PUBLIC DISCLOSURE

March 27, 2023

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

RCB Bank
RSSD# 945053

300 West Patti Page Boulevard
Claremore, Oklahoma 74017

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 institution. 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

This institution is rated: **Satisfactory**

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

Performance Levels	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			X
High Satisfactory	X	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.*

Major factors supporting the rating include:

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 delineated AAs.
- 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 good.
- The bank makes a relatively high level of community development (CD) loans.

Investment Test

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

Service Test

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

INSTITUTION

DESCRIPTION OF INSTITUTION

The bank is an interstate financial institution headquartered in Claremore, Oklahoma. The bank's characteristics include:

- The bank is a wholly owned subsidiary of RCB Holding Company, Inc., a one bank holding company also headquartered in Claremore.
- The bank had total assets of $3.9 billion as of September 30, 2022.
- The bank operates its network of 62 banking offices within 11 AAs in the two contiguous states of Oklahoma and Kansas. Since the prior evaluation, the bank expanded its branch networks in Oklahoma and Kansas by a total of seven offices through the acquisition of two branches from an area financial institution, as well as the acquisition of two area banks.
- The bank's primary business strategy is small to medium-sized business lending, as well as residential real estate lending, although the composition of its loan portfolio (Table 1) illustrates a well-diversified mixture.

Table 1

Composition of Loan Portfolio as of September 30, 2022		
Loan Type	$(000)	%
Construction and Land Development	115,321	5.1
Farmland	85,727	3.8
1-4 Family Residential Real Estate	429,652	19.0
Multifamily Residential Real Estate	39,806	1.8
Non-Farm Non-Residential Real Estate	711,894	31.4
Agricultural	53,704	2.4
Commercial and Industrial	125,502	5.5
Consumer	233,399	10.3
Other	469,356	20.7
Gross Loans	**2,264,361**	**100.0**
Note: Percentages may not total 100.0 percent due to rounding.		

The bank was rated Satisfactory under the Community Reinvestment Act (CRA) at its March 22, 2021 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

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large 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. Examiners reviewed the following data:

- The bank's home purchase, home refinance, home improvement, and multi-family loans reported on the bank's 2020 and 2021 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- The bank's small business and small farm loans reported on the bank's 2020 and 2021 CRA LARs;
- CD loans originated from January 1, 2021 to December 31, 2022;
- Qualified investments that were made from January 1, 2021 to December 31, 2022, and qualified investments made prior to, but still outstanding, during this period, and qualified grants, donations, or in-kind contributions of property made during this period; and,
- Retail banking services and CD services from January 1, 2021 to December 31, 2022.

For this evaluation, more weight was placed on the bank's performance in the state of Oklahoma when determining the overall institution rating given the bank's loan and deposit volumes as well as its larger branch presence within the state relative to its state of Kansas presence. The bank's small business lending was weighted more heavily in the analysis due to the volume of loans included in the analysis and strategic emphasis at the institution-level; however, home mortgage lending and, to a lesser extent, small farm lending, was weighted appropriately based on the volume of originations within each AA analysis and the credit needs of the AAs based on their characteristics. Additionally, emphasis was placed on the bank's lending performance in comparison to aggregate lending data, as it is considered a representative indicator of credit demand within the AAs. Demographic data was incorporated into the analysis to a lesser extent to understand available opportunities present throughout the bank's various markets. While included in the lending tables and totals throughout this report, home mortgage loans reported on the bank's HMDA LAR with a purpose of "Other" or "Not Applicable" were not evaluated individually in the geographic and borrower analyses. Additionally, within the geographic distribution of home mortgage loan products, an evaluation of multifamily lending is not conducted throughout this report based on volumes too limited to conduct a meaningful analysis.

Table 2 illustrates the bank's presence in each AA by number of branches, including the type of performance review analysis applied in this evaluation of each AA (full-scope or limited-scope), the number of banking offices, the percentage of lending and deposits compared to the bank-wide and the state level totals, and the bank's June 30, 2022 deposit market share as a percentage of all Federal Deposit Insurance Corporation (FDIC)-insured financial institutions.

Table 2

Review Type and Market Share by AA								
Assessment Area	Review Type	Br. #	Percent of Bank's Lending by $[1]		Percent of Bank's Deposits by $[2]		Deposit Market Share	
			Bank	State	Bank	State	% Market Share[2]	Market Share Rank[3]
State of Oklahoma		44	65.4		82.1		2.4	8 of 204
Kay County	Full	5	9.9	15.1	14.3	17.4	39.7	1 of 8
Northeast Oklahoma	Limited	6	5.7	8.7	13.5	16.5	23.7	1 of 15
Oklahoma City MSA	Full	11	14.5	22.1	9.2	11.2	0.7	26 of 72
Payne County	Limited	4	4.3	6.5	6.7	8.1	12.5	3 of 17
Tulsa MSA	Full	17	29.7	45.4	37.6	45.8	4.0	5 of 57
Washington County	Limited	1	1.4	2.1	0.8	1.0	2.6	7 of 11
State of Kansas		18	27.4		17.9		0.7	35 of 258
Cowley County	Full	6	8.0	29.3	8.9	49.9	41.7	1 of 7
Lawrence MSA	Limited	1	2.7	9.7	0.4	2.0	0.4	21 of 22
Montgomery County	Limited	1	0.1	0.2	0.5	2.9	2.7	6 of 7
Reno County	Limited	4	6.7	24.3	4.9	27.6	13.7	2 of 11
Wichita MSA	Full	6	10.0	36.5	3.2	17.6	0.6	29 of 46

1 Based on the bank's HMDA, small business, and small farm lending used in the analysis.
2 Based on the June 30, 2022 FDIC's Deposit Market Share Report.
3 Based on the bank's ranking among FDIC-insured financial institutions in each AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

This performance evaluation first discusses the bank's overall performance, followed by an in-depth evaluation of the bank's record of lending, investment, and service test performance in the states of Oklahoma and Kansas. Conclusions with respect to the lending test for full-scope reviewed AAs are reflected in the body of the report, while lending data for AAs that received a limited-scope review are located in Appendix E. As discussed, and unless otherwise noted, the bank's performance in its Oklahoma AAs generally carried greater weight in the institutional conclusions.

LENDING TEST

The bank's overall lending test performance is rated high satisfactory. The state of Oklahoma received a high satisfactory lending test rating, while the state of Kansas is rated low satisfactory.

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. Table 3 summarizes the bank's lending activities considered in this performance analysis.

Table 3

Summary of Lending Activity Reviewed				
Loan Type	2020 and 2021			
	#	$(000)	#%	$%
Home Purchase – Conv.	1,415	282,711	13.8	22.7
Home Purchase – FHA	198	28,926	1.9	2.3
Home Improvement	46	3,481	0.5	0.3
Multi-Family Housing	59	105,315	0.6	8.5
Other Purpose Closed-End	35	4,741	0.3	0.4
Refinancing	1,062	216,119	10.4	17.3
Home Purchase – VA	49	11,001	0.5	0.9
Total HMDA related	2,864	652,294	28.0	52.4
Total Small Business	6,379	502,196	62.4	40.3
Total Small Farm	977	91,478	9.6	7.3
Total Loans	**10,220**	**1,245,968**	**100.0**	**100.0**

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The bank continues to offer traditional, industry-recognized government-guaranteed loan programs through agencies such as the Federal Housing Administration, the Veterans Administration, and the United States Department of Agriculture throughout each of the bank's AAs for consumers seeking residential real estate loans. Small Business Administration (SBA) and Farm Service Agency loans are also offered for commercial and agricultural operating entities, including a significant volume of SBA Paycheck Protection Program (PPP) loans originated during the evaluation as a result of the COVID-19 Disease Pandemic (the pandemic).

During the analysis period illustrated in Table 3, the bank financed 4,322 loans totaling $247.1 million to small businesses under the PPP loan program. The volume of lending to small businesses in this analysis period was more than two and a half times the volume of originations evaluated at the prior evaluation, illustrating a significant response to the needs of small businesses during the pandemic.

Assessment Area Concentration

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

Table 4

Lending Inside and Outside the Assessment Areas								
Loan Type	**Inside**				**Outside**			
	#	#%	**$(000)**	**$%**	#	#%	**$(000)**	**$%**
Home Purchase - Conventional	1,298	91.7	254,503	90.0	117	8.3	28,208	10.0
Home Purchase - FHA	179	90.4	26,289	90.9	19	9.6	2,637	9.1
Home Improvement	44	95.7	3,324	95.5	2	4.3	157	4.5
Multi-Family Housing	53	89.8	99,908	94.9	6	10.2	5,407	5.1
Other Purpose Closed-End	34	97.1	4,477	94.4	1	2.9	264	5.6
Refinancing	987	92.9	200,346	92.7	75	7.1	15,773	7.3
Home Purchase - VA	45	91.8	10,278	93.4	4	8.2	723	6.6
Total HMDA related	2,640	92.2	599,125	91.8	224	7.8	53,169	8.2
Total Small Business	6,020	94.4	468,155	93.2	359	5.6	34,041	6.8
Total Small Farm	820	83.9	76,195	83.3	157	16.1	15,283	16.7
Total Loans	**9,480**	**92.8**	**1,143,475**	**91.8**	**740**	**7.2**	**102,493**	**8.2**
Note: Percentages may not total 100.0 percent due to rounding.								

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 adequate distribution among the different census tracts and dispersion throughout the AAs. The conclusion is derived from adequate penetration levels noted in the state evaluations of Oklahoma and Kansas.

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 good penetration among individuals of different income levels and businesses and farms of different sizes. The conclusion is derived from good penetration levels noted in the state evaluations of Oklahoma and Kansas.

Community Development Lending

This performance criterion evaluates the bank's level of CD lending. The bank makes a relatively high level of CD loans when considering the bank's capacity and the need and availability of such opportunities. AAs in the state of Oklahoma reflect a relatively high level of CD lending, while AAs in the state of Kansas reflect an adequate level of CD lending.

Table 5 illustrates the volume of CD loans by number and dollar based on their CD purpose. The bank makes a significant portion of its CD loans that is considered responsive to area affordable housing needs. Additionally, and consistent with its historical strategy, the bank provides interim lease financing to area municipal organizations, including area schools that contain a majority of their student populations eligible for free or reduced lunches under the National School Lunch Program (NSLP).

Examples of responsive CD lending activities include:

- The bank provided interim lease financing totaling $12.0 million to a rural area municipality for immediate improvements to its city-wide electric infrastructure. The loan is considered responsive to the revitalization and stabilization needs of an area that is comprised of moderate-income and distressed nonmetropolitan middle-income tracts.
- The bank provided CD financing totaling $2.0 million that supported the economic development needs of an area small business under the PPP loan program. The proceeds of the loan supported job creation and retention via payroll needs to a small business located in a moderate-income area.

Table 5

Community Development Loans – All		
Community Development Purpose	**#**	**$(000)**
Affordable Housing	30	3,711
Community Services	6	75,587
Economic Development	1	2,000
Revitalization and Stabilization	1	12,000
Outside Activities	2	386
Total Loans	**40**	**93,683**

INVESTMENT TEST

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

The bank's overall performance under the investment test is high satisfactory. The rating is derived from an outstanding investment test performance in the state of Oklahoma, while the state of Kansas investment test is rated low satisfactory. The bank has a significant level of qualified CD investments and grants but is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits good responsiveness to the credit and CD needs of its AAs. Table 6 illustrates the total volumes of investment and donation activities by CD purpose, including an itemization of investments that remain on the bank's balance sheet (prior-period) and new investments made during the current evaluation period. While weighting is generally even among prior-period and current-period investments, the volume of investments that were made during the evaluation period further supports the bank's performance in meeting the ongoing investment needs within its AAs.

Examples of qualified CD investments include:

- During the evaluation period, the bank purchased a $1.7 million school bond that was established for the construction and furnishing of an area school that contained a student population of 95.0 percent that was eligible for free or reduced lunches under the NSLP.
- Two school bonds totaling $2.3 million were purchased for improvements and facility expansions for three schools in one of the bank's AAs that each contained more than a majority of its student populations eligible for free or reduced lunches under the NSLP.

In addition to its qualified investments, the bank's level of CD donations was most responsive to area organizations that provide community services for LMI individuals and families. The bank's philanthropic activity included donations to 165 different area organizations, including nonprofit entities and local grassroots agencies, and to organizations that support activities that provide for the revitalization and stabilization of their respective geographies. Examples of the responsive donations include:

- The bank made 12 donations totaling $37,763 to a well-known nonprofit agency that provides an array of community services targeted to LMI individuals and families, including financial assistance, shelter, food, medical access, and educational resources.
- A $10,000 donation was made to a specific initiative of an area economic development corporation to support small business growth and job creation for area residents.

Table 6

Investments, Grants, and Donations – All								
Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	0	0	0	0	10	12	10	12
Community Services	11	3,375	22	15,830	220	229	268	22,374
Economic Development	0	0	0	0	2	15	2	15
Revitalization and Stabilization	0	0	0	0	1	0[3]	1	0
Outside Activities	5	1,809	12	8,626	0	0	21	10,435
Total	**16**	**5,184**	**34**	**24,456**	**233**	**256**	**302**	**32,836**

[1] *Book Value of Investment*
[2] *Original Market Value of Investment*
[3] *Donation totaling $260*

SERVICE TEST

The bank's overall performance under the service test is outstanding. This performance conclusion is derived from an outstanding service test rating in the state of Kansas, while the state of Oklahoma was rated high satisfactory. The volume of CD services performed in the state of Kansas had a favorable impact on the overall institution rating given the notable volume of services performed by bank staff relative to the bank's presence in the state's predominantly rural AAs.

Retail Banking Services

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

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are readily accessible to the bank's various geographies and to individuals of different income levels in each AA. As illustrated in Table 7, the locations of bank offices and full-service ATMs distributed among the various census tracts align similarly to the proportion of such tracts throughout the bank's geographic footprint, particularly in LMI tracts. Additionally, a number of banking offices located in middle- and upper-income tracts remain in close proximity to LMI tracts.

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 expanded its branch network through acquisition activities since the prior evaluation, including one branch acquired in a moderate-income tract (Caney, Kansas) and other offices located in middle-income tracts. Additionally, one branch was closed in Oilton, Oklahoma, located in a middle-income 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. Lobby hours and drive-through services vary among the bank's markets, although accessible operating hours are generally between 8:00 a.m. and 5:00 p.m. Monday through Friday and 9:00 a.m. and 12:00 p.m. on Saturday.

Table 7

Retail Banking and Community Development Services – All												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	4.8	27.4	46.8	21.0	0.0	100.0	5.6	26.2	38.8	27.0	2.5	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Households by Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	38.5	46.2	15.4	0.0	100.0	4.5	24.6	42.1	27.9	0.9	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	62		7		1		0	1	5	0	0	6
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	3		139		13		0		155		82	

[1] Based on 2022 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 bank staff performed 155 services to 82 organizations during the evaluation period, which is a considerable increase in its CD services compared to the previous evaluation period that was limited by the impacts of the pandemic. As illustrated in Table 7, the substantial majority of services were provided to organizations that provide community services to LMI individuals and were comprised of an even mixture of board of directors (board) membership capacities and financial literacy education sessions. Examples of the types of CD services performed include:

- A bank representative provided their financial expertise serving in a leadership position on the board for an area educational foundation for a rural school district that contains a majority of its student population eligible for free or reduced lunches. Additionally, the bank representative also served as treasurer for an area nonprofit agency that provides an array of services which support area affordable housing needs.
- A bank representative provided five CD services during the evaluation and dedicated a notable volume of hours providing their financial expertise in board membership capacities at community services organizations and an affordable housing agency, as well as instructing financial education sessions for students in schools with a majority of their student populations eligible for free or reduced lunches.

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.

STATE OF OKLAHOMA

CRA rating for Oklahoma: **Satisfactory**
The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **Outstanding**
The Service Test is rated: **High Satisfactory**

Major factors supporting the rating include:

Lending Test

- Lending levels reflect good responsiveness to AA credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- The bank's distribution of loans by income level of geography 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 is good.
- The bank makes a relatively high level of CD loans within its AAs.

Investment Test

- The bank makes an excellent level of qualified CD investments and grants and is occasionally in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives but exhibits excellent responsiveness to the credit and CD needs throughout its Oklahoma AAs.

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels throughout its AAs.
- The bank's record of opening and closing 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 AAs, particularly LMI geographies and/or individuals.
- The bank provides a relatively high level of CD services within its Oklahoma AAs and is responsive to the available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Oklahoma is consistent with the overall scope for the institution. Full-scope reviews were conducted for the Tulsa Metropolitan Statistical Area (MSA) AA, Oklahoma City MSA AA, and the Kay County AA. Limited-scope reviews were conducted for the Northeast Oklahoma, Payne County, and Washington County AAs to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state evaluation. The overall state rating was influenced more heavily by the bank's performance in the Tulsa MSA and Oklahoma City MSA AAs due to the bank's larger deposit, loan, and branching presence in these AAs; however, where applicable, notable performance in limited-scope reviewed AAs was considered in the statewide performance tests.

The analysis of loans originated in the state included 4,414 small business, 1,833 home mortgage, and 434 small farm loans. Weighting among individual product groups aligns with discussion in the overall Institution Scope of Examination section of this report.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN OKLAHOMA

The bank delineates 6 of its 11 AAs and operates 44 of its 62 branches in Oklahoma**.** The bank's presence in the state includes banking offices in the densely populated cities of Tulsa (Tulsa MSA AA) and Oklahoma City (Oklahoma City MSA AA), while its four remaining AAs each possess much less populated communities and reflect generally rural, nonmetropolitan characteristics. Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of this report, with a primary emphasis on small business and home mortgage lending. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

The bank's performance under the lending test in the state of Oklahoma is high satisfactory. Lending test performance in the Tulsa MSA AA is rated good, while the Oklahoma City MSA and Kay County AAs are rated adequate. Additionally, stronger CD lending performance in the limited-scope reviewed Northeast Oklahoma and Payne County AAs had a positive influence on the overall lending test performance within the state.

Lending Activity

The bank's overall lending activities in Oklahoma reflect good responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The lending programs offered in the state generally mirror those outlined in the overall Institution Lending Activity section of this report.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within Oklahoma reflects adequate distribution among the different census tracts and dispersion throughout the AAs. This conclusion mirrors the performance noted in the three full-scope reviewed AAs.

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

The bank's lending within Oklahoma has an overall good penetration among individuals of different income levels and businesses and farms of different sizes. The borrower distribution in the Tulsa MSA AA reflects excellent penetration, while the distribution in the Kay County AA reflects good penetration and the Oklahoma City MSA AA reflects adequate penetration.

Community Development Lending

The bank provides a relatively high level of CD loans within the state of Oklahoma. The bank originated 13 CD loans totaling $58.8 million in AAs within the state and three CD loans totaling $31.6 million in a broader regional area within the state. The three CD loans originated beyond AA boundaries were comprised of government lease financing that benefitted schools with a majority of their students eligible for free or reduced lunches.

Table 8

Community Development Loans – State of Oklahoma		
Community Development Purpose	**#**	**$(000)**
Affordable Housing	8	776
Community Services	3	44,037
Economic Development	1	2,000
Revitalization and Stabilization	1	12,000
Outside Activities	3	31,550
Total Loans	**16**	**90,363**

INVESTMENT TEST

The bank's overall performance under the investment test in the state of Oklahoma is outstanding. The bank has an excellent level of qualified CD investments and grants within Oklahoma and is occasionally in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits excellent responsiveness to the credit and CD needs of its AAs.

The investment test in the Oklahoma City MSA AA is excellent, while the Tulsa MSA and Kay County AAs reflect good investment test performance. Additionally, the bank's level of investments in the limited-reviewed Northeast Oklahoma AA is notable and had a positive influence on the overall state rating given the bank's relatively limited presence in the three-county, rural AA. For example, the volume of donations by number and dollar in the AA ranked second among all Oklahoma AAs and third among bank-wide AAs.

Consistent with prior evaluations, the bank's CD investment strategy is comprised of purchasing municipal bonds that benefit area schools and districts which contain a majority of student populations eligible for free and reduced lunches. The bank also presented and received qualified investment credit for schools located in statewide areas beyond the bank's AAs in rural communities that also have a majority of students eligible for free and reduced lunches.

In addition to its debt securities, the bank made a considerable volume of donations in the state, primarily to organizations that provide community services that support LMI individuals and families.

Table 9

Investments, Grants, and Donations – State of Oklahoma								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	0	0	0	0	1	1	1	1
Community Services	11	3,375	22	15,830	139	164	172	19,369
Economic Development	0	0	0	0	1	5	1	5
Revitalization and Stabilization	0	0	0	0	1	0[3]	1	0[3]
Outside Activities	4	1,503	12	8,626	0	0	16	10,129
Total	**15**	**4,878**	**34**	**24,456**	**142**	**170**	**191**	**29,504**

1 *Book Value of Investment*
2 *Original Market Value of Investment*
3 *Donation totaling $260*

SERVICE TEST

The bank's overall performance under the service test in the state of Oklahoma is high satisfactory. The service test in the Kay County AA is excellent, while the Tulsa MSA and Oklahoma City MSA AAs reflect good service test performance.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, within Oklahoma AAs are accessible to the bank's various geographies and to individuals of different income levels in each AA. The bank operates 10 of its 44 statewide branches in LMI tracts, including two in low- and eight in moderate-income tracts. As illustrated in Table 10, this distribution of branches is generally comparable to the proportion of the various income tracts in its AAs, particularly in LMI tracts. Additionally, the bank operates 7 of its 17 full-service ATMs in moderate-income tracts.

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. Since the prior evaluation, the bank closed one branch (Oilton, OK), while acquisition activities resulted in the opening of six branches, including one branch located in a moderate-income tract (Chelsea, OK).

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. The bank's operations in the state of Oklahoma generally reflect those of the overall institution, which is described in the overall Institution Retail Banking Services section of this evaluation.

Table 10

Retail Banking and Community Development Services – State of Oklahoma												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	4.6	22.7	45.5	27.3	0.0	100.0	5.9	26.2	36.5	28.6	2.7	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Households by Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	41.2	41.2	17.6	0.0	100.0	5.0	24.8	40.0	29.3	0.9	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	44		6		1		0	1	4	0	0	5
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	2		70		10		0		82		50	

[1] *Based on 2022 FFIEC census tract definitions.*
Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

Community Development Services

The bank provides a relatively high level of CD services within the state of Oklahoma. During the evaluation, bank representatives performed 82 services to 50 organizations throughout the state. A substantial majority of services performed were to organizations that provide various community services that benefit LMI individuals and families. Capacities of CD services performed generally consisted of board membership and financial literacy instruction in schools with a majority of student populations eligible for free or reduced lunches.

TULSA MSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)

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

The bank's Tulsa MSA AA consists of Creek, Okmulgee, Osage, Pawnee, Rogers, Tulsa, and Wagoner Counties in their entireties, which also comprise the Tulsa, Oklahoma MSA. (See Appendix C for a map of the AA and Appendix D for additional demographic data.)

- There have been no changes to the AA delineation since the prior examination.
- The AA is comprised of 313 census tracts, including 16 low-, 93 moderate-, 106 middle-, 97 upper-, and one unknown-income census tract. At the previous exam, the AA was comprised of 272 census tracts, including 17 low-, 76 moderate-, 111 middle-, and 68 upper-income census tracts.
- According to the June 30, 2022 FDIC Market Share Report, the bank's deposit market share was 4.0 percent for the Tulsa MSA AA, which ranked 5th out of the 57 FDIC-insured institutions operating in the AA.
- To further support the CRA evaluation, a recent interview with a member of the community within the bank's AA conducted for another CRA evaluation to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions was referenced. The community member represented an organization focused on economic development.

Table 11

Population Change Assessment Area: Tulsa MSA			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Tulsa MSA	962,676	1,015,331	5.5
Creek County, OK	70,761	71,754	1.4
Okmulgee County, OK	39,446	36,706	(6.9)
Osage County, OK	48,054	45,818	(4.7)
Pawnee County, OK	16,499	15,553	(5.7)
Rogers County, OK	89,190	95,240	6.8
Tulsa County, OK	623,335	669,279	7.4
Wagoner County, OK	75,391	80,981	7.4
Oklahoma	3,849,733	3,959,353	2.8
Source: 2020 U.S. Census Bureau Decennial Census 2011 – 2015 U.S. Census Bureau: American Community Survey			

- As illustrated in the table above, the overall AA population experienced positive growth during the period between 2015 and 2020, although there was population decline in the AA's three least populated counties.
- According to the 2020 American Community Survey (ACS) data, the population of the Tulsa MSA AA is younger than the overall statewide population of Oklahoma. The population of residents age 65 years and over in the state of Oklahoma is 15.6 percent, while the population of residents 65 years or older in the AA is 15.2 percent.

Table 12

Median Family Income Change Assessment Area: Tulsa MSA			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Tulsa MSA	66,846	72,203	8.0
Creek County, OK	59,697	66,569	11.5
Okmulgee County, OK	53,473	57,161	6.9
Osage County, OK	62,463	62,130	(0.5)
Pawnee County, OK	59,434	61,250	3.1
Rogers County, OK	74,047	79,527	7.4
Tulsa County, OK	67,531	73,515	8.9
Wagoner County, OK	70,042	79,407	13.4
Oklahoma	63,401	67,511	6.5

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.

- According to the 2020 ACS data, the Tulsa MSA AA contains a concentration of families below the poverty level at 10.4 percent, which is below the statewide figure of 11.3 percent.

Table 13

Housing Cost Burden Assessment Area: Tulsa MSA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Tulsa MSA	72.4	32.8	39.3	54.7	26.8	16.4
Creek County, OK	55.8	24.0	32.0	44.3	15.6	15.6
Okmulgee County, OK	63.2	27.7	34.8	47.2	20.3	15.9
Osage County, OK	63.4	20.3	38.2	43.2	17.3	15.6
Pawnee County, OK	61.8	32.5	29.4	46.1	24.0	15.0
Rogers County, OK	70.0	29.5	37.1	57.2	30.5	15.6
Tulsa County, OK	74.8	34.6	40.5	59.7	29.9	17.1
Wagoner County, OK	72.4	26.6	37.3	50.1	26.7	14.7
Oklahoma	71.1	30.5	37.9	52.5	24.5	16.0

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

- The median family housing value in the Tulsa MSA AA, at $155,020, is above the statewide figure of $142,400.
- The median gross rent of $818 for the state of Oklahoma is below the Tulsa MSA AA figure of $863.

Table 14

Unemployment Rates Assessment Area: Tulsa MSA					
Area	2017	2018	2019	2020	2021
Tulsa MSA	4.2	3.3	3.1	6.5	4.0
Creek County, OK	4.7	3.7	3.5	6.6	4.2
Okmulgee County, OK	6.0	4.8	4.7	7.4	5.2
Osage County, OK	4.9	4.1	3.6	6.6	4.2
Pawnee County, OK	5.1	4.0	3.7	6.7	4.1
Rogers County, OK	4.2	3.2	2.9	5.9	3.5
Tulsa County, OK	4.0	3.2	3.0	6.6	4.0
Wagoner County, OK	4.1	3.2	3.0	5.9	3.5
Oklahoma	4.0	3.3	3.1	6.2	3.8

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The primary industries operating in the Tulsa MSA AA include Advanced Manufacturing, Aerospace and Defense, Logistics and Distribution, Healthcare and Social Services, and Professional Services.
- The major employers operating in the Tulsa MSA AA include American Airlines, Ascension Healthcare, Hillcrest Healthcare, Saint Francis Health System and Tulsa Public Schools.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TULSA MSA AA

LENDING TEST

The bank's performance under the lending test in the Tulsa MSA AA is good.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The evaluation of lending in the AA included 2,124 small business, 769 home mortgage, and 143 small farm loans.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of the bank's flexible lending products is discussed in the overall Institution section of this report.

Due to the absence of volumes sufficient to conduct a meaningful analysis, home improvement lending is not discussed separately in the evaluation of home mortgage lending throughout this state analysis.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects adequate distribution among the different census tracts and dispersion throughout the AA. Small business and home mortgage lending, which carried greater weight in this AA analysis, reflect adequate penetration levels, while small farm lending reflects poor levels of penetration.

<u>Home Mortgage Lending</u>

The geographic distribution of home mortgage lending is adequate. The bank did not report a home mortgage loan in a low-income tract in 2021, as illustrated in Table 15. A review of aggregate lending data and the demographic figure of owner-occupied units in low-income tracts indicates that opportunities may be limited relative to other tract income levels, which aggregate lending data patterns support. A review of bank lending in moderate-income tracts reflects a concentration of lending comparable to the aggregate lending data and below the demographic figure.

The distribution of 2020 home mortgage loans reflected penetration levels and comparative sets of data consistent with 2021 lending patterns. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. Consistent with the discussion in the total home mortgage lending analysis, the bank did not record an origination in a low-income tract. Lending in moderate-income tracts was comparable to the aggregate lending data and below the demographic figure.

The distribution of 2020 home purchase loans reflected penetration levels and comparative sets of data consistent with 2021 lending patterns. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Home Refinance Loans

The geographic distribution of home refinance lending is adequate. Consistent with the discussion in the total home mortgage lending analysis, the bank did not record an origination in a low-income tract. Lending in moderate-income tracts was comparable to the aggregate lending data and below the demographic figure.

The distribution of 2020 home refinance loans reflected penetration levels and comparative sets of data consistent with 2021 lending patterns. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Table 15

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Tulsa MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	0.8	0.9	328	0.7	0.4	0	0.0	1.0	0	0.0	0.5	2.7
Moderate	34	13.9	13.3	3,948	8.2	8.4	26	12.4	14.5	3,627	7.9	9.4	19.4
Middle	117	48.0	43.3	22,459	46.8	39.1	98	46.9	43.0	21,350	46.3	39.2	45.7
Upper	91	37.3	42.6	21,253	44.3	52.2	85	40.7	41.5	21,173	45.9	50.9	32.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	244	100.0	100.0	47,988	100.0	100.0	209	100.0	100.0	46,150	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.3	0	0.0	0.2	0	0.0	0.5	0	0.0	0.3	2.7
Moderate	7	3.7	8.3	670	1.7	5.2	9	9.3	10.0	761	4.2	6.4	19.4
Middle	101	53.4	39.1	19,220	49.3	34.4	51	52.6	42.4	9,744	54.2	38.2	45.7
Upper	81	42.9	52.4	19,133	49.0	60.2	37	38.1	47.1	7,474	41.6	55.1	32.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	189	100.0	100.0	39,023	100.0	100.0	97	100.0	100.0	17,979	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.0	0	0.0	0.5	0	0.0	1.8	0	0.0	1.2	2.7
Moderate	0	0.0	14.4	0	0.0	11.4	0	0.0	13.9	0	0.0	10.9	19.4
Middle	5	71.4	37.5	279	38.3	33.6	1	100.0	42.1	20	100.0	39.4	45.7
Upper	2	28.6	47.0	450	61.7	54.5	0	0.0	42.3	0	0.0	48.5	32.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	729	100.0	100.0	1	100.0	100.0	20	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	12.2	0	0.0	4.2	0	0.0	4.5	0	0.0	2.7	9.5
Moderate	2	28.6	44.2	2,836	34.5	48.6	2	33.3	45.2	4,143	48.4	42.1	36.7
Middle	5	71.4	35.3	5,393	65.5	39.4	0	0.0	37.6	0	0.0	36.4	32.8
Upper	0	0.0	8.3	0	0.0	7.7	4	66.7	12.7	4,413	51.6	18.8	21.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	8,229	100.0	100.0	6	100.0	100.0	8,556	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	2	0.4	0.7	328	0.3	0.4	0	0.0	0.8	0	0.0	0.5	2.7
Moderate	43	9.5	11.5	7,454	7.7	8.3	37	11.7	12.7	8,531	11.6	9.7	19.4
Middle	232	51.2	41.3	47,596	49.3	37.0	151	47.8	42.7	31,169	42.4	38.7	45.7
Upper	176	38.9	46.5	41,168	42.6	54.3	128	40.5	43.7	33,800	46.0	51.0	32.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	453	100.0	100.0	96,546	100.0	100.0	316	100.0	100.0	73,500	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
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 adequate. The distribution of 2021 small business loans in low-income tracts is comparable to the aggregate lending data as well as the demographic figure (businesses with annual revenues of $1 million or less in those tracts). Lending in moderate-income tracts is also comparable to the aggregate lending data and the demographic figure.

