<b>85,115</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2020 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

**Table 13**

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Kansas City MO-KS Metropolitan													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$ (000)	%	%	#	%	%	\$ (000)	%	%	
<b>Other Purpose LOC</b>													
Low	0	0.0	5.0	0	0.0	2.9	0	0.0	4.2	0	0.0	2.3	21.4
Moderate	0	0.0	13.5	0	0.0	8.9	0	0.0	15.1	0	0.0	9.2	17.4
Middle	0	0.0	22.0	0	0.0	15.7	0	0.0	22.0	0	0.0	16.0	20.3
Upper	0	0.0	56.6	0	0.0	69.3	0	0.0	56.3	0	0.0	70.1	40.9
Unknown	0	0.0	2.9	0	0.0	3.1	0	0.0	2.5	0	0.0	2.3	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>													
Low	0	0.0	10.5	0	0.0	7.6	0	0.0	8.0	0	0.0	3.3	21.4
Moderate	0	0.0	16.8	0	0.0	11.1	0	0.0	18.8	0	0.0	11.3	17.4
Middle	0	0.0	21.8	0	0.0	16.8	2	28.6	22.4	250	25.1	16.7	20.3
Upper	0	0.0	45.3	0	0.0	56.7	4	57.1	45.1	679	68.0	62.8	40.9
Unknown	0	0.0	5.7	0	0.0	7.9	1	14.3	5.6	69	6.9	5.9	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>998</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>													
Low	0	0.0	0.5	0	0.0	0.2	0	0.0	0.1	0	0.0	0.0	21.4
Moderate	0	0.0	1.0	0	0.0	1.1	0	0.0	0.0	0	0.0	0.0	17.4
Middle	0	0.0	0.8	0	0.0	1.3	0	0.0	0.0	0	0.0	0.0	20.3
Upper	0	0.0	1.2	0	0.0	3.7	0	0.0	0.0	0	0.0	0.0	40.9
Unknown	0	0.0	96.5	0	0.0	93.7	0	0.0	99.8	0	0.0	100.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Small Business Lending**

The borrower distribution of small business lending is adequate. The distribution of 2020 loan originations to businesses with revenues of \$1MM or less is above aggregate lending data but below the percentage of small businesses in the AA.

The bank's lending performance for 2018 and 2019 reflected penetration levels that were below that of 2020 with a penetration level only comparable to aggregate lending data.

**Table 14**

Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Kansas City MO-KS Metropolitan													
	Bank And Aggregate Loans By Year												Total Businesses %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	280	37.9	46.1	41,469	28.6	31.5	801	52.2	37.5	49,982	20.8	21.0	90.4
<b>Over \$1 Million</b>	458	62.1	53.9	103,284	71.4	68.5	726	47.3	62.5	190,392	79.1	79.0	8.9
<b>Revenue Unknown</b>	0	0.0		0	0.0		7	0.5		281	0.1		0.7
<b>Total</b>	738	100.0	100.0	144,753	100.0	100.0	1,534	100.0	100.0	240,655	100.0	100.0	100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	401	54.3	91.3	15,991	11.0	28.5	924	60.2	83.7	32,783	13.6	24.2	
<b>\$100,001 - \$250,000</b>	151	20.5	3.9	27,970	19.3	14.6	308	20.1	8.5	53,117	22.1	19.2	
<b>\$250,001 - \$1 Million</b>	186	25.2	4.8	100,792	69.6	56.9	302	19.7	7.8	154,755	64.3	56.7	
<b>Total</b>	738	100.0	100.0	144,753	100.0	100.0	1,534	100.0	100.0	240,655	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	159	56.8		6,583	15.9		693	86.5		20,084	40.2		
<b>\$100,001 - \$250,000</b>	76	27.1		13,203	31.8		70	8.7		12,107	24.2		
<b>\$250,001 - \$1 Million</b>	45	16.1		21,683	52.3		38	4.7		17,791	35.6		
<b>Total</b>	280	100.0		41,469	100.0		801	100.0		49,982	100.0		
<i>Source: 2020 FFIEC Census Data 2020 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>													
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>													

**Small Farm Lending**

The borrower distribution of small farm lending is excellent. The distribution of 2020 loan originations to farms with revenues of \$1MM or less is above aggregate lending data and comparable to the percentage of small farms in the AA.

The bank's lending performance for 2018 was consistent with that of 2020, as, the bank's lending penetration level was above aggregate lending data. Additionally, the bank's performance in 2019 was consistent with that of 2020, with penetration levels well-above aggregate lending data.

