



PUBLIC DISCLOSURE

June 5, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Exchange Bank of Missouri
RSSD# 686459

101 South Church Street
Fayette, Missouri 65248

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

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

Exchange Bank of Missouri (the bank) is rated **Satisfactory**. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment areas' (AAs) credit needs.
- A majority of the bank's loans are originated inside the AAs.
- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses and farms of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* 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. In addition, available aggregate data for the most recent three years (2019, 2020, and 2021) was referenced for additional perspective to gauge credit demand within the bank's AAs. Lending performance was assessed within the bank's three AAs. The bank's Saline County AA and Columbia Metropolitan Statistical Area (MSA) AA were assessed using a full-scope review. The Jefferson City MSA AA was assessed using a limited-scope review. Examiners reviewed the following data:

- The bank's 19-quarter average NLTD ratio,
- A statistical sample of 111 small business loans selected from a universe of 247 loans originated between January 1, 2022 and December 31, 2022.
- A statistical sample of 112 small farm loans selected from a universe of 252 loans originated between January 1, 2022 and December 31, 2022.
- A universe of 179 home mortgage loans originated between January 1, 2022 and December 31, 2022.

More weight was given to small farm loans in the overall determination of performance ratings as they comprise the greatest portion of the bank's loan portfolio by both asset dollars and gross percentage. In addition, more weight was given to conclusions in the Columbia MSA AA as it reflects the greatest portion of lending across all products.

DESCRIPTION OF INSTITUTION

The bank is a community bank headquartered in Fayette, Missouri. The bank's characteristics include:

- The bank is a wholly owned subsidiary of Exchange Bancorp of Missouri, Inc. This holding company is further owned by a top tier holding company, Northern Missouri Bancshares, Inc., which owns additional middle-tier bank holding companies.
- The bank does not have any lending affiliates or subsidiary relationships.
- The bank has total assets of \$306.0 million as of December 31, 2022.
- In addition to its main office in Fayette, the bank has five additional offices located in New Franklin, Fulton, Slater, Marshall, and Hallsville, Missouri.
- All six branches have onsite automated teller machines (ATMs), with one stand-alone full-service ATM in the city of Marshall, and three stand-alone cash-only ATMs, two located in the city of Fayette and one in the city of Booneville.
- As shown in the table below, the bank's primary business focus is agricultural and commercial lending.

Table 1

Composition of Loan Portfolio as of December 31, 2022		
Loan Type	\$(000)	%
Construction and Land Development	7,931	3.2
Farmland	92,899	37.9
1-4 Family Residential Real Estate	46,725	19.1
Multifamily Residential Real Estate	2,160	0.9
Non-Farm Non-Residential Real Estate	43,359	17.7
Agricultural	23,657	9.7
Commercial and Industrial	22,794	9.3
Consumer	4,404	1.8
Other	1,015	0.4
Gross Loans	244,944	100.0

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

The bank was rated Satisfactory under the CRA at its November 27, 2018 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.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA¹

This performance evaluation first discusses the bank’s overall performance, followed by an in-depth evaluation of performance in the Saline County and Columbia MSA AAs (full-scope reviews) and a brief discussion of performance in the Jefferson City MSA AA (limited-scope review).

The bank’s overall lending test performance is Satisfactory. This conclusion was based on a reasonable NLTD ratio, a majority of loans originated within the bank’s AAs, as well as reasonable geographic and borrower distribution of lending.

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank’s average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and in comparison, to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, similar loan portfolios and geographic proximity to the bank.

The bank’s NLTD ratio is reasonable. The 19-quarter NLTD ratio at 84.9 percent is above, but near the range of all other similarly situated banks.

Table 2

Comparative NLTD Ratios June 30, 2018 – December 31, 2022			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			19 Quarter Average
Exchange Bank of Missouri	Fayette, Missouri	305,994	84.9
Similarly Situated Institutions			
Citizens Community Bank	Pilot Grove, Missouri	125,503	75.1
Regional Missouri Bank	Marceline, Missouri	545,162	82.7
Community Bank of Marshall	Marshall, Missouri	221,653	48.7
Tri-County Trust Company	Glasgow, Missouri	59,954	77.6

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. The bank originated a majority of loans, by number and dollar, inside the AAs.

¹ The net loan-to-deposit ratio and percentage of loans and other lending-related activity in the assessment area only apply to the institution overall. No discussion of these performance criteria applies to sections of the performance evaluation related to assessment areas.

Table 3

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Home Purchase - Conventional	62	68.1	9,583	54.2	29	31.9	8,090	45.8
Home Purchase - FHA	11	84.6	1,448	79.3	2	15.4	378	20.7
Home Improvement	1	33.3	16	4.4	2	66.7	351	95.6
Multi-Family Housing	8	66.7	6,980	72.6	4	33.3	2,640	27.4
Other Purpose Closed-End	3	75.0	217	78.3	1	25.0	60	21.7
Refinancing	43	76.8	6,543	75.4	13	23.2	2,136	24.6
Total HMDA related	128	71.5	24,787	64.5	51	28.5	13,655	35.5
Small Business	86	77.5	8,432	76.7	25	22.5	2,565	23.3
Small Farm	81	72.3	6,220	68.4	31	27.7	2,880	31.6
TOTAL LOANS	295	73.4	39,439	67.4	107	26.6	19,100	32.6
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

Geographic Distribution of Loans

This performance criterion evaluates the bank’s distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank’s overall geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AAs. Within each assessment area discussion, the distribution of home mortgage loans is discussed at the total level or total level and home purchase level only as the numbers of loans across purpose types between the multiple assessment areas was too small to render meaningful analyses and conclusions. Lending performance for the geographic distribution in the Jefferson City MSA was consistent with performance in the full-scope review AAs.

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

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses and farms of different revenue sizes. The bank’s lending has an overall reasonable distribution among individuals of different income levels and businesses and farms of different sizes. Within each assessment area discussion, the distribution of home mortgage loans is discussed at the total level or total level and home purchase level only as the numbers of loans across purpose types between the multiple assessment areas was too small to render meaningful analyses and conclusions. Lending performance for the borrower distribution in the Jefferson City MSA was consistent with performance in the two full-scope review AAs.

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.

**SALINE COUNTY ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN SALINE COUNTY AA

The bank's Saline County AA consists of the entire county of Saline. (See Appendix A for an AA map and Appendix B for additional demographic data.)