The geographic distribution of 2020 small business loans reflected consistent performance to 2021 lending patterns. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Table 16

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography
Assessment Area: Tulsa MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	5	0.4	2.4	254	0.3	3.2	4	0.4	2.7	842	1.3	3.5	3.1
Moderate	267	22.4	20.7	20,916	26.0	23.5	192	20.6	19.9	17,242	27.0	23.2	22.7
Middle	609	51.0	41.7	42,108	52.3	43.0	509	54.7	41.9	34,872	54.7	43.0	40.6
Upper	312	26.2	34.8	17,202	21.4	30.2	226	24.3	34.7	10,800	16.9	30.1	33.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.5	0	0.0	0.2	0	0.0	0.9	0	0.0	0.2	
Total	1,193	100.0	100.0	80,480	100.0	100.0	931	100.0	100.0	63,756	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 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 poor. The bank did not record an origination in a low-income tract during the 2021 or 2020 analysis years; however, as illustrated in Table 17, the presence of farm operations and aggregate lending data in such tracts is negligible. Lending in moderate-income tracts reflects penetration levels significantly below the aggregate lending data and demographic figures (farms with $1 million or less in annual revenues) in such tracts.

The geographic distribution of small farm lending in 2020 reflects consistent performance with 2021 lending patterns. Consistent with a lack of penetration among LMI tracts, the bank's dispersion of loans revealed gaps in lending that is consistent with the performance conclusions noted above.

Table 17

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography Assessment Area: Tulsa MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.1
Moderate	2	2.9	9.4	91	1.9	6.9	1	1.4	7.7	48	0.8	7.3	12.8
Middle	54	78.3	72.2	3,978	83.9	76.5	54	73.0	71.5	4,392	75.4	73.8	58.0
Upper	13	18.8	18.0	672	14.2	16.6	19	25.7	20.2	1,387	23.8	18.8	28.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.2	0	0.0	0.0	0	0.0	0.6	0	0.0	0.1	
Total	69	100.0	100.0	4,741	100.0	100.0	74	100.0	100.0	5,827	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 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 excellent distribution among individuals of different income levels and businesses and farms of different sizes. The distribution of small business and small farm loans reflects excellent penetration, while home mortgage lending reflects adequate penetration.

The borrower distribution of 2020 home mortgage lending reflected performance consistent with 2021 lending patterns, with penetration that generally aligned with the aggregate lending data.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The distribution of 2021 home mortgage lending to low-income borrowers reflects a comparable penetration to aggregate lending data, although significantly below the demographic figure of the percentage of families. Lending to moderate-income borrowers is comparable to the aggregate lending data as well as the demographic figure.

The borrower distribution of 2020 home mortgage lending reflected performance consistent with 2021 lending patterns, with penetration that generally aligned with the aggregate lending data.

Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The distribution of 2021 home mortgage lending to low-income borrowers reflects a comparable penetration to aggregate lending data, although significantly below the demographic figure. Lending to moderate-income borrowers is comparable to the aggregate lending data as well as the demographic figure.

The borrower distribution of 2020 home purchase lending reflected performance consistent with 2021 lending patterns, with penetration that generally aligned with the aggregate lending data.

Home Refinance Loans

The borrower distribution of home refinance lending is adequate. The distribution of 2021 home refinance lending to low-income borrowers reflects a comparable penetration to aggregate lending data and below the demographic figure. Lending to moderate-income borrowers is comparable to the aggregate lending data and below the demographic figure.

The borrower distribution of 2020 home purchase lending reflected performance consistent with 2021 lending patterns, with a penetration that generally aligned with the aggregate lending data.

Table 18

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Tulsa MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	7	2.9	5.2	592	1.2	2.8	7	3.3	6.3	681	1.5	3.5	21.5
Moderate	41	16.8	19.7	6,166	12.8	14.3	28	13.4	18.1	4,207	9.1	13.6	17.7
Middle	57	23.4	21.1	9,782	20.4	19.4	47	22.5	19.3	10,215	22.1	18.3	20.3
Upper	94	38.5	36.8	24,800	51.7	48.2	99	47.4	30.4	26,626	57.7	39.9	40.5
Unknown	45	18.4	17.2	6,648	13.9	15.2	28	13.4	25.9	4,421	9.6	24.7	0.0
Total	244	100.0	100.0	47,988	100.0	100.0	209	100.0	100.0	46,150	100.0	100.0	100.0
Refinance Loans													
Low	4	2.1	2.9	440	1.1	1.4	8	8.2	5.1	504	2.8	2.7	21.5
Moderate	14	7.4	10.5	1,743	4.5	6.3	9	9.3	14.4	808	4.5	9.8	17.7
Middle	39	20.6	16.8	6,500	16.7	12.7	18	18.6	18.0	2,924	16.3	14.9	20.3
Upper	108	57.1	47.7	25,379	65.0	57.3	51	52.6	36.3	11,217	62.4	45.2	40.5
Unknown	24	12.7	22.1	4,961	12.7	22.3	11	11.3	26.1	2,526	14.0	27.5	0.0
Total	189	100.0	100.0	39,023	100.0	100.0	97	100.0	100.0	17,979	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.0	0	0.0	3.3	0	0.0	5.6	0	0.0	3.2	21.5
Moderate	0	0.0	12.9	0	0.0	9.9	1	100.0	14.2	20	100.0	11.2	17.7
Middle	1	14.3	17.9	100	13.7	14.6	0	0.0	18.9	0	0.0	15.7	20.3
Upper	5	71.4	55.3	615	84.4	61.1	0	0.0	51.2	0	0.0	59.5	40.5
Unknown	1	14.3	8.8	14	1.9	11.0	0	0.0	10.1	0	0.0	10.4	0.0
Total	7	100.0	100.0	729	100.0	100.0	1	100.0	100.0	20	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	11	2.5	4.1	1,032	1.2	2.1	16	5.2	5.7	1,240	1.9	3.2	21.5
Moderate	58	13.0	14.9	8,316	9.4	10.4	39	12.6	16.2	5,275	8.1	11.9	17.7
Middle	100	22.4	18.5	16,552	18.7	15.9	65	21.0	18.5	13,139	20.2	16.7	20.3
Upper	207	46.4	40.9	50,794	57.5	51.5	150	48.4	33.5	37,843	58.3	42.3	40.5
Unknown	70	15.7	21.6	11,623	13.2	20.1	40	12.9	26.1	7,447	11.5	25.9	0.0
Total	446	100.0	100.0	88,317	100.0	100.0	310	100.0	100.0	64,944	100.0	100.0	100.0

Source: 2021 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.
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 excellent. The distribution of 2021 loans originated to small businesses (those with annual revenues of $1 million or less) is significantly above the aggregate lending data and comparable to the demographic figure.

The distribution of small business loans in 2020 reflected overall performance below that of 2021 distribution levels; however, the bank's distribution of loans to small businesses outperformed aggregate lending data penetration levels.

Table 19

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses Assessment Area: Tulsa MSA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	659	55.2	33.5	29,887	37.1	23.5	705	75.7	43.2	36,339	57.0	28.3	91.2
Over $1 Million	221	18.5		38,210	47.5		172	18.5		25,556	40.1		7.9
Revenue Unknown	313	26.2		12,383	15.4		54	5.8		1,861	2.9		0.9
Total	1,193	100.0		80,480	100.0		931	100.0		63,756	100.0		100.0
By Loan Size													
$100,000 or Less	1,013	84.9	87.9	28,721	35.7	29.5	787	84.5	91.0	21,381	33.5	32.1	
$100,001 - $250,000	113	9.5	6.3	18,225	22.6	17.7	83	8.9	4.6	13,421	21.1	17.1	
$250,001 - $1 Million	67	5.6	5.8	33,534	41.7	52.8	61	6.6	4.4	28,954	45.4	50.8	
Total	1,193	100.0	100.0	80,480	100.0	100.0	931	100.0	100.0	63,756	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	607	92.1		15,694	52.5		633	89.8		15,098	41.5		
$100,001 - $250,000	34	5.2		5,623	18.8		43	6.1		7,250	20.0		
$250,001 - $1 Million	18	2.7		8,570	28.7		29	4.1		13,991	38.5		
Total	659	100.0		29,887	100.0		705	100.0		36,339	100.0		

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

<u>Small Farm Lending</u>

The borrower distribution of small farm lending is excellent. The distribution of loans to small farms (those with annual revenues of $1 million or less) reflects penetration significantly above the aggregate lending data by number volume and comparable by dollar volume, while the concentration of loans is comparable to the demographic figure.

The borrower distribution of small farm loans in 2020 reflected consistent performance with 2021 loan penetrations.

Table 20

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms Assessment Area: Tulsa MSA													
	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	66	95.7	77.1	4,374	92.3	84.0	71	95.9	68.0	5,612	96.3	77.7	98.7
Over $1 Million	2	2.9		317	6.7		3	4.1		215	3.7		1.1
Revenue Unknown	1	1.4		50	1.1		0	0.0		0	0.0		0.3
Total	69	100.0		4,741	100.0		74	100.0		5,827	100.0		100.0
By Loan Size													
$100,000 or Less	56	81.2	81.0	2,118	44.7	35.1	61	82.4	82.9	2,379	40.8	36.1	
$100,001 - $250,000	9	13.0	13.1	1,337	28.2	34.0	5	6.8	11.5	681	11.7	30.4	
$250,001 - $500,000	4	5.8	5.9	1,286	27.1	30.9	8	10.8	5.6	2,767	47.5	33.5	
Total	69	100.0	100.0	4,741	100.0	100.0	74	100.0	100.0	5,827	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	54	81.8		2,018	46.1		58	81.7		2,164	38.6		
$100,001 - $250,000	9	13.6		1,337	30.6		5	7.0		681	12.1		
$250,001 - $500,000	3	4.5		1,019	23.3		8	11.3		2,767	49.3		
Total	66	100.0		4,374	100.0		71	100.0		5,612	100.0		

Source: 2021 FFIEC Census Data
2021 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

The bank provides an adequate level of CD loans. The bank originated eight CD loans totaling $2.7 million in this AA, and was most responsive to area affordable housing needs. Examples of CD lending activities include:

- The bank provided CD financing totaling $2.0 million that supported the economic development needs of an area small business under the PPP loan program. The proceeds of the loan supported job creation and retention via payroll needs to a small business located in a moderate-income area.
- As illustrated in Table 21, the bank provided six loans totaling $697 thousand for the purchase, rehabilitation, and/or ongoing working capital needs of a collection of multifamily housing units throughout the AA that rent at levels determined as affordable for LMI individuals and families.

Table 21

Community Development Loans – Tulsa MSA AA		
Community Development Purpose	#	**$(000)**
Affordable Housing	6	697
Community Services	1	37
Economic Development	1	2,000
Revitalization and Stabilization	0	0
Total Loans	8	2,734

INVESTMENT TEST

The bank's performance under the investment test in the Tulsa MSA AA is good. The bank has a significant level of qualified CD investments and grants and is occasionally in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits good responsiveness to the credit and CD needs of its AA. Consistent with prior evaluations, the bank's investment activities in the AA are predominately comprised of school bonds for area educational facilities where the majority of student populations are eligible for free or reduced lunches, as well as organizations that provide community services to LMI individuals and families.

Examples of investment activities includes:

- Six school bond investments totaling $1.4 million benefited a rural school district with a majority population of students eligible for free or reduced lunches. The bonds were issued for the renovation and improvements of the small school district's elementary and high school.
- The bank donated a total of $12,600 during the evaluation to an area elementary school that contains a majority population of students eligible for free or reduced lunches. The donations were made to provide educational resources and teaching supplies.

Table 22

Investments, Grants, and Donations – Tulsa MSA AA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	0	0	0	0	0	0	0	0
Community Services	6	1,205	8	4,772	40	76	54	6,053
Economic Development	0	0	0	0	1	5	1	5
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	6	1,205	8	4,772	41	81	55	6,058

1 *Book Value of Investment*
2 *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the Tulsa MSA AA is good.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are readily accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates seven of its 17 full-service branches in moderate-income tracts and the remaining branches are distributed among middle- and upper-income tracts, with numerous branches in close proximity to LMI tracts throughout the AA. Additionally, the bank operates two full-service ATMs in a moderate-income and middle-income tract, respectively.

The bank's record of opening and closing branches has improved the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the prior evaluation, the bank expanded its branch footprint through acquisition activities, adding two full-service branches, including one branch in a moderate-income tract (Chelsea, Oklahoma) and one branch in a middle-income tract.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The bank's operations in the AA generally reflect those of the overall institution, which is described in the overall Institution Retail Banking Services section of this evaluation.

Table 23

<table>
<tr><th colspan="13">Retail Banking and Community Development Services – Tulsa MSA AA</th></tr>
<tr><td rowspan="6">Branch Accessibility</td><th colspan="6">Location of Branches by Tract (%)</th><th colspan="6">Percent of Tracts[1] (%)</th></tr>
<tr><th>Low</th><th>Mod</th><th>Mid</th><th>Upp</th><th>Unk</th><th>Total</th><th>Low</th><th>Mod</th><th>Mid</th><th>Upp</th><th>Unk</th><th>Total</th></tr>
<tr><td>0.0</td><td>41.2</td><td>35.3</td><td>23.5</td><td>0.0</td><td>100.0</td><td>5.1</td><td>29.7</td><td>33.9</td><td>31.0</td><td>0.3</td><td>100.0</td></tr>
<tr><th colspan="6">Location of Full-Service ATMs by Tract (%)</th><th colspan="6">Percent of Households by Tracts[1] (%)</th></tr>
<tr><th>Low</th><th>Mod</th><th>Mid</th><th>Upp</th><th>Unk</th><th>Total</th><th>Low</th><th>Mod</th><th>Mid</th><th>Upp</th><th>Unk</th><th>Total</th></tr>
<tr><td>0.0</td><td>75.0</td><td>25.0</td><td>0.0</td><td>0.0</td><td>100.0</td><td>5.2</td><td>29.0</td><td>35.1</td><td>30.5</td><td>0.2</td><td>100.0</td></tr>
<tr><td rowspan="3">Changes in Branch Location</td><th colspan="6">Number of Branches (#)</th><th colspan="6">Net Change in Branch Locations (#)</th></tr>
<tr><th colspan="2">Total Branches</th><th colspan="2">Openings (#)</th><th colspan="2">Closings (#)</th><th>Low</th><th>Mod</th><th>Mid</th><th>Upp</th><th>Unk</th><th>Total</th></tr>
<tr><td colspan="2">17</td><td colspan="2">2</td><td colspan="2">0</td><td>0</td><td>1</td><td>1</td><td>0</td><td>0</td><td>2</td></tr>
<tr><td rowspan="2">Community Development Services</td><th colspan="2">Affordable Housing</th><th colspan="2">Community Services</th><th colspan="2">Economic Development</th><th colspan="2">Revitalization & Stabilization</th><th colspan="2">Total Services</th><th colspan="2">Total Organizations</th></tr>
<tr><td colspan="2">0</td><td colspan="2">22</td><td colspan="2">3</td><td colspan="2">0</td><td colspan="2">25</td><td colspan="2">15</td></tr>
<tr><td colspan="13">[1] Based on 2022 FFIEC census tract definitions.
Note: Total percentages may vary by 0.1 percent due to automated rounding differences.</td></tr>
</table>

Community Development Services

The bank provides a relatively high level of CD services in the AA. During the evaluation period, 22 bank representatives provided 25 CD services to 15 area organizations. The services were a mixture of board membership for organizations that provide community services to LMI individuals and families and financial education instruction to students from schools with majority populations eligible for free or reduced lunches.

Examples of CD services include:

- A representative of the bank’s senior executive staff chaired the board of an area organization that provides an array of community services to LMI individuals, including emergency shelter, counseling services, domestic abuse advocacy, and financial education. In their capacity, the bank representative provided financial expertise and guidance related to organizational projects, services, and fundraising.
- A bank representative served on the board of a rural community organization that provides support to small businesses in the area. In their capacity, the representative served in recurring monthly outreach events which attracted small business entrepreneurs and facilitated educational opportunities for business growth and development.

OKLAHOMA CITY MSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE OKLAHOMA CITY MSA AA

The bank's Oklahoma City MSA AA consists of Canadian, Cleveland, Grady, Lincoln, Logan, McClain, and Oklahoma Counties in their entireties, which also comprise the Oklahoma City, Oklahoma MSA. (See Appendix C for a map of the AA and Appendix D for additional demographic data.)

- There have been no changes to the AA delineation since the prior examination.
- The AA comprises 419 census tracts, including 30 low-, 104 moderate-, 147 middle-, 119 upper-, and 19 unknown-income census tracts. At the previous exam, the AA comprised 363 total census tracts, including 29 low-, 106 moderate-, 136 middle-, 83 upper-, and nine unknown-income census tracts.
- According to the June 30, 2022 FDIC Market Share Report, the bank's deposit market share was 0.7 percent for the Oklahoma City MSA AA, which ranked 26th out of the 72 FDIC-insured institutions operating in the AA.
- To further support the CRA evaluation, a recent interview with a member of the community within the bank's AA conducted in conjunction with another CRA evaluation to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions was referenced. The community member represented an area organization that works closely with local leadership to identify and meet area business needs and attract business growth to the area.

Table 24

Population Change Assessment Area: Oklahoma City MSA			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Oklahoma City MSA	1,318,408	1,425,695	8.1
Canadian County, OK	126,193	154,405	22.4
Cleveland County, OK	268,614	295,528	10.0
Grady County, OK	53,612	54,795	2.2
Lincoln County, OK	34,504	33,458	(3.0)
Logan County, OK	44,493	49,555	11.4
McClain County, OK	36,512	41,662	14.1
Oklahoma County, OK	754,480	796,292	5.5
Oklahoma	3,849,733	3,959,353	2.8

Source: 2020 U.S. Census Bureau Decennial Census
2011 – 2015 U.S. Census Bureau: American Community Survey

- According to the 2020 ACS data, the population of the Oklahoma City MSA AA is younger than the overall statewide population of Oklahoma. The population of residents age 65 years and over residing within the state of Oklahoma is 15.6 percent, while the population of residents 65 years or older in the AA is 13.7 percent.

Table 25

Median Family Income Change Assessment Area: Oklahoma City MSA			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Oklahoma City MSA	69,988	75,170	7.4
Canadian County, OK	79,529	85,700	7.8
Cleveland County, OK	76,689	80,924	5.5
Grady County, OK	67,163	75,100	11.8
Lincoln County, OK	60,374	63,261	4.8
Logan County, OK	73,817	90,430	22.5
McClain County, OK	75,587	80,385	6.3
Oklahoma County, OK	65,933	70,629	7.1
Oklahoma	63,401	67,511	6.5

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 Oklahoma City MSA AA contains a concentration of families below the poverty level, at 9.5 percent, which is below the statewide figure of 11.3 percent.

Table 26

Housing Cost Burden Assessment Area: Oklahoma City MSA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Oklahoma City MSA	75.2	29.4	39.8	56.4	26.7	16.5
Canadian County, OK	70.1	33.2	33.0	62.1	33.0	15.6
Cleveland County, OK	79.2	32.4	39.8	62.1	29.7	16.0
Grady County, OK	66.0	16.5	33.3	41.8	16.5	12.4
Lincoln County, OK	50.2	12.1	26.5	46.0	24.3	15.3
Logan County, OK	62.3	22.8	38.8	42.6	27.7	15.3
McClain County, OK	74.6	9.6	37.2	53.1	22.9	15.1
Oklahoma County, OK	75.8	29.3	41.0	57.5	25.9	17.4
Oklahoma	71.1	30.5	37.9	52.5	24.5	16.0

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

- The median family housing value in the Oklahoma City MSA AA, at $162,598, is above the statewide figure of $142,400.
- The median gross rent of $818 for the state of Oklahoma is below the Oklahoma City MSA AA figure of $886.

Table 27

Unemployment Rates Assessment Area: Oklahoma City MSA					
Area	2017	2018	2019	2020	2021
Oklahoma City MSA	3.6	3.0	2.9	6.2	3.7
Canadian County, OK	3.3	2.7	2.7	5.9	3.2
Cleveland County, OK	3.3	2.8	2.7	5.7	3.2
Grady County, OK	3.8	2.9	2.9	6.2	3.5
Lincoln County, OK	4.1	3.4	3.4	5.7	3.5
Logan County, OK	3.5	2.9	2.7	5.2	3.3
McClain County, OK	3.3	2.7	2.6	5.6	3.1
Oklahoma County, OK	3.8	3.2	3.0	6.5	4.1
Oklahoma	4.0	3.3	3.1	6.2	3.8

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The major industries operating in the AA include health care, retail trade, educational services, accommodation & food services, and professional, scientific and technical services.
- The major employers operating in the Oklahoma City MSA AA include the State of Oklahoma, Tinker Air Force Base, Oklahoma State University, Integris Health and Amazon.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE OKLAHOMA CITY MSA AA

LENDING TEST

The bank's performance under the lending test in the Oklahoma City MSA AA is adequate.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The evaluation of lending in the AA included 919 small business, 547 home mortgage, and 12 small farm loans.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of the bank's flexible lending products is discussed in the overall Institution section of this report.

Small business lending generally carried greater weight in the AA analysis based on larger loan volumes. Additionally, due to the absence of volumes sufficient to conduct a meaningful analysis, small farm loans are not included in the lending test evaluation and home improvement loans are not discussed separately.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects adequate distribution among the different census tracts and dispersion throughout the AA. This conclusion is derived from adequate penetrations noted among tracts of various income levels for both home mortgage and small business lending.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The bank did not report a home mortgage loan in a low-income tract in 2021, as illustrated in Table 28. A review of aggregate lending data and the demographic figure of owner-occupied units in low-income tracts indicates that opportunities may be limited relative to other tract levels. A review of bank lending in moderate-income tracts reflects a concentration of lending by number that is comparable to aggregate lending data but below the demographic figure.

The distribution of 2020 home mortgage loans reflected penetration levels in low- and moderate-income tracts that were comparable to the aggregate lending data and overall, reflected comparable performance with 2021 lending patterns. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. Consistent with the discussion in the total home mortgage lending analysis, the bank did not record an origination in a low-income tract in 2021. Lending in moderate-income tracts reflects comparable penetration to the aggregate lending data but below the demographic figure.

The distribution of 2020 home purchase loans reflected penetration levels in low- and moderate-income tracts that were comparable to the aggregate lending data and overall, reflected comparable performance with 2021 lending patterns. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Home Refinance Loans

The geographic distribution of home refinance lending is adequate. Consistent with the discussion in the total home mortgage lending analysis, the bank did not record an origination in a low-income tract in 2021. Lending in moderate-income tracts by number is comparable to the aggregate lending data but below the demographic figure.

The distribution of 2020 home refinance loans reflected penetration levels in low- and moderate-income tracts that were comparable to aggregate lending data and overall, reflected comparable performance with 2021 lending patterns. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Table 28

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography – Assessment Area: Oklahoma City MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	0.5	1.8	100	0.2	1.0	0	0.0	2.1	0	0.0	1.3	3.4
Moderate	23	12.5	13.3	3,649	8.8	8.8	12	9.0	13.7	2,392	7.3	9.1	18.4
Middle	54	29.3	37.7	9,184	22.2	32.6	50	37.3	39.3	9,816	30.1	34.1	44.1
Upper	105	57.1	47.1	27,754	67.0	57.3	71	53.0	44.8	20,188	61.9	55.3	34.1
Unknown	1	0.5	0.1	760	1.8	0.2	1	0.7	0.1	244	0.7	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	184	100.0	100.0	41,447	100.0	100.0	134	100.0	100.0	32,640	100.0	100.0	100.0
Refinance Loans													
Low	4	2.9	0.9	243	0.6	0.4	0	0.0	1.1	0	0.0	0.7	3.4
Moderate	14	10.1	8.4	1,618	4.0	5.4	5	7.5	10.5	678	4.1	6.9	18.4
Middle	39	28.1	35.6	7,955	19.9	29.3	22	32.8	38.0	5,183	31.7	32.1	44.1
Upper	81	58.3	54.9	29,759	74.5	64.6	40	59.7	50.2	10,513	64.2	60.1	34.1
Unknown	1	0.7	0.1	388	1.0	0.2	0	0.0	0.1	0	0.0	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	139	100.0	100.0	39,963	100.0	100.0	67	100.0	100.0	16,374	100.0	100.0	100.0
Home Improvement Loans													
Low	1	100.0	2.7	46	100.0	2.0	0	0.0	2.7	0	0.0	1.7	3.4
Moderate	0	0.0	11.1	0	0.0	8.0	0	0.0	13.0	0	0.0	9.9	18.4
Middle	0	0.0	43.0	0	0.0	36.2	2	50.0	38.8	370	52.9	32.9	44.1
Upper	0	0.0	43.1	0	0.0	53.3	2	50.0	45.4	329	47.1	55.3	34.1
Unknown	0	0.0	0.1	0	0.0	0.4	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	46	100.0	100.0	4	100.0	100.0	699	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	9.5	0	0.0	4.3	0	0.0	12.0	0	0.0	4.3	8.5
Moderate	4	44.4	38.7	6,708	14.6	28.9	2	33.3	39.4	717	4.7	34.6	39.3
Middle	2	22.2	33.2	3,577	7.8	34.0	1	16.7	32.2	12,300	80.3	35.3	33.4
Upper	3	33.3	18.0	35,571	77.6	32.2	3	50.0	16.2	2,302	15.0	22.4	17.5
Unknown	0	0.0	0.6	0	0.0	0.6	0	0.0	0.3	0	0.0	3.5	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	45,856	100.0	100.0	6	100.0	100.0	15,319	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	6	1.8	1.5	389	0.3	1.0	0	0.0	1.8	0	0.0	1.2	3.4
Moderate	41	12.3	11.5	11,975	9.4	8.4	19	8.9	12.5	3,787	5.8	9.8	18.4
Middle	96	28.7	37.2	20,813	16.3	31.5	76	35.7	38.9	27,720	42.5	33.5	44.1
Upper	189	56.6	49.7	93,084	73.1	58.9	117	54.9	46.7	33,472	51.3	55.0	34.1
Unknown	2	0.6	0.1	1,148	0.9	0.2	1	0.5	0.1	244	0.4	0.4	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	334	100.0	100.0	127,409	100.0	100.0	213	100.0	100.0	65,223	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
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 adequate. The distribution of 2021 small business loans in low-income tracts is comparable to the aggregate lending data as well as the demographic figure of the percentage of businesses in the tracts with $1 million or less in annual revenues. Lending in moderate-income tracts is also comparable to the aggregate lending data and the demographic figure.

The geographic distribution of 2020 small business loans reflected consistent performance to 2021 lending patterns. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Table 29

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Oklahoma City MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	22	3.8	4.2	3,185	4.3	5.5	8	2.4	4.2	1,848	4.5	5.3	4.4
Moderate	103	17.7	19.6	16,594	22.6	22.5	58	17.3	19.3	7,967	19.5	20.9	22.4
Middle	231	39.6	36.7	32,992	44.9	35.2	135	40.2	37.3	17,905	43.8	37.2	37.3
Upper	208	35.7	36.8	18,151	24.7	32.1	123	36.6	36.4	12,119	29.7	32.2	32.7
Unknown	19	3.3	2.4	2,599	3.5	4.5	12	3.6	2.1	1,000	2.4	4.2	3.1
Tract-Unk	0	0.0	0.4	0	0.0	0.2	0	0.0	0.7	0	0.0	0.1	
Total	583	100.0	100.0	73,521	100.0	100.0	336	100.0	100.0	40,839	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 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 distribution among individuals of different income levels and businesses and farms of different sizes. The distribution of small business loans reflects good levels of penetration, while the analysis of home mortgage lending reflects poor levels of penetration.

Home Mortgage Lending

The borrower distribution of home mortgage lending is poor when evaluating the penetration of loans to borrowers of different income levels in 2020 and 2021 loan years. The distribution of 2021 loans to low-income borrowers reflects comparable penetration levels to aggregate lending data, although significantly below the demographic figure of the percentage of families. Lending to moderate-income borrowers is also comparable to the aggregate lending data and below the demographic figure.

The borrower distribution of 2020 loans reflected penetration levels below the performance of 2021 lending, specifically with penetration levels to moderate-income borrowers that were below aggregate lending data. The performance to borrowers of different income levels in 2020 impacted the overall conclusion for home mortgage lending.

Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The distribution of 2021 loans to low-income borrowers is comparable to the aggregate lending data, although significantly below the demographic figure. Lending to moderate-income borrowers is also comparable to the aggregate lending data and below the demographic figure.

The borrower distribution of 2020 home purchase lending reflected performance below 2021 lending patterns, specifically with regard to lending to moderate-income borrowers.

Home Refinance Loans

The borrower distribution of home refinance lending is poor. The distribution of 2021 loans to low-income borrowers was comparable to the aggregate lending data, although significantly below the demographic figure. Lending to moderate-income borrowers is below the aggregate lending data and significantly below the demographic figure.

The borrower distribution of 2020 home refinance loans reflected consistent performance with 2021 lending patterns.

Table 30

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Oklahoma City MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	9	4.9	6.3	1,032	2.5	3.6	4	3.0	5.2	435	1.3	2.9	21.3
Moderate	25	13.6	19.9	4,255	10.3	15.4	16	11.9	16.4	2,904	8.9	12.4	17.5
Middle	37	20.1	20.3	7,272	17.5	19.5	18	13.4	18.3	3,234	9.9	17.3	20.5
Upper	86	46.7	32.4	24,389	58.8	42.7	72	53.7	30.8	21,100	64.6	40.1	40.7
Unknown	27	14.7	21.1	4,499	10.9	18.8	24	17.9	29.3	4,967	15.2	27.3	0.0
Total	184	100.0	100.0	41,447	100.0	100.0	134	100.0	100.0	32,640	100.0	100.0	100.0
Refinance Loans													
Low	4	2.9	3.1	297	0.7	1.3	1	1.5	4.0	75	0.5	1.9	21.3
Moderate	4	2.9	10.5	733	1.8	6.5	3	4.5	12.2	607	3.7	8.0	17.5
Middle	8	5.8	16.0	1,682	4.2	12.7	11	16.4	17.4	1,947	11.9	14.1	20.5
Upper	92	66.2	41.0	28,492	71.3	49.3	42	62.7	35.7	11,282	68.9	43.5	40.7
Unknown	31	22.3	29.4	8,759	21.9	30.2	10	14.9	30.7	2,463	15.0	32.5	0.0
Total	139	100.0	100.0	39,963	100.0	100.0	67	100.0	100.0	16,374	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	7.0	0	0.0	3.7	0	0.0	6.2	0	0.0	3.5	21.3
Moderate	0	0.0	13.0	0	0.0	9.1	1	25.0	12.5	129	18.5	8.8	17.5
Middle	1	100.0	18.3	46	100.0	13.9	0	0.0	19.8	0	0.0	15.3	20.5
Upper	0	0.0	52.5	0	0.0	61.8	2	50.0	51.7	400	57.2	58.8	40.7
Unknown	0	0.0	9.3	0	0.0	11.5	1	25.0	9.9	170	24.3	13.6	0.0
Total	1	100.0	100.0	46	100.0	100.0	4	100.0	100.0	699	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	13	4.0	4.7	1,329	1.6	2.5	5	2.4	4.7	510	1.0	2.5	21.3
Moderate	29	8.9	15.0	4,988	6.1	11.0	21	10.1	14.3	3,691	7.4	10.5	17.5
Middle	46	14.2	17.7	9,000	11.0	16.0	29	14.0	17.7	5,181	10.4	15.9	20.5
Upper	179	55.1	35.6	52,978	65.0	45.0	117	56.5	33.1	32,922	66.0	41.5	40.7
Unknown	58	17.8	27.0	13,258	16.3	25.5	35	16.9	30.1	7,600	15.2	29.7	0.0
Total	325	100.0	100.0	81,553	100.0	100.0	207	100.0	100.0	49,904	100.0	100.0	100.0

Source: 2021 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.
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 good. The 2021 distribution of loans to small businesses (those with $1 million or less in annual revenues) reflects penetration by number that was above aggregate lending data but was below the demographic figure.