**Table 15**

Distribution of 2019 and 2020 Small Farm Lending By Revenue Size of Farms													
Assessment Area: Kansas City MO-KS Metropolitan													
	Bank And Aggregate Loans By Year												Total Farms %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
<b>\$1 Million or Less</b>	23	100.0	66.1	1,221	100.0	79.0	18	100.0	61.5	974	100.0	70.7	97.1
<b>Over \$1 Million</b>	0	0.0	33.9	0	0.0	21.0	0	0.0	38.5	0	0.0	29.3	2.6
<b>Revenue Unknown</b>	0	0.0		0	0.0		0	0.0		0	0.0		0.3
<b>Total</b>	23	100.0	100.0	1,221	100.0	100.0	18	100.0	100.0	974	100.0	100.0	100.0
By Loan Size													
<b>\$100,000 or Less</b>	20	87.0	82.2	534	43.7	30.1	15	83.3	77.1	500	51.3	28.0	
<b>\$100,001 - \$250,000</b>	2	8.7	11.4	375	30.7	32.8	3	16.7	15.6	474	48.7	37.5	
<b>\$250,001 - \$500,000</b>	1	4.3	6.4	312	25.6	37.1	0	0.0	7.3	0	0.0	34.5	
<b>Total</b>	23	100.0	100.0	1,221	100.0	100.0	18	100.0	100.0	974	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
<b>\$100,000 or Less</b>	20	87.0		534	43.7		15	83.3		500	51.3		
<b>\$100,001 - \$250,000</b>	2	8.7		375	30.7		3	16.7		474	48.7		
<b>\$250,001 - \$500,000</b>	1	4.3		312	25.6		0	0.0		0	0.0		
<b>Total</b>	23	100.0		1,221	100.0		18	100.0		974	100.0		

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Community Development Lending**

This performance criterion evaluates the bank’s level of CD lending. The bank is a leader in making CD loans. The bank originated 74 CD loans totaling \$187.4MM in the AA. Given the significant volume of CD lending with respect to the bank’s lending, deposits, and branching presence in the AA, the performance resulted in a positive impact to the overall lending test rating.

The bank’s performance by both number and dollar amount compares favorably to other peer institutions that are leaders in making CD loans. A large percentage of CD loans supported economic development by financing small businesses, which helped to retain or maintain jobs within the bank’s AA. Table 4 illustrates the bank’s total volume of CD loans by number and dollar volume based on the respective CD purpose. The bank’s overall CD lending by number reflects a 17.5 percent increase by number and 17.9 percent increase by dollar when compared to the bank’s CD lending at the prior evaluation. Additionally, since the bank’s CD activities were responsive in its AA, examiners considered CD loans outside the Kansas City, Missouri-Kansas

Metropolitan AA. The bank originated 23 loans totaling \$117.6MM that were outside the AA. Some of these loans occurred in counties adjacent to the bank’s AA. Table 18 does not include these loans. Examples of CD loans originated inside the bank’s AA considered responsive to the needs of the AA include:

- A \$5MM loan was originated to a nonprofit organization that provides valuable community services to children in a LMI area.
- A \$2.6MM loan was originated to fund the purchase and rehabilitation of an 80-unit multifamily housing property that supported affordable housing needs within the AA.
- A \$4.8MM loan was originated to a redevelopment organization for the rehabilitation of an establishment located in a low-income tract. This funding supported the revitalization and stabilization of the area, which also includes activities that support job creation.

**Table 16**

<b>Community Development Loans Kansas City MO-KS Metropolitan Assessment Area</b>		
<b>Community Development Purpose</b>	<b>#</b>	<b>\$(000's)</b>
Affordable Housing	3	3,660
Community Services	11	18,821
Economic Development	36	89,127
Revitalization and Stabilization	24	75,788
<b>TOTAL LOANS</b>	<b>74</b>	<b>187,397</b>

**INVESTMENT TEST**

The bank’s overall performance under the investment test is Outstanding.

This performance criterion evaluates the bank’s level of qualifying grants, donations, or in-kind contributions of property made since the last examination that have a primary purpose of CD.

The bank has an excellent level of qualified CD investments and grants and is often in a leadership position based on the overall dollar volume. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to credit and CD needs of its AA. Consistent with prior performance evaluations, the bank’s strategy continues to focus on selecting CD investments that are comprised of mortgage-backed securities (MBS) that contain residential mortgages originated to LMI borrowers or for residential real estate located in LMI geographies. Specifically, the bank maintains MBS investment pools, which contain individually bundled mortgages in groups ranging from 6 mortgages to 25 mortgages. Examples of responsive investments include:

- Investments in 13 MBS for \$17.6MM specifically supporting mortgages for LMI individuals and families.

Additionally, the bank made 109 donations for \$909.5 thousand (M) during the evaluation period. Examples of responsive donations include:

- A donation of \$408M over two years to support a scholarship fund for poverty-stricken students living in the metropolitan area.
- A \$59M donation over two years to an organization that supports the educational advancement for students with limited financial resources.