- The bank operates two locations that each offer an ATM in this AA in the towns of Slater and Marshall, Missouri. In addition, the bank operates one full-service ATM in the town of Marshall.
- The delineation of the assessment area has changed since the previous performance evaluation. Previously, Saline County was included in a three county AA that was comprised of Saline, Howard, and Cooper counties. Due to revisions made by the Office of Management and Budget in 2018, Howard and Cooper counties became part of the Columbia MSA, resulting in the bank taking Saline County in its entirety as a separate AA.
- The Saline County AA is comprised of eight census tracts: five middle- and three-upper income census tracts. Since the prior performance evaluation, the income designations of census tracts in the county changed from one moderate-, six middle-, and one upper-income census tract. The tract composition changed as of 2022 due to changes resulting from the release of the 2016-2020 American Community Survey (ACS) data.
- As of the June 30, 2022 FDIC Deposit Market Share Report, the bank ranks third of six institutions with 17.2 percent of the market share.
- An interview with a member of the community in which the bank operates was conducted to ascertain the credit needs of the area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The contact represented an organization committed to economic development in the AA.

Table 4

Population Change Assessment Area: Saline County			
Area	2015 Population	2020 Population	Percent Change
Saline County	23,334	23,333	0.0
NonMSA Missouri	1,550,288	1,505,909	(2.9)
Missouri	6,045,448	6,154,913	1.8
<i>Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey</i>			

- The town of Marshall, Missouri, where the bank has its branch in the assessment area, has a population of 18,806, comprising 81.6 percent of the total county population. The town of Slater, where the bank’s other branch is located, has a population of 1,886, or 8.0 percent of the county population.
- The U.S. Census Bureau estimates a 1.3 percent population decline in Saline County as of 2022.

Table 5

Median Family Income Change Assessment Area: Saline County			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Saline County	53,294	63,713	19.6
NonMSA Missouri	52,816	56,957	7.8
Missouri	66,438	72,834	9.6

*Source: 2011-2015 U.S. Census Bureau: American Community Survey
2016-2020 U.S. Census Bureau: American Community Survey*

Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.

- The community contact indicated that the greatest concentration of LMI individuals in the AA occurs in the Marshall area.
- Median household incomes in Marshall, at \$45,979, are somewhat lower than the county household median by less than 1 percent, but 24.7 percent lower than the state of Missouri. The percent of households living below the poverty level at 13.9 percent was comparable to that of the state of Missouri at 12.9 percent.

Table 6

Housing Cost Burden Assessment Area: Saline County						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Saline County	64.3	35.3	37.5	58.4	29.2	15.8
NonMSA Missouri	66.4	26.6	35.9	52.7	23.9	16.6
Missouri	72.8	26.6	39.7	56.8	25.6	16.5

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

Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy

- The median housing value in Marshall is \$111,800, while the median listing price is \$143,446, 22.1 percent over listing values.
- A community contact indicated that a particular need of the county is additional housing stock as there is not enough units to meet the demand across single or multi-family homes and apartments.

Table 7

Unemployment Rates					
Assessment Area: Saline County					
Area	2017	2018	2019	2020	2021
Saline County	3.5	3.0	3.0	4.5	3.5
NonMSA Missouri	4.4	3.7	3.8	6.1	4.4
Missouri	3.7	3.2	3.1	6.1	4.4

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- According to the U.S Department of Labor, the labor force participation rate in Saline County is 76.4 percent, comparable to the state of Missouri at 77.3 percent.
- The primary industries in Saline County are health care and social assistance, manufacturing, educational services, and retail trade at 17.1 percent, 15.5 percent, 12.1 percent, and 11.1 percent of employment by industry, respectively.
- The community contact indicated the major employers in the area are Cargill, Conagra, Cage Civil Engineering, Marshall Electric, and the public school system.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN SALINE COUNTY AA

The bank’s performance in the Saline County AA is reasonable.

Geographic Distribution of Loans

The bank’s geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The distribution of lending was evaluated based on performance in middle- and upper-income census tracts only. Lending in middle-income tracts (demographic figure) was greater than the percent of owner-occupied units in middle-income tracts while lending in upper-income tracts was below the demographic figure. No conspicuous gaps in lending were identified.

Table 11

Distribution of 2022 Home Mortgage Lending By Income Level of Geography					
Assessment Area: Saline County					
Geographic Income Level	Bank Loans*				Owner Occupied
	#	#%	\$(000)	%	Units %
Home Purchase Loans					
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	18	78.3	1,947	66.1	59.3
Upper	5	21.7	997	33.9	40.7
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	23	100.0	2,944	100.0	100.0
Refinance Loans					
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	8	61.5	734	45.5	59.3
Upper	5	38.5	878	54.5	40.7
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	13	100.0	1,612	100.0	100.0
Home Improvement Loans					
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	0	0.0	0	0.0	59.3
Upper	0	0.0	0	0.0	40.7
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	0	0.0	0	0.0	100.0
Multifamily Loans					Multi-family Units %
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	0	0.0	0	0.0	71.3
Upper	0	0.0	0	0.0	28.7
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	0	0.0	0	0.0	100.0
Total Home Mortgage Loans					Owner Occupied Units %
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	27	73.0	2,704	59.1	59.3
Upper	10	27.0	1,875	40.9	40.7
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	37	100.0	4,579	100.0	100.0
Source: 2022 FFIEC Census Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.					

Small Business Lending

The geographic distribution of small business lending is reasonable. The distribution of lending was evaluated based on performance in middle- and upper-income census tracts only. The bank’s lending in middle-income tracts was below the percent of total businesses operating in middle-income tracts (demographic figure). The bank’s lending in upper-income tracts was above the demographic figure. No conspicuous gaps in lending were identified.

Table 12

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Saline County					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	12	48.0	742	33.5	60.2
Upper	13	52.0	1,470	66.5	39.8
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	25	100.0	2,212	100.0	100.0

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 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 reasonable. The distribution of lending was evaluated based on performance in middle- and upper-income census tracts only. The bank’s lending in middle-income tracts was above the percent of farms operating in middle-income tracts (demographic figure). The bank’s lending in upper-income tracts was below the demographic figure. While conspicuous gaps in lending were identified, they do not impact small farm lending conclusions as the AA contains no low- or moderate-income geographies.