The borrower distribution of small business loans in 2020 reflected consistent performance with 2021 loan penetrations.

Table 31

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses Assessment Area: Oklahoma City MSA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	285	48.9	29.7	29,172	39.7	25.9	186	55.4	41.3	15,126	37.0	32.4	91.5
Over $1 Million	156	26.8		36,656	49.9		99	29.5		19,796	48.5		7.4
Revenue Unknown	142	24.4		7,693	10.5		51	15.2		5,917	14.5		1.2
Total	583	100.0		73,521	100.0		336	100.0		40,839	100.0		100.0
By Loan Size													
$100,000 or Less	400	68.6	86.9	13,286	18.1	30.5	224	66.7	91.0	7,832	19.2	34.7	
$100,001 - $250,000	94	16.1	7.4	16,227	22.1	20.2	65	19.3	4.9	11,040	27.0	18.2	
$250,001 - $1 Million	89	15.3	5.7	44,008	59.9	49.3	47	14.0	4.1	21,967	53.8	47.1	
Total	583	100.0	100.0	73,521	100.0	100.0	336	100.0	100.0	40,839	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	222	77.9		6,450	22.1		152	81.7		4,429	29.3		
$100,001 - $250,000	28	9.8		4,785	16.4		18	9.7		3,135	20.7		
$250,001 - $1 Million	35	12.3		17,937	61.5		16	8.6		7,562	50.0		
Total	285	100.0		29,172	100.0		186	100.0		15,126	100.0		

Source: 2021 FFIEC Census Data
2021 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

The bank makes few, if any, CD loans in the AA. During the evaluation period, the bank did not originate a CD loan in the AA; however, a review of the universe of loans originated during the evaluation period revealed that the bank originated a limited volume of large dollar loans that are not already reported as required by the CRA, thereby limiting the volume of loans eligible for CD lending consideration. As such, the lack of CD lending did not have an adverse impact on the lending test conclusion.

INVESTMENT TEST

The bank's performance under the investment test in the Oklahoma City MSA AA is excellent. The bank has an excellent level of qualified CD investments and grants and is occasionally in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits excellent responsiveness to the credit and CD needs of its AA. Consistent with prior evaluations, the bank's investment activities in the AA are predominately comprised of school bonds for area educational facilities that contain majority student populations that are eligible for free or reduced lunches, as well as organizations that provide community services to LMI individuals and families. It is noted that the bank's investment activities in this AA reflect substantial growth in dollar volume since the last evaluation. Specifically, municipal bond investment totals were four times greater than the amounts qualified at the prior evaluation.

Examples of investment activities include:

- The bank invested in a $1.5 million bond for the benefit of a rural area high school that possesses a majority student population which is eligible for free or reduced lunches. The bond's issuance was for the construction and furnishing of a new building and emergency storm shelter for the students and staff.
- The bank donated $3,000 to an area charitable organization that provides an array of services for infants and toddlers from homes in need of emergency aid, including baby formula, diapers, and other critical necessities.

Table 32

Investments, Grants, and Donations – Oklahoma City MSA AA								
Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	0	0	0	0	1	1	1	1
Community Services	3	1,404	6	5,179	18	20	27	6,603
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	3	1,404	6	5,179	19	21	28	6,604

[1] *Book Value of Investment*
[2] *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the Oklahoma City MSA AA is good.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates 1 of its 11 full-service branches in a moderate-income tract and the remaining branches are distributed among middle- and upper-income tracts.

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. Since the prior evaluation, the bank deactivated an interactive teller machine (virtual branch) located in a middle-income tract near the campus of the University of Oklahoma. There were no other branch openings or closings in the AA during the evaluation period.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The bank's operations in the AA generally reflect those of the overall institution, which is described in the overall Institution Retail Banking Services section of this evaluation.

Table 33

Retail Banking and Community Development Services – Oklahoma City MSA AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	9.1	36.4	54.6	0.0	100.0	7.2	24.8	35.1	28.4	4.5	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Households by Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	40.0	60.0	0.0	100.0	5.6	23.6	39.4	30.1	1.3	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	11		0		1		0	0	(1)	0	0	0
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	1		15		1		0		17		10	

[1] *Based on 2022 FFIEC census tract definitions.*
Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

Community Development Services

The bank provides a relatively high level of CD services. During the evaluation period, nine bank representatives provided 17 CD services to 10 area organizations. The services were a mixture of board membership for organizations that provide community services to LMI individuals and families, financial education instruction to students from schools with majority populations eligible for free or reduced lunches, as well as providing financial expertise to assist area agencies that support small businesses and affordable housing.

Examples of CD services include:

- A bank representative provided their financial expertise serving in a leadership position on the board for an area educational foundation for a rural school district where the majority of its student population is eligible for free or reduced lunches. Additionally, the bank representative also served as treasurer for an area nonprofit agency that provides an array of services which support area affordable housing needs.
- A bank representative supported area economic development needs by providing seven small business counseling and financial literacy presentations for start-up businesses in 2022.

KAY COUNTY ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE KAY COUNTY AA

The bank's AA is comprised of Kay County in its entirety. (See Appendix C for a map of the AA and Appendix D for additional demographic data.)

- There have been no changes to the AA delineation since the prior examination.
- The AA is comprised of 11 census tracts, including two moderate-, seven middle- and two upper-income census tracts. At the previous exam, the AA was also comprised of 11 census tracts, but included three moderate-, six middle- and two upper-income census tracts.
- According to the June 30, 2022 FDIC Market Share Report, the bank's deposit market share was 39.7 percent, which ranked 1st of 8 FDIC-insured institutions operating in the AA.
- To further support the CRA evaluation, a recent interview with a member of the community within the bank's AA conducted in conjunction with another CRA evaluation to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions was referenced. The community member represented an organization that provides services that supports area economic development, including services needed by small businesses.

Table 3

Population Change Assessment Area: Kay County			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Kay County	45,587	43,700	(4.1)
NonMSA Oklahoma	1,333,350	1,289,548	(3.3)
Oklahoma	3,849,733	3,959,353	2.8
Source: 2020 U.S. Census Bureau Decennial Census 2011 – 2015 U.S. Census Bureau: American Community Survey			

- At 19.3 percent, the proportion of the AA population age 65 and older is greater than the statewide figure of 15.6 percent and other nonmetropolitan areas in Oklahoma at 18.3 percent.

Table 35

Median Family Income Change Assessment Area: Kay County			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Kay County	56,106	58,856	4.9
NonMSA Oklahoma	56,258	58,565	4.1
Oklahoma	63,401	67,511	6.5

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 AA contains a concentration of families below the poverty level at 12.8 percent, which is above the state of Oklahoma figure at 11.3 percent but below the nonmetropolitan figure of 13.5 percent.

Table 36

Housing Cost Burden Assessment Area: Kay County						
Area	**Cost Burden – Renters**			**Cost Burden – Owners**		
	Low Income	**Moderate Income**	**All Renters**	**Low Income**	**Moderate Income**	**All Owners**
Kay County	68.8	26.6	31.0	54.1	24.5	16.0
NonMSA Oklahoma	64.4	27.6	34.5	48.4	21.4	15.5
Oklahoma	71.1	30.5	37.9	52.5	24.5	16.0

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

- The median family housing value in the Kay County AA, at $96,654, is below both the statewide figure at $142,400, and the nonmetropolitan figure at $110,370.
- The median gross rent of $699 for the AA is below the state of Oklahoma figure at $818 but comparable to the nonmetropolitan figure at $698.

Table 37

Unemployment Rates Assessment Area: Kay County					
Area	**2017**	**2018**	**2019**	**2020**	**2021**
Kay County	5.1	4.5	4.0	6.7	4.3
NonMSA Oklahoma	4.3	3.5	3.4	6.0	3.8
Oklahoma	4.0	3.3	3.1	6.2	3.8

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The major industries operating in the AA include manufacturing, health care and social assistance, retail trade, educational services, and accommodation and food services.
- Major employers operating in the Kay County AA include Phillips 66 Refinery, Ponca City Public Schools, Dorada Foods, Alliance Health Ponca City, and the City of Ponca.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KAY COUNTY AA

LENDING TEST

The bank's performance under the lending test in the Kay County AA is adequate.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The evaluation of loans in the AA included 640 small business, 208 home mortgage, and 161 small farm loans.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of the bank's flexible lending products is discussed in the overall Institution section of this report.

Due to the absence of volumes sufficient to conduct a meaningful analysis, home improvement lending is not discussed separately in the evaluation of home mortgage lending throughout this state analysis.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects adequate distribution among the different census tracts and dispersion throughout the AA. The distribution of small business and home mortgage loans reflects adequate penetration levels, while small farm lending reflects good penetration levels.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. As discussed in the AA description, there were no low-income tracts in the AA during the evaluation period. As such, the concentration of 2021 loans in moderate-income tracts is comparable to the aggregate lending data by number volume and above by dollar volume, and is comparable to the demographic figure of the percentage of owner-occupied units.

The distribution of home mortgage lending in 2020 reflected consistent penetration levels to that of 2021 lending patterns. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The concentration of 2021 loans originated in moderate-income tracts is comparable to the aggregate lending data by number volume and above by dollar volume, while comparable to the demographic figure.

The distribution of home purchase lending in 2020 reflected consistent penetration levels to that of 2021 lending patterns. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Home Refinance Loans

The geographic distribution of home refinance lending is good. The concentration of 2021 loans originated in moderate-income tracts is above aggregate lending data by number and dollar volume and comparable to the demographic figure.

The distribution of home refinance lending in 2020 reflected penetration levels that exceed 2021 lending patterns. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Table 38

Geographic Income Level	2020 Bank #	2020 Bank #%	2020 Agg #%	2020 Bank $(000)	2020 Bank $%	2020 Agg $%	2021 Bank #	2021 Bank #%	2021 Agg #%	2021 Bank $(000)	2021 Bank $%	2021 Agg $%	Owner Occupied Units %
Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography — Assessment Area: Kay County													
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	9	11.7	10.9	783	8.0	7.6	11	17.5	14.9	1,619	20.4	12.3	20.5
Middle	45	58.4	59.7	4,748	48.2	51.0	34	54.0	56.2	3,412	43.0	47.5	58.1
Upper	23	29.9	29.5	4,310	43.8	41.4	18	28.6	29.0	2,898	36.5	40.3	21.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	77	100.0	100.0	9,841	100.0	100.0	63	100.0	100.0	7,929	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	16.7	10.1	455	11.3	6.5	4	13.8	8.8	372	9.7	5.4	20.5
Middle	16	53.3	52.3	1,944	48.2	41.8	12	41.4	52.9	1,269	33.1	46.1	58.1
Upper	9	30.0	37.5	1,631	40.5	51.7	13	44.8	38.3	2,196	57.2	48.6	21.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	30	100.0	100.0	4,030	100.0	100.0	29	100.0	100.0	3,837	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	23.1	0	0.0	19.7	0	0.0	15.8	0	0.0	4.1	20.5
Middle	2	100.0	76.9	84	100.0	80.3	2	100.0	68.4	120	100.0	78.1	58.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	15.8	0	0.0	17.7	21.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	84	100.0	100.0	2	100.0	100.0	120	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	25.0	0	0.0	47.8	0	0.0	15.8	0	0.0	5.8	10.9
Middle	1	100.0	50.0	195	100.0	28.7	0	0.0	73.7	0	0.0	70.6	80.7
Upper	0	0.0	25.0	0	0.0	23.5	0	0.0	10.5	0	0.0	23.6	8.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	195	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	15	13.4	11.2	1,289	9.0	8.3	15	15.6	12.9	1,991	16.5	9.4	20.5
Middle	65	58.0	57.2	7,026	49.3	47.3	48	50.0	55.5	4,801	39.8	48.8	58.1
Upper	32	28.6	31.6	5,941	41.7	44.4	33	34.4	31.6	5,267	43.7	41.7	21.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	112	100.0	100.0	14,256	100.0	100.0	96	100.0	100.0	12,059	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
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 adequate. The concentration of 2021 small business loans originated in moderate income tracts is comparable to the aggregate lending data by number volume and below by dollar volume, while comparable to the demographic figure of businesses with $1 million or less in annual revenues in the tracts.

The geographic distribution of 2020 small business loans reflected consistent performance to 2021 lending patterns. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Table 39

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Kay County													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	96	27.7	26.3	6,543	23.1	22.4	53	18.1	21.0	2,400	12.8	19.9	24.4
Middle	192	55.3	55.3	17,362	61.3	57.8	172	58.7	57.9	12,637	67.2	60.2	57.3
Upper	59	17.0	18.2	4,425	15.6	19.8	68	23.2	20.3	3,768	20.0	19.8	18.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.3	0	0.0	0.0	0	0.0	0.8	0	0.0	0.1	
Total	347	100.0	100.0	28,330	100.0	100.0	293	100.0	100.0	18,805	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 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 good. The concentration of 2021 small farm loans originated in moderate-income tracts is above the aggregate lending data by number volume and comparable by dollar volume while above the demographic figure of small farms in those tracts.

The geographic distribution of 2020 small farm loans reflected performance below 2021 lending patterns, with a distribution of loans comparable to aggregate lending data and the demographic figure. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Table 40

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography Assessment Area: Kay County													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	9	13.4	15.0	1,251	17.2	26.3	15	16.0	11.1	2,025	28.8	23.4	11.5
Middle	40	59.7	71.4	4,038	55.4	61.9	51	54.3	70.5	3,697	52.6	64.7	74.6
Upper	18	26.9	13.6	1,999	27.4	11.8	28	29.8	18.3	1,305	18.6	11.9	13.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	67	100.0	100.0	7,288	100.0	100.0	94	100.0	100.0	7,027	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 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 a good distribution among individuals of different income levels and businesses and farms of different sizes. The distribution of loans among the three products evaluated reflect good penetration levels.

Home Mortgage Lending

The borrower distribution of home mortgage lending is good. The concentration of 2021 loans to low-income borrowers is comparable to the aggregate lending data and below the demographic figure of the percentage of families. Lending to moderate-income borrowers is significantly above the aggregate lending data and comparable to the demographic figure.

The borrower distribution of home mortgage lending in 2020 reflected penetration levels that were below the performance of 2021 lending patterns, with concentrations of lending generally comparable to the aggregate lending data.

Home Purchase Loans

The borrower distribution of home purchase lending is good. The concentration of 2021 loans to low-income borrowers is above the aggregate lending data and below the demographic figure. Lending to moderate-income borrowers is significantly above the aggregate lending data by number volume and above by dollar volume, and above the demographic figure.

The borrower distribution of home purchase lending in 2020 reflected penetration levels that were below the performance of 2021 lending patterns, with concentrations of lending generally comparable to the aggregate lending data. Considering the bank's overall home purchase lending performance for both years, the borrower distribution of home purchase lending is considered good.

Home Refinance Loans

The borrower distribution of home refinance lending is adequate. The bank did not originate a home refinance loan to a low-income borrower in 2021. The concentration of loans to moderate-income borrowers is comparable to the aggregate lending data and below the demographic figure.

The borrower distribution of home refinance lending in 2020 reflected penetration levels that were consistent with the performance of 2021 lending patterns, with concentrations of lending generally comparable to the aggregate lending data.

Table 41

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Kay County													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	3	3.9	3.9	143	1.5	2.0	7	11.1	7.2	407	5.1	4.1	21.2
Moderate	14	18.2	18.6	1,214	12.3	13.9	15	23.8	16.3	1,380	17.4	12.3	18.4
Middle	19	24.7	20.3	2,202	22.4	19.1	6	9.5	18.1	568	7.2	16.5	19.7
Upper	38	49.4	32.3	5,800	58.9	42.2	32	50.8	31.1	4,764	60.1	39.8	40.7
Unknown	3	3.9	24.8	482	4.9	22.7	3	4.8	27.3	810	10.2	27.3	0.0
Total	77	100.0	100.0	9,841	100.0	100.0	63	100.0	100.0	7,929	100.0	100.0	100.0
Refinance Loans													
Low	1	3.3	3.6	69	1.7	1.5	0	0.0	2.5	0	0.0	0.9	21.2
Moderate	3	10.0	8.2	236	5.9	5.0	3	10.3	9.6	238	6.2	6.0	18.4
Middle	8	26.7	15.1	599	14.9	10.2	6	20.7	12.3	862	22.5	9.3	19.7
Upper	17	56.7	46.8	3,015	74.8	56.3	17	58.6	46.3	2,307	60.1	54.7	40.7
Unknown	1	3.3	26.3	111	2.8	27.0	3	10.3	29.2	430	11.2	29.0	0.0
Total	30	100.0	100.0	4,030	100.0	100.0	29	100.0	100.0	3,837	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.2
Moderate	0	0.0	7.7	0	0.0	6.2	2	100.0	31.6	120	100.0	19.1	18.4
Middle	1	50.0	23.1	32	38.1	18.8	0	0.0	5.3	0	0.0	2.0	19.7
Upper	1	50.0	53.8	52	61.9	61.2	0	0.0	47.4	0	0.0	62.1	40.7
Unknown	0	0.0	15.4	0	0.0	13.7	0	0.0	15.8	0	0.0	16.9	0.0
Total	2	100.0	100.0	84	100.0	100.0	2	100.0	100.0	120	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	5	4.5	3.7	263	1.9	1.8	7	7.3	5.3	407	3.4	2.9	21.2
Moderate	18	16.2	14.5	1,505	10.7	10.4	22	22.9	14.2	1,911	15.8	10.2	18.4
Middle	28	25.2	17.9	2,833	20.1	15.5	12	12.5	15.6	1,430	11.9	13.7	19.7
Upper	56	50.5	35.7	8,867	63.1	46.1	49	51.0	35.9	7,071	58.6	44.8	40.7
Unknown	4	3.6	28.2	593	4.2	26.2	6	6.3	28.9	1,240	10.3	28.5	0.0
Total	111	100.0	100.0	14,061	100.0	100.0	96	100.0	100.0	12,059	100.0	100.0	100.0

Source: 2021 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.
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 good. The distribution of 2021 loans originated to small businesses (those with $1 million or less in annual revenues) is significantly above the aggregate lending data by number volume and comparable by dollar volume, as well as comparable to the demographic figure.

The distribution of small business loans in 2020 reflected overall performance below that of 2021 distribution levels; however, the bank's distribution of loans to small businesses outperformed aggregate lending data penetration.

Table 42

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses Assessment Area: Kay County													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	198	57.1	41.9	7,069	25.0	23.2	237	80.9	59.6	7,317	38.9	42.8	89.8
Over $1 Million	81	23.3		16,970	59.9		47	16.0		11,270	59.9		8.6
Revenue Unknown	68	19.6		4,291	15.1		9	3.1		218	1.2		1.6
Total	347	100.0		28,330	100.0		293	100.0		18,805	100.0		100.0
By Loan Size													
$100,000 or Less	276	79.5	84.1	8,047	28.4	30.4	251	85.7	90.2	5,542	29.5	35.2	
$100,001 - $250,000	39	11.2	8.9	6,145	21.7	21.9	22	7.5	5.5	3,428	18.2	19.7	
$250,001 - $1 Million	32	9.2	7.0	14,138	49.9	47.6	20	6.8	4.2	9,835	52.3	45.0	
Total	347	100.0	100.0	28,330	100.0	100.0	293	100.0	100.0	18,805	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	187	94.4		4,553	64.4		224	94.5		4,585	62.7		
$100,001 - $250,000	7	3.5		1,109	15.7		10	4.2		1,452	19.8		
$250,001 - $1 Million	4	2.0		1,407	19.9		3	1.3		1,280	17.5		
Total	198	100.0		7,069	100.0		237	100.0		7,317	100.0		

Source: 2021 FFIEC Census Data
2021 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 borrower distribution of small farm lending is good. The distribution of loans to small farms (those with $1 million or less in annual revenues) reflects penetration above the aggregate lending data by number volume, comparable by dollar volume, and comparable to the demographic figure.

The borrower distribution of small farm loans in 2020 reflected consistent performance with 2021 loan penetrations.

Table 43

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms Assessment Area: Kay County													
	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	61	91.0	79.8	5,667	77.8	82.8	91	96.8	86.4	6,177	87.9	89.0	100.0
Over $1 Million	6	9.0		1,621	22.2		3	3.2		850	12.1		0.0
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	67	100.0		7,288	100.0		94	100.0		7,027	100.0		100.0
By Loan Size													
$100,000 or Less	43	64.2	76.3	1,692	23.2	31.6	75	79.8	86.1	3,031	43.1	41.5	
$100,001 - $250,000	17	25.4	17.4	2,871	39.4	37.4	14	14.9	9.2	2,305	32.8	27.2	
$250,001 - $500,000	7	10.4	6.3	2,725	37.4	31.0	5	5.3	4.7	1,691	24.1	31.3	
Total	67	100.0	100.0	7,288	100.0	100.0	94	100.0	100.0	7,027	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	43	70.5		1,692	29.9		75	82.4		3,031	49.1		
$100,001 - $250,000	15	24.6		2,569	45.3		13	14.3		2,105	34.1		
$250,001 - $500,000	3	4.9		1,406	24.8		3	3.3		1,041	16.9		
Total	61	100.0		5,667	100.0		91	100.0		6,177	100.0		

Source: 2021 FFIEC Census Data
2021 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

The bank provides an adequate level of CD loans in the AA. The bank originated one CD loan totaling $49,318 in this AA, which provided financing for two multifamily residential properties that provide affordable housing. While limited, this level of CD lending is considered adequate given the lack of opportunity for CD lending in the AA. Kay County is sparsely populated and predominantly rural in nature. Rural areas typically have fewer CD needs than larger, more populated areas. Further, a review of the universe of loans originated during the evaluation period revealed that the bank originated a limited volume of large dollar loans that are not already reported as required by the CRA, thereby limiting the volume of loans eligible for CD lending consideration.

Table 44

Community Development Loans – Kay County AA		
Community Development Purpose	**#**	**$(000)**
Affordable Housing	1	49
Community Services	0	0
Economic Development	0	0
Revitalization and Stabilization	0	0
Total Loans	**1**	**49**

INVESTMENT TEST

The bank's performance under the investment test in the Kay County AA is good. The bank has a significant level of qualified CD investments and grants but is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits good responsiveness to the credit and CD needs of its AA. Consistent with prior evaluations, the bank's investment activities in the AA are predominately comprised of school bonds for area educational facilities that contain majority student populations who are eligible for free or reduced lunches, as well as organizations that provide community services to LMI individuals and families.

Examples of investment activities include:

- The bank invested in a school bond totaling $782 thousand during the evaluation period for the construction of an elementary school building in a rural community that contains a majority population of students eligible for free or reduced lunches.
- A total of $10,700 was donated to a local area organization that provides a multitude of community services to LMI individuals and families.

Table 45

Investments, Grants, and Donations – Kay County AA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	0	0	0	0	0	0	0	0
Community Services	1	481	3	1,894	28	23	32	2,398
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	1	481	3	1,894	28	23	32	2,398

[1] *Book Value of Investment*
[2] *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the Kay County AA is excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates four branches in middle-income tracts and one branch in an upper-income tract. It is noted that a majority of branches are located in close proximity to the AAs only moderate-income tracts, located in Ponca City and Blackwell. In addition to its branches, the bank operates a full-service ATM onsite at a branch in a middle-income tract.

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. There have been no branch openings or closures in the AA since the prior evaluation.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The bank's operations in the AA generally reflect those of the overall institution, which is described in the overall Institution Retail Banking Services section of this evaluation.

Table 46

Retail Banking and Community Development Services – Kay County AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	80.0	20.0	0.0	100.0	0.0	18.2	63.6	18.2	0.0	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Households by Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	100.0	0.0	0.0	100.0	0.0	16.4	64.2	19.4	0.0	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	5		0		0		0	0	0	0	0	0
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	0		13		2		0		15		10	

[1] *Based on 2022 FFIEC census tract definitions.*
Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

Community Development Services

The bank is a leader in providing CD services. During the evaluation period, 11 bank representatives provided 15 CD services to 10 area organizations. The services were a mixture of board membership participation, as well as financial education instruction to students from schools with a majority population eligible for free or reduced lunches.

Examples of CD services include:

- For the entire two-year evaluation period, a member of the bank's executive leadership served on the board of an area organization that provides services in support of small business growth, development, and attraction in the rural community in which it operates. The organization also provides affordable housing assistance to area residents.
- A bank representative served on the board of an area organization that provides an array of community services to LMI individuals and families, including emergency financial assistance and food sources.

NORTHEAST OKLAHOMA ASSESSMENT AREA
NONMETROPOLITAN AREA
(Limited-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE NORTHEAST OKLAHOMA AA

The AA is comprised of Craig, Delaware and Mayes Counties in their entireties. Since the prior evaluation, this AA (previously the Mayes County AA) expanded due to acquisition activities that added two new branches located in Craig County, and one branch located in Delaware County. Refer to Appendix C for a map of the AA.

- The AA is comprised of 28 total census tracts, including 4 moderate-, 21 middle-, and 3 upper-income tracts.
- The bank operates six full-service branches in the AA, including one branch in a moderate-, four in middle-, and one in an upper-income tract. Additionally, the bank operates three full-service ATMs, including one unit in a moderate-income tract and two in middle-income tracts.
- The AA's composition of families by income level includes 23.3 percent low-, 18.0 percent moderate-, 20.2 percent middle-, and 38.5 percent upper-income families.
- According to the June 30, 2022 FDIC Market Share Report, the bank ranked 1st out of 15 FDIC-insured institutions in the AA with a market share of 23.7 percent.
- Based on 2020 Census data, the AA population was 93,550.

PAYNE COUNTY ASSESSMENT AREA
NONMETROPOLITAN AREA
(Limited-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE PAYNE COUNTY AA

The AA is comprised of Payne County in its entirety. Refer to Appendix C for a map of the AA.

- The AA is comprised of 23 total census tracts, including 2 low-, 6 moderate-, 7 middle-, 6 upper-, and 2 unknown-income tracts.
- The bank operates four full-service branches in the AA, including two branches in low-, one in a moderate-, and one in a middle-income tract.
- The AA's composition of families by income level includes 17.8 percent low-, 17.3 percent moderate-, 16.6 percent middle-, and 48.3 percent upper-income families.
- According to the June 30, 2022 FDIC Market Share Report, the bank ranked 3rd out of 17 FDIC-insured institutions in the AA with a market share of 12.5 percent.
- Based on 2020 Census data, the AA population was 81,646.

WASHINGTON COUNTY ASSESSMENT AREA
NONMETROPOLITAN AREA
(Limited-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE WASHINGTON COUNTY AA

The AA is comprised of Washington County in its entirety. Refer to Appendix C for a map of the AA.

- The AA is comprised of 14 total census tracts, including 3 moderate-, 7 middle-, and 4 upper-income tracts.
- The bank operates one full-service branch in the AA located in a middle-income tract in Bartlesville.
- The AA's composition of families by income level includes 17.1 percent low-, 15.6 percent moderate-, 18.0 percent middle-, and 49.4 percent upper-income families.
- According to the June 30, 2022 FDIC Market Share Report, the bank ranked 7th out of 11 FDIC-insured institutions in the AA with a market share of 2.6 percent.
- Based on 2020 Census data, the AA population was 52,455.

The state of Oklahoma AAs listed in the table below were reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance in these areas does not change the rating for the state of Oklahoma.

Table 47

Assessment Area	Lending Test	Investment Test	Service Test
Northeast Oklahoma	Exceeds	Consistent	Consistent
Payne County	Consistent	Below	Exceeds
Washington County	Below	Below	Exceeds

STATE OF KANSAS

CRA rating for Kansas: **Satisfactory**
The Lending Test is rated: **Low Satisfactory**
The Investment Test is rated: **Low Satisfactory**
The Service Test is rated: **Outstanding**

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate responsiveness to AA credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- The bank's distribution of loans by income level of geography 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 is good.
- The bank makes an adequate level of CD loans within its AAs.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants but is rarely in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives but exhibits adequate responsiveness to the credit and CD needs throughout its Kansas AAs.

Service Test

- The bank's delivery systems are readily accessible to geographies and/or individuals of different income levels throughout its AAs.
- The bank's record of opening and closing 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 AAs, particularly LMI geographies and/or individuals.
- The bank is a leader in providing CD services within its Kansas AAs and is responsive to the available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Kansas was consistent with the overall scope for the institution. Full-scope reviews were conducted for the Cowley County AA and the Wichita MSA AA. Limited-scope reviews were conducted for the Lawrence MSA AA, Montgomery County AA, and Reno County AA to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state evaluation. Weighting among AAs was generally even between the Cowley County AA and Wichita MSA AA given the bank's branch, deposit, and loan presence in the two AAs relative to its limited-scope reviewed AAs; however, notable performance in limited-scope review AAs is reflected in the conclusions of the various tests, as applicable.

The analysis of loans originated in the state included 1,606 small business, 807 home mortgage, and 386 small farm loans. Consistent with other markets, small business lending carried the predominate weight among individual product lines included in the analysis based on lending volumes and emphasis as a primary product for the bank.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN KANSAS

The bank delineates 5 of its 11 AAs and operates 18 of its 62 branches in the state of Kansas. The bank's presence in the state includes banking offices in the state's largest city (Wichita), while the remaining branches are situated in less populated communities and reflect generally rural, nonmetropolitan characteristics. Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of this report. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

The bank's performance under the lending test in the state of Kansas is low satisfactory. This conclusion aligns with the performance noted in the Cowley County and Wichita MSA AAs.

Lending Activity

The bank's overall lending activities in the state of Kansas reflect adequate responsiveness to AA credit needs.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The lending programs offered in the state generally mirror those outlined in the overall Institution Lending Activity section of this report.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within Kansas reflects adequate distribution among the different census tracts and dispersion throughout the AAs. This conclusion mirrors the performance noted in the Cowley County and Wichita MSA AAs.

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

The bank's lending within Kansas has an overall good penetration among individuals of different income levels and businesses and farms of different sizes. This conclusion mirrors the performance noted in the Cowley County and Wichita MSA AAs.

Community Development Lending

The bank provides an adequate level of CD loans within the state of Kansas. The bank originated 22 CD loans totaling $2.9 million in AAs within the state, all of which were considered responsive to area affordable housing needs. The majority of CD lending occurred in the more populated Wichita MSA AA, while the remaining loans benefited the Reno County AA (limited-review).

Table 48

Community Development Loans – State of Kansas		
Community Development Purpose	**#**	**$(000)**
Affordable Housing	22	2,934
Community Services	0	0
Economic Development	0	0
Revitalization and Stabilization	0	0
Outside Activities	0	0
Total Loans	22	2,934

INVESTMENT TEST

The bank's overall performance under the investment test in the state of Kansas is low satisfactory. The investment test performance in the Cowley County AA is adequate, while the Wichita MSA AA is poor.