**Table 17**

Investments, Grants, and Donations Kansas City MO-KS Metropolitan Assessment Area								
Community Development Purpose	Prior Period Investments <sup>1</sup>		Current Investments <sup>2</sup>		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	10	8,236	3	9,379	4	15	17	17,630
Community Services	0	0	0	0	103	894	103	894
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	3	3,080	1	1,000	1	1	5	4,081
<b>TOTAL</b>	<b>13</b>	<b>11,316</b>	<b>4</b>	<b>10,379</b>	<b>108</b>	<b>910</b>	<b>125</b>	<b>22,605</b>
<sup>1</sup> Book Value of Investment <sup>2</sup> Original Market Value of Investment								

**SERVICE TEST**

The bank’s overall performance under the service test is Outstanding. Under this test, CD services carried the most weight when calculating the overall rating.

**Retail Banking Services**

This performance criterion evaluates the bank’s level of service-delivery systems provided in each geography classification.

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking are accessible to the bank’s various geographies and to individuals of different income levels in the bank’s AA. The AA contains 25 branches, 21 of which offer full-service ATMs, including four ATMs in moderate-income census tracts. Overall, the distribution of branches is generally proportional to the percent of tracts by income level.



The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank opened two branches in upper-income census tracts and consolidated one branch in a moderate-income tract into another branch located in a moderate-income census tract.

The bank’s products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. Most branches have lobby hours from 9:00 AM to 5:00 PM, Monday through Friday, with extended hours for drive-through services, and lobby hours on Saturday from 9:00 AM to 12:00 PM.

**Table 18**

<b>Retail Banking and Community Development Services Kansas City MO-KS Metropolitan Assessment Area</b>												
<b>Branch Accessibility</b>	<b>Location of Branches by Tract (%)</b>						<b>Percent of Tracts<sup>1</sup> (%)</b>					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	4.0	12.0	36.0	48.0	0.0	100.0	16.5	22.3	31.1	26.3	3.8	100.0
	<b>Location of Full-Service ATMs by Tract (%)</b>						<b>Percent of Tracts<sup>1</sup> (%)</b>					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	20.0	30.0	50.0	0	100.0	16.5	22.3	31.1	26.3	3.8	100.0	
<b>Changes in Branch Location</b>	<b>Number of Branches (#)</b>					<b>Net Change in Branch Locations (#)</b>						
	<b>Total Branches</b>		<b>Openings (#)</b>	<b>Closings (#)</b>		Low	Mod	Mid	Upp	Unk	Total	
	25		2	1		0	(1)	0	2	0	1	
<b>Community Development Services</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalization &amp; Stabilization</b>		<b>Total Services</b>		<b>Total Organizations</b>	
	9		100		3		2		114		20	
<sup>1</sup> Based on 2020 FFIEC census tract definitions. (NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)												

**Community Development Services**

This performance criterion evaluates the bank’s level of CD services. The bank is a leader in providing CD services. As illustrated in Table 20, bank employees supported 20 organizations in the community and provided 114 services offering their technical and professional expertise. Typical services provided included serving on boards or committees providing technical assistance on financial matters such as budgeting, financial planning, and credit review; financial education and literacy; and support for marketing and fundraising efforts of the organization. Examples of services performed by bank employees include:

- A vice president served as a member of the Finance Council for a nonprofit CD organization that is committed to stabilizing and revitalizing the community through various affordable housing and economic development initiatives.

- A bank officer served on the board of an organization focused on transforming the food system for low-income households to help cultivate a healthy and sustainable lifestyle.
- A bank representative served as a board member for an area housing agency that strives to provide greater access to affordable housing through various programs, such as first-time home buyer assistance, rental assistance, and homeless services.
- 72 services totaling approximately 2,176 hours were provided by 36 bank representatives to a reputable nonprofit agency's financial literacy program at a school where a majority of the student population is eligible for the National School Lunch Program.