Table 13

Distribution of 2022 Small Farm Lending By Income Level of Geography					
Assessment Area: Saline County					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	15	51.7	1,627	64.1	35.1
Upper	14	48.3	911	35.9	64.9
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	29	100.0	2,537	100.0	100.0

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 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 a reasonable distribution among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. Total home mortgage lending to low-income borrowers was below the demographic figure of percentage of families by family income; however, a community contact indicated there is very limited housing availability across the county, which results in inflated sales prices that are not typically feasible for low-income individuals. This is further supported by a review of three-year aggregate lending data (2019, 2020 and 2021) submitted by HMDA reporters which reflects a relatively low lending distribution of 8.5 percent by number and 5.2 percent by dollar to low-income individuals. In contrast, home mortgage lending to moderate-income borrowers is comparable to the demographic figure by number and is comparable by dollar, demonstrating the bank’s willingness to make loans to LMI individuals.

Table 14

Distribution of 2022 Home Mortgage Lending By Borrower Income Level					
Assessment Area: Saline County					
Borrower Income Level	Bank Loans*				Families by Family
	#	#%	\$(000)	%	Income %
Home Purchase Loans					
Low	0	0.0	0	0.0	15.0
Moderate	5	21.7	337	11.4	16.2
Middle	8	34.8	881	29.9	21.6
Upper	9	39.1	1,537	52.2	47.2
Unknown	1	4.3	189	6.4	0.0
Total	23	100.0	2,944	100.0	100.0
Refinance Loans					
Low	0	0.0	0	0.0	15.0
Moderate	3	23.1	255	15.8	16.2
Middle	4	30.8	576	35.7	21.6
Upper	5	38.5	735	45.6	47.2
Unknown	1	7.7	46	2.9	0.0
Total	13	100.0	1,612	100.0	100.0
Home Improvement Loans					
Low	0	0.0	0	0.0	15.0
Moderate	0	0.0	0	0.0	16.2
Middle	0	0.0	0	0.0	21.6
Upper	0	0.0	0	0.0	47.2
Unknown	0	0.0	0	0.0	0.0
Total	0	0.0	0	0.0	100.0
Total Home Mortgage Loans					
Low	0	0.0	0	0.0	15.0
Moderate	9	24.3	615	13.4	16.2
Middle	12	32.4	1,457	31.8	21.6
Upper	14	37.8	2,272	49.6	47.2
Unknown	2	5.4	235	5.1	0.0
Total	37	100.0	4,579	100.0	100.0
Source: 2022 FFIEC Census Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					
Multifamily loans are not included in the borrower distribution analysis.					
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.					

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank’s lending to businesses with gross annual revenue of \$1 million or less was comparable to the percentage of small businesses in the AA. Moreover, 88.0 percent of the loans made by number were in amounts of \$250,000 or less, with 95.2 percent of those loans going to businesses with revenues of \$1 million or less, speaking to the bank’s willingness to meet the needs of small businesses in the community.

Table 15

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Saline County					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	21	84.0	1,095	49.5	89.2
Over \$1 Million	4	16.0	1,118	50.5	7.8
Revenue Unknown	0	0.0	0	0.0	2.9
Total	25	100.0	2,212	100.0	100.0
By Loan Size					
\$100,000 or Less	19	76.0	711	32.1	
\$100,001 - \$250,000	3	12.0	434	19.6	
\$250,001 - \$1 Million	3	12.0	1,068	48.3	
Total	25	100.0	2,212	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	19	90.5	711	64.9	
\$100,001 - \$250,000	1	4.8	134	12.2	
\$250,001 - \$1 Million	1	4.8	250	22.8	
Total	21	100.0	1,095	100.0	
<i>Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 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 reasonable. The bank’s lending to small farms with gross annual revenues of \$1 million or less was comparable to the demographic figure. Of those loans, 100 percent of loans in amounts of \$250,000 or less were made to farms with revenues of \$1 million or less which shows a willingness to meet the needs of small farms in the community.

Table 16

Distribution of 2022 Small Farm Lending By Revenue Size of Farms					
Assessment Area: Saline County					
	Bank Loans				Total Farms
	#	#%	\$(000)	\$%	%
By Revenue					
\$1 Million or Less	25	86.2	1,762	69.5	96.9
Over \$1 Million	4	13.8	776	30.6	3.1
Revenue Unknown	0	0.0	0	0.0	0.0
Total	29	100.0	2,537	100.0	100.0
By Loan Size					
\$100,000 or Less	19	65.5	607	23.9	
\$100,001 - \$250,000	8	27.6	1,231	48.5	
\$250,001 - \$500,000	2	6.9	700	27.6	
Total	29	100.0	2,537	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	17	68.0	531	30.1	
\$100,001 - \$250,000	8	32.0	1,231	69.9	
\$250,001 - \$500,000	0	0.0	0	0.0	
Total	25	100.0	1,762	100.0	
<i>Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

**COLUMBIA MSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE COLUMBIA MSA AA

The bank's Columbia MSA AA consists of the entire Columbia, Missouri MSA, comprising Howard, Cooper, and Boone Counties. (See Appendix A for an AA map and Appendix B for additional demographic data.)

- The bank operates three locations that each offer an ATM in this AA in the towns of Fayette, New Franklin, and Hallsville, Missouri. In addition, the bank offers three cash dispensing ATMs, two in the town of Fayette and one in the town of Boonville.
- The delineation of the assessment area has changed since the last exam. Previously, the Columbia MSA was comprised of Boone County only. Due to revisions made by the Office of Management and Budget in 2018, Howard and Cooper counties became part of the Columbia MSA. In response, the bank modified its AA delineation to continue taking the entirety of the MSA as its AA.
- The Columbia MSA is comprised of forty-eight census tracts, including: four low-, fourteen moderate-, twenty middle-, nine upper-, and one unknown-income census tract. Since the prior performance evaluation, the income designations of census tracts in the county changed from three low-, six moderate-, eighteen middle-, seven upper-, and three unknown-income census tracts. The tract composition changed as of 2022 due to changes resulting from the release of the 2016-2020 ACS data. During the prior evaluation, the unknown tracts in Boone County surrounded higher education establishments; the tract changes resulted in these becoming low-income census tracts. The only unknown tract in the current AA is directly south of this area and is comprised predominately of Capen Municipal Park, the Grindstone Nature Area, University of Missouri athletic properties, and a golf course; this area was included in a middle-income tract neighborhood during the prior evaluation period.
- According to the June 30, 2022 FDIC Deposit Market Share Report, the bank ranks 15th out of 28 FDIC-insured institutions operating in the AA with a 1.6 percent deposit market share.
- An interview with a community contact in which the bank operates was conducted to ascertain the credit needs of the area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The contact was a representative of the academic community with knowledge of rural economic development in the AA.