The bank has an adequate level of qualified CD investments and grants within Kansas but is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits adequate responsiveness to the credit and CD needs of its AAs.

The bank's composition of investments during the evaluation period was predominately comprised of donations, as the bank did not present any qualified debt or equity investments within its delineated AAs. Donation activities by unit volume were most prevalent in the bank's two full-scope reviewed AAs, although by dollar volume, the limited-scope reviewed Lawrence MSA AA reflected the second largest concentration of donations in the state.

Additionally, a prior-period qualified school bond remains on the bank's investment ledger for a rural school district located approximately 80 miles northeast of its Cowley County AA. The school bond provided facility improvements for the junior and senior high school in a rural district that contains less than 300 total residents and a majority student population eligible for free or reduced lunches. The investment was considered responsive to an area that may possess limited investment resources and, as such, was factored into the overall state conclusion.

Table 49

Investments, Grants, and Donations – State of Kansas								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	0	0	0	0	9	11	9	11
Community Services	0	0	0	0	81	65	81	65
Economic Development	0	0	0	0	1	10	1	10
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Outside Activities	1	306	0	0	0	0	1	306
Total	1	306	0	0	91	86	92	392

[1] *Book Value of Investment*
[2] *Original Market Value of Investment*

SERVICE TEST

The bank's overall performance under the service test in the state of Kansas is outstanding. The service test performance in both the Cowley County AA and Wichita MSA AA is excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, within Kansas are readily accessible to the bank's various geographies and to individuals of different income levels in each AA. The bank operates 18 branches in the state, including a branch in a low-income tract and 7 branches in moderate-income tracts. The concentration of branches among the various income tract levels, particularly LMI tracts, provides favorable accessibility relative to the concentration of such tracts throughout the state. Additionally, the bank operates eight full-service ATMs throughout the state, including three located in moderate-income tracts.

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. Since the prior evaluation, the bank expanded its branch footprint through acquisition activities resulting in the addition of a branch in Caney, KS (middle-income tract). There were no branch closures during the evaluation period in the state.

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. The bank's operations in the state of Kansas generally reflect those of the overall institution, which is described in the overall Institution Retail Banking Services section of this evaluation.

Table 50

<table>
<tr><th colspan="13">Retail Banking and Community Development Services – State of Kansas</th></tr>
<tr><td rowspan="6">Branch Accessibility</td><td colspan="6">Location of Branches by Tract (%)</td><td colspan="6">Percent of Tracts[1] (%)</td></tr>
<tr><td>Low</td><td>Mod</td><td>Mid</td><td>Upp</td><td>Unk</td><td>Total</td><td>Low</td><td>Mod</td><td>Mid</td><td>Upp</td><td>Unk</td><td>Total</td></tr>
<tr><td>5.6</td><td>38.9</td><td>50.0</td><td>5.6</td><td>0.0</td><td>100.0</td><td>4.3</td><td>26.1</td><td>46.6</td><td>21.4</td><td>1.7</td><td>100.0</td></tr>
<tr><td colspan="6">Location of Full-Service ATMs by Tract (%)</td><td colspan="6">Percent of Households by Tracts[1] (%)</td></tr>
<tr><td>Low</td><td>Mod</td><td>Mid</td><td>Upp</td><td>Unk</td><td>Total</td><td>Low</td><td>Mod</td><td>Mid</td><td>Upp</td><td>Unk</td><td>Total</td></tr>
<tr><td>0.0</td><td>33.3</td><td>55.6</td><td>11.1</td><td>0.0</td><td>100.0</td><td>2.9</td><td>24.1</td><td>48.2</td><td>23.7</td><td>1.1</td><td>100.0</td></tr>
<tr><td rowspan="3">Changes in Branch Location</td><td colspan="6">Number of Branches (#)</td><td colspan="6">Net Change in Branch Locations (#)</td></tr>
<tr><td colspan="2">Total Branches</td><td colspan="2">Openings (#)</td><td colspan="2">Closings (#)</td><td>Low</td><td>Mod</td><td>Mid</td><td>Upp</td><td>Unk</td><td>Total</td></tr>
<tr><td colspan="2">18</td><td colspan="2">1</td><td colspan="2">0</td><td>0</td><td>0</td><td>1</td><td>0</td><td>0</td><td>1</td></tr>
<tr><td rowspan="2">Community Development Services</td><td colspan="2">Affordable Housing</td><td colspan="2">Community Services</td><td colspan="2">Economic Development</td><td colspan="2">Revitalization & Stabilization</td><td colspan="2">Total Services</td><td colspan="2">Total Organizations</td></tr>
<tr><td colspan="2">1</td><td colspan="2">69</td><td colspan="2">3</td><td colspan="2">0</td><td colspan="2">73</td><td colspan="2">32</td></tr>
<tr><td colspan="13">[1] Based on 2022 FFIEC census tract definitions.
Note: Total percentages may vary by 0.1 percent due to automated rounding differences.</td></tr>
</table>

Community Development Services

The bank is a leader in providing CD services within the state of Kansas. During the evaluation period, bank representatives provided 73 CD services to 32 organizations throughout the state. A substantial majority of services performed were to organizations that provide various community services that benefit LMI individuals and families. Capacities of CD services performed generally consisted of board membership and financial literacy instruction in schools with a majority of student populations eligible for free or reduced lunches.

WICHITA MSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)

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

The bank's Wichita MSA AA consists of Sedgwick, Sumner, Harvey, and Butler Counties in their entireties, which also comprise the Wichita, Kansas MSA. (See Appendix C for a map of the AA and Appendix D for additional demographic data.)

- The AA is comprised of 167 total census tracts, including 8 low-, 44 moderate-, 71 middle-, 42 upper-, and two unknown-income census tracts. Since the prior evaluation, and as a result of 2020 Census tract changes, the AA increased by a total of 18 tracts. These changes include a reduction of 7 low-income tracts, an increase of 5 moderate-income tracts, an increase of 20 middle-income tracts, and a reduction of 2 upper-income tracts. Additionally, the AA added two unknown-income tracts since the prior evaluation period.
- The bank operates six branches in the AA, including two in moderate-, three in middle-, and one in an upper-income census tract. Five branch locations offer full-service ATMs, while two branches offer cash-only ATMs.
- The AA's composition of families by income level includes 19.5 percent low-, 18.4 percent moderate-, 21.7 percent middle-, and 40.4 percent upper-income families.
- According to the June 30, 2022 FDIC Market Share Report, the bank held a 0.6 percent market share of deposits in the AA, ranking 29th of 46 FDIC-insured financial institutions with offices in the AA.
- An interview with a local member of the community was conducted to ascertain information relevant to the bank's CRA performance criterion and to gain a perspective on local economic conditions, possible credit needs in the area, and the responsiveness of area banks in meeting those needs. The contact represented an organization that promotes and participates in area economic development activities.

Table 51

Population Change Assessment Area: Wichita MSA			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Wichita MSA	631,094	647,610	2.6
Butler County, KS	66,092	67,380	1.9
Harvey County, KS	34,835	34,024	(2.3)
Sedgwick County, KS	506,529	523,824	3.4
Sumner County, KS	23,638	22,382	(5.3)
Kansas	2,892,987	2,937,880	1.6

Source: 2020 U.S. Census Bureau Decennial Census
2011 – 2015 U.S. Census Bureau: American Community Survey

- The Wichita MSA contains the largest city in the state of Kansas, accounting for 22.0 percent of the state population.
- As the table indicates, population loss has been experienced in the rural areas of the MSA (Harvey and Sumner Counties), while the metropolitan Wichita area (Sedgwick County) has experienced growth that has outpaced the overall state rate.

Table 52

Median Family Income Change Assessment Area: Wichita MSA			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Wichita MSA	70,287	73,930	5.2
Butler County, KS	79,511	83,602	5.1
Harvey County, KS	71,430	69,739	(2.4)
Sedgwick County, KS	69,683	73,508	5.5
Sumner County, KS	70,945	70,220	(1.0)
Kansas	72,535	77,620	7.0

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.

- According to the 2020 Census data, the concentration of AA LMI families, at 37.9 percent, was higher than the overall statewide figure of 35.9 percent. Within the AA, Sumner County contained the largest concentration of LMI families, at 39.9 percent; conversely, Butler County, the more affluent county in the AA, reflected a concentration of 30.7 percent.

Table 53

Housing Cost Burden Assessment Area: Wichita MSA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Wichita MSA	74.1	24.0	40.7	57.3	24.7	15.5
Butler County, KS	71.4	21.6	40.3	57.4	27.1	15.2
Harvey County, KS	69.9	17.2	39.0	56.1	17.7	12.9
Sedgwick County, KS	75.1	24.8	41.2	57.3	25.0	15.6
Sumner County, KS	55.5	19.6	29.1	57.3	23.2	16.8
Kansas	73.0	26.6	38.4	57.7	24.8	15.6

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

- According to the 2020 Census data, the median age of AA housing stock at 52 years was above the statewide figure of 46 years. Butler County contained the newest stock of housing, at a median age of 39 years, while Sumner County had the oldest median age at 56 years.

Table 54

Unemployment Rates Assessment Area: Wichita MSA					
Area	2017	2018	2019	2020	2021
Wichita MSA	4.1	3.6	3.4	8.1	4.4
Butler County, KS	3.7	3.4	3.2	6.4	3.5
Harvey County, KS	4.1	3.1	2.9	5.2	2.9
Sedgwick County, KS	4.2	3.7	3.4	8.5	4.6
Sumner County, KS	3.8	3.4	3.3	8.0	4.1
Kansas	3.6	3.3	3.1	5.7	3.2

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The overall unemployment rates during the evaluation period trended higher than the state figures. As Table 54 illustrates, Sedgwick County contained the highest unemployment figures within the AA and reflects unemployment rate trends similar to the overall AA due to the significant population center in Wichita.
- The most significant industries contained in the Wichita area were advanced manufacturing and materials, aerospace, agriculture, energy, healthcare, IT system and support, and transportation and logistics. The largest employers in the AA include Spirit AeroSystems, Inc., Textron Aviation, McConnell Air Force Base, Wichita Public Schools, Ascension Via Christi Health, and Koch Industries Inc.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WICHITA MSA AA

LENDING TEST

The bank's performance under the lending test in the Wichita MSA AA is adequate.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The evaluation of lending in the AA included 597 small business, 289 home mortgage, and 135 small farm loans.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of the bank's flexible lending products is discussed in the overall Institution section of this report.

Due to the absence of volumes sufficient to conduct a meaningful analysis, home improvement loans are not discussed separately in the evaluation of home mortgage lending throughout this state analysis.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects adequate distribution among the different census tracts and dispersion throughout the AA. The geographic distribution of home mortgage and small farm loans reflects adequate penetration, while the distribution of small business loans reflects poor penetration levels.

<u>Home Mortgage Lending</u>

The geographic distribution of home mortgage lending is adequate. The bank did not originate a home mortgage loan within AA low-income tracts in 2021. A review of penetration levels from aggregate lending data indicates a relatively low penetration of loans reported by other area financial institutions, as well as a relatively low demographic figure of owner-occupied housing in low-income tracts (4.5 percent) compared to other tract distributions, which indicates a limited opportunity for home mortgage lending in low-income tracts. The bank's lending in moderate-income tracts reflects comparable concentrations of lending to the aggregate lending data by number volume and below by dollar volume, as well as a comparable concentration of lending relative to the demographic figure.

The geographic distribution of home mortgage loans in 2020 reflected performance which was above 2021 penetration levels, particularly in LMI tracts. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is adequate. As discussed in the overall home mortgage lending section, there are no loan originations in 2021 recorded in low-income tracts. The bank's distribution of loans in moderate-income tracts is comparable to the aggregate lending data by number and dollar volume, as well as comparable to the demographic figure.

The geographic distribution of home purchase lending in 2020 reflected performance which was consistent with 2021 penetration levels. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Home Refinance Loans

The geographic distribution of home refinance lending is adequate. As discussed in the overall home mortgage lending section, there are no loan originations in 2021 recorded in low-income tracts. The bank's distribution of loans in moderate-income tracts is comparable to the aggregate lending data by number and by dollar volume, as well as comparable to the demographic figure.

The geographic distribution of home refinance lending in 2020 reflected performance which was above 2021 penetration levels, particularly with a larger volume of lending in LMI tracts. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Table 55

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Wichita MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	4	3.7	2.3	353	1.7	1.1	0	0.0	3.2	0	0.0	1.6	4.5
Moderate	13	11.9	16.4	1,432	6.8	8.9	11	12.9	15.6	1,151	6.3	9.2	16.6
Middle	34	31.2	33.9	5,026	23.9	27.8	38	44.7	35.0	6,393	35.1	29.6	37.7
Upper	58	53.2	47.4	14,260	67.7	62.2	36	42.4	46.1	10,666	58.6	59.7	41.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	109	100.0	100.0	21,071	100.0	100.0	85	100.0	100.0	18,210	100.0	100.0	100.0
Refinance Loans													
Low	2	4.0	1.0	60	0.6	0.4	0	0.0	1.5	0	0.0	0.9	4.5
Moderate	11	22.0	7.6	945	10.0	4.3	3	12.5	10.0	183	3.8	5.8	16.6
Middle	12	24.0	30.0	1,821	19.3	24.5	7	29.2	33.9	656	13.7	28.3	37.7
Upper	25	50.0	61.3	6,627	70.1	70.7	14	58.3	54.6	3,951	82.5	65.0	41.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	50	100.0	100.0	9,453	100.0	100.0	24	100.0	100.0	4,790	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.4	0	0.0	1.2	0	0.0	3.0	0	0.0	1.4	4.5
Moderate	0	0.0	8.4	0	0.0	5.4	0	0.0	10.2	0	0.0	6.3	16.6
Middle	0	0.0	30.9	0	0.0	21.8	1	100.0	31.8	26	100.0	27.6	37.7
Upper	0	0.0	58.3	0	0.0	71.6	0	0.0	55.1	0	0.0	64.7	41.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	26	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	2	22.2	11.4	1,015	14.2	6.8	0	0.0	14.9	0	0.0	13.6	9.0
Moderate	2	22.2	36.0	950	13.3	40.0	1	12.5	35.3	271	2.4	29.4	33.2
Middle	4	44.4	32.5	3,435	48.0	25.3	3	37.5	29.5	2,269	20.0	18.5	40.4
Upper	1	11.1	20.2	1,760	24.6	27.9	4	50.0	20.4	8,822	77.6	38.5	17.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	7,160	100.0	100.0	8	100.0	100.0	11,362	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	8	4.7	1.9	1,428	3.8	1.2	0	0.0	2.5	0	0.0	2.3	4.5
Moderate	26	15.4	12.4	3,327	8.8	8.7	15	12.5	13.1	1,605	4.5	9.5	16.6
Middle	50	29.6	32.0	10,282	27.2	26.1	49	40.8	34.4	9,344	26.4	28.1	37.7
Upper	85	50.3	53.7	22,817	60.3	64.0	56	46.7	50.0	24,395	69.0	60.1	41.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	169	100.0	100.0	37,854	100.0	100.0	120	100.0	100.0	35,344	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
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 poor. As illustrated in the table below, the distribution of 2021 small business loans in low-income tracts is comparable to the aggregate lending data, as well as comparable to the demographic figure of the percentage of total businesses in these tracts. The bank's concentration of loans among moderate-income tracts is significantly below the aggregate lending data and demographic figure, which primarily influenced the performance conclusion.

The geographic distribution of small business lending in 2020 reflected consistent performance with the penetration levels noted in 2021, particularly with a concentration of lending among moderate-income tracts which was still below aggregate lending and demographic figures. An analysis of loan dispersions supports the conclusion noted in this product line, as lapses in lending among moderate-income tracts was noted.

Table 56

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Wichita MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	14	5.5	5.4	1,805	6.8	6.4	22	6.5	5.0	2,167	7.8	5.2	5.3
Moderate	37	14.5	25.6	3,034	11.5	32.2	22	6.5	24.1	3,577	12.9	31.7	26.0
Middle	113	44.1	29.9	10,952	41.5	28.3	172	50.4	31.0	10,814	39.0	26.5	33.5
Upper	92	35.9	38.9	10,622	40.2	33.1	125	36.7	39.5	11,203	40.4	36.5	35.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.2	0	0.0	0.0	0	0.0	0.4	0	0.0	0.1	
Total	256	100.0	100.0	26,413	100.0	100.0	341	100.0	100.0	27,761	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 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. Consistent with prior evaluations of small farm lending, the bank did not report any lending in AA LMI tracts. As illustrated in Table 57, the substantial majority of LMI tracts are positioned within the urban core of Wichita, KS, as well as in smaller towns situated within the boundaries of the MSA. These tracts contain approximately 0.5 percent of total farms in the AA, indicating small farm lending opportunities are limited. This context is supported by a similarly limited volume of loans reflected in the aggregate lending data. Conversely, the bank's penetration of small farm loans is most prevalent in middle- and upper-income tracts, which aligns with the characteristics of the rural portions of the AA.

The geographic distribution of small farm lending in 2020 reflects consistent performance, as well as circumstances with regards to AA characteristics. While the dispersion of loans reflected gaps or lapses in lending, particularly in LMI tracts, the aforementioned performance context supports a negligible impact to the conclusion.

Table 57

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography Assessment Area: Wichita MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.6	0	0.0	0.1	0	0.0	1.2	0	0.0	0.2	0.5
Moderate	0	0.0	3.0	0	0.0	2.9	0	0.0	2.7	0	0.0	3.3	3.5
Middle	45	83.3	60.9	4,619	78.1	66.7	59	72.8	60.1	5,940	74.2	68.2	55.4
Upper	9	16.7	35.6	1,295	21.9	30.3	22	27.2	36.0	2,070	25.8	28.3	40.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	54	100.0	100.0	5,914	100.0	100.0	81	100.0	100.0	8,010	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 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 a good distribution among individuals of different income levels and businesses and farms of different sizes. The conclusion is derived from good penetration levels noted in small business lending, while home mortgage lending reflects poor penetration and small farm lending reflects excellent penetration. Due to origination volume, small business lending was given the most weight in deriving the overall conclusion.

<u>Home Mortgage Lending</u>

The borrower distribution of home mortgage lending is poor. The distribution of 2021 home mortgage loans to low-income borrowers is below aggregate lending data and significantly below the demographic figure of percentage of families in the AA. Lending to moderate-income borrowers was comparable to the aggregate lending data and the demographic figure, however.

The borrower distribution of home mortgage loans in 2020 reflected performance below 2021 lending patterns with concentrations of lending generally below the aggregate lending data, further supporting the overall poor rating.

Home Purchase Loans

The borrower distribution of home purchase lending is poor. The distribution of 2021 loans to low-income borrowers is below the aggregate lending data and significantly below the demographic figure. Lending to moderate-income borrowers was below the aggregate lending data by number, but was comparable by dollar volume and was comparable to the demographic figure.

The borrower distribution of home purchase lending in 2020 reflected penetration levels that were consistent with the performance of 2021 lending patterns, with concentrations of lending generally below the aggregate lending data.

Home Refinance Loans

The borrower distribution of home refinance lending is adequate. The bank did not originate a home refinance loan to a low-income borrower in 2021, although aggregate lending data similarly reflected lower concentrations of home refinance lending to low-income borrowers. Lending to moderate-income borrowers reflects a concentration of lending that was above the aggregate lending data by number volume and comparable by dollar volume, as well as to the demographic figure.

The borrower distribution of home refinance lending in 2020 reflected penetration levels below 2021 lending patterns, with concentrations of lending below the aggregate lending data and significantly below the demographic figures. However, the volume of loans in 2020 was small and more weight was given to the bank’s performance in 2021 when deriving the overall performance rating for home refinance loans.

Table 58

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Wichita MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	7	6.4	9.0	929	4.4	4.7	3	3.5	8.7	254	1.4	4.6	20.2
Moderate	15	13.8	22.8	2,227	10.6	17.5	11	12.9	19.6	1,913	10.5	15.1	17.7
Middle	18	16.5	21.4	2,874	13.6	21.5	9	10.6	20.3	1,359	7.5	19.9	21.4
Upper	30	27.5	28.9	9,015	42.8	41.7	31	36.5	27.8	10,385	57.0	38.7	40.7
Unknown	39	35.8	17.9	6,026	28.6	14.6	31	36.5	23.6	4,299	23.6	21.7	0.0
Total	109	100.0	100.0	21,071	100.0	100.0	85	100.0	100.0	18,210	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.5	0	0.0	1.6	0	0.0	5.0	0	0.0	2.6	20.2
Moderate	3	6.0	13.4	280	3.0	8.7	5	20.8	15.2	625	13.0	10.5	17.7
Middle	8	16.0	19.8	856	9.1	16.0	4	16.7	19.6	693	14.5	17.0	21.4
Upper	28	56.0	40.9	7,152	75.7	50.8	9	37.5	33.3	2,983	62.3	42.6	40.7
Unknown	11	22.0	22.4	1,165	12.3	22.9	6	25.0	26.9	489	10.2	27.3	0.0
Total	50	100.0	100.0	9,453	100.0	100.0	24	100.0	100.0	4,790	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.4	0	0.0	3.2	0	0.0	7.6	0	0.0	3.9	20.2
Moderate	0	0.0	15.7	0	0.0	10.2	1	100.0	14.0	26	100.0	9.2	17.7
Middle	0	0.0	19.9	0	0.0	15.7	0	0.0	19.4	0	0.0	16.8	21.4
Upper	0	0.0	53.7	0	0.0	65.1	0	0.0	46.8	0	0.0	53.7	40.7
Unknown	0	0.0	5.3	0	0.0	5.9	0	0.0	12.3	0	0.0	16.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	26	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	7	4.4	6.1	929	3.0	3.1	3	2.7	6.8	254	1.1	3.7	20.2
Moderate	18	11.3	17.4	2,507	8.2	12.7	17	15.2	17.2	2,564	10.7	12.8	17.7
Middle	27	16.9	20.1	3,900	12.7	18.4	14	12.5	19.6	2,208	9.2	18.3	21.4
Upper	58	36.3	34.7	16,167	52.7	46.0	41	36.6	30.6	14,168	59.1	40.4	40.7
Unknown	50	31.3	21.8	7,191	23.4	19.7	37	33.0	25.8	4,788	20.0	24.7	0.0
Total	160	100.0	100.0	30,694	100.0	100.0	112	100.0	100.0	23,982	100.0	100.0	100.0

Source: 2021 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.
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 good. The distribution of 2021 lending to small businesses (those with annual revenues of $1 million or less) is significantly above the aggregate lending data and comparable to the demographic figure.

The borrower distribution of loans to small businesses in 2020 reflected performance which was below 2021 lending patterns with a concentration of loans that was comparable to the aggregate lending data, although below the demographic figure.

Table 59

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses Assessment Area: Wichita MSA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	123	48.0	41.0	10,649	40.3	26.8	277	81.2	52.8	16,784	60.5	32.5	89.2
Over $1 Million	67	26.2		12,996	49.2		53	15.5		10,515	37.9		9.9
Revenue Unknown	66	25.8		2,768	10.5		11	3.2		462	1.7		0.9
Total	256	100.0		26,413	100.0		341	100.0		27,761	100.0		100.0
By Loan Size													
$100,000 or Less	187	73.0	82.4	5,806	22.0	23.2	282	82.7	87.2	7,389	26.6	23.8	
$100,001 - $250,000	37	14.5	9.1	6,204	23.5	19.5	27	7.9	6.1	4,644	16.7	17.3	
$250,001 - $1 Million	32	12.5	8.5	14,403	54.5	57.3	32	9.4	6.7	15,728	56.7	58.8	
Total	256	100.0	100.0	26,413	100.0	100.0	341	100.0	100.0	27,761	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	103	83.7		2,940	27.6		245	88.4		5,676	33.8		
$100,001 - $250,000	8	6.5		1,468	13.8		16	5.8		2,579	15.4		
$250,001 - $1 Million	12	9.8		6,241	58.6		16	5.8		8,529	50.8		
Total	123	100.0		10,649	100.0		277	100.0		16,784	100.0		

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

<u>Small Farm Lending</u>

The borrower distribution of small farm lending is excellent. The distribution of loans to small farms (those with annual revenues of $1 million or less) is significantly above the aggregate lending data by number volume and comparable by dollar volume, as well as comparable to the demographic figure.

The borrower distribution of loans to small farms in 2020 reflected performance which was consistent with 2021 lending patterns, with concentrations of lending generally above aggregate lending data and comparable to the demographic figure.

Table 60

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms Assessment Area: Wichita MSA													
	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	50	92.6	56.9	5,432	91.8	80.2	79	97.5	62.2	7,462	93.2	88.4	99.0
Over $1 Million	4	7.4		482	8.2		1	1.2		500	6.2		0.9
Revenue Unknown	0	0.0		0	0.0		1	1.2		48	0.6		0.1
Total	54	100.0		5,914	100.0		81	100.0		8,010	100.0		100.0
By Loan Size													
$100,000 or Less	34	63.0	80.0	1,158	19.6	27.1	58	71.6	83.9	2,129	26.6	30.8	
$100,001 - $250,000	14	25.9	13.0	2,750	46.5	35.6	14	17.3	10.7	2,566	32.0	33.4	
$250,001 - $500,000	6	11.1	7.0	2,006	33.9	37.3	9	11.1	5.4	3,315	41.4	35.8	
Total	54	100.0	100.0	5,914	100.0	100.0	81	100.0	100.0	8,010	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	31	62.0		1,026	18.9		57	72.2		2,081	27.9		
$100,001 - $250,000	14	28.0		2,750	50.6		14	17.7		2,566	34.4		
$250,001 - $500,000	5	10.0		1,656	30.5		8	10.1		2,815	37.7		
Total	50	100.0		5,432	100.0		79	100.0		7,462	100.0		

Source: 2021 FFIEC Census Data
2021 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

The bank provides an adequate level of CD loans. The bank originated 17 CD loans totaling $2.0 million in this AA. The entirety of lending qualified as responsive to CD needs was for the benefit of affordable housing within the AA.

Examples of CD lending include:

- A total of $623,000 in financing benefited three residential properties with rents at levels considered affordable for LMI individuals in the AA.
- A total of $180,000 in financing was originated for a multifamily apartment complex which rents all units at levels considered affordable for LMI individuals in the AA.

Table 61

Community Development Loans – Wichita MSA AA		
Community Development Purpose	**#**	**$(000)**
Affordable Housing	17	1,951
Community Services	0	0
Economic Development	0	0
Revitalization and Stabilization	0	0
Total Loans	**17**	**1,951**

INVESTMENT TEST

The bank's performance under the investment test in the Wichita MSA AA is poor. The bank has a poor level of qualified CD investments and grants. The bank makes rare use of innovative and/or complex investments and exhibits poor responsiveness to the credit and CD needs of its AA.

The bank did not present any debt or equity instruments during the evaluation period, which is consistent with the prior evaluation. A review of area institutions' CRA performance, as well as information obtained from a community member's perspective, provide support that additional opportunities for CD investments are available.

The bank's donation activities reflect generally consistent volumes with the prior evaluation and is entirely concentrated in support of organizations that provide community services to LMI individuals or for the benefit of schools that contain majority student populations eligible for free or reduced lunches.

Examples of investments include:

- One donation totaling $3,250 benefited an area school district that contains a majority student population eligible for free or reduced lunches. The proceeds of the donations were for the provision of books and other materials for the student body.
- The bank provided $2,400 to an area organization that provides free laundering services for homeless individuals and LMI individuals and families in need of clean and sanitary clothing.

Table 62

Investments, Grants, and Donations – Wichita MSA AA								
Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	0	0	0	0	0	0	0	0
Community Services	0	0	0	0	25	19	25	19
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	**0**	**0**	**0**	**0**	**25**	**19**	**25**	**19**

[1] *Book Value of Investment*
[2] *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the Wichita MSA AA is excellent.

Retail Banking Services

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 AA. The bank operates six branches in the AA, including two branches in moderate-, three in middle-, and one in an upper-income tract. Additionally, the bank operates five full-service ATMs, including one unit in a moderate-income tract located within a branch.

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. There have been no branch openings or closures in the AA since the prior evaluation.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The bank's operations in the AA generally reflect those of the overall institution, which is described in the overall Institution Retail Banking Services section of this evaluation.

Table 63

Retail Banking and Community Development Services – Wichita MSA AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	33.3	50.0	16.7	0.0	100.0	4.8	26.3	42.5	25.1	1.2	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Households by Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	20.0	60.0	20.0	0.0	100.0	3.3	24.7	44.1	27.1	0.8	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	6		0		0		0	0	0	0	0	0
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	1		12		2		0		15		7	

[1] *Based on 2022 FFIEC census tract definitions.*
Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

Community Development Services

The bank is a leader in providing CD services. During the evaluation period, 9 bank representatives provided 15 services to 7 area organizations. The services were a mixture of board membership participation as well as financial education instruction to students from area schools where majority populations are eligible for free or reduced lunches.

Examples of CD services include:

- A bank representative served in a board membership capacity during both years of the evaluation period for the local chapter of an organization that provides an array of community services for the benefit of LMI individuals and families, including financial assistance, education, and health resources.
- A bank representative served on the board for an area organization that supports small business economic development needs, including SBA program education and access to small business loan programs.

LAWRENCE MSA ASSESSMENT AREA
METROPOLITAN AREA
(Limited-Scope Review)

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

The AA is comprised of the entirety of the Lawrence, Kansas MSA which overlaps with Douglas County.

- The AA is comprised of 27 total census tracts, including seven moderate-, 13 middle-, five upper-, and two unknown-income tracts.
- The bank operates one full-service branch in Lawrence, located in a middle-income tract.
- The AA's composition of families by income level includes 19.6 percent low-, 18.9 percent moderate-, 22.6 percent middle-, and 38.9 percent upper-income families.
- According to the June 30, 2022 FDIC Market Share Report, the bank ranked 21st of 22 FDIC-insured institutions in the AA with a market share of 0.4 percent.
- Based on 2020 Census data, the AA population was 118,785.

The Lawrence MSA AA was reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance in this AA does not change the rating for the state of Kansas.

Table 64

Assessment Area	Lending Test	Investment Test	Service Test
Lawrence MSA	Consistent	Consistent	Consistent

COWLEY COUNTY ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE COWLEY COUNTY AA

The bank's AA is comprised of Cowley County in its entirety. (Refer to Appendix C for a map of the AA and Appendix D for additional demographic data).

- There have been no changes to the AA delineation since the prior examination.
- The AA is comprised of 11 census tracts, including three moderate-, six middle- and two upper-income census tracts. At the previous exam, the AA was also comprised of 11 census tracts, but included two moderate-, eight middle- and one upper-income census tracts.
- According to the June 30, 2022 FDIC Market Share Report, the bank's deposit market share was 41.7 percent, which ranked 1st of 7 FDIC-insured institutions operating in the AA.
- An interview with a member of the local community was conducted to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for relevant perspectives on location economic conditions. The community member represented an organization that provides services which support area agricultural operations.

Table 65

Population Change Assessment Area: Cowley County			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Cowley County	36,079	34,549	(4.2)
NonMSA Kansas	922,403	892,006	(3.3)
Kansas	2,892,987	2,937,880	1.6
Source: 2020 U.S. Census Bureau Decennial Census 2011 – 2015 U.S. Census Bureau: American Community Survey			

- As illustrated in the table above, Cowley County experienced a decline in population during the five-year period between 2015 and 2020 at a rate which trended similarly to other nonmetropolitan areas in Kansas.

Table 66

Median Family Income Change Assessment Area: Cowley County			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Cowley County	59,547	60,888	2.3
NonMSA Kansas	62,527	65,467	4.7
Kansas	72,535	77,620	7.0

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 AA experienced a positive increase in area median family incomes (MFIs), although at a lower rate than other nonmetropolitan statewide areas and the overall state figure.
- It is noted that the percentage of AA families below poverty, at 10.4 percent, reflects a higher concentration when compared to other nonmetropolitan statewide areas and the overall state figure, at 8.4 percent and 7.6 percent, respectively.