### **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

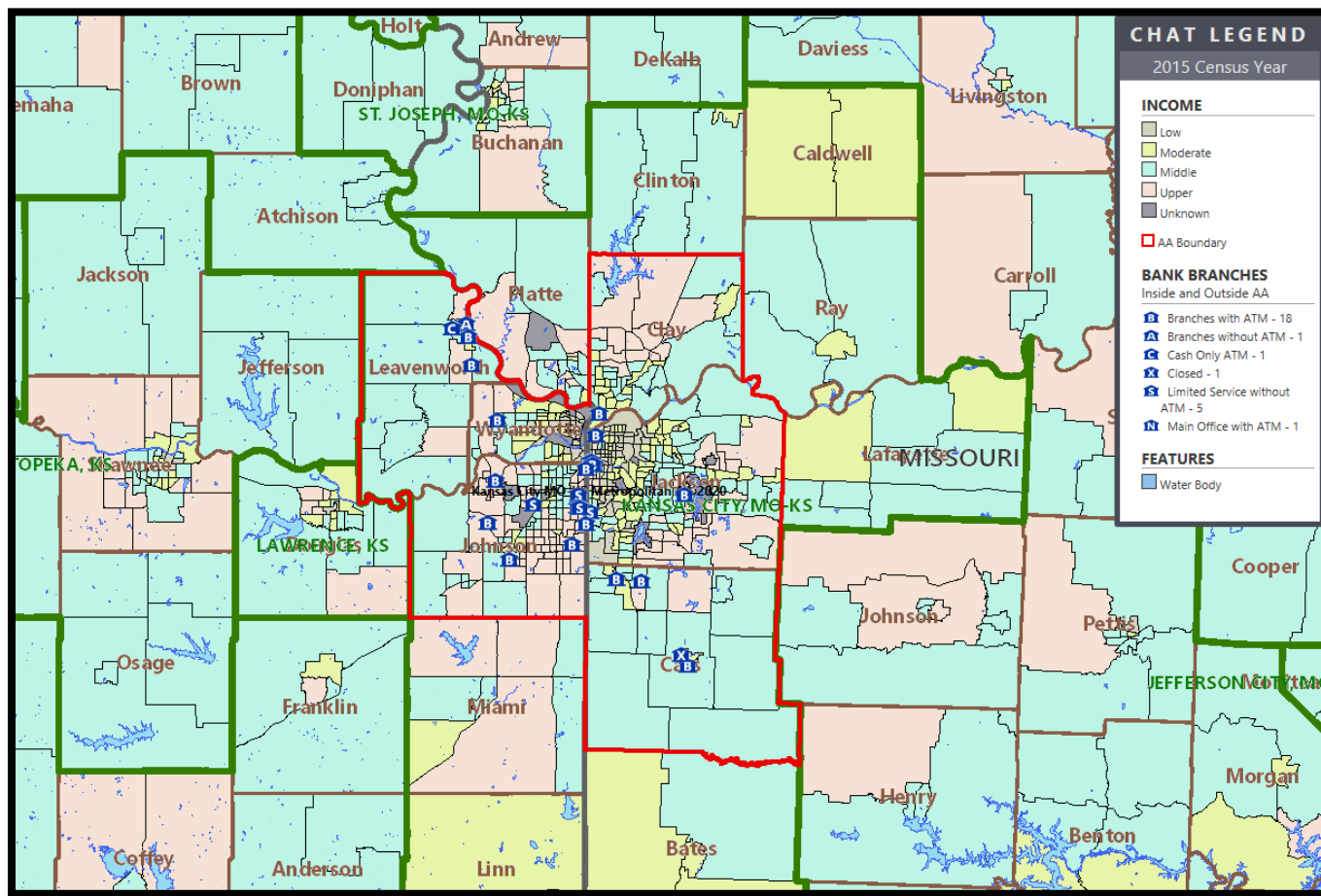
Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**APPENDIX A**

<b>SCOPE OF EXAMINATION</b>			
<b><u>FINANCIAL INSTITUTION</u></b> Country Club Bank Kansas City, Missouri		<b><u>PRODUCTS/SERVICES REVIEWED</u></b> <ul style="list-style-type: none"> <li>• Home Purchase Loans</li> <li>• Home Refinance Loans</li> <li>• Home Improvement Loans</li> <li>• Multifamily Loans</li> <li>• Small Business (SB) Loans</li> <li>• Small Farm (SF) Loans</li> <li>• CD Loans</li> <li>• CD Investments and Donations</li> <li>• CD Services</li> </ul>	
<b><u>TIME PERIODS REVIEWED</u></b> HMDA LAR and CRA SB and SF Loans:            January 1, 2018 to December 31, 2020  Community Development Activities:            January 1, 2019 to December 31, 2020			
<b>LIST OF AFFILIATES CONSIDERED IN THIS EVALUATION</b>			
AFFILIATES	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
None	NA	NA	
<b>LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION</b>			
ASSESSMENT AREA	TYPE OF EXAM	BRANCHES VISITED	COMMUNITY CONTACTS
<u>Multistate MSA</u> MSA 28140 Kansas City MO-KS Metropolitan AA	Full Review	1 Ward Parkway, Kansas City, Missouri	2 prior