Table 17

Population Change			
Assessment Area: Columbia MSA			
Area	2015 Population	2020 Population	Percent Change
Columbia MSA	198,545	210,864	6.2
Boone County, MO	170,770	183,610	7.5
Cooper County, MO	17,593	17,103	(2.8)
Howard County, MO	10,182	10,151	(0.3)
Missouri	6,045,448	6,154,913	1.8
<i>Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey</i>			

- While the Columbia MSA saw population growth between 2015 to 2020, U.S. Census Bureau data estimates growth of only 0.4 percent in 2022, with growth in Boone and Howard counties at 2.2 percent and 0.2 percent respectively, and a population decline in Cooper County at 2.0 percent. A community member supported this, mentioning the majority of migration to this area would occur in Boone County.
- The bank has branches in Fayette, New Franklin, and Hallsville, which have populations of 2,709, 1,041, and 1,633 respectively; only 7.0 percent of the population of the entire AA.

Table 18

Median Family Income Change			
Assessment Area: Columbia MSA			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Columbia MSA	75,834	78,168	3.1
Boone County, MO	79,394	80,817	1.8
Cooper County, MO	62,897	65,798	4.6
Howard County, MO	63,288	66,495	5.1
Missouri	66,438	72,834	9.6
<i>Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey</i>			
<i>Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

- While the median household income in Boone County is \$58,740, the estimated 2021 low-income census tract median household income ranges from \$16,355 to \$25,576; an average of 61.1 percent lower than the county, 60.5 percent lower than the AA average, and 60.2 percent lower than the state of Missouri.
- The percentage of families living below the poverty level for Howard (9.8 percent), and Cooper (13.0 percent) Counties are comparable to the state of Missouri at 12.7 percent, while Boone County is above the statewide figure at 18.0 percent.

Table 19

Housing Cost Burden Assessment Area: Columbia MSA						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Columbia MSA	78.4	33.0	46.2	55.6	26.0	13.9
Boone County, MO	79.7	34.3	47.5	53.6	26.4	13.6
Cooper County, MO	63.7	17.9	29.4	60.4	22.9	15.2
Howard County, MO	53.2	13.9	31.5	69.8	25.8	16.8
Missouri	72.8	26.6	39.7	56.8	25.6	16.5

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy

- According to 2017-2021 ACS data, the median housing values in Boone, Howard, and Cooper Counties are \$204,000, \$142,400, and \$151,500, respectively, with only Boone County being over the Missouri state median housing value of \$171,800.
- The median gross rent for Boone (\$933), Howard (\$712), and Cooper (\$675) Counties follows the trend of housing values with only Boone County above the state median gross rent of \$886.

Table 20

Unemployment Rates Assessment Area: Columbia MSA					
Area	2017	2018	2019	2020	2021
Columbia MSA	2.7	2.3	2.4	4.3	3.0
Boone County, MO	2.6	2.2	2.3	4.2	3.0
Cooper County, MO	3.6	3.1	3.5	5.4	3.6
Howard County, MO	3.8	2.8	2.9	4.1	3.2
Missouri	3.7	3.2	3.1	6.1	4.4

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- According to the U.S. Department of Labor, the labor force participation rate in the AA was 65.7 percent; comparable to Boone County but higher than rates in Howard and Cooper Counties at 59.9 and 56.6 percent, respectively.
- Educational services are a major industry across all three counties in the assessment area, the number one industry in Boone, and the number two industry in both Howard and Cooper counties at 17.9 percent, 10.5 percent, and 9.41 percent, respectively. Healthcare and social assistance are among the top industries in Cooper County (17.3 percent) and Boone County (17.4 percent); Howard County’s leading industry is management occupations at 11.9 percent. This aligns with information provided by a community member, who stated that schools and hospitals were major employers in this area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE COLUMBIA MSA AA

The bank's performance in the Columbia MSA AA is reasonable.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA. The bank's refinance, home improvement, and multifamily lending are not evaluated individually in this evaluation due to insufficient volumes to render meaningful conclusions.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. While the bank originated only two loans in low-income census tracts, there was limited lending opportunity with only 0.9 percent of housing designated as owner-occupied units located in these tracts. Additionally, the two loans originated in low-income tracts were for multifamily housing, which is particularly responsive to the housing needs of the area, as it is predominately made up of higher education institutions and associated student populations. In contrast, lending in the moderate-income census tract is comparable to the demographic figure (owner-occupied units) across all home mortgage products.

Conspicuous lending gaps occur throughout the MSA with no lending in some tracts in Cooper and Boone Counties; however, this is attributed to distance from the bank's branches and the presence of other competing institutions in the area and did not impact the overall conclusions.

Home Purchase Lending

The geographic distribution of home purchase lending is reasonable. The bank's home purchase lending in the low-income census tracts was below the demographic figure but based on the low percentage of owner-occupied units in these tracts at 0.9 percent, lending is still comparable to the demographic. Lending in the moderate-income census tracts is comparable to the demographic figure.

An evaluation of the dispersion of home purchase loans revealed some gaps in lending, but they do not impact the overall conclusion. The gaps occur in areas with a large student population or where the bank does not have a closely situated branch.

Table 24

Distribution of 2022 Home Mortgage Lending By Income Level of Geography					
Assessment Area: Columbia MSA					
Geographic Income Level	Bank Loans*				Owner Occupied Units %
	#	#%	\$(000)	%	
Home Purchase Loans					
Low	0	0.0	0	0.0	0.9
Moderate	7	23.3	1,161	20.8	20.8
Middle	22	73.3	3,767	67.6	48.1
Upper	1	3.3	647	11.6	29.8
Unknown	0	0.0	0	0.0	0.4
Tract-Unk	0	0.0	0	0.0	
Total	30	100.0	5,575	100.0	100.0
Refinance Loans					
Low	0	0.0	0	0.0	0.9
Moderate	3	15.0	519	13.3	20.8
Middle	17	85.0	3,388	86.7	48.1
Upper	0	0.0	0	0.0	29.8
Unknown	0	0.0	0	0.0	0.4
Tract-Unk	0	0.0	0	0.0	
Total	20	100.0	3,907	100.0	100.0
Home Improvement Loans					
Low	0	0.0	0	0.0	0.9
Moderate	1	100.0	16	100.0	20.8
Middle	0	0.0	0	0.0	48.1
Upper	0	0.0	0	0.0	29.8
Unknown	0	0.0	0	0.0	0.4
Tract-Unk	0	0.0	0	0.0	
Total	1	100.0	16	100.0	100.0
Multifamily Loans					Multi-family Units %
Low	2	33.3	4,903	73.9	21.6
Moderate	2	33.3	1,120	16.9	37.8
Middle	1	16.7	86	1.3	20.9
Upper	1	16.7	529	8.0	11.1
Unknown	0	0.0	0	0.0	8.7
Tract-Unk	0	0.0	0	0.0	
Total	6	100.0	6,638	100.0	100.0
Total Home Mortgage Loans					Owner Occupied Units %
Low	2	3.5	4,903	30.4	0.9
Moderate	13	22.8	2,816	17.5	20.8
Middle	40	70.2	7,241	44.9	48.1
Upper	2	3.5	1,176	7.3	29.8
Unknown	0	0.0	0	0.0	0.4
Tract-Unk	0	0.0	0	0.0	
Total	57	100.0	16,136	100.0	100.0
Source: 2022 FFIEC Census Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.					