Table 67

Housing Cost Burden Assessment Area: Cowley County						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Cowley County	68.1	15.3	31.5	54.5	14.8	15.1
NonMSA Kansas	66.6	19.8	34.1	51.6	19.9	14.9
Kansas	73.0	26.6	38.4	57.7	24.8	15.6

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

- A review of area rental housing cost burden indicates generally more affordable housing in the AA for all renters relative to the statewide figure.
- Home ownership is generally similar in terms of affordability for all income levels of ownership; however, the AA also reflects more affordable home ownership for low- and moderate-income owners relative to overall statewide figures.
- Median housing values in the AA, at $88,569, were lower than other statewide nonmetropolitan areas, at $103,478, and significantly below statewide values, at $157,600. This data supports a greater level of home affordability within the AA.

Table 68

Unemployment Rates Assessment Area: Cowley County					
Area	**2017**	**2018**	**2019**	**2020**	**2021**
Cowley County	3.8	3.3	3.3	6.3	3.4
NonMSA Kansas	3.5	3.1	3.0	4.4	2.7
Kansas	3.6	3.3	3.1	5.7	3.2
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- Unemployment rates in the AA trended similarly with nonmetropolitan and overall statewide figures, although the AA reflected slightly higher unemployment levels relative to other nonmetropolitan areas in the state.
- A community member indicated that Cowley County is a rural area which consists of farming and ranching industries. Additionally, major employers in the area include Creekstone Farms Premium Beef (animal processing), Newell Rubbermaid (plastics manufacturing), GE Aviation, and local city, school, and government occupations.
- The contact further indicated that area agricultural conditions are strong, particularly in the cattle market, although recent drought conditions have challenged area crop-related industries, resulting in cash-flow interruptions for area farmers.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COWLEY COUNTY AA

LENDING TEST

The bank's performance under the lending test in the Cowley County AA is adequate.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The evaluation of lending in the AA included 466 small business, 179 small farm, and 175 home mortgage loans.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of the bank's flexible lending products is discussed in the overall Institution section of this report.

Due to the absence of volumes sufficient to conduct a meaningful analysis, the home refinance and home improvement products are not discussed separately in the evaluation of home mortgage lending throughout this state analysis.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects an adequate distribution among the different census tracts and dispersion throughout the AA. The geographic distribution of small business and small farm loans reflects adequate penetration levels, while home mortgage lending reflects good penetration levels.

<u>Home Mortgage Lending</u>

The geographic distribution of home mortgage lending is good. As discussed, the AA did not contain low-income tracts during the evaluation period; as such, performance conclusions were based on penetration levels noted among moderate-income tracts. The distribution of 2021 home mortgage lending in moderate-income tracts is above the aggregate lending data by number volume and comparable by dollar volume, and is comparable to the demographic figure of the percentage of owner-occupied units.

The geographic distribution of home mortgage lending in 2020 reflected performance below that of 2021 lending patterns with penetration levels comparable to the aggregate lending data. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

<u>Home Purchase Loans</u>

The geographic distribution of home purchase lending is good. The distribution of 2021 home purchase lending in moderate-income tracts is above the aggregate lending data by number volume and comparable by dollar volume, and comparable to the demographic figure.

The geographic distribution of home purchase lending in 2020 reflected performance below that of 2021 lending patterns with penetration levels comparable to the aggregate lending data. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Table 69

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Cowley County													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	6.9	5.2	325	4.7	2.9	5	8.1	4.4	187	2.7	2.1	7.9
Middle	52	89.7	84.8	6,121	89.1	82.0	54	87.1	89.5	6,271	92.0	88.6	82.2
Upper	2	3.4	10.0	425	6.2	15.1	3	4.8	6.1	360	5.3	9.3	9.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	58	100.0	100.0	6,871	100.0	100.0	62	100.0	100.0	6,818	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	4.0	2.6	120	3.9	1.5	0	0.0	1.7	0	0.0	0.7	7.9
Middle	21	84.0	83.1	2,047	66.7	81.1	13	86.7	83.5	1,361	87.2	82.4	82.2
Upper	3	12.0	14.3	900	29.3	17.3	2	13.3	14.7	199	12.8	16.9	9.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	25	100.0	100.0	3,067	100.0	100.0	15	100.0	100.0	1,560	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	50.0	10.0	46	66.7	11.3	1	16.7	11.1	54	30.0	5.7	7.9
Middle	1	50.0	70.0	23	33.3	75.6	4	66.7	66.7	83	46.1	62.8	82.2
Upper	0	0.0	20.0	0	0.0	13.1	1	16.7	22.2	43	23.9	31.5	9.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	69	100.0	100.0	6	100.0	100.0	180	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	33.3	0	0.0	13.0	0	0.0	0.0	0	0.0	0.0	3.3
Middle	2	100.0	66.7	406	100.0	87.0	0	0.0	100.0	0	0.0	100.0	96.7
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	406	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	6.7	4.4	491	4.6	3.0	7	8.1	3.6	273	3.1	1.6	7.9
Middle	76	85.4	84.1	8,597	80.5	82.2	73	84.9	87.1	7,812	89.9	86.3	82.2
Upper	7	7.9	11.5	1,593	14.9	14.8	6	7.0	9.3	602	6.9	12.1	9.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	89	100.0	100.0	10,681	100.0	100.0	86	100.0	100.0	8,687	100.0	100.0	100.0

Source: *2021 FFIEC Census Data*
2011-2015 U.S. Census Bureau: American Community Survey
Note: *Percentages may not total 100.0 percent due to rounding.*
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 adequate. The distribution of 2021 small business loans in moderate-income tracts is comparable to the aggregate lending data by number volume and above by dollar volume, while reflecting a concentration of loans below the demographic figure (total businesses in each tract with annual revenues of $1 million or less.)

The geographic distribution of 2020 small business loans reflected performance consistent with 2021 lending patterns and penetration levels that were comparable to the aggregate lending data. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Table 70

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography
Assessment Area: Cowley County

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	27	12.6	10.0	1,484	11.9	7.8	17	6.8	9.8	938	12.7	9.6	15.5
Middle	157	73.0	74.6	7,891	63.1	66.8	194	77.3	74.0	5,522	74.6	67.5	76.4
Upper	31	14.4	14.8	3,138	25.1	25.2	40	15.9	15.3	943	12.7	22.5	8.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.5	0	0.0	0.1	0	0.0	0.8	0	0.0	0.4	
Total	215	100.0	100.0	12,513	100.0	100.0	251	100.0	100.0	7,403	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 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 conclusion is based on the bank's performance of small farm lending within middle- and upper-income tracts due to an absence of farm operations and bank lending within either of the AA's two moderate-income tracts, as indicated by the demographic section (total farms with annual revenues of $1 million or less) of Table 71. The two moderate-income tracts are located within the city limits of Arkansas City, which reasonably supports the limited availability of lending to traditional farming operations.

As such, the bank's penetration of 2021 and 2020 small farm loans among middle- and upper-income tracts aligns comparably with the aggregate lending data and demographic figures within each tract level, respectively. Additionally, the AA characteristics and lending patterns are consistent for both years of the evaluation. An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Table 71

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography Assessment Area: Cowley County													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.7	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	67	85.9	81.9	7,420	85.0	84.9	87	86.1	83.2	8,529	81.4	82.3	85.4
Upper	11	14.1	17.4	1,310	15.0	15.1	14	13.9	16.8	1,944	18.6	17.7	14.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	78	100.0	100.0	8,730	100.0	100.0	101	100.0	100.0	10,473	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 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 a good distribution among individuals of different income levels and businesses and farms of different sizes. The distribution of small business loans reflects good penetration, while small farm reflects excellent penetration and home mortgage lending reflects adequate penetration levels in consideration of performance in both years and between total home mortgage lending and home purchase lending.

<u>Home Mortgage Lending</u>

The borrower distribution of home mortgage lending is good. The distribution of 2021 loans to low-income borrowers is comparable to the aggregate lending data and significantly below the demographic figure of the percentage of families. Lending to moderate-income borrowers was above the aggregate lending data by number and significantly above by dollar volume, while also above the demographic figure.

The borrower distribution of 2020 home mortgage lending reflects lending patterns below the penetration levels noted in 2021, with lending that was comparable to the aggregate lending data. While 2020 performance is considered adequate, the overall home mortgage lending performance is considered good given the strong penetrations to moderate-income borrowers.

Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The distribution of 2021 loans to low-income borrowers is below the aggregate lending data and significantly below the demographic figure. Lending to moderate-income borrowers is above the aggregate lending data and significantly above the demographic figure.

The borrower distribution of 2020 home purchase lending was consistent with performance noted in the 2021 lending analysis.

Table 72

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Cowley County													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	4	6.9	12.1	305	4.4	6.9	2	3.2	7.8	107	1.6	4.7	21.2
Moderate	13	22.4	18.4	1,001	14.6	13.9	18	29.0	22.8	1,510	22.1	16.9	19.2
Middle	12	20.7	18.6	1,641	23.9	19.7	15	24.2	19.7	1,374	20.2	18.4	21.8
Upper	20	34.5	28.0	3,187	46.4	37.9	20	32.3	24.9	3,249	47.7	37.0	37.8
Unknown	9	15.5	23.0	737	10.7	21.6	7	11.3	24.9	578	8.5	23.0	0.0
Total	58	100.0	100.0	6,871	100.0	100.0	62	100.0	100.0	6,818	100.0	100.0	100.0
Refinance Loans													
Low	1	4.0	2.6	55	1.8	1.0	0	0.0	3.5	0	0.0	1.3	21.2
Moderate	2	8.0	11.4	158	5.2	7.0	2	13.3	9.8	185	11.9	6.8	19.2
Middle	11	44.0	22.9	965	31.5	17.4	5	33.3	20.8	486	31.2	18.8	21.8
Upper	7	28.0	42.0	1,328	43.3	51.1	6	40.0	44.2	672	43.1	53.5	37.8
Unknown	4	16.0	21.1	561	18.3	23.4	2	13.3	21.7	217	13.9	19.6	0.0
Total	25	100.0	100.0	3,067	100.0	100.0	15	100.0	100.0	1,560	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	1	16.7	16.7	21	11.7	5.4	21.2
Moderate	1	50.0	40.0	23	33.3	41.1	1	16.7	11.1	27	15.0	5.5	19.2
Middle	1	50.0	40.0	46	66.7	47.8	0	0.0	0.0	0	0.0	0.0	21.8
Upper	0	0.0	10.0	0	0.0	4.9	1	16.7	44.4	43	23.9	59.9	37.8
Unknown	0	0.0	10.0	0	0.0	6.2	3	50.0	27.8	89	49.4	29.2	0.0
Total	2	100.0	100.0	69	100.0	100.0	6	100.0	100.0	180	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	5	5.7	8.0	360	3.5	4.3	5	5.8	6.4	195	2.2	3.4	21.2
Moderate	16	18.4	15.4	1,182	11.5	11.0	21	24.4	17.4	1,722	19.8	12.8	19.2
Middle	24	27.6	20.0	2,652	25.8	18.4	20	23.3	19.5	1,860	21.4	18.4	21.8
Upper	29	33.3	31.7	4,783	46.5	41.9	28	32.6	31.2	4,026	46.3	42.8	37.8
Unknown	13	14.9	25.0	1,298	12.6	24.4	12	14.0	25.4	884	10.2	22.6	0.0
Total	87	100.0	100.0	10,275	100.0	100.0	86	100.0	100.0	8,687	100.0	100.0	100.0

Source: 2021 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.
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 good. The distribution of loans to small businesses in 2021 is above the aggregate lending data and comparable to the demographic figure of the percentage of businesses with annual revenues of $1 million or less.

The borrower distribution of 2020 loans to small businesses was below the performance of 2021 lending patterns, with a concentration of loans that was comparable to the aggregate lending data.

Table 73

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses Assessment Area: Cowley County													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	124	57.7	49.8	4,839	38.7	36.8	224	89.2	70.3	5,142	69.5	48.7	89.9
Over $1 Million	30	14.0		5,899	47.1		19	7.6		1,997	27.0		8.0
Revenue Unknown	61	28.4		1,775	14.2		8	3.2		264	3.6		2.1
Total	215	100.0		12,513	100.0		251	100.0		7,403	100.0		100.0
By Loan Size													
$100,000 or Less	189	87.9	90.0	4,621	36.9	37.0	239	95.2	95.5	4,695	63.4	51.6	
$100,001 - $250,000	14	6.5	5.3	2,198	17.6	15.2	8	3.2	2.5	1,227	16.6	13.5	
$250,001 - $1 Million	12	5.6	4.8	5,694	45.5	47.8	4	1.6	2.0	1,481	20.0	34.9	
Total	215	100.0	100.0	12,513	100.0	100.0	251	100.0	100.0	7,403	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	116	93.5		2,743	56.7		217	96.9		3,734	72.6		
$100,001 - $250,000	4	3.2		635	13.1		5	2.2		744	14.5		
$250,001 - $1 Million	4	3.2		1,461	30.2		2	0.9		664	12.9		
Total	124	100.0		4,839	100.0		224	100.0		5,142	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

<u>Small Farm Lending</u>

The borrower distribution of small farm lending is excellent. The distribution of loans to small farms in 2021 is significantly above the aggregate lending data by number volume and is comparable by dollar volume, as well as comparable to the demographic figure of the percentage of farms with annual revenues of $1 million or less.

The borrower distribution of 2020 loans to small farms was below the performance of 2021 lending patterns, with a concentration of loans that was comparable to the aggregate lending data.

Table 74

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms Assessment Area: Cowley County													
	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	76	97.4	79.0	8,505	97.4	94.9	96	95.0	68.4	9,404	89.8	85.3	99.0
Over $1 Million	1	1.3		75	0.9		4	4.0		919	8.8		1.0
Revenue Unknown	1	1.3		150	1.7		1	1.0		150	1.4		0.0
Total	78	100.0		8,730	100.0		101	100.0		10,473	100.0		100.0
By Loan Size													
$100,000 or Less	50	64.1	72.5	1,906	21.8	26.2	69	68.3	78.7	2,537	24.2	29.3	
$100,001 - $250,000	18	23.1	18.8	2,903	33.3	34.1	19	18.8	12.9	3,037	29.0	28.1	
$250,001 - $500,000	10	12.8	8.7	3,921	44.9	39.7	13	12.9	8.4	4,899	46.8	42.5	
Total	78	100.0	100.0	8,730	100.0	100.0	101	100.0	100.0	10,473	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	49	64.5		1,831	21.5		68	70.8		2,462	26.2		
$100,001 - $250,000	17	22.4		2,753	32.4		17	17.7		2,668	28.4		
$250,001 - $500,000	10	13.2		3,921	46.1		11	11.5		4,274	45.4		
Total	76	100.0		8,505	100.0		96	100.0		9,404	100.0		

Source: 2021 FFIEC Census Data
2021 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

The bank provides few, if any, CD loans. During the evaluation period, the bank did not originate a CD loan in the AA; however, a review of the universe of loans originated during the evaluation revealed that the bank originated a limited volume of large loans beyond those reported under CRA data-reporting requirements, thereby limiting the volume of loans eligible for CD lending consideration. As such, the lack of CD lending did not have an unfavorable impact on the lending test conclusion.

INVESTMENT TEST

The bank's performance under the investment test in the Cowley County AA is adequate. The bank has an adequate level of qualified CD investments and grants and is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits adequate responsiveness to the credit and CD needs of its AA. Consistent with prior evaluations, the bank did not present any debt or equity investment activity for this evaluation period and, as such, the conclusion of investment performance was determined by its philanthropic donation activity within its AA. The beneficiaries of the bank's donations were organizations that support affordable housing needs or which provide community services to LMI individuals and families, as well as area schools that contain majority populations of students eligible for free or reduced lunches.

Examples of CD donations include:

- A $5,000 donation was invested in an area educational fund which provides scholarship grants to local prospective healthcare industry professionals based on financial need.
- Two donations totaling $3,000 were made to a specific fund at an area medical facility which alleviates healthcare costs for LMI individuals and families without the ability to pay.

Table 75

Investments, Grants, and Donations – Cowley County AA								
Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	0	0	0	0	4	4	4	4
Community Services	0	0	0	0	38	30	38	30
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	0	0	0	0	42	34	42	34

1 *Book Value of Investment*
2 *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the Cowley County AA is excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are readily accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates six branches in the AA, including five branches in moderate-income tracts and the remaining branch in a middle-income tract. Additionally, two full-service ATMs are located in moderate-income tracts on branch premises.

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. There were no branch opening or closures since the prior evaluation period.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The bank's operations in the AA generally reflect those of the overall institution, which is described in the overall Institution Retail Banking Services section of this evaluation.

Table 76

<table>
<tr><th colspan="13">Retail Banking and Community Development Services – Cowley County AA</th></tr>
<tr><th rowspan="6">Branch Accessibility</th><th colspan="6">Location of Branches by Tract (%)</th><th colspan="6">Percent of Tracts[1] (%)</th></tr>
<tr><th>Low</th><th>Mod</th><th>Mid</th><th>Upp</th><th>Unk</th><th>Total</th><th>Low</th><th>Mod</th><th>Mid</th><th>Upp</th><th>Unk</th><th>Total</th></tr>
<tr><td>0.0</td><td>83.3</td><td>16.7</td><td>0.0</td><td>0.0</td><td>100.0</td><td>0.0</td><td>27.3</td><td>54.5</td><td>18.2</td><td>0.0</td><td>100.0</td></tr>
<tr><th colspan="6">Location of Full-Service ATMs by Tract (%)</th><th colspan="6">Percent of Households by Tracts[1] (%)</th></tr>
<tr><th>Low</th><th>Mod</th><th>Mid</th><th>Upp</th><th>Unk</th><th>Total</th><th>Low</th><th>Mod</th><th>Mid</th><th>Upp</th><th>Unk</th><th>Total</th></tr>
<tr><td>0.0</td><td>100.0</td><td>0.0</td><td>0.0</td><td>0.0</td><td>100.0</td><td>0.0</td><td>24.9</td><td>57.8</td><td>17.3</td><td>0.0</td><td>100.0</td></tr>
<tr><th rowspan="3">Changes in Branch Location</th><th colspan="6">Number of Branches (#)</th><th colspan="6">Net Change in Branch Locations (#)</th></tr>
<tr><th colspan="2">Total Branches</th><th colspan="2">Openings (#)</th><th colspan="2">Closings (#)</th><th>Low</th><th>Mod</th><th>Mid</th><th>Upp</th><th>Unk</th><th>Total</th></tr>
<tr><td colspan="2">6</td><td colspan="2">0</td><td colspan="2">0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr>
<tr><th rowspan="2">Community Development Services</th><th colspan="2">Affordable Housing</th><th colspan="2">Community Services</th><th colspan="2">Economic Development</th><th colspan="2">Revitalization & Stabilization</th><th colspan="2">Total Services</th><th colspan="2">Total Organizations</th></tr>
<tr><td colspan="2">0</td><td colspan="2">29</td><td colspan="2">0</td><td colspan="2">0</td><td colspan="2">29</td><td colspan="2">12</td></tr>
<tr><td colspan="13">[1] Based on 2022 FFIEC census tract definitions.
Note: Total percentages may vary by 0.1 percent due to automated rounding differences.</td></tr>
</table>

Community Development Services

The bank is a leader in providing CD services. During the evaluation period, 8 bank representatives provided 29 CD services to 12 area organizations. The services were a mixture of board membership for organizations that provide community services to LMI individuals and families and financial education instruction to students from schools with majority populations eligible for free or reduced lunches.

Examples of CD services include:

- A bank representative provided financial literacy courses in each year of the evaluation to students from an area school where a majority of students were eligible for free or reduced lunches. The educational instruction included personal financial management and understanding credit scoring, among other financial literacy principles.
- An executive officer for the bank served on a special accreditation review board which benefitted an area school district in which a majority of students in the district were eligible for free or reduced lunches.

MONTGOMERY COUNTY ASSESSMENT AREA
NONMETROPOLITAN AREA
(Limited-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE MONTGOMERY COUNTY AA

The AA is comprised of Montgomery County in its entirety. Refer to Appendix C for a map of the AA.

- The AA is comprised of 12 total census tracts, including one low-, five moderate-, and six middle-income tracts.
- The bank operates one full-service branch in the AA located in a middle-income tract in Caney.
- The AA's composition of families by income level includes 26.4 percent low-, 18.3 percent moderate-, 22.9 percent middle-, and 32.5 percent upper-income families.
- According to the June 30, 2022 FDIC Market Share Report, the bank ranked 6th out of 7 FDIC-insured institutions in the AA with a market share of 2.7 percent.
- Based on 2020 Census data, the AA population was 31,486.

RENO COUNTY ASSESSMENT AREA
NONMETROPOLITAN AREA
(Limited-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE RENO COUNTY AA

The AA is comprised of Reno County in its entirety. Refer to Appendix C for a map of the AA.

- The AA is comprised of 17 total census tracts, including one low-, two moderate-, 13 middle-, and one upper-income tracts.
- The bank operates four full-service branches in the AA, each located in the county seat of Hutchinson. The distribution of branches includes one branch in a low-income tract and three located in middle-income tracts.
- The AA's composition of families by income level includes 20.1 percent low-, 19.5 percent moderate-, 20.5 percent middle-, and 39.9 percent upper-income families.
- According to the June 30, 2022 FDIC Market Share Report, the bank ranked 2nd out of 11 FDIC-insured institutions in the AA with a market share of 13.7 percent.
- Based on 2020 Census data, the AA population was 61,898.

The state of Kansas AAs listed in the table below were reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance in these areas does not change the rating for the state of Kansas.

Table 77

Assessment Area	Lending Test	Investment Test	Service Test
Montgomery County	Below	Below	Below
Reno County	Consistent	Consistent	Consistent

APPENDIX A – SCOPE OF EXAMINATION

Table A-1

Scope of Examination		
Financial Institution **RCB Bank** Claremore, Oklahoma	**Products/Services Reviewed** • Home Purchase Loans • Home Refinance Loans • Home Improvement Loans • Multifamily Loans	• Small Business Loans • Small Farm Loans • Community Development Loans • Qualified Investments and Donations • Community Development Services
Time Period		
HMDA LAR and CRA Small Business and Small Farm Loans:	January 1, 2020 to December 31, 2021	
Community Development Activities:	January 1, 2021 to December 31, 2022	

List of Affiliates Considered in this Evaluation		
Affiliates	**Affiliate Relationship**	**Products Reviewed**
None	None	None

List of Assessment Areas and Type of Examination			
Assessment Area	**Type of Exam**	**Branches Visited**	**Community Contacts**
Oklahoma			
MSA 46140 Tulsa, OK	Full Review	None	One Prior
MSA 36420 Oklahoma City, OK	Full Review	None	One Prior
Kay County	Full Review	None	One Prior
Northeast Oklahoma	Limited Review	None	None
Payne County	Limited Review	None	None
Washington County	Limited Review	None	None
Kansas			
MSA 48620 Wichita, KS	Full Review	None	One Current
Cowley County	Full Review	None	One Current
MSA 29940 Lawrence, KS	Limited Review	None	None
Reno County	Limited Review	None	None
Montgomery County	Limited Review	None	None

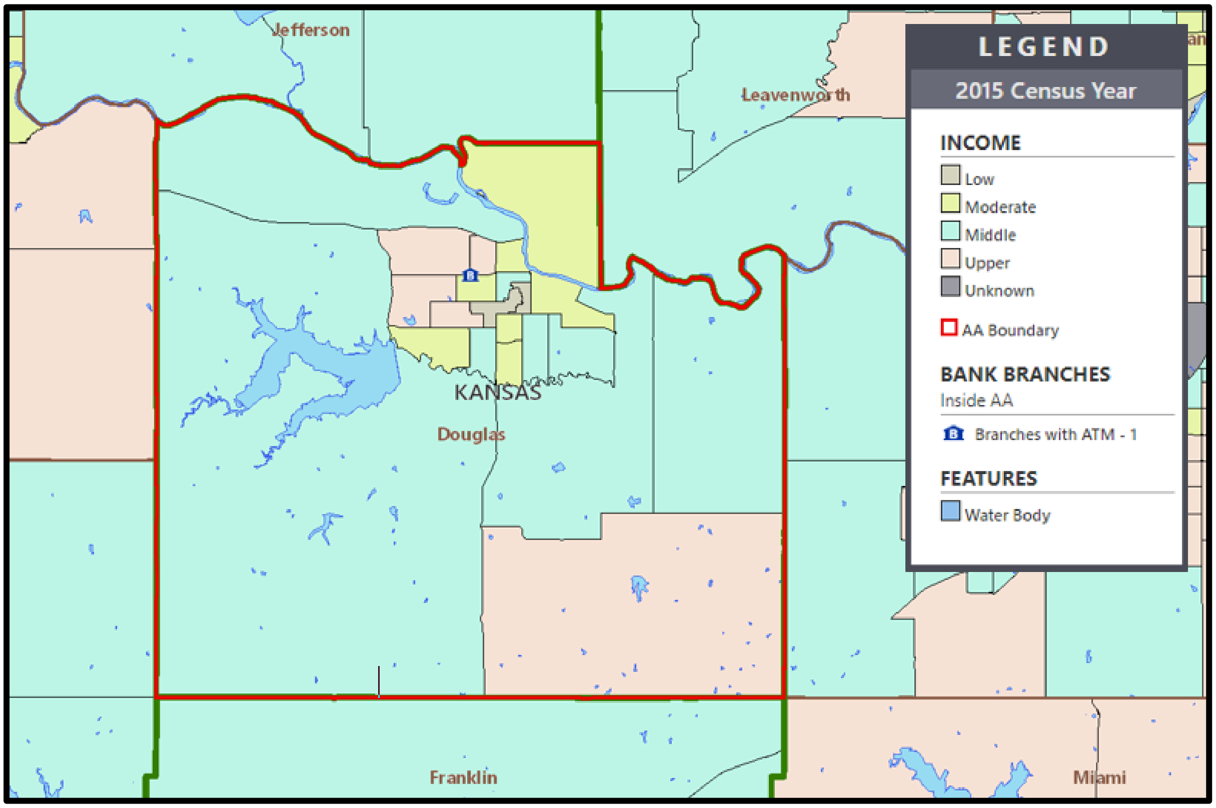
APPENDIX B – SUMMARY OF STATE RATINGS

Table B-1

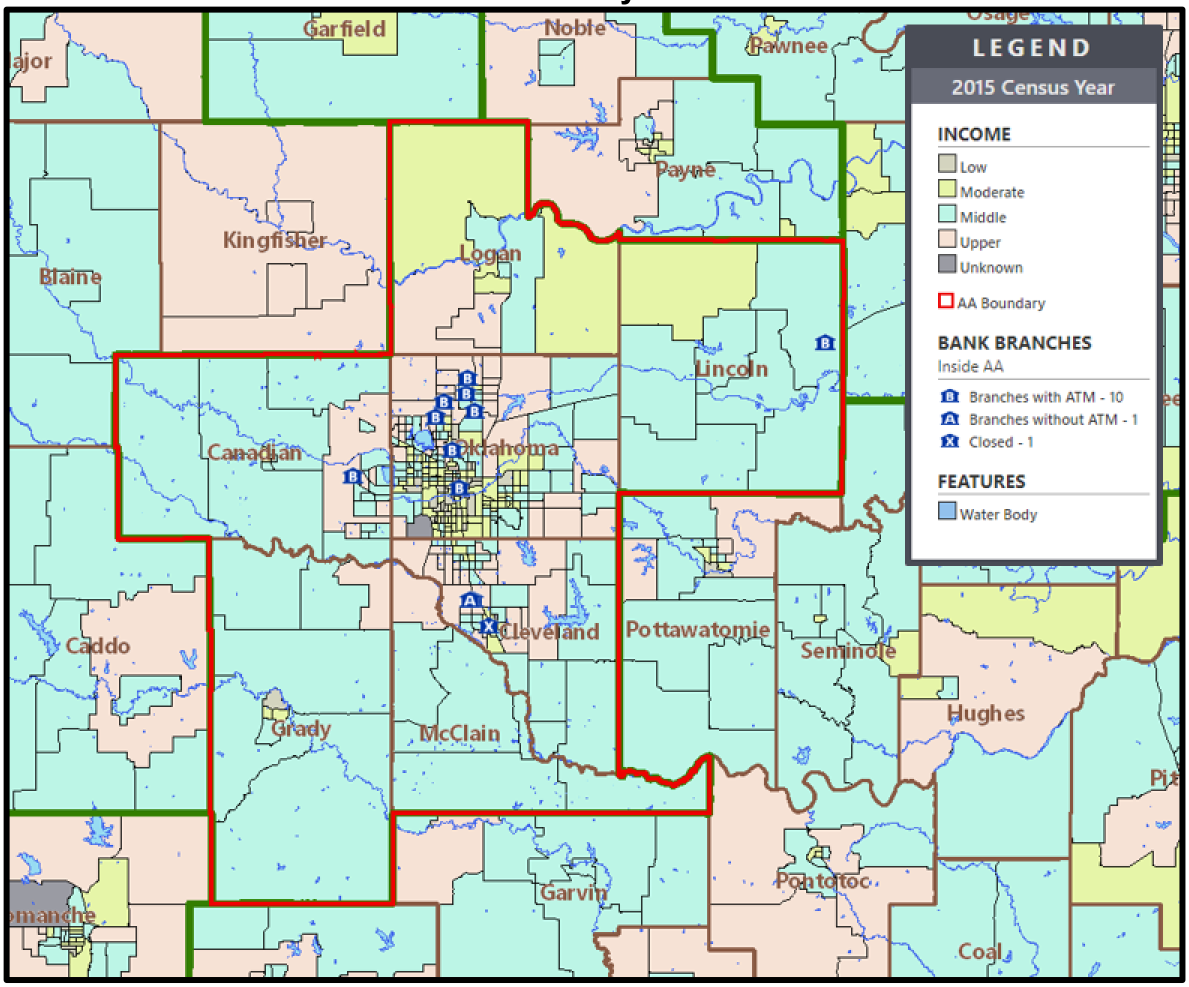
State Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Oklahoma	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Kansas	Low Satisfactory	Low Satisfactory	Outstanding	Satisfactory