APPENDIX B – MAP OF THE ASSESSMENT AREA

KANSAS CITY MO-KS METROPOLITAN AA



**APPENDIX C – 2018-2020 DEMOGRAPHIC AND 2018 ANALYSIS TABLES**

**A. Kansas City MO-KS Metropolitan AA – 2018-2020 Demographic Tables  
Table C-1**

2018 Kansas City MO-KS Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	79	16.5	39,180	8.6	13,683	34.9	97,462	21.4
Moderate	107	22.3	91,803	20.1	14,358	15.6	79,390	17.4
Middle	149	31.1	165,594	36.3	10,376	6.3	92,487	20.3
Upper	126	26.3	158,206	34.7	3,500	2.2	186,432	40.9
Unknown	18	3.8	988	0.2	451	45.6	0	0.0
<b>Total AA</b>	<b>479</b>	<b>100.0</b>	<b>455,771</b>	<b>100.0</b>	<b>42,368</b>	<b>9.3</b>	<b>455,771</b>	<b>100.0</b>
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied				Rental		Vacant	
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	92,203	28,833	6.3	31.3	43,560	47.2	19,810	21.5
Moderate	178,463	82,305	18.0	46.1	75,778	42.5	20,380	11.4
Middle	277,152	173,322	37.9	62.5	84,176	30.4	19,654	7.1
Upper	224,274	172,516	37.7	76.9	42,325	18.9	9,433	4.2
Unknown	4,019	863	0.2	21.5	1,780	44.3	1,376	34.2
<b>Total AA</b>	<b>776,111</b>	<b>457,839</b>	<b>100.0</b>	<b>59.0</b>	<b>247,619</b>	<b>31.9</b>	<b>70,653</b>	<b>9.1</b>
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	6,439	7.5	5,497	7.2	893	11.1	49	6.5
Moderate	16,507	19.4	14,786	19.3	1,599	20.0	122	16.2
Middle	28,947	33.9	26,173	34.2	2,509	31.3	265	35.1
Upper	31,777	37.3	29,057	38.0	2,417	30.2	303	40.2
Unknown	1,629	1.9	1,023	1.3	591	7.4	15	2.0
<b>Total AA</b>	<b>85,299</b>	<b>100.0</b>	<b>76,536</b>	<b>100.0</b>	<b>8,009</b>	<b>100.0</b>	<b>754</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>89.7</b>		<b>9.4</b>		<b>0.9</b>	
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	20	1.9	18	1.8	1	4.0	1	25.0
Moderate	82	8.0	82	8.2	0	0.0	0	0.0
Middle	530	51.5	516	51.6	12	48.0	2	50.0
Upper	395	38.4	384	38.4	10	40.0	1	25.0
Unknown	2	0.2	0	0.0	2	8.0	0	0.0
<b>Total AA</b>	<b>1,029</b>	<b>100.0</b>	<b>1,000</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>97.2</b>		<b>2.4</b>		<b>0.4</b>	
<p>Source: 2018 FFIEC Census Data 2018 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding.</p>								

**Table C-2**

2019 Kansas City MO-KS Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	79	16.5	39,180	8.6	13,683	34.9	97,462	21.4
Moderate	107	22.3	91,803	20.1	14,358	15.6	79,390	17.4
Middle	149	31.1	165,594	36.3	10,376	6.3	92,487	20.3
Upper	126	26.3	158,206	34.7	3,500	2.2	186,432	40.9
Unknown	18	3.8	988	0.2	451	45.6	0	0.0
<b>Total AA</b>	<b>479</b>	<b>100.0</b>	<b>455,771</b>	<b>100.0</b>	<b>42,368</b>	<b>9.3</b>	<b>455,771</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	92,203	28,833	6.3	31.3	43,560	47.2	19,810	21.5
Moderate	178,463	82,305	18.0	46.1	75,778	42.5	20,380	11.4
Middle	277,152	173,322	37.9	62.5	84,176	30.4	19,654	7.1
Upper	224,274	172,516	37.7	76.9	42,325	18.9	9,433	4.2
Unknown	4,019	863	0.2	21.5	1,780	44.3	1,376	34.2
<b>Total AA</b>	<b>776,111</b>	<b>457,839</b>	<b>100.0</b>	<b>59.0</b>	<b>247,619</b>	<b>31.9</b>	<b>70,653</b>	<b>9.1</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	6,636	7.8	5,724	7.4	869	11.1	43	6.7
Moderate	16,689	19.6	15,049	19.6	1,545	19.8	95	14.9
Middle	28,911	33.9	26,233	34.1	2,460	31.5	218	34.1
Upper	31,487	36.9	28,867	37.5	2,352	30.1	268	41.9
Unknown	1,642	1.9	1,038	1.3	589	7.5	15	2.3
<b>Total AA</b>	<b>85,365</b>	<b>100.0</b>	<b>76,911</b>	<b>100.0</b>	<b>7,815</b>	<b>100.0</b>	<b>639</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.1</b>		<b>9.2</b>		<b>0.7</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	22	2.2	20	2.0	1	4.2	1	25.0
Moderate	82	8.1	81	8.2	1	4.2	0	0.0
Middle	526	52.0	513	52.2	11	45.8	2	50.0
Upper	380	37.6	369	37.5	10	41.7	1	25.0
Unknown	1	0.1	0	0.0	1	4.2	0	0.0
<b>Total AA</b>	<b>1,011</b>	<b>100.0</b>	<b>983</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>
<b>Percentage of T total Farms:</b>				<b>97.2</b>		<b>2.4</b>		<b>0.4</b>
Source: 2019 FFIEC Census Data								
2019 Dun & Bradstreet Data								
2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**Table C-3**