Small Business Lending

The geographic distribution of small business lending is reasonable. The bank had no lending in low-income census tracts; however, as previously discussed, this area is comprised predominately of higher learning establishments and student housing. Further, businesses in these tracts make up only 10.5 percent of all businesses in the AA, which indicates lower demand for small business credit compared to other communities in the AA. Within the moderate-income census tracts, the bank’s lending to small businesses is comparable to the percentage of businesses.

As discussed previously, conspicuous lending gaps were noted; however, these gaps are sufficiently explained by the proximity of the bank’s branches from these areas and numerous competing institutions located nearby.

Table 25

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Columbia MSA					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	10.5
Moderate	10	20.4	618	12.6	26.3
Middle	39	79.6	4,305	87.4	39.2
Upper	0	0.0	0	0.0	21.4
Unknown	0	0.0	0	0.0	2.6
Tract-Unk	0	0.0	0	0.0	
Total	49	100.0	4,924	100.0	100.0

*Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 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 reasonable. No small farm loans were made in low-income census tracts; however, 0.8 percent of farms reside in these tracts, which presents limited lending opportunity. Given this limited opportunity, the bank’s lack of lending is considered comparable to the demographic figure. In the moderate-income census tracts, the bank’s lending was comparable to the percentage of total farms.

Conspicuous lending gaps were identified in Boone and Cooper Counties, as previously discussed, and are sufficiently explained by the lack of lending opportunity, proximity of the bank’s branches to these areas, and numerous competing institutions located nearby.

Table 26

Distribution of 2022 Small Farm Lending By Income Level of Geography					
Assessment Area: Columbia MSA					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0.8
Moderate	5	13.9	270	11.3	14.9
Middle	31	86.1	2,128	88.7	67.0
Upper	0	0.0	0	0.0	16.5
Unknown	0	0.0	0	0.0	0.8
Tract-Unk	0	0.0	0	0.0	
Total	36	100.0	2,398	100.0	100.0

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 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 a reasonable distribution among individuals of different income levels and businesses and farms of different sizes. The bank’s refinance, home improvement, and multifamily lending are not evaluated individually in this evaluation due to insufficient volumes to render meaningful conclusions.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The bank’s total home mortgage lending to low-income borrowers at 15.7 percent is comparable to the demographic figure at 19.6 percent; lending to moderate-income borrowers at 15.7 percent is equally comparable.

Home Purchase Lending

The borrower distribution of home purchase lending is reasonable. The bank’s lending to low-income borrowers at 16.7 percent was comparable to the demographic figure at 19.6 percent; lending to moderate-income borrowers at 13.3 percent is equally comparable to the percentage of families in these tracts.

Table 27

Distribution of 2022 Home Mortgage Lending By Borrower Income Level					
Assessment Area: Columbia MSA					
Borrower Income Level	Bank Loans*				Families by Family
	#	#%	\$(000)	%	Income %
Home Purchase Loans					
Low	5	16.7	387	6.9	19.6
Moderate	4	13.3	702	12.6	18.9
Middle	7	23.3	860	15.4	21.2
Upper	7	23.3	2,378	42.7	40.3
Unknown	7	23.3	1,248	22.4	0.0
Total	30	100.0	5,575	100.0	100.0
Refinance Loans					
Low	3	15.0	262	6.7	19.6
Moderate	4	20.0	494	12.6	18.9
Middle	4	20.0	675	17.3	21.2
Upper	5	25.0	1,880	48.1	40.3
Unknown	4	20.0	596	15.3	0.0
Total	20	100.0	3,907	100.0	100.0
Home Improvement Loans					
Low	0	0.0	0	0.0	19.6
Moderate	0	0.0	0	0.0	18.9
Middle	0	0.0	0	0.0	21.2
Upper	0	0.0	0	0.0	40.3
Unknown	1	100.0	16	100.0	0.0
Total	1	100.0	16	100.0	100.0
Total Home Mortgage Loans					
Low	8	15.7	649	6.8	19.6
Moderate	8	15.7	1,196	12.6	18.9
Middle	11	21.6	1,535	16.2	21.2
Upper	12	23.5	4,258	44.8	40.3
Unknown	12	23.5	1,860	19.6	0.0
Total	51	100.0	9,498	100.0	100.0
Source: 2022 FFIEC Census Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					
Multifamily loans are not included in the borrower distribution analysis.					
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.					

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank’s lending to businesses with gross annual revenues of \$1 million or less was comparable to the percentage of small businesses in the AA. Moreover, 89.8 percent of loans were made in amounts of \$250,000 or less, indicating the willingness of the bank to meet the needs of small businesses in their community.

Table 28

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Columbia MSA					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	39	79.6	2,684	54.5	91.9
Over \$1 Million	10	20.4	2,240	45.5	7.1
Revenue Unknown	0	0.0	0	0.0	1.0
Total	49	100.0	4,924	100.0	100.0
By Loan Size					
\$100,000 or Less	36	73.5	1,190	24.2	
\$100,001 - \$250,000	8	16.3	1,206	24.5	
\$250,001 - \$1 Million	5	10.2	2,527	51.3	
Total	49	100.0	4,924	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	31	79.5	981	36.5	
\$100,001 - \$250,000	6	15.4	886	33.0	
\$250,001 - \$1 Million	2	5.1	817	30.4	
Total	39	100.0	2,684	100.0	
<i>Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 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 reasonable. The bank’s lending to farms with gross annual revenues of \$1 million or less is comparable to the percentage of small farms in the area. Additionally, 94.4 percent of loans were originated in amounts of \$250,000 or less, indicating a willingness to lend to small farms.