APPENDIX C – MAPS OF THE ASSESSMENT AREAS

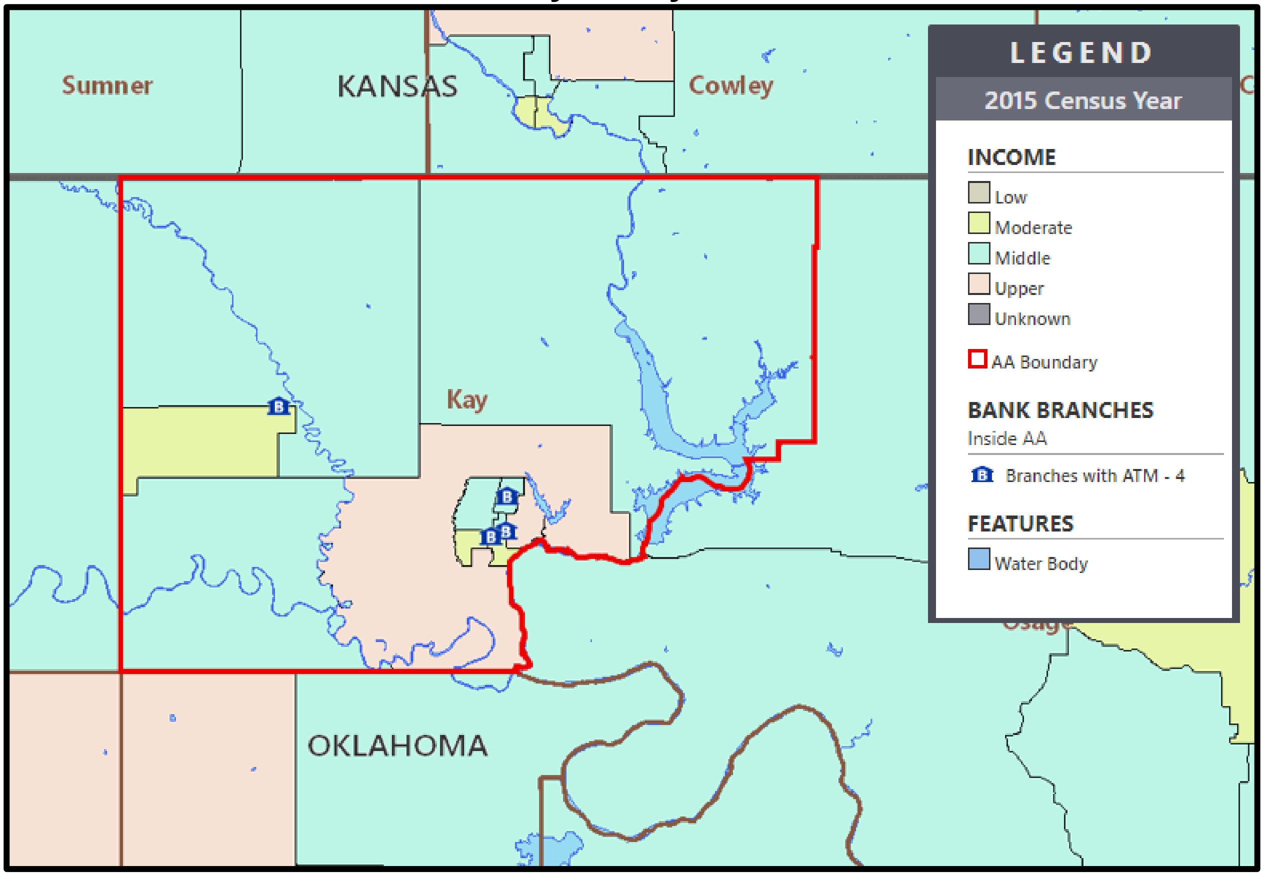
Tulsa MSA AA



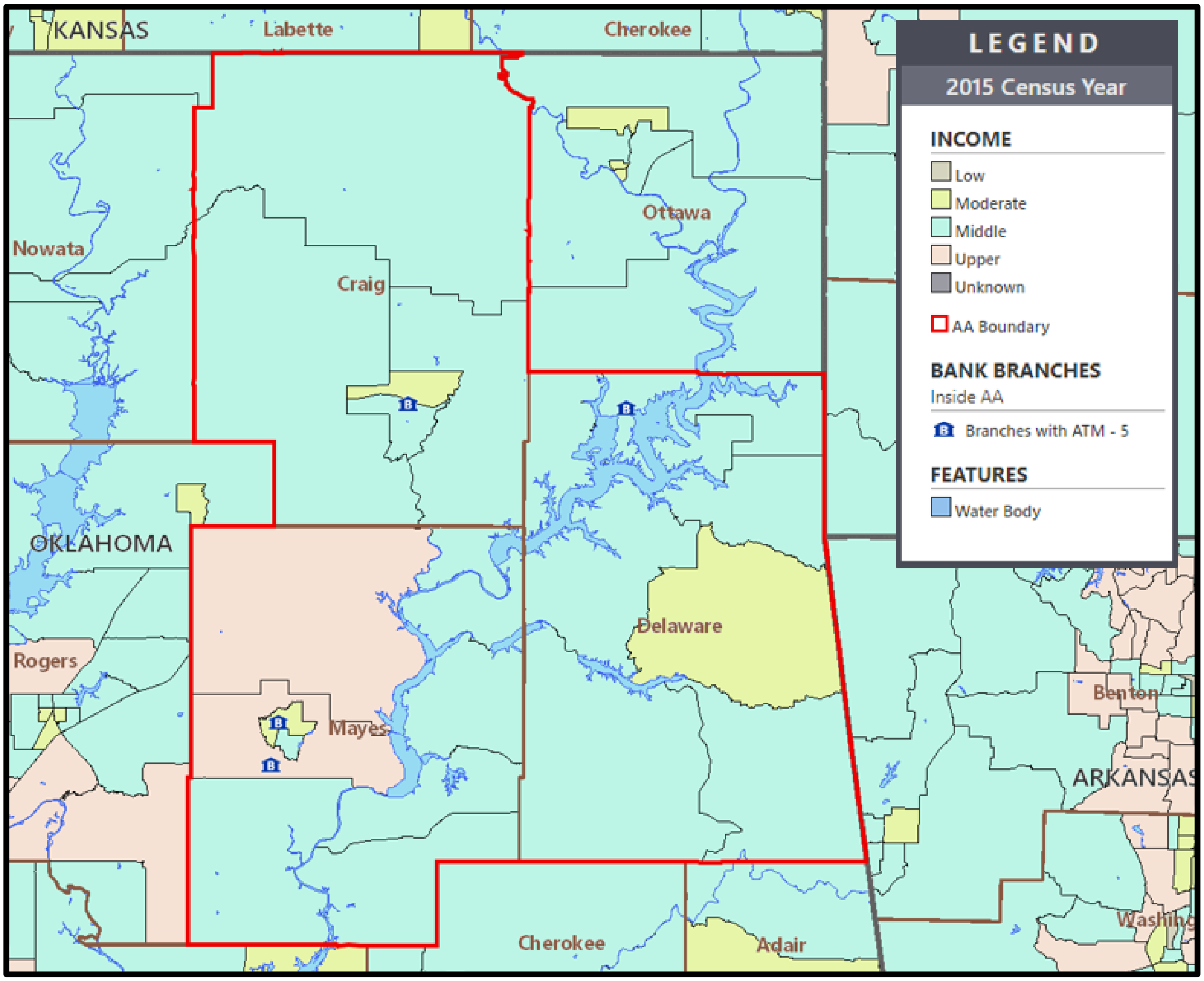
Oklahoma City MSA AA



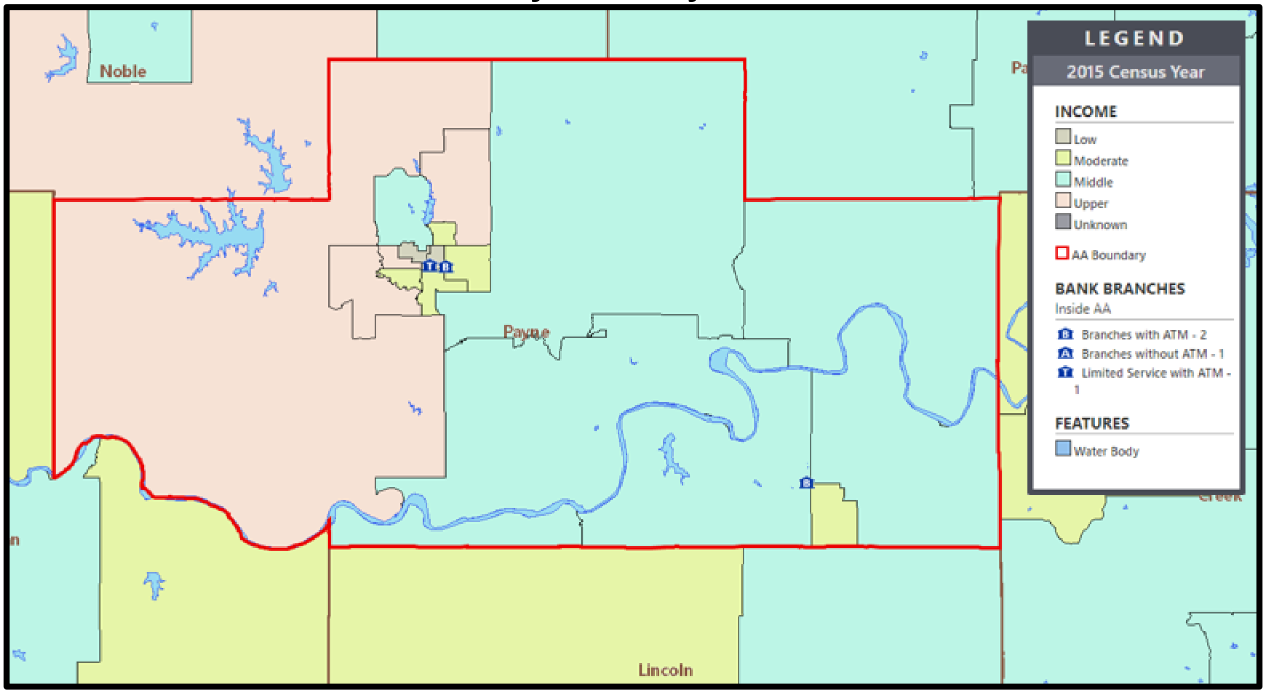
Kay County AA



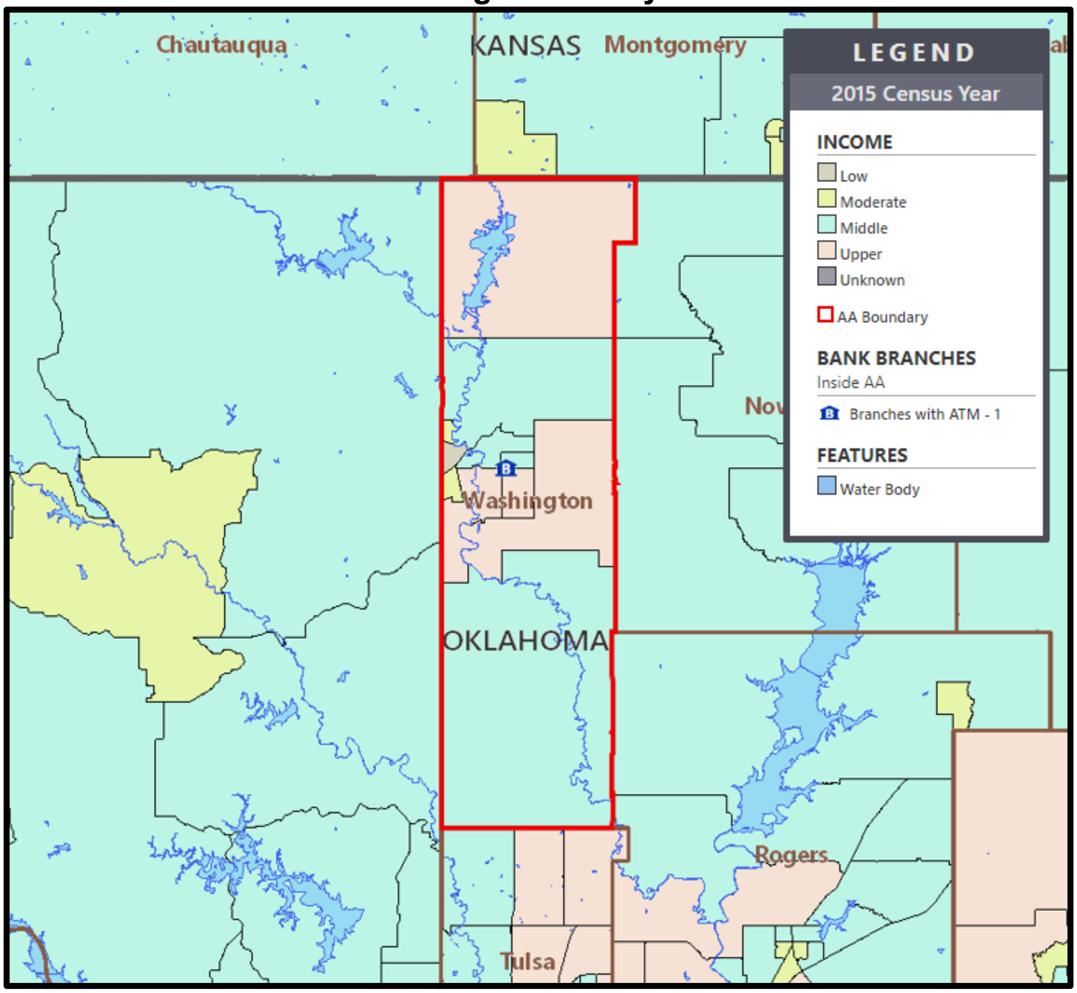
Northeast Oklahoma AA



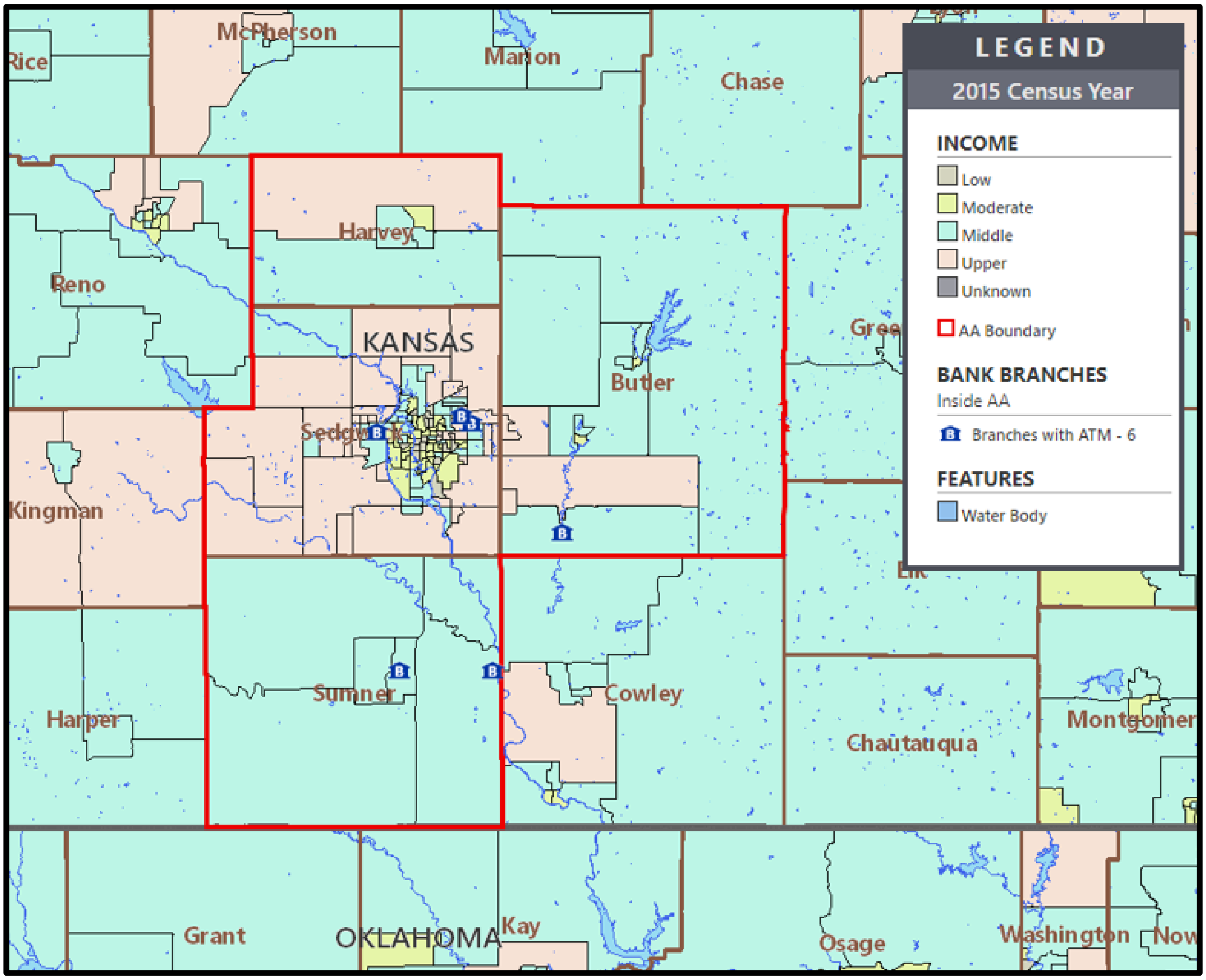
Payne County AA



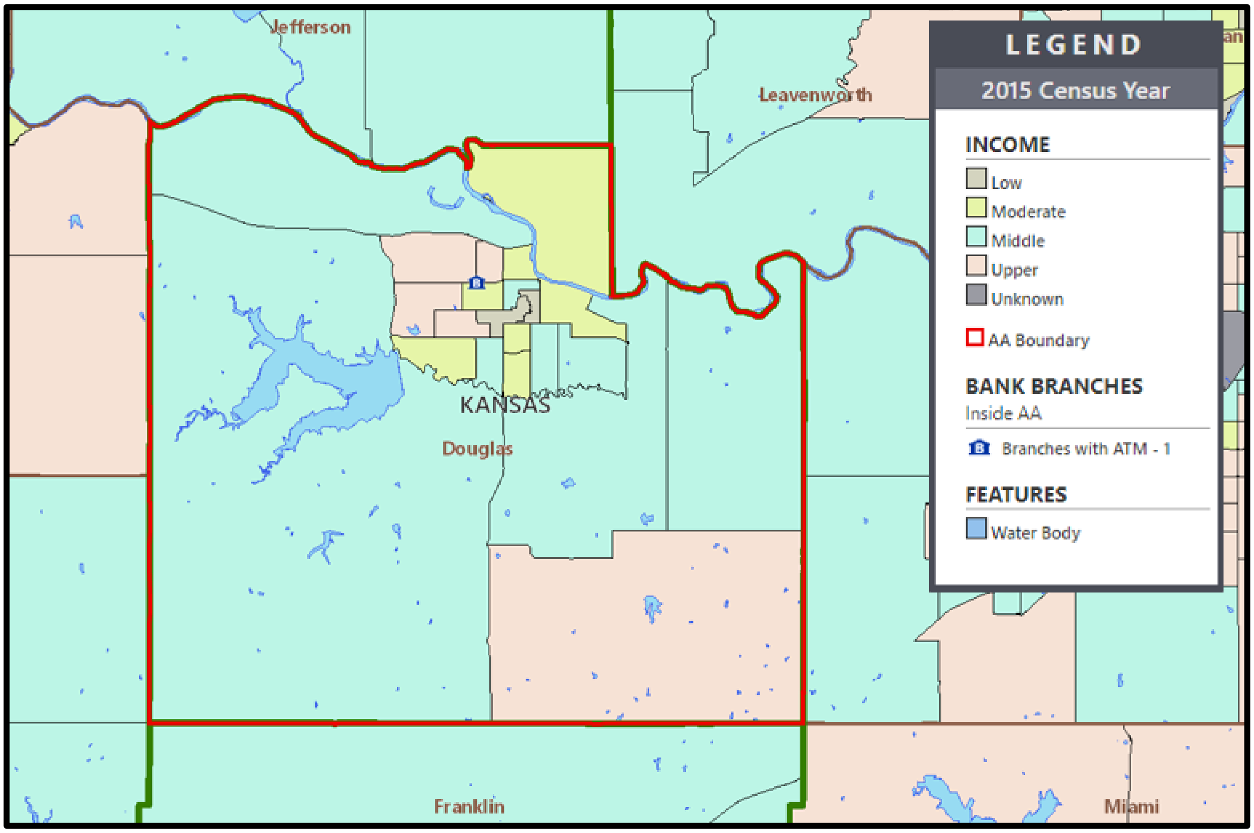
Washington County AA



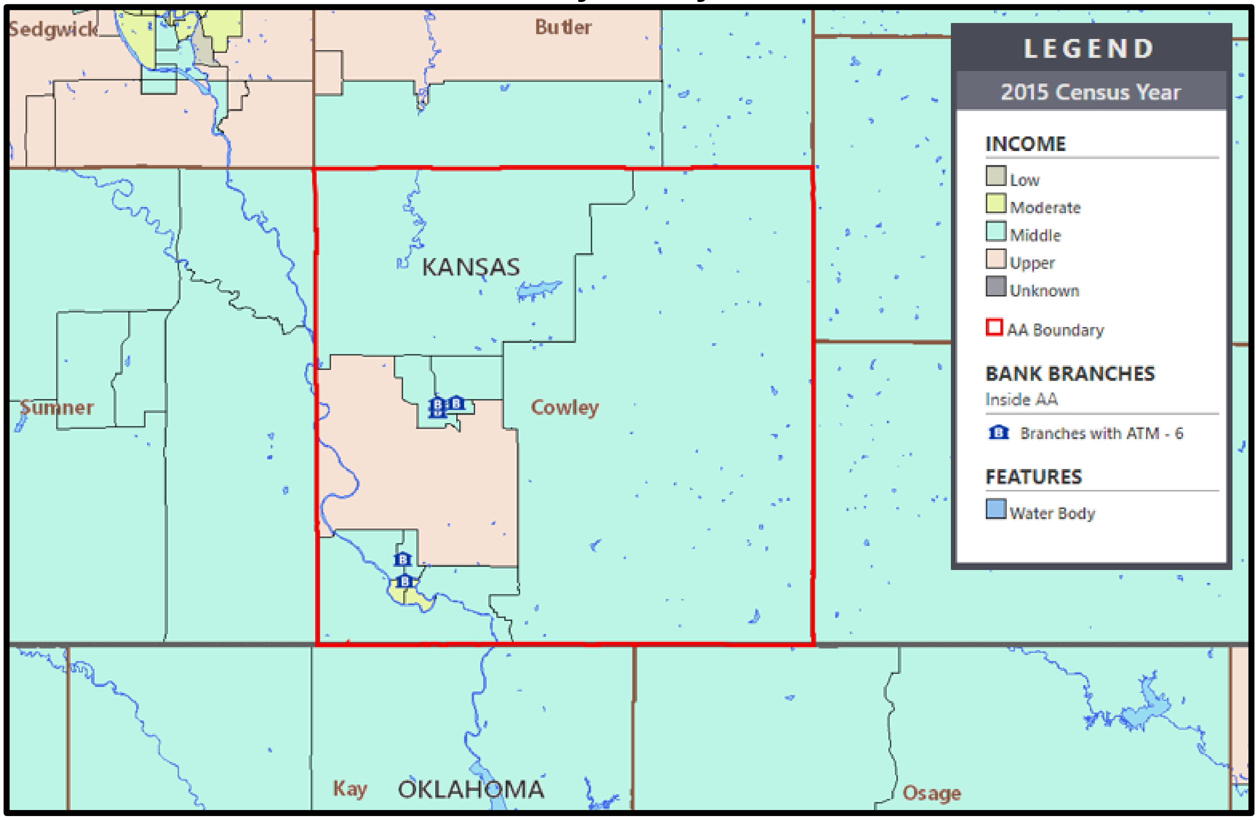
Wichita MSA AA



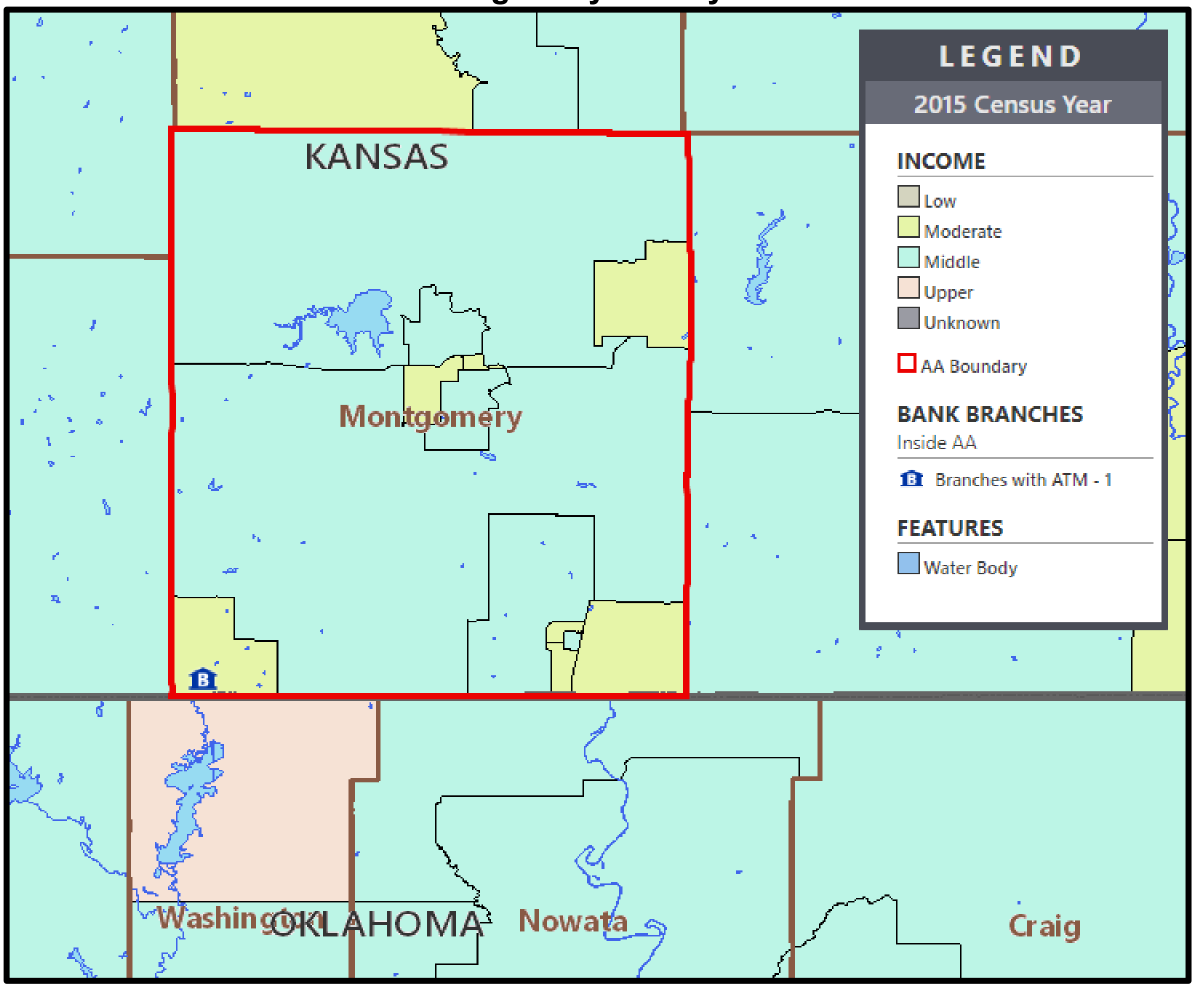
Lawrence MSA AA



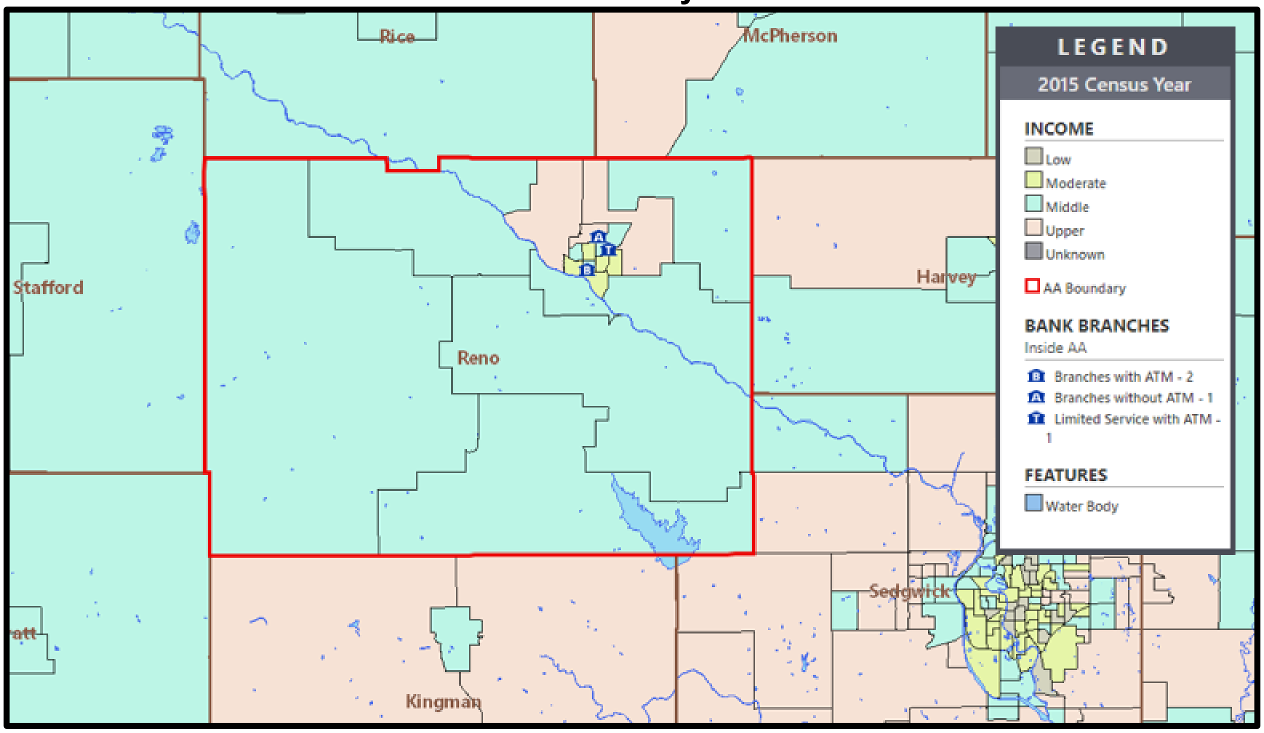
Cowley County AA



Montgomery County AA



Reno County AA



APPENDIX D – DEMOGRAPHIC INFORMATION
Table D-1

2022 Tulsa MSA AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	16	5.1	11,228	4.5	4,351	38.8	54,015	21.5
Moderate	93	29.7	67,089	26.6	11,708	17.5	44,478	17.7
Middle	106	33.9	88,606	35.2	6,977	7.9	49,662	19.7
Upper	97	31.0	84,698	33.6	3,074	3.6	103,601	41.2
Unknown	1	0.3	135	0.1	26	19.3	0	0.0
Total AA	**313**	**100.0**	**251,756**	**100.0**	**26,136**	**10.4**	**251,756**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	23,615	7,291	2.9	30.9	12,597	53.3	3,727	15.8
Moderate	131,743	57,065	22.7	43.3	54,553	41.4	20,125	15.3
Middle	151,483	93,869	37.4	62.0	41,038	27.1	16,576	10.9
Upper	125,844	92,709	36.9	73.7	24,347	19.3	8,788	7.0
Unknown	1,185	104	0.0	8.8	796	67.2	285	24.1
Total AA	**433,870**	**251,038**	**100.0**	**57.9**	**133,331**	**30.7**	**49,501**	**11.4**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,830	4.7	1,576	4.5	240	7.4	14	3.8
Moderate	11,209	28.9	10,001	28.4	1,111	34.2	97	26.6
Middle	13,743	35.4	12,440	35.3	1,166	35.9	137	37.6
Upper	11,984	30.9	11,149	31.7	720	22.2	115	31.6
Unknown	59	0.2	49	0.1	9	0.3	1	0.3
Total AA	**38,825**	**100.0**	**35,215**	**100.0**	**3,246**	**100.0**	**364**	**100.0**
Percentage of Total Businesses:				**90.7**		**8.4**		**0.9**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	6	1.0	6	1.0	0	0.0	0	0.0
Moderate	112	18.1	110	17.9	2	40.0	0	0.0
Middle	317	51.1	315	51.3	2	40.0	0	0.0
Upper	185	29.8	183	29.8	1	20.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**620**	**100.0**	**614**	**100.0**	**5**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**99.0**		**0.8**		**0.2**

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 D-2

2021 Tulsa MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	17	6.3	10,765	4.3	4,413	41.0	53,262	21.5
Moderate	76	27.9	57,255	23.1	11,405	19.9	43,878	17.7
Middle	111	40.8	106,931	43.1	9,570	8.9	50,431	20.3
Upper	68	25.0	73,083	29.5	2,835	3.9	100,463	40.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**272**	**100.0**	**248,034**	**100.0**	**28,223**	**11.4**	**248,034**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	22,903	6,671	2.7	29.1	12,302	53.7	3,930	17.2
Moderate	111,533	47,411	19.4	42.5	47,707	42.8	16,415	14.7
Middle	177,271	111,527	45.7	62.9	47,732	26.9	18,012	10.2
Upper	106,635	78,449	32.1	73.6	20,866	19.6	7,320	6.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**418,342**	**244,058**	**100.0**	**58.3**	**128,607**	**30.7**	**45,677**	**10.9**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,578	3.1	1,364	3.0	202	5.1	12	2.7
Moderate	11,413	22.7	10,093	22.0	1,213	30.7	107	23.7
Middle	20,370	40.6	18,537	40.5	1,650	41.8	183	40.6
Upper	16,858	33.6	15,825	34.5	884	22.4	149	33.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**50,219**	**100.0**	**45,819**	**100.0**	**3,949**	**100.0**	**451**	**100.0**
Percentage of Total Businesses:				**91.2**		**7.9**		**0.9**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	8	1.1	7	0.9	1	12.5	0	0.0
Moderate	97	12.8	96	12.8	1	12.5	0	0.0
Middle	440	58.0	435	58.1	5	62.5	0	0.0
Upper	214	28.2	211	28.2	1	12.5	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**759**	**100.0**	**749**	**100.0**	**8**	**100.0**	**2**	**100.0**
Percentage of Total Farms:				**98.7**		**1.1**		**0.3**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-3

2020 Tulsa MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	17	6.3	10,765	4.3	4,413	41.0	53,262	21.5
Moderate	76	27.9	57,255	23.1	11,405	19.9	43,878	17.7
Middle	111	40.8	106,931	43.1	9,570	8.9	50,431	20.3
Upper	68	25.0	73,083	29.5	2,835	3.9	100,463	40.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**272**	**100.0**	**248,034**	**100.0**	**28,223**	**11.4**	**248,034**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	22,903	6,671	2.7	29.1	12,302	53.7	3,930	17.2
Moderate	111,533	47,411	19.4	42.5	47,707	42.8	16,415	14.7
Middle	177,271	111,527	45.7	62.9	47,732	26.9	18,012	10.2
Upper	106,635	78,449	32.1	73.6	20,866	19.6	7,320	6.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**418,342**	**244,058**	**100.0**	**58.3**	**128,607**	**30.7**	**45,677**	**10.9**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,572	3.1	1,357	2.9	202	4.9	13	3.0
Moderate	11,628	22.7	10,268	21.9	1,254	30.5	106	24.1
Middle	20,710	40.3	18,806	40.2	1,731	42.1	173	39.4
Upper	17,423	33.9	16,352	35.0	924	22.5	147	33.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**51,333**	**100.0**	**46,783**	**100.0**	**4,111**	**100.0**	**439**	**100.0**
Percentage of Total Businesses:				**91.1**		**8.0**		**0.9**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	8	1.0	7	0.9	1	12.5	0	0.0
Moderate	99	12.6	99	12.8	0	0.0	0	0.0
Middle	447	56.9	443	57.2	4	50.0	0	0.0
Upper	231	29.4	226	29.2	3	37.5	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**785**	**100.0**	**775**	**100.0**	**8**	**100.0**	**2**	**100.0**
Percentage of Total Farms:				**98.7**		**1.0**		**0.3**

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.