2020 Kansas City MO-KS Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	79	16.5	39,180	8.6	13,683	34.9	97,462	21.4
Moderate	107	22.3	91,803	20.1	14,358	15.6	79,390	17.4
Middle	149	31.1	165,594	36.3	10,376	6.3	92,487	20.3
Upper	126	26.3	158,206	34.7	3,500	2.2	186,432	40.9
Unknown	18	3.8	988	0.2	451	45.6	0	0.0
<b>Total AA</b>	<b>479</b>	<b>100.0</b>	<b>455,771</b>	<b>100.0</b>	<b>42,368</b>	<b>9.3</b>	<b>455,771</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	92,203	28,833	6.3	31.3	43,560	47.2	19,810	21.5
Moderate	178,463	82,305	18.0	46.1	75,778	42.5	20,380	11.4
Middle	277,152	173,322	37.9	62.5	84,176	30.4	19,654	7.1
Upper	224,274	172,516	37.7	76.9	42,325	18.9	9,433	4.2
Unknown	4,019	863	0.2	21.5	1,780	44.3	1,376	34.2
<b>Total AA</b>	<b>776,111</b>	<b>457,839</b>	<b>100.0</b>	<b>59.0</b>	<b>247,619</b>	<b>31.9</b>	<b>70,653</b>	<b>9.1</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	6,675	7.8	5,793	7.5	838	11.0	44	7.1
Moderate	16,844	19.7	15,233	19.7	1,512	19.9	99	15.9
Middle	28,756	33.7	26,176	33.9	2,368	31.1	212	34.0
Upper	31,443	36.8	28,871	37.4	2,317	30.4	255	40.9
Unknown	1,680	2.0	1,085	1.4	581	7.6	14	2.2
<b>Total AA</b>	<b>85,398</b>	<b>100.0</b>	<b>77,158</b>	<b>100.0</b>	<b>7,616</b>	<b>100.0</b>	<b>624</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.4</b>		<b>8.9</b>		<b>0.7</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	19	2.0	18	1.9	1	4.0	0	0.0
Moderate	76	7.8	74	7.8	2	8.0	0	0.0
Middle	503	51.8	489	51.9	12	48.0	2	66.7
Upper	371	38.2	361	38.3	9	36.0	1	33.3
Unknown	2	0.2	1	0.1	1	4.0	0	0.0
<b>Total AA</b>	<b>971</b>	<b>100.0</b>	<b>943</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>97.1</b>		<b>2.6</b>		<b>0.3</b>
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**B. Kansas City MO-KS Metropolitan AA – 2018 Lending Tables  
Table C-4**

<b>Distribution of 2018 Home Mortgage Lending By Income Level of Geography Assessment Area: Kansas City MO-KS Metropolitan</b>							
<b>Geographic Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Owner Occupied Units %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
Low	3	3.8	3.1	246	1.3	1.5	6.3
Moderate	22	28.2	17.2	1,995	10.9	10.5	18.0
Middle	24	30.8	38.5	4,261	23.3	33.7	37.9
Upper	29	37.2	41.1	11,756	64.4	54.2	37.7
Unknown	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>78</b>	<b>100.0</b>	<b>100.0</b>	<b>18,258</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	2.9	0	0.0	1.6	6.3
Moderate	4	16.0	15.4	264	4.1	9.5	18.0
Middle	6	24.0	38.9	1,022	16.0	34.2	37.9
Upper	15	60.0	42.7	5,116	79.9	54.5	37.7
Unknown	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>25</b>	<b>100.0</b>	<b>100.0</b>	<b>6,402</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	2.6	0	0.0	2.3	6.3
Moderate	7	41.2	10.3	536	29.6	7.7	18.0
Middle	7	41.2	33.0	830	45.9	29.9	37.9
Upper	3	17.6	53.9	444	24.5	60.0	37.7
Unknown	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>1,810</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							
							<b>Multi-family Units %</b>
Low	4	21.1	21.6	9,752	33.7	10.7	15.6
Moderate	5	26.3	27.4	1,442	5.0	20.5	26.5
Middle	8	42.1	32.6	5,770	19.9	36.7	35.0
Upper	2	10.5	16.1	11,974	41.4	27.0	21.2
Unknown	0	0.0	2.3	0	0.0	5.1	1.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>28,938</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
							<b>Owner Occupied Units %</b>
Low	7	5.0	3.1	9,998	18.0	2.4	6.3
Moderate	38	27.1	16.3	4,237	7.6	11.2	18.0
Middle	46	32.9	38.0	12,042	21.7	33.9	37.9
Upper	49	35.0	42.4	29,290	52.7	51.9	37.7
Unknown	0	0.0	0.2	0	0.0	0.6	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>140</b>	<b>100.0</b>	<b>100.0</b>	<b>55,567</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2018 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