Table 29

Distribution of 2022 Small Farm Lending By Revenue Size of Farms					
Assessment Area: Columbia MSA					
	Bank Loans				Total Farms
	#	#%	\$(000)	\$%	%
By Revenue					
\$1 Million or Less	33	91.7	1,864	77.7	98.9
Over \$1 Million	3	8.3	535	22.3	0.3
Revenue Unknown	0	0.0	0	0.0	0.8
Total	36	100.0	2,398	100.0	100.0
By Loan Size					
\$100,000 or Less	30	83.3	1,171	48.8	
\$100,001 - \$250,000	4	11.1	626	26.1	
\$250,001 - \$500,000	2	5.6	601	25.1	
Total	36	100.0	2,398	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	29	87.9	1,121	60.1	
\$100,001 - \$250,000	3	9.1	443	23.8	
\$250,001 - \$500,000	1	3.0	300	16.1	
Total	33	100.0	1,864	100.0	
<i>Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

**JEFFERSON CITY MSA ASSESSMENT AREA
METROPOLITAN AREA
(Limited-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE JEFFERSON CITY
MSA AA**

The bank's delineated AA is comprised of the entirety of the Jefferson City, Missouri MSA, which consists of Cole, Callaway, Moniteau and Osage Counties. (See Appendix A for an AA map.)

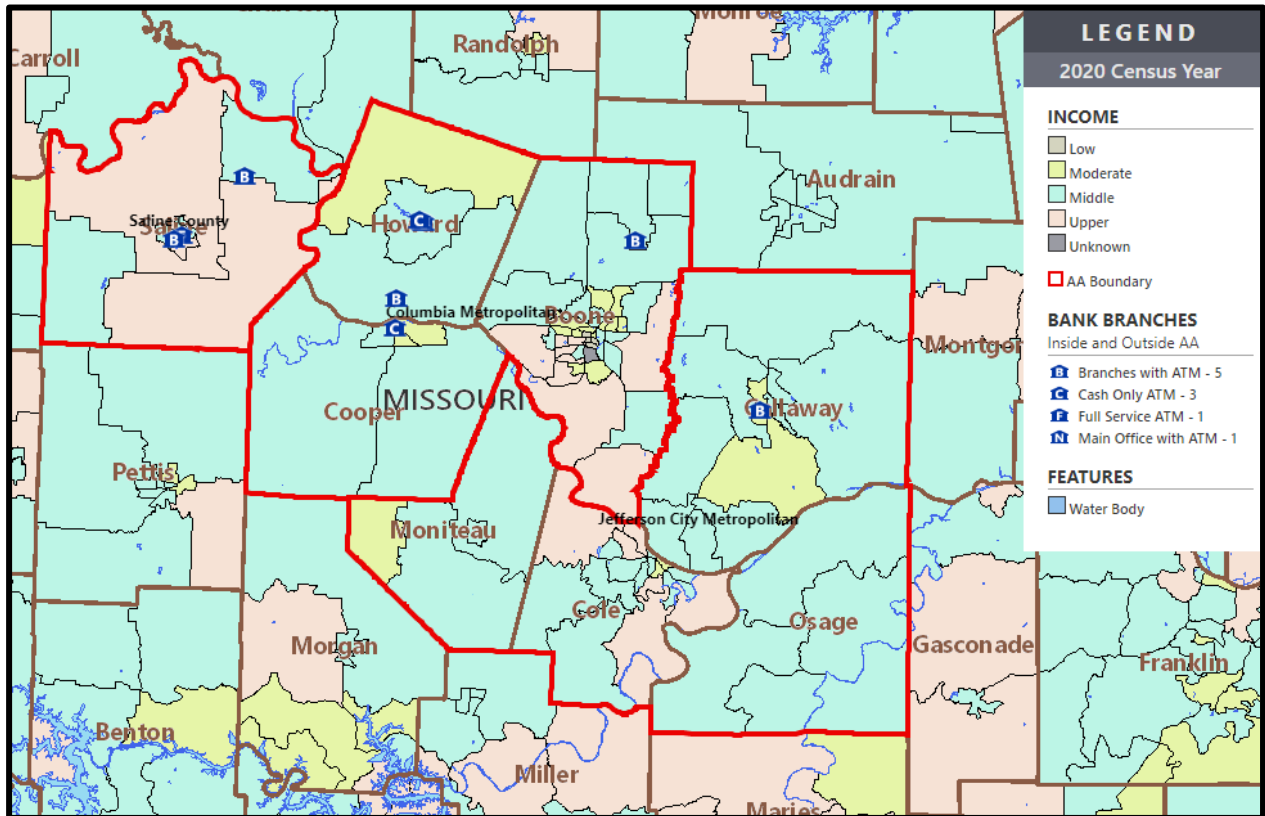
- There have been no changes to the AA delineation since the prior CRA evaluation.
- The bank's AA is comprised of 37 census tracts, including five moderate-, twenty-six middle-, and six upper-income census tracts. Since the prior performance evaluation, the income designations of census tracts in the county changed from one low-, three moderate-, twenty-two middle-, and five upper-income census tracts. The composition changed as of 2022 due to the release of the 2016-2020 ACS data. (See Appendix C for demographic and lending data.)
- According to the 2020 census data, the AA consists of 17.4 percent low-, 19.5 percent moderate-, 24.1 percent middle-, and 39.0 percent upper-income families.
- The bank operates one full-service branch with an on-site ATM in the city of Fulton.
- According to 2020 ACS data, the AA population was 150,309.
- Based on the June 30, 2022 FDIC Deposit Market Share Report, the bank ranks 17th of 20 FDIC-insured depository institutions operating in the AA, with 0.7 percent deposit market share.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE
JEFFERSON CITY MSA AA**