Table D-4

2022 Oklahoma 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	30	7.2	16,348	4.8	5,259	32.2	71,032	21.1
Moderate	104	24.8	69,107	20.5	11,314	16.4	59,287	17.6
Middle	147	35.1	131,884	39.1	10,121	7.7	69,214	20.5
Upper	119	28.4	116,059	34.4	3,967	3.4	137,645	40.8
Unknown	19	4.5	3,780	1.1	1,426	37.7	0	0.0
Total AA	**419**	**100.0**	**337,178**	**100.0**	**32,087**	**9.5**	**337,178**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	34,467	11,460	3.4	33.2	17,614	51.1	5,393	15.6
Moderate	141,428	60,471	18.0	42.8	62,738	44.4	18,219	12.9
Middle	226,594	135,018	40.1	59.6	71,225	31.4	20,351	9.0
Upper	167,700	127,024	37.7	75.7	30,622	18.3	10,054	6.0
Unknown	8,154	2,874	0.9	35.2	4,108	50.4	1,172	14.4
Total AA	**578,343**	**336,847**	**100.0**	**58.2**	**186,307**	**32.2**	**55,189**	**9.5**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,300	5.4	2,026	5.1	243	8.1	31	6.5
Moderate	11,774	27.5	10,563	26.8	1,070	35.7	141	29.5
Middle	16,016	37.4	14,940	37.9	912	30.4	164	34.3
Upper	11,686	27.3	10,868	27.6	686	22.9	132	27.6
Unknown	1,086	2.5	989	2.5	87	2.9	10	2.1
Total AA	**42,862**	**100.0**	**39,386**	**100.0**	**2,998**	**100.0**	**478**	**100.0**
Percentage of Total Businesses:				**91.9**		**7.0**		**1.1**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	16	2.3	14	2.0	2	20.0	0	0.0
Moderate	130	18.4	127	18.3	2	20.0	1	100.0
Middle	364	51.6	360	51.9	4	40.0	0	0.0
Upper	189	26.8	187	26.9	2	20.0	0	0.0
Unknown	6	0.9	6	0.9	0	0.0	0	0.0
Total AA	**705**	**100.0**	**694**	**100.0**	**10**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.4**		**1.4**		**0.1**

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 D-5

2021 Oklahoma 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	29	8.0	17,305	5.3	6,311	36.5	68,992	21.3
Moderate	106	29.2	70,397	21.7	14,193	20.2	56,617	17.5
Middle	136	37.5	135,181	41.8	11,774	8.7	66,502	20.5
Upper	83	22.9	100,538	31.1	3,708	3.7	131,650	40.7
Unknown	9	2.5	340	0.1	119	35.0	0	0.0
Total AA	**363**	**100.0**	**323,761**	**100.0**	**36,105**	**11.2**	**323,761**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	34,089	10,670	3.4	31.3	17,711	52.0	5,708	16.7
Moderate	143,022	58,380	18.4	40.8	64,973	45.4	19,669	13.8
Middle	225,991	140,031	44.1	62.0	64,019	28.3	21,941	9.7
Upper	147,331	108,384	34.1	73.6	29,427	20.0	9,520	6.5
Unknown	1,583	195	0.1	12.3	1,094	69.1	294	18.6
Total AA	**552,016**	**317,660**	**100.0**	**57.5**	**177,224**	**32.1**	**57,132**	**10.3**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,799	4.4	2,402	4.2	380	8.2	17	2.3
Moderate	14,087	22.4	12,730	22.1	1,197	25.8	160	21.7
Middle	23,457	37.3	21,470	37.3	1,695	36.6	292	39.6
Upper	20,602	32.7	19,317	33.6	1,054	22.7	231	31.3
Unknown	1,974	3.1	1,626	2.8	311	6.7	37	5.0
Total AA	**62,919**	**100.0**	**57,545**	**100.0**	**4,637**	**100.0**	**737**	**100.0**
Percentage of Total Businesses:				**91.5**		**7.4**		**1.2**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	18	1.6	17	1.5	1	4.5	0	0.0
Moderate	134	11.8	129	11.6	5	22.7	0	0.0
Middle	627	55.3	615	55.4	11	50.0	1	100.0
Upper	350	30.9	345	31.1	5	22.7	0	0.0
Unknown	4	0.4	4	0.4	0	0.0	0	0.0
Total AA	**1,133**	**100.0**	**1,110**	**100.0**	**22**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.0**		**1.9**		**0.1**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-6

2020 Oklahoma 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	29	8.0	17,305	5.3	6,311	36.5	68,992	21.3
Moderate	106	29.2	70,397	21.7	14,193	20.2	56,617	17.5
Middle	136	37.5	135,181	41.8	11,774	8.7	66,502	20.5
Upper	83	22.9	100,538	31.1	3,708	3.7	131,650	40.7
Unknown	9	2.5	340	0.1	119	35.0	0	0.0
Total AA	**363**	**100.0**	**323,761**	**100.0**	**36,105**	**11.2**	**323,761**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	34,089	10,670	3.4	31.3	17,711	52.0	5,708	16.7
Moderate	143,022	58,380	18.4	40.8	64,973	45.4	19,669	13.8
Middle	225,991	140,031	44.1	62.0	64,019	28.3	21,941	9.7
Upper	147,331	108,384	34.1	73.6	29,427	20.0	9,520	6.5
Unknown	1,583	195	0.1	12.3	1,094	69.1	294	18.6
Total AA	**552,016**	**317,660**	**100.0**	**57.5**	**177,224**	**32.1**	**57,132**	**10.3**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,860	4.4	2,448	4.2	396	8.3	16	2.3
Moderate	14,406	22.4	12,995	22.1	1,259	26.3	152	22.2
Middle	24,022	37.4	22,033	37.4	1,724	36.0	265	38.7
Upper	21,065	32.8	19,749	33.6	1,094	22.9	222	32.5
Unknown	1,961	3.0	1,619	2.8	313	6.5	29	4.2
Total AA	**64,314**	**100.0**	**58,844**	**100.0**	**4,786**	**100.0**	**684**	**100.0**
Percentage of Total Businesses:				**91.5**		**7.4**		**1.1**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	19	1.6	18	1.5	1	4.2	0	0.0
Moderate	135	11.4	131	11.3	4	16.7	0	0.0
Middle	650	54.8	637	54.8	12	50.0	1	100.0
Upper	380	32.0	373	32.1	7	29.2	0	0.0
Unknown	3	0.3	3	0.3	0	0.0	0	0.0
Total AA	**1,187**	**100.0**	**1,162**	**100.0**	**24**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**97.9**		**2.0**		**0.1**

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.

Table D-7

2022 Kay 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	2,198	20.1
Moderate	2	18.2	1,781	16.3	397	22.3	2,136	19.5
Middle	7	63.6	6,806	62.1	759	11.2	2,245	20.5
Upper	2	18.2	2,367	21.6	249	10.5	4,375	39.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**11**	**100.0**	**10,954**	**100.0**	**1,405**	**12.8**	**10,954**	**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	3,799	1,762	15.3	46.4	1,088	28.6	949	25.0
Middle	13,843	7,155	62.2	51.7	4,016	29.0	2,672	19.3
Upper	3,813	2,591	22.5	68.0	780	20.5	442	11.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**21,455**	**11,508**	**100.0**	**53.6**	**5,884**	**27.4**	**4,063**	**18.9**
	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	207	11.9	186	11.9	19	12.8	2	7.1
Middle	1,214	69.8	1,085	69.5	107	71.8	22	78.6
Upper	318	18.3	291	18.6	23	15.4	4	14.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,739**	**100.0**	**1,562**	**100.0**	**149**	**100.0**	**28**	**100.0**
Percentage of Total Businesses:				**89.8**		**8.6**		**1.6**
	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	13	10.0	13	10.0	0	0.0	0	0.0
Middle	99	76.2	99	76.2	0	0.0	0	0.0
Upper	18	13.8	18	13.8	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**130**	**100.0**	**130**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**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 D-8

2021 Kay 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	2,452	21.2
Moderate	3	27.3	2,522	21.8	505	20.0	2,128	18.4
Middle	6	54.5	6,897	59.7	929	13.5	2,272	19.7
Upper	2	18.2	2,134	18.5	137	6.4	4,701	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**11**	**100.0**	**11,553**	**100.0**	**1,571**	**13.6**	**11,553**	**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	5,052	2,566	20.5	50.8	1,352	26.8	1,134	22.4
Middle	13,049	7,257	58.1	55.6	3,851	29.5	1,941	14.9
Upper	3,525	2,665	21.3	75.6	424	12.0	436	12.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**21,626**	**12,488**	**100.0**	**57.7**	**5,627**	**26.0**	**3,511**	**16.2**
	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	424	24.4	384	24.6	35	23.5	5	17.9
Middle	997	57.3	887	56.8	91	61.1	19	67.9
Upper	318	18.3	291	18.6	23	15.4	4	14.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,739**	**100.0**	**1,562**	**100.0**	**149**	**100.0**	**28**	**100.0**
Percentage of Total Businesses:				**89.8**		**8.6**		**1.6**
	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	15	11.5	15	11.5	0	0.0	0	0.0
Middle	97	74.6	97	74.6	0	0.0	0	0.0
Upper	18	13.8	18	13.8	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**130**	**100.0**	**130**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-9

2020 Kay 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	2,452	21.2
Moderate	3	27.3	2,522	21.8	505	20.0	2,128	18.4
Middle	6	54.5	6,897	59.7	929	13.5	2,272	19.7
Upper	2	18.2	2,134	18.5	137	6.4	4,701	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**11**	**100.0**	**11,553**	**100.0**	**1,571**	**13.6**	**11,553**	**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	5,052	2,566	20.5	50.8	1,352	26.8	1,134	22.4
Middle	13,049	7,257	58.1	55.6	3,851	29.5	1,941	14.9
Upper	3,525	2,665	21.3	75.6	424	12.0	436	12.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**21,626**	**12,488**	**100.0**	**57.7**	**5,627**	**26.0**	**3,511**	**16.2**
	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	434	24.2	392	24.6	37	22.2	5	17.2
Middle	1,024	57.2	899	56.4	105	62.9	20	69.0
Upper	332	18.5	303	19.0	25	15.0	4	13.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,790**	**100.0**	**1,594**	**100.0**	**167**	**100.0**	**29**	**100.0**
Percentage of Total Businesses:				**89.1**		**9.3**		**1.6**
	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	11.8	16	11.8	0	0.0	0	0.0
Middle	98	72.1	98	72.1	0	0.0	0	0.0
Upper	22	16.2	22	16.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**136**	**100.0**	**136**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

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.

Table D-10

2022 Wichita MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	8	4.8	4,447	2.8	1,641	36.9	31,171	19.5
Moderate	44	26.3	33,659	21.1	5,802	17.2	29,416	18.4
Middle	71	42.5	71,530	44.8	4,836	6.8	34,616	21.7
Upper	42	25.1	49,528	31.0	1,475	3.0	64,442	40.4
Unknown	2	1.2	481	0.3	185	38.5	0	0.0
Total AA	**167**	**100.0**	**159,645**	**100.0**	**13,939**	**8.7**	**159,645**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	10,363	2,579	1.6	24.9	5,645	54.5	2,139	20.6
Moderate	70,808	27,873	17.5	39.4	33,083	46.7	9,852	13.9
Middle	118,608	75,188	47.3	63.4	33,784	28.5	9,636	8.1
Upper	71,282	53,015	33.4	74.4	13,858	19.4	4,409	6.2
Unknown	2,500	258	0.2	10.3	1,728	69.1	514	20.6
Total AA	**273,561**	**158,913**	**100.0**	**58.1**	**88,098**	**32.2**	**26,550**	**9.7**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	563	3.3	503	3.3	60	3.3	0	0.0
Moderate	4,837	28.1	4,227	27.7	584	32.5	26	18.4
Middle	7,137	41.5	6,326	41.5	740	41.2	71	50.4
Upper	4,417	25.7	4,008	26.3	366	20.4	43	30.5
Unknown	239	1.4	192	1.3	46	2.6	1	0.7
Total AA	**17,193**	**100.0**	**15,256**	**100.0**	**1,796**	**100.0**	**141**	**100.0**
Percentage of Total Businesses:				**88.7**		**10.4**		**0.8**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.2	1	0.2	0	0.0	0	0.0
Moderate	19	3.8	19	3.8	0	0.0	0	0.0
Middle	314	62.5	312	62.7	1	33.3	1	100.0
Upper	166	33.1	164	32.9	2	66.7	0	0.0
Unknown	2	0.4	2	0.4	0	0.0	0	0.0
Total AA	**502**	**100.0**	**498**	**100.0**	**3**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**99.2**		**0.6**		**0.2**

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 D-11

2021 Wichita MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	15	10.1	10,259	6.5	3,615	35.2	31,872	20.2
Moderate	39	26.2	30,412	19.3	6,278	20.6	27,888	17.7
Middle	51	34.2	56,960	36.2	4,656	8.2	33,688	21.4
Upper	44	29.5	59,847	38.0	1,691	2.8	64,030	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**149**	**100.0**	**157,478**	**100.0**	**16,240**	**10.3**	**157,478**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	22,180	7,163	4.5	32.3	11,145	50.2	3,872	17.5
Moderate	61,927	26,291	16.6	42.5	27,133	43.8	8,503	13.7
Middle	98,788	59,482	37.7	60.2	30,368	30.7	8,938	9.0
Upper	82,591	64,989	41.2	78.7	13,335	16.1	4,267	5.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**265,486**	**157,925**	**100.0**	**59.5**	**81,981**	**30.9**	**25,580**	**9.6**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,222	5.3	1,066	5.2	154	6.8	2	1.0
Moderate	5,964	26.0	5,099	24.9	832	36.5	33	16.7
Middle	7,699	33.5	6,898	33.6	713	31.3	88	44.4
Upper	8,093	35.2	7,439	36.3	579	25.4	75	37.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**22,978**	**100.0**	**20,502**	**100.0**	**2,278**	**100.0**	**198**	**100.0**
Percentage of Total Businesses:				**89.2**		**9.9**		**0.9**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4	0.5	4	0.5	0	0.0	0	0.0
Moderate	27	3.5	27	3.5	0	0.0	0	0.0
Middle	426	55.4	421	55.3	4	57.1	1	100.0
Upper	312	40.6	309	40.6	3	42.9	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**769**	**100.0**	**761**	**100.0**	**7**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**99.0**		**0.9**		**0.1**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-12

2020 Wichita MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	15	10.1	10,259	6.5	3,615	35.2	31,872	20.2
Moderate	39	26.2	30,412	19.3	6,278	20.6	27,888	17.7
Middle	51	34.2	56,960	36.2	4,656	8.2	33,688	21.4
Upper	44	29.5	59,847	38.0	1,691	2.8	64,030	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**149**	**100.0**	**157,478**	**100.0**	**16,240**	**10.3**	**157,478**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	22,180	7,163	4.5	32.3	11,145	50.2	3,872	17.5
Moderate	61,927	26,291	16.6	42.5	27,133	43.8	8,503	13.7
Middle	98,788	59,482	37.7	60.2	30,368	30.7	8,938	9.0
Upper	82,591	64,989	41.2	78.7	13,335	16.1	4,267	5.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**265,486**	**157,925**	**100.0**	**59.5**	**81,981**	**30.9**	**25,580**	**9.6**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,230	5.2	1,065	5.1	164	7.0	1	0.5
Moderate	6,124	26.0	5,224	24.9	871	37.0	29	15.4
Middle	7,993	34.0	7,159	34.1	749	31.8	85	45.2
Upper	8,172	34.7	7,528	35.9	571	24.2	73	38.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**23,519**	**100.0**	**20,976**	**100.0**	**2,355**	**100.0**	**188**	**100.0**
Percentage of Total Businesses:				**89.2**		**10.0**		**0.8**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5	0.6	5	0.6	0	0.0	0	0.0
Moderate	30	3.7	30	3.8	0	0.0	0	0.0
Middle	442	55.1	436	55.0	4	57.1	2	100.0
Upper	325	40.5	322	40.6	3	42.9	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**802**	**100.0**	**793**	**100.0**	**7**	**100.0**	**2**	**100.0**
Percentage of Total Farms:				**98.9**		**0.9**		**0.2**

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.

Table D-13

2022 Cowley 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	1,660	19.2
Moderate	3	27.3	1,865	21.5	281	15.1	1,872	21.6
Middle	6	54.5	4,968	57.4	578	11.6	1,867	21.6
Upper	2	18.2	1,824	21.1	40	2.2	3,258	37.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**11**	**100.0**	**8,657**	**100.0**	**899**	**10.4**	**8,657**	**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	4,099	1,923	20.4	46.9	1,514	36.9	662	16.2
Middle	9,470	5,388	57.1	56.9	2,589	27.3	1,493	15.8
Upper	2,654	2,124	22.5	80.0	262	9.9	268	10.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**16,223**	**9,435**	**100.0**	**58.2**	**4,365**	**26.9**	**2,423**	**14.9**
	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	442	40.4	392	39.9	44	50.6	6	26.1
Middle	489	44.7	445	45.3	31	35.6	13	56.5
Upper	162	14.8	146	14.9	12	13.8	4	17.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,093**	**100.0**	**983**	**100.0**	**87**	**100.0**	**23**	**100.0**
Percentage of Total Businesses:				**89.9**		**8.0**		**2.1**
	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	2	1.9	2	2.0	0	0.0	0	0.0
Middle	75	72.8	75	73.5	0	0.0	0	0.0
Upper	26	25.2	25	24.5	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**103**	**100.0**	**102**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.0**		**1.0**		**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 D-14

2021 Cowley 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	1,932	21.2
Moderate	2	18.2	906	9.9	150	16.6	1,752	19.2
Middle	8	72.7	7,403	81.1	874	11.8	1,992	21.8
Upper	1	9.1	822	9.0	71	8.6	3,455	37.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**11**	**100.0**	**9,131**	**100.0**	**1,095**	**12.0**	**9,131**	**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	1,768	728	7.9	41.2	665	37.6	375	21.2
Middle	13,002	7,604	82.2	58.5	3,670	28.2	1,728	13.3
Upper	1,225	913	9.9	74.5	108	8.8	204	16.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**15,995**	**9,245**	**100.0**	**57.8**	**4,443**	**27.8**	**2,307**	**14.4**
	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	169	15.5	146	14.9	19	21.8	4	17.4
Middle	835	76.4	759	77.2	58	66.7	18	78.3
Upper	89	8.1	78	7.9	10	11.5	1	4.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,093**	**100.0**	**983**	**100.0**	**87**	**100.0**	**23**	**100.0**
Percentage of Total Businesses:				**89.9**		**8.0**		**2.1**
	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	88	85.4	88	86.3	0	0.0	0	0.0
Upper	15	14.6	14	13.7	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**103**	**100.0**	**102**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.0**		**1.0**		**0.0**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-15

2020 Cowley 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	1,932	21.2
Moderate	2	18.2	906	9.9	150	16.6	1,752	19.2
Middle	8	72.7	7,403	81.1	874	11.8	1,992	21.8
Upper	1	9.1	822	9.0	71	8.6	3,455	37.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**11**	**100.0**	**9,131**	**100.0**	**1,095**	**12.0**	**9,131**	**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	1,768	728	7.9	41.2	665	37.6	375	21.2
Middle	13,002	7,604	82.2	58.5	3,670	28.2	1,728	13.3
Upper	1,225	913	9.9	74.5	108	8.8	204	16.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**15,995**	**9,245**	**100.0**	**57.8**	**4,443**	**27.8**	**2,307**	**14.4**
	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	167	15.0	143	14.3	21	22.8	3	15.0
Middle	849	76.4	772	77.3	61	66.3	16	80.0
Upper	95	8.6	84	8.4	10	10.9	1	5.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,111**	**100.0**	**999**	**100.0**	**92**	**100.0**	**20**	**100.0**
Percentage of Total Businesses:				**89.9**		**8.3**		**1.8**
	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	93	84.5	93	85.3	0	0.0	0	0.0
Upper	17	15.5	16	14.7	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**110**	**100.0**	**109**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.1**		**0.9**		**0.0**

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.

APPENDIX E – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES

Table E-1

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Northeast Oklahoma													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	8.8	8.1	243	3.4	5.2	1	3.6	11.1	102	2.3	7.5	11.1
Middle	18	52.9	78.6	3,759	53.1	81.4	20	71.4	75.8	3,074	69.1	77.9	77.4
Upper	13	38.2	13.3	3,078	43.5	13.5	7	25.0	13.1	1,273	28.6	14.7	11.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	34	100.0	100.0	7,080	100.0	100.0	28	100.0	100.0	4,449	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	14.7	5.6	383	6.8	4.0	4	20.0	6.5	688	18.3	4.4	11.1
Middle	19	55.9	79.7	3,454	61.8	81.5	12	60.0	77.5	2,327	62.0	79.6	77.4
Upper	10	29.4	14.7	1,755	31.4	14.5	4	20.0	16.0	737	19.6	16.0	11.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	34	100.0	100.0	5,592	100.0	100.0	20	100.0	100.0	3,752	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	5.3	0	0.0	5.3	1	25.0	11.8	46	20.6	7.0	11.1
Middle	1	33.3	75.4	36	26.3	77.0	3	75.0	75.3	177	79.4	74.5	77.4
Upper	2	66.7	19.3	101	73.7	17.7	0	0.0	12.9	0	0.0	18.5	11.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	137	100.0	100.0	4	100.0	100.0	223	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	30.0	0	0.0	22.5	27.2
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	70.0	0	0.0	77.5	69.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	3.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	8	11.0	6.9	626	4.8	4.6	7	12.7	10.0	892	10.3	6.6	11.1
Middle	39	53.4	79.0	7,279	56.2	81.7	37	67.3	76.5	5,775	66.6	78.7	77.4
Upper	26	35.6	14.1	5,054	39.0	13.7	11	20.0	13.5	2,010	23.2	14.7	11.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	73	100.0	100.0	12,959	100.0	100.0	55	100.0	100.0	8,677	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
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 E-2

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Northeast Oklahoma													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	62	32.5	14.4	3,765	23.9	12.8	35	18.5	12.9	2,106	19.0	12.7	16.7
Middle	72	37.7	72.3	4,413	28.0	74.9	84	44.4	72.5	3,857	34.8	75.2	74.3
Upper	57	29.8	12.6	7,598	48.2	12.1	70	37.0	13.2	5,108	46.1	10.6	9.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.7	0	0.0	0.2	0	0.0	1.4	0	0.0	1.5	
Total	191	100.0	100.0	15,776	100.0	100.0	189	100.0	100.0	11,071	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-3

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography Assessment Area: Northeast Oklahoma													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	3.0	10.8	15	0.6	10.1	0	0.0	8.2	0	0.0	10.2	6.3
Middle	13	39.4	75.5	1,119	46.3	80.5	25	59.5	80.8	1,930	62.8	80.8	72.4
Upper	19	57.6	13.5	1,281	53.0	9.3	17	40.5	10.7	1,142	37.2	9.0	21.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.2	0	0.0	0.0	0	0.0	0.4	0	0.0	0.1	
Total	33	100.0	100.0	2,415	100.0	100.0	42	100.0	100.0	3,072	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-4

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Northeast Oklahoma													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	5.9	3.8	217	3.1	1.7	3	10.7	4.3	276	6.2	1.8	23.5
Moderate	5	14.7	13.9	601	8.5	8.3	4	14.3	13.3	410	9.2	8.3	18.0
Middle	5	14.7	18.4	770	10.9	13.8	5	17.9	16.3	806	18.1	12.7	22.2
Upper	19	55.9	47.7	4,971	70.2	61.8	13	46.4	41.6	2,572	57.8	53.7	36.3
Unknown	3	8.8	16.2	521	7.4	14.4	3	10.7	24.5	385	8.7	23.4	0.0
Total	34	100.0	100.0	7,080	100.0	100.0	28	100.0	100.0	4,449	100.0	100.0	100.0
Refinance Loans													
Low	1	2.9	2.5	95	1.7	1.2	2	10.0	2.6	159	4.2	1.1	23.5
Moderate	2	5.9	6.9	138	2.5	3.9	3	15.0	7.3	225	6.0	4.1	18.0
Middle	1	2.9	15.1	220	3.9	10.6	4	20.0	17.0	388	10.3	12.5	22.2
Upper	20	58.8	49.8	3,543	63.4	58.5	9	45.0	45.5	2,764	73.7	55.6	36.3
Unknown	10	29.4	25.6	1,596	28.5	25.9	2	10.0	27.6	216	5.8	26.7	0.0
Total	34	100.0	100.0	5,592	100.0	100.0	20	100.0	100.0	3,752	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.8	0	0.0	1.1	0	0.0	3.5	0	0.0	1.0	23.5
Moderate	0	0.0	1.8	0	0.0	0.3	0	0.0	8.2	0	0.0	5.7	18.0
Middle	0	0.0	15.8	0	0.0	6.5	1	25.0	12.9	27	12.1	8.9	22.2
Upper	3	100.0	68.4	137	100.0	79.2	2	50.0	58.8	87	39.0	73.4	36.3
Unknown	0	0.0	12.3	0	0.0	12.9	1	25.0	16.5	109	48.9	11.0	0.0
Total	3	100.0	100.0	137	100.0	100.0	4	100.0	100.0	223	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	3	4.1	3.3	312	2.4	1.5	5	9.1	3.3	435	5.0	1.5	23.5
Moderate	7	9.6	10.5	739	5.7	6.3	7	12.7	10.0	635	7.3	6.4	18.0
Middle	6	8.2	16.7	990	7.6	12.1	11	20.0	15.4	1,248	14.4	12.2	22.2
Upper	44	60.3	48.0	8,801	67.9	59.8	26	47.3	41.1	5,649	65.1	54.2	36.3
Unknown	13	17.8	21.5	2,117	16.3	20.3	6	10.9	30.2	710	8.2	25.7	0.0
Total	73	100.0	100.0	12,959	100.0	100.0	55	100.0	100.0	8,677	100.0	100.0	100.0

Source: 2021 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.
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 E-5

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses Assessment Area: Northeast Oklahoma													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	108	56.5	34.8	3,516	22.3	26.4	159	84.1	44.2	5,323	48.1	20.9	90.1
Over $1 Million	50	26.2		10,139	64.3		27	14.3		5,731	51.8		7.4
Revenue Unknown	33	17.3		2,121	13.4		3	1.6		17	0.2		2.4
Total	191	100.0		15,776	100.0		189	100.0		11,071	100.0		100.0
By Loan Size													
$100,000 or Less	149	78.0	86.8	4,363	27.7	26.6	158	83.6	86.8	2,822	25.5	24.9	
$100,001 - $250,000	30	15.7	7.0	5,144	32.6	18.7	22	11.6	6.9	3,648	33.0	19.4	
$250,001 - $1 Million	12	6.3	6.2	6,269	39.7	54.7	9	4.8	6.3	4,601	41.6	55.7	
Total	191	100.0	100.0	15,776	100.0	100.0	189	100.0	100.0	11,071	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	103	95.4		2,603	74.0		147	92.5		2,367	44.5		
$100,001 - $250,000	4	3.7		513	14.6		9	5.7		1,380	25.9		
$250,001 - $1 Million	1	0.9		400	11.4		3	1.9		1,576	29.6		
Total	108	100.0		3,516	100.0		159	100.0		5,323	100.0		

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-6

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms Assessment Area: Northeast Oklahoma													
	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	32	97.0	81.5	2,375	98.3	88.6	42	100.0	43.8	3,072	100.0	51.4	99.4
Over $1 Million	1	3.0		40	1.7		0	0.0		0	0.0		0.0
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.6
Total	33	100.0		2,415	100.0		42	100.0		3,072	100.0		100.0
By Loan Size													
$100,000 or Less	25	75.8	82.0	930	38.5	40.5	33	78.6	85.5	1,396	45.4	42.6	
$100,001 - $250,000	7	21.2	14.2	1,234	51.1	38.3	9	21.4	10.4	1,676	54.6	30.8	
$250,001 - $500,000	1	3.0	3.8	251	10.4	21.2	0	0.0	4.1	0	0.0	26.6	
Total	33	100.0	100.0	2,415	100.0	100.0	42	100.0	100.0	3,072	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	24	75.0		890	37.5		33	78.6		1,396	45.4		
$100,001 - $250,000	7	21.9		1,234	52.0		9	21.4		1,676	54.6		
$250,001 - $500,000	1	3.1		251	10.6		0	0.0		0	0.0		
Total	32	100.0		2,375	100.0		42	100.0		3,072	100.0		