**Table C-5**

Distribution of 2018 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Kansas City MO-KS Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Other Purpose LOC</b>							
Low	0	0.0	1.3	0	0.0	1.1	6.3
Moderate	0	0.0	10.1	0	0.0	6.8	18.0
Middle	0	0.0	32.0	0	0.0	26.8	37.9
Upper	0	0.0	56.4	0	0.0	65.2	37.7
Unknown	0	0.0	0.2	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Other Purpose Closed/Exempt</b>							
Low	0	0.0	3.6	0	0.0	2.1	6.3
Moderate	0	0.0	17.0	0	0.0	11.0	18.0
Middle	1	100.0	38.5	159	100.0	30.7	37.9
Upper	0	0.0	40.7	0	0.0	56.0	37.7
Unknown	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>159</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Purpose Not Applicable</b>							
Low	0	0.0	4.8	0	0.0	2.6	6.3
Moderate	0	0.0	25.5	0	0.0	17.4	18.0
Middle	0	0.0	38.1	0	0.0	35.6	37.9
Upper	0	0.0	31.3	0	0.0	43.9	37.7
Unknown	0	0.0	0.3	0	0.0	0.4	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2018 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table C-6**

<b>Distribution of 2018 Small Business Lending By Income Level of Geography</b>							
<b>Assessment Area: Kansas City MO-KS Metropolitan</b>							
<b>Geographic Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Total Businesses %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	
<b>Low</b>	58	9.0	7.2	11,496	8.5	9.4	7.5
<b>Moderate</b>	114	17.6	17.2	21,608	15.9	17.3	19.4
<b>Middle</b>	245	37.9	31.1	46,570	34.3	29.8	33.9
<b>Upper</b>	208	32.1	41.0	51,138	37.6	37.3	37.3
<b>Unknown</b>	22	3.4	2.6	5,069	3.7	6.0	1.9
<b>Tract-Unk</b>	0	0.0	1.0	0	0.0	0.3	
<b>Total</b>	647	100.0	100.0	135,881	100.0	100.0	100.0

Source: 2018 FFIEC Census Data  
2018 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Table C-7**

<b>Distribution of 2018 Small Farm Lending By Income Level of Geography</b>							
<b>Assessment Area: Kansas City MO-KS Metropolitan</b>							
<b>Geographic Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Total Farms %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	
<b>Low</b>	1	3.0	0.9	30	1.7	0.6	1.9
<b>Moderate</b>	2	6.1	5.6	300	17.4	4.7	8.0
<b>Middle</b>	25	75.8	65.0	1,162	67.5	70.5	51.5
<b>Upper</b>	5	15.2	27.8	229	13.3	24.1	38.4
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0.2
<b>Tract-Unk</b>	0	0.0	0.7	0	0.0	0.1	
<b>Total</b>	33	100.0	100.0	1,721	100.0	100.0	100.0

Source: 2018 FFIEC Census Data  
2018 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Table C-8**

<b>Distribution of 2018 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: Kansas City MO-KS Metropolitan</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	0	0.0	8.6	0	0.0	4.4	21.4
<b>Moderate</b>	2	2.6	21.7	368	2.0	15.8	17.4
<b>Middle</b>	8	10.3	22.4	1,330	7.3	21.1	20.3
<b>Upper</b>	33	42.3	33.1	10,800	59.2	45.4	40.9
<b>Unknown</b>	35	44.9	14.1	5,760	31.5	13.3	0.0
<b>Total</b>	78	100.0	100.0	18,258	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	1	4.0	9.4	7	0.1	5.4	21.4
<b>Moderate</b>	1	4.0	19.8	40	0.6	14.9	17.4
<b>Middle</b>	1	4.0	22.3	200	3.1	20.7	20.3
<b>Upper</b>	15	60.0	34.6	4,470	69.8	45.9	40.9
<b>Unknown</b>	7	28.0	13.9	1,685	26.3	13.2	0.0
<b>Total</b>	25	100.0	100.0	6,402	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0.0	5.7	0	0.0	4.0	21.4
<b>Moderate</b>	0	0.0	13.5	0	0.0	9.7	17.4
<b>Middle</b>	2	11.8	21.7	128	7.1	18.6	20.3
<b>Upper</b>	3	17.6	52.7	181	10.0	57.2	40.9
<b>Unknown</b>	12	70.6	6.4	1,501	82.9	10.5	0.0
<b>Total</b>	17	100.0	100.0	1,810	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	1	0.8	8.3	7	0.0	4.6	21.4
<b>Moderate</b>	3	2.5	20.0	408	1.5	15.1	17.4
<b>Middle</b>	11	9.1	21.9	1,658	6.2	20.5	20.3
<b>Upper</b>	52	43.0	34.8	15,610	58.6	45.4	40.9
<b>Unknown</b>	54	44.6	15.0	8,946	33.6	14.3	0.0
<b>Total</b>	121	100.0	100.0	26,629	100.0	100.0	100.0
<p>Source: 2018 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>							