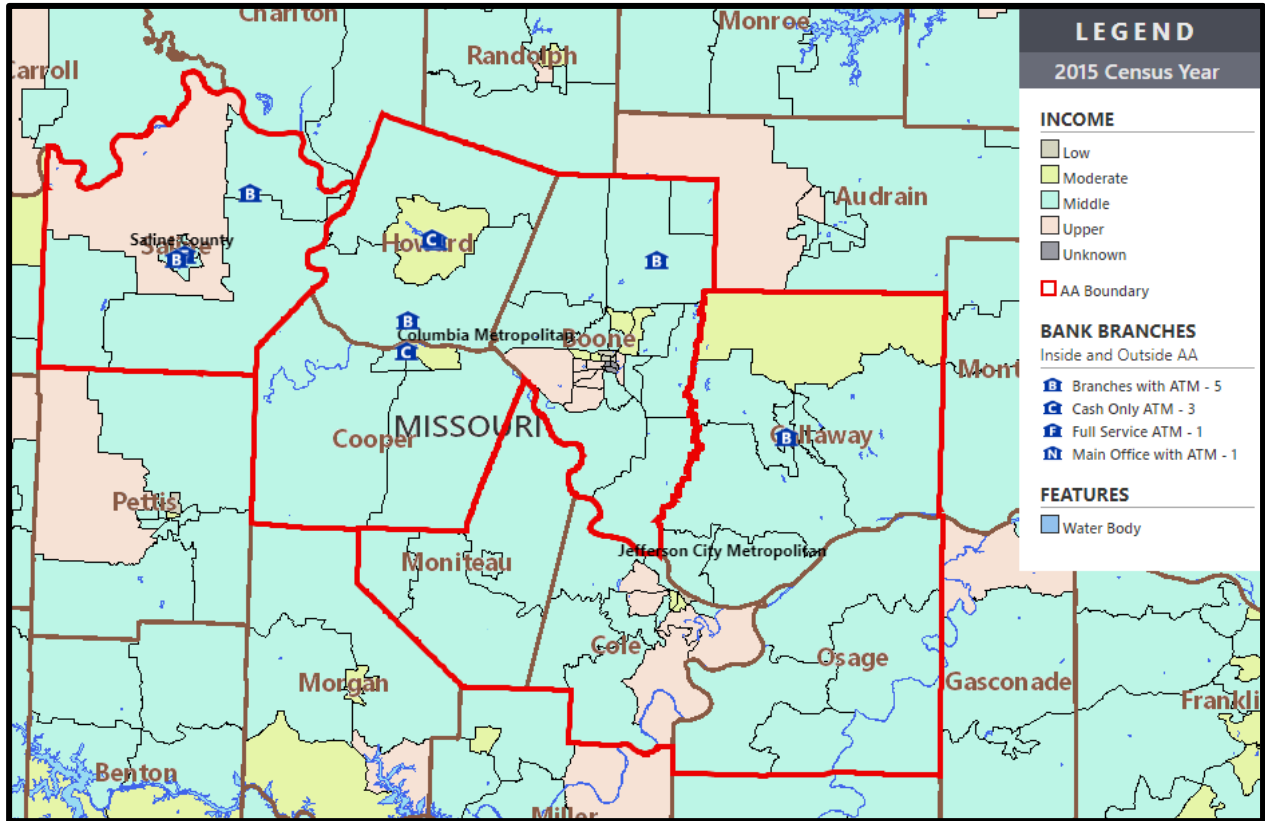
Conclusions regarding the bank's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The institution's performance in the area is consistent with the bank's performance in the other AAs.

APPENDIX A – MAPS OF THE ASSESSMENT AREAS

Map A-1
2022



Map A-2
2021



APPENDIX B – DEMOGRAPHIC INFORMATION

Table B-1

2022 Saline County AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	764	15.0
Moderate	0	0.0	0	0.0	0	0.0	825	16.2
Middle	5	62.5	2,921	57.3	338	11.6	1,101	21.6
Upper	3	37.5	2,176	42.7	113	5.2	2,407	47.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	8	100.0	5,097	100.0	451	8.8	5,097	100.0
Income Categories	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	6,413	3,459	59.3	53.9	1,770	27.6	1,184	18.5
Upper	3,789	2,370	40.7	62.5	636	16.8	783	20.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	10,202	5,829	100.0	57.1	2,406	23.6	1,967	19.3
Income Categories	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	470	60.2	415	59.5	39	63.9	16	69.6
Upper	311	39.8	282	40.5	22	36.1	7	30.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	781	100.0	697	100.0	61	100.0	23	100.0
Percentage of Total Businesses:				89.2		7.8		2.9
Income Categories	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	34	35.1	32	34.0	2	66.7	0	0.0
Upper	63	64.9	62	66.0	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	97	100.0	94	100.0	3	100.0	0	0.0
Percentage of Total Farms:				96.9		3.1		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table B-2

2022 Columbia MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	8.3	962	2.0	333	34.6	9,367	19.6
Moderate	14	29.2	10,742	22.4	1,159	10.8	9,065	18.9
Middle	20	41.7	22,743	47.5	1,814	8.0	10,155	21.2
Upper	9	18.8	13,085	27.3	249	1.9	19,309	40.3
Unknown	1	2.1	364	0.8	127	34.9	0	0.0
Total AA	48	100.0	47,896	100.0	3,682	7.7	47,896	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	5,831	426	0.9	7.3	4,616	79.2	789	13.5
Moderate	25,006	9,941	20.8	39.8	12,335	49.3	2,730	10.9
Middle	37,673	22,947	48.1	60.9	10,762	28.6	3,964	10.5
Upper	19,919	14,233	29.8	71.5	4,512	22.7	1,174	5.9
Unknown	2,032	207	0.4	10.2	1,742	85.7	83	4.1
Total AA	90,461	47,754	100.0	52.8	33,967	37.5	8,740	9.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	878	10.5	789	10.3	78	13.2	11	13.6
Moderate	2,192	26.3	1,973	25.8	203	34.3	16	19.8
Middle	3,263	39.2	3,001	39.2	222	37.6	40	49.4
Upper	1,786	21.4	1,693	22.1	79	13.4	14	17.3
Unknown	214	2.6	205	2.7	9	1.5	0	0.0
Total AA	8,333	100.0	7,661	100.0	591	100.0	81	100.0
Percentage of Total Businesses:				91.9		7.1		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	3	0.8	3	0.8	0	0.0	0	0.0
Moderate	55	14.9	55	15.0	0	0.0	0	0.0
Middle	248	67.0	245	66.9	1	100.0	2	66.7
Upper	61	16.5	60	16.4	0	0.0	1	33.3
Unknown	3	0.8	3	0.8	0	0.0	0	0.0
Total AA	370	100.0	366	100.0	1	100.0	3	100.0
Percentage of Total Farms:				98.9		0.3		0.8
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX C – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES

Table C-1

Distribution of 2022 Home Mortgage Lending By Income Level of Geography					
Assessment Area: Jefferson City MSA					
Geographic Income Level	Bank Loans*				Owner Occupied Units %
	#	#%	\$(000)	%	
Home Purchase Loans					
Low	0	0.0	0	0.0	0.0
Moderate	1	5.0	50	2.0	7.2
Middle	18	90.0	2,198	87.5	75.0
Upper	1	5.0	264	10.5	17.8
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	20	100.0	2,512	100.0	100.0
Refinance Loans					
Low	0	0.0	0	0.0	0.0
Moderate	2	20.0	185	18.1	7.2
Middle	8	80.0	839	81.9	75.0
Upper	0	0.0	0	0.0	17.8
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	10	100.0	1,024	100.0	100.0
Home Improvement Loans					
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	7.2
Middle	0	0.0	0	0.0	75.0
Upper	0	0.0	0	0.0	17.8
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	0	0.0	0	0.0	100.0
Multifamily Loans					Multi-family Units %
Low	0	0.0	0	0.0	0.0
Moderate	1	50.0	242	70.8	35.0
Middle	1	50.0	100	29.2	54.1
Upper	0	0.0	0	0.0	10.9
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	2	100.0	342	100.0	100.0
Total Home Mortgage Loans					Owner Occupied Units %
Low	0	0.0	0	0.0	0.0
Moderate	4	11.8	477	11.7	7.2
Middle	29	85.3	3,331	81.8	75.0
Upper	1	2.9	264	6.5	17.8
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	34	100.0	4,072	100.0	100.0

Source: 2022 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Table C-2

Distribution of 2022 Home Mortgage Lending By Borrower Income Level					
Assessment Area: Jefferson City MSA					
Borrower Income Level	Bank Loans*				Families by Family Income %
	#	%	\$(000)	%	
Home Purchase Loans					
Low	7	35.0	730	29.1	17.4
Moderate	4	20.0	550	21.9	19.5
Middle	3	15.0	403	16.0	24.1
Upper	4	20.0	640	25.5	39.0
Unknown	2	10.0	189	7.5	0.0
Total	20	100.0	2,512	100.0	100.0
Refinance Loans					
Low	3	30.0	195	19.0	17.4
Moderate	2	20.0	111	10.8	19.5
Middle	3	30.0	333	32.5	24.1
Upper	2	20.0	385	37.6	39.0
Unknown	0	0.0	0	0.0	0.0
Total	10	100.0	1,024	100.0	100.0
Home Improvement Loans					
Low	0	0.0	0	0.0	17.4
Moderate	0	0.0	0	0.0	19.5
Middle	0	0.0	0	0.0	24.1
Upper	0	0.0	0	0.0	39.0
Unknown	0	0.0	0	0.0	0.0
Total	0	0.0	0	0.0	100.0
Total Home Mortgage Loans					
Low	10	31.3	925	24.8	17.4
Moderate	7	21.9	704	18.9	19.5
Middle	6	18.8	736	19.7	24.1
Upper	7	21.9	1,176	31.5	39.0
Unknown	2	6.3	189	5.1	0.0
Total	32	100.0	3,730	100.0	100.0
<p>Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available. Multifamily loans are not included in the borrower distribution analysis.</p> <p>Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.</p>					

Table C-3

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Jefferson City MSA					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	5	45.5	880	69.0	24.5
Middle	6	54.5	396	31.1	75.5
Upper	0	0.0	0	0.0	0.0
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	11	100.0	1,275	100.0	100.0

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table C-4

Distribution of 2022 Small Farm Lending By Income Level of Geography					
Assessment Area: Jefferson City MSA					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	1	6.3	15	1.2	12.5
Middle	15	93.8	1,269	98.8	87.5
Upper	0	0.0	0	0.0	0.0
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	16	100.0	1,284	100.0	100.0

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table C-5

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Jefferson City MSA					
	Bank Loans				Total Businesses
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	9	81.8	700	54.9	92.2
Over \$1 Million	2	18.2	576	45.2	6.6
Revenue Unknown	0	0.0	0	0.0	1.2
Total	11	100.0	1,275	100.0	100.0
By Loan Size					
\$100,000 or Less	7	63.6	161	12.6	
\$100,001 - \$250,000	2	18.2	293	23.0	
\$250,001 - \$1 Million	2	18.2	821	64.4	
Total	11	100.0	1,275	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	6	66.7	147	21.0	
\$100,001 - \$250,000	2	22.2	293	41.9	
\$250,001 - \$1 Million	1	11.1	260	37.1	
Total	9	100.0	700	100.0	
<i>Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Table C-6

Distribution of 2022 Small Farm Lending By Revenue Size of Farms					
Assessment Area: Jefferson City MSA					
	Bank Loans				Total Farms
	#	#%	\$(000)	%	%
By Revenue					
\$1 Million or Less	16	100.0	1,284	100.0	98.4
Over \$1 Million	0	0.0	0	0.0	0.8
Revenue Unknown	0	0.0	0	0.0	0.8
Total	16	100.0	1,284	100.0	100.0
By Loan Size					
\$100,000 or Less	11	68.8	460	35.8	
\$100,001 - \$250,000	5	31.3	824	64.2	
\$250,001 - \$500,000	0	0.0	0	0.0	
Total	16	100.0	1,284	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	11	68.8	460	35.8	
\$100,001 - \$250,000	5	31.3	824	64.2	
\$250,001 - \$500,000	0	0.0	0	0.0	
Total	16	100.0	1,284	100.0	
<i>Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Table C-7

2022 Jefferson City MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,158	19.5
Moderate	2	18.2	1,972	17.8	278	14.1	2,450	22.1
Middle	9	81.8	9,121	82.2	656	7.2	2,826	25.5
Upper	0	0.0	0	0.0	0	0.0	3,659	33.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	11	100.0	11,093	100.0	934	8.4	11,093	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	3,492	1,617	13.4	46.3	1,293	37.0	582	16.7
Middle	15,492	10,487	86.6	67.7	2,836	18.3	2,169	14.0
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	18,984	12,104	100.0	63.8	4,129	21.7	2,751	14.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	340	24.5	306	23.9	30	32.6	4	25.0
Middle	1,049	75.5	975	76.1	62	67.4	12	75.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,389	100.0	1,281	100.0	92	100.0	16	100.0
Percentage of Total Businesses:				92.2		6.6		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	16	12.5	15	11.9	0	0.0	1	100.0
Middle	112	87.5	111	88.1	1	100.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	128	100.0	126	100.0	1	100.0	1	100.0
Percentage of Total Farms:				98.4		0.8		0.8
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

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, 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.

Nonmetropolitan area (NonMSA): Any area that is not located within an MSA.

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. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

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