**Table C-9**

<b>Distribution of 2018 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: Kansas City MO-KS Metropolitan</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Other Purpose LOC</b>							
<b>Low</b>	0	0.0	5.3	0	0.0	3.6	21.4
<b>Moderate</b>	0	0.0	15.0	0	0.0	11.1	17.4
<b>Middle</b>	0	0.0	23.2	0	0.0	19.5	20.3
<b>Upper</b>	0	0.0	54.9	0	0.0	64.2	40.9
<b>Unknown</b>	0	0.0	1.6	0	0.0	1.6	0.0
<b>Total</b>	0	0.0	100.0	0	0.0	100.0	100.0
<b>Other Purpose Closed/Exempt</b>							
<b>Low</b>	0	0.0	9.1	0	0.0	5.8	21.4
<b>Moderate</b>	0	0.0	17.5	0	0.0	12.5	17.4
<b>Middle</b>	0	0.0	22.2	0	0.0	15.1	20.3
<b>Upper</b>	1	100.0	44.8	159	100.0	56.5	40.9
<b>Unknown</b>	0	0.0	6.3	0	0.0	10.1	0.0
<b>Total</b>	1	100.0	100.0	159	100.0	100.0	100.0
<b>Purpose Not Applicable</b>							
<b>Low</b>	0	0.0	1.1	0	0.0	0.6	21.4
<b>Moderate</b>	0	0.0	1.8	0	0.0	1.1	17.4
<b>Middle</b>	0	0.0	2.0	0	0.0	0.8	20.3
<b>Upper</b>	0	0.0	2.4	0	0.0	1.0	40.9
<b>Unknown</b>	0	0.0	92.7	0	0.0	96.5	0.0
<b>Total</b>	0	0.0	100.0	0	0.0	100.0	100.0
<i>Source: 2018 FFIEC Census Data</i>							
<i>2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

**Table C-10**

<b>Distribution of 2018 Small Business Lending By Revenue Size of Businesses</b>							
<b>Assessment Area: Kansas City MO-KS Metropolitan</b>							
	<b>Bank And Aggregate Loans</b>						<b>Total Businesses %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	325	50.2	43.2	46,267	34.0	28.8	89.7
<b>Over \$1 Million</b>	322	49.8	56.8	89,614	66.0	71.2	9.4
<b>Revenue Unknown</b>	0	0.0		0	0.0		0.9
<b>Total</b>	647	100.0	100.0	135,881	100.0	100.0	100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	293	45.3	91.1	13,818	10.2	26.8	
<b>\$100,001 - \$250,000</b>	175	27.0	3.9	31,294	23.0	14.4	
<b>\$250,001 - \$1 Million</b>	179	27.7	5.0	90,769	66.8	58.8	
<b>Total</b>	647	100.0	100.0	135,881	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	190	58.5		7,711	16.7		
<b>\$100,001 - \$250,000</b>	83	25.5		14,541	31.4		
<b>\$250,001 - \$1 Million</b>	52	16.0		24,015	51.9		
<b>Total</b>	325	100.0		46,267	100.0		
<i>Source: 2018 FFIEC Census Data                  2018 Dun &amp; Bradstreet Data                  2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

**Table C-11**

<b>Distribution of 2018 Small Farm Lending By Revenue Size of Farms</b>							
<b>Assessment Area: Kansas City MO-KS Metropolitan</b>							
	<b>Bank And Aggregate Loans</b>						<b>Total Farms %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	30	90.9	57.8	1,415	82.2	67.4	97.2
<b>Over \$1 Million</b>	3	9.1	42.2	306	17.8	32.6	2.4
<b>Revenue Unknown</b>	0	0.0		0	0.0		0.4
<b>Total</b>	33	100.0	100.0	1,721	100.0	100.0	100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	29	87.9	81.9	1,041	60.5	31.8	
<b>\$100,001 - \$250,000</b>	4	12.1	11.8	680	39.5	31.8	
<b>\$250,001 - \$500,000</b>	0	0.0	6.3	0	0.0	36.4	
<b>Total</b>	33	100.0	100.0	1,721	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	27	90.0		885	62.5		
<b>\$100,001 - \$250,000</b>	3	10.0		530	37.5		
<b>\$250,001 - \$500,000</b>	0	0.0		0	0.0		
<b>Total</b>	30	100.0		1,415	100.0		
<i>Source: 2018 FFIEC Census Data                  2018 Dun &amp; Bradstreet Data                  2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

## APPENDIX D – 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.

**Census tract:** A small subdivision of metropolitan and other densely populated 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 upon 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 development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet 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; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income 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.

**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 is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary

reports of their mortgage lending activity. The reports include such data as the race, gender and the income of applications, the amount of loan requested, and the disposition of the application (for example, 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 refinancings of home improvement and home purchase loans.

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

**Limited-scope review:** Performance is analyzed using only quantitative factors (for example, 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.

**Metropolitan area (MA):** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A 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. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a 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.

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



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

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

**Rated area:** A rated area is a state or 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 loan(s) to business(es):** A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. 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):** A loan included in "loans to small farms" as defined in the instructions for preparation of the 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.

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