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-7

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Payne County													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.9	0	0.0	0.6	0	0.0	1.2	0	0.0	0.9	0.6
Moderate	16	43.2	28.2	2,295	33.6	20.2	11	27.5	25.7	1,319	17.7	18.3	22.0
Middle	9	24.3	28.2	1,492	21.8	24.0	10	25.0	28.1	1,622	21.7	25.0	43.1
Upper	12	32.4	42.7	3,049	44.6	55.2	19	47.5	45.0	4,522	60.6	55.8	34.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	37	100.0	100.0	6,836	100.0	100.0	40	100.0	100.0	7,463	100.0	100.0	100.0
Refinance Loans													
Low	1	3.6	0.8	267	4.8	0.7	0	0.0	0.9	0	0.0	0.7	0.6
Moderate	2	7.1	12.9	69	1.2	8.8	5	33.3	16.0	616	23.2	11.2	22.0
Middle	7	25.0	28.5	1,030	18.5	25.4	6	40.0	33.5	1,207	45.4	31.9	43.1
Upper	18	64.3	57.8	4,208	75.5	65.0	4	26.7	49.6	837	31.5	56.3	34.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	28	100.0	100.0	5,574	100.0	100.0	15	100.0	100.0	2,660	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.4	0	0.0	13.9	0	0.0	2.3	0	0.0	1.8	0.6
Moderate	0	0.0	13.5	0	0.0	14.1	0	0.0	15.9	0	0.0	7.9	22.0
Middle	0	0.0	40.5	0	0.0	32.9	1	100.0	43.2	300	100.0	45.2	43.1
Upper	0	0.0	40.5	0	0.0	39.0	0	0.0	38.6	0	0.0	45.1	34.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	300	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	1	100.0	16.7	1,605	100.0	5.2	1	50.0	28.6	521	68.9	21.0	23.5
Moderate	0	0.0	22.2	0	0.0	3.3	1	50.0	28.6	235	31.1	18.1	31.9
Middle	0	0.0	22.2	0	0.0	34.7	0	0.0	28.6	0	0.0	37.9	29.9
Upper	0	0.0	38.9	0	0.0	56.8	0	0.0	14.3	0	0.0	23.0	14.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	1,605	100.0	100.0	2	100.0	100.0	756	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	2	3.0	1.0	1,872	13.4	1.2	1	1.7	1.2	521	4.7	2.3	0.6
Moderate	18	27.3	21.2	2,364	16.9	14.0	17	29.3	21.8	2,170	19.4	15.8	22.0
Middle	16	24.2	28.3	2,522	18.0	25.6	17	29.3	30.7	3,129	28.0	28.4	43.1
Upper	30	45.5	49.4	7,257	51.8	59.3	23	39.7	46.3	5,359	47.9	53.5	34.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	66	100.0	100.0	14,015	100.0	100.0	58	100.0	100.0	11,179	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
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 E-8

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Payne County													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	9	5.7	8.9	626	6.1	13.5	7	5.8	7.5	411	5.0	12.0	10.6
Moderate	43	27.4	30.5	2,239	21.7	29.6	28	23.1	25.0	2,052	24.8	30.2	29.3
Middle	73	46.5	28.5	6,515	63.2	23.6	53	43.8	31.7	4,064	49.2	26.8	32.6
Upper	32	20.4	32.0	933	9.0	33.3	33	27.3	34.3	1,735	21.0	30.7	27.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.1	0	0.0	0.0	0	0.0	1.5	0	0.0	0.3	
Total	157	100.0	100.0	10,313	100.0	100.0	121	100.0	100.0	8,262	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-9

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography Assessment Area: Payne County													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.9	0	0.0	1.8	0	0.0	0.0	0	0.0	0.0	0.9
Moderate	0	0.0	1.8	0	0.0	3.4	0	0.0	1.4	0	0.0	0.1	9.8
Middle	12	75.0	58.9	666	75.0	52.1	12	63.2	63.6	710	55.7	54.8	54.5
Upper	4	25.0	38.4	222	25.0	42.7	7	36.8	35.0	565	44.3	45.1	34.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	16	100.0	100.0	888	100.0	100.0	19	100.0	100.0	1,275	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-10

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Payne County													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.1	0	0.0	0.9	0	0.0	2.0	0	0.0	1.0	19.8
Moderate	4	10.8	11.2	458	6.7	7.5	3	7.5	9.9	437	5.9	6.6	17.5
Middle	6	16.2	15.0	830	12.1	12.4	12	30.0	12.7	2,052	27.5	10.7	18.7
Upper	18	48.6	52.3	4,141	60.6	60.8	18	45.0	44.5	3,821	51.2	50.9	44.0
Unknown	9	24.3	19.6	1,407	20.6	18.4	7	17.5	30.8	1,153	15.4	30.8	0.0
Total	37	100.0	100.0	6,836	100.0	100.0	40	100.0	100.0	7,463	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.3	0	0.0	1.0	0	0.0	1.2	0	0.0	0.5	19.8
Moderate	1	3.6	4.4	120	2.2	2.4	0	0.0	6.3	0	0.0	3.5	17.5
Middle	2	7.1	14.7	183	3.3	11.1	1	6.7	13.1	105	3.9	9.5	18.7
Upper	19	67.9	57.6	4,101	73.6	64.1	10	66.7	53.2	1,986	74.7	57.9	44.0
Unknown	6	21.4	21.1	1,170	21.0	21.4	4	26.7	26.3	569	21.4	28.5	0.0
Total	28	100.0	100.0	5,574	100.0	100.0	15	100.0	100.0	2,660	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.7	0	0.0	1.8	0	0.0	4.5	0	0.0	3.0	19.8
Moderate	0	0.0	16.2	0	0.0	10.9	0	0.0	11.4	0	0.0	13.0	17.5
Middle	0	0.0	8.1	0	0.0	4.4	0	0.0	15.9	0	0.0	15.3	18.7
Upper	0	0.0	64.9	0	0.0	63.9	1	100.0	61.4	300	100.0	63.5	44.0
Unknown	0	0.0	8.1	0	0.0	18.9	0	0.0	6.8	0	0.0	5.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	300	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	2.2	0	0.0	0.9	0	0.0	1.7	0	0.0	0.8	19.8
Moderate	5	7.7	8.0	578	4.7	5.1	3	5.4	8.5	437	4.2	5.4	17.5
Middle	8	12.3	14.4	1,013	8.2	11.7	13	23.2	12.9	2,157	20.7	10.3	18.7
Upper	37	56.9	54.1	8,242	66.4	61.7	29	51.8	47.9	6,107	58.6	53.5	44.0
Unknown	15	23.1	21.3	2,577	20.8	20.6	11	19.6	29.1	1,722	16.5	29.9	0.0
Total	65	100.0	100.0	12,410	100.0	100.0	56	100.0	100.0	10,423	100.0	100.0	100.0

Source: 2021 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.
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 E-11

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses Assessment Area: Payne County													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	91	58.0	35.0	3,845	37.3	40.6	90	74.4	49.0	4,468	54.1	47.8	91.8
Over $1 Million	29	18.5		5,074	49.2		28	23.1		3,629	43.9		7.3
Revenue Unknown	37	23.6		1,394	13.5		3	2.5		165	2.0		0.9
Total	157	100.0		10,313	100.0		121	100.0		8,262	100.0		100.0
By Loan Size													
$100,000 or Less	132	84.1	85.5	3,531	34.2	30.4	98	81.0	90.0	2,517	30.5	35.4	
$100,001 - $250,000	19	12.1	9.1	3,264	31.6	25.9	15	12.4	6.7	2,462	29.8	26.3	
$250,001 - $1 Million	6	3.8	5.4	3,518	34.1	43.7	8	6.6	3.3	3,283	39.7	38.2	
Total	157	100.0	100.0	10,313	100.0	100.0	121	100.0	100.0	8,262	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	84	92.3		1,731	45.0		81	90.0		1,906	42.7		
$100,001 - $250,000	5	5.5		837	21.8		5	5.6		894	20.0		
$250,001 - $1 Million	2	2.2		1,277	33.2		4	4.4		1,668	37.3		
Total	91	100.0		3,845	100.0		90	100.0		4,468	100.0		

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-12

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms Assessment Area: Payne County													
	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	15	93.8	85.7	741	83.4	88.7	18	94.7	83.9	1,265	99.2	95.5	97.3
Over $1 Million	1	6.3		147	16.6		0	0.0		0	0.0		2.7
Revenue Unknown	0	0.0		0	0.0		1	5.3		10	0.8		0.0
Total	16	100.0		888	100.0		19	100.0		1,275	100.0		100.0
By Loan Size													
$100,000 or Less	13	81.3	83.0	392	44.1	39.9	15	78.9	79.0	392	30.7	25.7	
$100,001 - $250,000	3	18.8	15.2	496	55.9	46.2	2	10.5	11.9	271	21.3	28.4	
$250,001 - $500,000	0	0.0	1.8	0	0.0	13.9	2	10.5	9.1	612	48.0	45.9	
Total	16	100.0	100.0	888	100.0	100.0	19	100.0	100.0	1,275	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	13	86.7		392	52.9		14	77.8		382	30.2		
$100,001 - $250,000	2	13.3		349	47.1		2	11.1		271	21.4		
$250,001 - $500,000	0	0.0		0	0.0		2	11.1		612	48.4		
Total	15	100.0		741	100.0		18	100.0		1,265	100.0		

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-13

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Washington County													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.4	0	0.0	0.2	0	0.0	0.6	0	0.0	0.4	2.3
Moderate	0	0.0	3.6	0	0.0	1.6	3	11.1	4.2	199	4.5	1.8	6.0
Middle	8	53.3	39.2	1,241	48.2	36.5	9	33.3	41.4	1,691	38.4	37.7	45.6
Upper	7	46.7	56.8	1,333	51.8	61.7	15	55.6	53.9	2,518	57.1	60.1	46.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	15	100.0	100.0	2,574	100.0	100.0	27	100.0	100.0	4,408	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.2	0	0.0	0.0	0	0.0	0.4	0	0.0	0.1	2.3
Moderate	0	0.0	1.5	0	0.0	0.6	0	0.0	1.4	0	0.0	0.7	6.0
Middle	5	62.5	42.3	930	63.1	40.5	1	33.3	43.3	46	12.9	42.8	45.6
Upper	3	37.5	56.0	543	36.9	59.0	2	66.7	54.8	311	87.1	56.3	46.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	1,473	100.0	100.0	3	100.0	100.0	357	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	3.4	0	0.0	2.2	2.3
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	5.1	0	0.0	1.8	6.0
Middle	1	100.0	42.9	21	100.0	26.2	1	100.0	50.8	51	100.0	54.3	45.6
Upper	0	0.0	57.1	0	0.0	73.8	0	0.0	40.7	0	0.0	41.7	46.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	21	100.0	100.0	1	100.0	100.0	51	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	8.3	0	0.0	1.3	0.9
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	8.3	0	0.0	2.9	3.8
Middle	0	0.0	50.0	0	0.0	54.4	0	0.0	41.7	0	0.0	36.4	54.6
Upper	1	100.0	50.0	242	100.0	45.6	0	0.0	41.7	0	0.0	59.4	40.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	242	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.4	0	0.0	0.2	0	0.0	0.7	0	0.0	0.4	2.3
Moderate	0	0.0	3.0	0	0.0	1.2	3	9.7	3.3	199	4.1	1.5	6.0
Middle	14	53.8	40.7	2,192	49.0	38.9	11	35.5	43.1	1,788	37.1	40.1	45.6
Upper	12	46.2	56.0	2,283	51.0	59.7	17	54.8	52.9	2,829	58.7	58.0	46.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	26	100.0	100.0	4,475	100.0	100.0	31	100.0	100.0	4,816	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
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 E-14

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Washington County													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	3	7.5	6.3	41	2.0	6.4	3	9.1	5.9	107	5.4	10.2	4.4
Moderate	0	0.0	0.8	0	0.0	0.1	1	3.0	1.8	30	1.5	0.5	1.6
Middle	22	55.0	54.7	1,240	61.8	62.3	19	57.6	50.9	1,328	66.9	53.1	57.5
Upper	15	37.5	37.8	724	36.1	31.1	10	30.3	40.5	520	26.2	36.0	36.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.4	0	0.0	0.1	0	0.0	0.8	0	0.0	0.1	
Total	40	100.0	100.0	2,005	100.0	100.0	33	100.0	100.0	1,985	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-15

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography Assessment Area: Washington County													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	1.0	0	0.0	1.6	0	0.0	0.0	0	0.0	0.0	1.7
Moderate	1	33.3	1.0	370	87.1	5.5	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	33.3	46.6	16	3.8	51.7	2	40.0	53.2	516	82.8	65.1	65.0
Upper	1	33.3	51.5	39	9.2	41.3	3	60.0	46.8	107	17.2	34.9	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	425	100.0	100.0	5	100.0	100.0	623	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-16

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Washington County													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	6.7	5.1	136	5.3	2.5	1	3.7	6.6	54	1.2	3.5	17.0
Moderate	2	13.3	15.1	144	5.6	10.4	3	11.1	14.3	382	8.7	10.0	16.4
Middle	1	6.7	22.2	131	5.1	19.2	3	11.1	16.4	380	8.6	15.2	18.0
Upper	10	66.7	39.1	2,122	82.4	51.2	12	44.4	34.3	2,413	54.7	44.9	48.6
Unknown	1	6.7	18.5	41	1.6	16.7	8	29.6	28.4	1,179	26.7	26.4	0.0
Total	15	100.0	100.0	2,574	100.0	100.0	27	100.0	100.0	4,408	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.8	0	0.0	1.0	1	33.3	4.4	46	12.9	2.2	17.0
Moderate	0	0.0	8.8	0	0.0	4.3	0	0.0	8.6	0	0.0	5.3	16.4
Middle	3	37.5	12.7	395	26.8	7.9	0	0.0	12.6	0	0.0	9.7	18.0
Upper	5	62.5	52.5	1,078	73.2	63.5	2	66.7	46.2	311	87.1	53.3	48.6
Unknown	0	0.0	23.3	0	0.0	23.3	0	0.0	28.2	0	0.0	29.5	0.0
Total	8	100.0	100.0	1,473	100.0	100.0	3	100.0	100.0	357	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	1.7	0	0.0	0.3	17.0
Moderate	1	100.0	11.4	21	100.0	7.3	1	100.0	15.3	51	100.0	11.9	16.4
Middle	0	0.0	17.1	0	0.0	8.8	0	0.0	22.0	0	0.0	19.4	18.0
Upper	0	0.0	51.4	0	0.0	53.6	0	0.0	49.2	0	0.0	57.9	48.6
Unknown	0	0.0	20.0	0	0.0	30.3	0	0.0	11.9	0	0.0	10.5	0.0
Total	1	100.0	100.0	21	100.0	100.0	1	100.0	100.0	51	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	4.0	4.0	136	3.2	1.9	2	6.5	5.5	100	2.1	2.9	17.0
Moderate	3	12.0	12.0	165	3.9	7.7	4	12.9	11.9	433	9.0	8.2	16.4
Middle	4	16.0	17.8	526	12.4	14.3	3	9.7	14.9	380	7.9	13.1	18.0
Upper	16	64.0	42.5	3,365	79.5	55.0	14	45.2	38.4	2,724	56.6	47.8	48.6
Unknown	1	4.0	23.6	41	1.0	21.2	8	25.8	29.3	1,179	24.5	28.0	0.0
Total	25	100.0	100.0	4,233	100.0	100.0	31	100.0	100.0	4,816	100.0	100.0	100.0

Source: 2021 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.
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 E-17

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses Assessment Area: Washington County													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	27	67.5	34.6	1,056	52.7	36.2	31	93.9	47.3	1,642	82.7	50.0	92.6
Over $1 Million	5	12.5		648	32.3		1	3.0		276	13.9		6.6
Revenue Unknown	8	20.0		301	15.0		1	3.0		67	3.4		0.8
Total	40	100.0		2,005	100.0		33	100.0		1,985	100.0		100.0
By Loan Size													
$100,000 or Less	34	85.0	84.9	825	41.1	32.8	29	87.9	89.6	898	45.2	37.1	
$100,001 - $250,000	5	12.5	9.4	745	37.2	25.0	2	6.1	6.6	251	12.6	23.4	
$250,001 - $1 Million	1	2.5	5.7	435	21.7	42.3	2	6.1	3.8	836	42.1	39.4	
Total	40	100.0	100.0	2,005	100.0	100.0	33	100.0	100.0	1,985	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	24	88.9		531	50.3		28	90.3		831	50.6		
$100,001 - $250,000	3	11.1		525	49.7		2	6.5		251	15.3		
$250,001 - $1 Million	0	0.0		0	0.0		1	3.2		560	34.1		
Total	27	100.0		1,056	100.0		31	100.0		1,642	100.0		

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-18

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms Assessment Area: Washington County													
	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	3	100.0	82.5	425	100.0	76.8	5	100.0	57.1	623	100.0	55.3	100.0
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	3	100.0		425	100.0		5	100.0		623	100.0		100.0
By Loan Size													
$100,000 or Less	2	66.7	81.6	55	12.9	31.5	4	80.0	86.4	182	29.2	36.6	
$100,001 - $250,000	0	0.0	10.7	0	0.0	28.9	0	0.0	5.8	0	0.0	17.1	
$250,001 - $500,000	1	33.3	7.8	370	87.1	39.6	1	20.0	7.8	441	70.8	46.3	
Total	3	100.0	100.0	425	100.0	100.0	5	100.0	100.0	623	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	2	66.7		55	12.9		4	80.0		182	29.2		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $500,000	1	33.3		370	87.1		1	20.0		441	70.8		
Total	3	100.0		425	100.0		5	100.0		623	100.0		

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-19

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Lawrence MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	4.8	1.6	118	2.8	1.6	1	2.6	2.1	181	1.7	2.4	1.3
Moderate	7	33.3	27.5	1,248	29.5	20.0	11	28.2	27.9	2,513	24.0	22.3	25.4
Middle	4	19.0	30.7	765	18.1	30.2	10	25.6	32.3	2,591	24.8	31.2	36.9
Upper	9	42.9	40.3	2,098	49.6	48.2	17	43.6	37.7	5,182	49.5	44.1	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	21	100.0	100.0	4,229	100.0	100.0	39	100.0	100.0	10,467	100.0	100.0	100.0
Refinance Loans													
Low	1	1.4	1.5	131	0.7	1.7	7	11.3	1.5	2,576	17.4	1.9	1.3
Moderate	21	28.4	19.5	3,345	19.0	14.2	18	29.0	21.7	3,407	23.0	16.2	25.4
Middle	25	33.8	32.4	6,426	36.4	32.6	16	25.8	35.4	4,190	28.2	35.6	36.9
Upper	27	36.5	46.6	7,730	43.8	51.5	21	33.9	41.4	4,671	31.5	46.3	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	74	100.0	100.0	17,632	100.0	100.0	62	100.0	100.0	14,844	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.7	0	0.0	7.1	0	0.0	3.1	0	0.0	7.8	1.3
Moderate	0	0.0	19.8	0	0.0	19.3	0	0.0	19.5	0	0.0	17.7	25.4
Middle	0	0.0	38.7	0	0.0	35.5	1	100.0	34.4	254	100.0	39.4	36.9
Upper	0	0.0	38.7	0	0.0	38.2	0	0.0	43.0	0	0.0	35.0	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	254	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	25.5	0	0.0	18.6	0	0.0	39.5	0	0.0	26.2	13.1
Moderate	0	0.0	40.4	0	0.0	28.6	0	0.0	31.6	0	0.0	47.2	42.9
Middle	0	0.0	21.3	0	0.0	31.1	0	0.0	18.4	0	0.0	20.3	23.0
Upper	0	0.0	12.8	0	0.0	21.7	0	0.0	10.5	0	0.0	6.3	20.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied
Low	2	2.1	1.7	249	1.1	2.7	8	7.7	2.1	2,757	10.7	3.1	1.3
Moderate	28	29.5	23.1	4,593	21.0	17.4	29	27.9	24.3	5,920	23.0	20.2	25.4
Middle	29	30.5	31.9	7,191	32.9	31.7	28	26.9	34.0	7,060	27.4	33.0	36.9
Upper	36	37.9	43.3	9,828	45.0	48.2	39	37.5	39.6	10,053	39.0	43.8	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	95	100.0	100.0	21,861	100.0	100.0	104	100.0	100.0	25,790	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
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 E-20

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Lawrence MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	4.4	0	0.0	3.9	1	2.6	3.6	10	0.4	4.0	5.8
Moderate	9	28.1	32.6	718	48.1	37.0	9	23.1	32.0	1,067	38.5	37.6	32.7
Middle	12	37.5	31.8	490	32.8	25.3	19	48.7	32.7	1,073	38.7	29.5	32.6
Upper	11	34.4	31.0	284	19.0	33.7	10	25.6	31.1	622	22.4	28.8	28.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.3	0	0.0	0.0	0	0.0	0.6	0	0.0	0.1	
Total	32	100.0	100.0	1,492	100.0	100.0	39	100.0	100.0	2,772	100.0	100.0	100.0

Source: *2021 FFIEC Census Data*
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: *Percentages may not total 100.0 percent due to rounding.*

Table E-21

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography Assessment Area: Lawrence MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.4	0	0.0	1.1	1	50.0	3.6	25	38.5	3.2	17.6
Middle	0	0.0	82.9	0	0.0	64.0	0	0.0	67.9	0	0.0	70.7	58.8
Upper	0	0.0	14.6	0	0.0	35.0	1	50.0	26.8	40	61.5	25.9	23.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-	0	0.0	0.0	0	0.0	0.0	0	0.0	1.8	0	0.0	0.2	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	65	100.0	100.0	100.0

Source: *2021 FFIEC Census Data*
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: *Percentages may not total 100.0 percent due to rounding.*

Table E-22

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Lawrence MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	4	19.0	12.2	798	18.9	7.2	4	10.3	8.6	641	6.1	5.0	19.1
Moderate	7	33.3	23.1	1,375	32.5	19.0	11	28.2	20.1	2,076	19.8	15.3	19.6
Middle	0	0.0	21.3	0	0.0	22.6	9	23.1	21.0	2,402	22.9	19.4	20.6
Upper	8	38.1	32.8	1,795	42.4	42.7	14	35.9	37.6	5,248	50.1	47.6	40.7
Unknown	2	9.5	10.7	261	6.2	8.6	1	2.6	12.8	100	1.0	12.8	0.0
Total	21	100.0	100.0	4,229	100.0	100.0	39	100.0	100.0	10,467	100.0	100.0	100.0
Refinance Loans													
Low	5	6.8	5.3	585	3.3	2.8	3	4.8	6.1	512	3.4	3.4	19.1
Moderate	15	20.3	18.2	2,885	16.4	13.3	8	12.9	18.7	1,392	9.4	13.7	19.6
Middle	11	14.9	20.4	2,307	13.1	18.1	20	32.3	22.4	4,245	28.6	19.8	20.6
Upper	39	52.7	42.2	11,304	64.1	51.5	30	48.4	37.6	8,441	56.9	46.2	40.7
Unknown	4	5.4	13.9	551	3.1	14.4	1	1.6	15.1	254	1.7	16.9	0.0
Total	74	100.0	100.0	17,632	100.0	100.0	62	100.0	100.0	14,844	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	7.2	0	0.0	3.5	0	0.0	5.5	0	0.0	2.6	19.1
Moderate	0	0.0	18.9	0	0.0	18.9	0	0.0	7.8	0	0.0	10.7	19.6
Middle	0	0.0	27.0	0	0.0	15.1	0	0.0	26.6	0	0.0	17.4	20.6
Upper	0	0.0	40.5	0	0.0	47.6	1	100.0	53.9	254	100.0	61.7	40.7
Unknown	0	0.0	6.3	0	0.0	15.0	0	0.0	6.3	0	0.0	7.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	254	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	9	9.5	8.0	1,383	6.3	4.5	8	7.7	7.1	1,353	5.2	4.1	19.1
Moderate	22	23.2	19.9	4,260	19.5	15.6	19	18.3	19.0	3,468	13.4	14.4	19.6
Middle	11	11.6	20.7	2,307	10.6	19.8	29	27.9	21.8	6,647	25.8	19.5	20.6
Upper	47	49.5	37.9	13,099	59.9	47.5	46	44.2	38.0	13,968	54.2	46.9	40.7
Unknown	6	6.3	13.5	812	3.7	12.7	2	1.9	14.1	354	1.4	15.1	0.0
Total	95	100.0	100.0	21,861	100.0	100.0	104	100.0	100.0	25,790	100.0	100.0	100.0

Source: 2021 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.
Due to the 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 E-23

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses Assessment Area: Lawrence MSA AA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	19	59.4	40.5	733	49.1	31.6	31	79.5	49.0	2,164	78.1	39.1	91.6
Over $1 Million	7	21.9		661	44.3		5	12.8		562	20.3		7.5
Revenue Unknown	6	18.8		98	6.6		3	7.7		46	1.7		0.9
Total	32	100.0		1,492	100.0		39	100.0		2,772	100.0		100.0
By Loan Size													
$100,000 or Less	28	87.5	85.8	778	52.1	29.8	31	79.5	89.9	838	30.2	32.5	
$100,001 - $250,000	3	9.4	8.6	441	29.6	22.1	4	10.3	6.0	498	18.0	21.5	
$250,001 - $1 Million	1	3.1	5.6	273	18.3	48.1	4	10.3	4.1	1,436	51.8	46.1	
Total	32	100.0	100.0	1,492	100.0	100.0	39	100.0	100.0	2,772	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	17	89.5		396	54.0		24	77.4		520	24.0		
$100,001 - $250,000	2	10.5		337	46.0		4	12.9		498	23.0		
$250,001 - $1 Million	0	0.0		0	0.0		3	9.7		1,146	53.0		
Total	19	100.0		733	100.0		31	100.0		2,164	100.0		

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-24

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms Assessment Area: Lawrence MSA AA													
	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	53.7	0	0.0	84.2	2	100.0	44.6	65	100.0	53.0	99.3
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		0.7
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	0	0.0		0	0.0		2	100.0		65	100.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	90.2	0	0.0	43.5	2	100.0	96.4	65	100.0	67.0	
$100,001 - $250,000	0	0.0	7.3	0	0.0	35.3	0	0.0	1.8	0	0.0	12.4	
$250,001 - $500,000	0	0.0	2.4	0	0.0	21.2	0	0.0	1.8	0	0.0	20.6	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	65	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		2	100.0		65	100.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		2	100.0		65	100.0		

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-25

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Montgomery County													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	30.8	0	0.0	22.5	0	0.0	38.4	0	0.0	28.7	36.3
Middle	0	0.0	69.2	0	0.0	77.5	0	0.0	61.6	0	0.0	71.3	63.7
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	22.4	0	0.0	15.2	0	0.0	22.1	0	0.0	16.3	36.3
Middle	0	0.0	77.6	0	0.0	84.8	0	0.0	77.9	0	0.0	83.7	63.7
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	50.0	0	0.0	19.7	0	0.0	40.0	0	0.0	21.6	36.3
Middle	0	0.0	50.0	0	0.0	80.3	0	0.0	60.0	0	0.0	78.4	63.7
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	76.9	0	0.0	86.5	0	0.0	100.0	0	0.0	100.0	19.7
Middle	0	0.0	23.1	0	0.0	13.5	0	0.0	0.0	0	0.0	0.0	80.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	29.0	0	0.0	21.4	0	0.0	33.6	0	0.0	24.7	36.3
Middle	0	0.0	71.0	0	0.0	78.6	0	0.0	66.4	0	0.0	75.3	63.7
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
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 E-26

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Montgomery County													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	49.5	0	0.0	55.8	4	80.0	45.5	45	86.5	57.2	53.8
Middle	0	0.0	48.1	0	0.0	43.0	1	20.0	50.8	7	13.5	41.9	46.2
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	2.3	0	0.0	1.2	0	0.0	3.7	0	0.0	1.0	
Total	0	0.0	100.0	0	0.0	100.0	5	100.0	100.0	52	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-27

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography Assessment Area: Montgomery County													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	5.3	0	0.0	6.4	1	100.0	20.2	105	100.0	14.3	10.2
Middle	0	0.0	94.7	0	0.0	93.6	0	0.0	79.8	0	0.0	85.7	89.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	105	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-28

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Montgomery County													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	18.2	0	0.0	10.7	0	0.0	13.3	0	0.0	7.6	22.7
Moderate	0	0.0	22.6	0	0.0	21.6	0	0.0	21.6	0	0.0	17.6	21.9
Middle	0	0.0	17.4	0	0.0	18.8	0	0.0	22.1	0	0.0	22.1	21.7
Upper	0	0.0	21.1	0	0.0	30.2	0	0.0	23.7	0	0.0	33.4	33.7
Unknown	0	0.0	20.6	0	0.0	18.7	0	0.0	19.3	0	0.0	19.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	5.4	0	0.0	2.9	0	0.0	4.6	0	0.0	1.9	22.7
Moderate	0	0.0	13.2	0	0.0	7.6	0	0.0	12.0	0	0.0	8.6	21.9
Middle	0	0.0	17.6	0	0.0	17.9	0	0.0	19.4	0	0.0	17.4	21.7
Upper	0	0.0	38.5	0	0.0	45.0	0	0.0	39.6	0	0.0	47.0	33.7
Unknown	0	0.0	25.4	0	0.0	26.6	0	0.0	24.4	0	0.0	25.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	12.5	0	0.0	4.3	0	0.0	10.0	0	0.0	1.7	22.7
Moderate	0	0.0	25.0	0	0.0	10.9	0	0.0	10.0	0	0.0	5.2	21.9
Middle	0	0.0	25.0	0	0.0	5.9	0	0.0	30.0	0	0.0	12.4	21.7
Upper	0	0.0	37.5	0	0.0	78.9	0	0.0	20.0	0	0.0	57.1	33.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	30.0	0	0.0	23.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	13.4	0	0.0	7.4	0	0.0	10.3	0	0.0	5.5	22.7
Moderate	0	0.0	18.8	0	0.0	15.6	0	0.0	18.2	0	0.0	14.3	21.9
Middle	0	0.0	17.6	0	0.0	18.6	0	0.0	21.0	0	0.0	20.3	21.7
Upper	0	0.0	26.7	0	0.0	35.9	0	0.0	28.6	0	0.0	38.3	33.7
Unknown	0	0.0	23.5	0	0.0	22.4	0	0.0	22.0	0	0.0	21.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 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.
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 E-29

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses Assessment Area: Montgomery County													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	31.5	0	0.0	17.7	5	100.0	51.2	52	100.0	33.3	90.2
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		8.4
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.3
Total	0	0.0		0	0.0		5	100.0		52	100.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	89.4	0	0.0	31.2	5	100.0	92.6	52	100.0	34.2	
$100,001 - $250,000	0	0.0	6.0	0	0.0	22.3	0	0.0	4.7	0	0.0	24.0	
$250,001 - $1 Million	0	0.0	4.6	0	0.0	46.5	0	0.0	2.7	0	0.0	41.8	
Total	0	0.0	100.0	0	0.0	100.0	5	100.0	100.0	52	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		5	100.0		52	100.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		5	100.0		52	100.0		

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-30

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms Assessment Area: Montgomery County													
	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	0	0.0	38.6	0	0.0	73.1	1	100.0	40.5	105	100.0	56.8	96.6
Over $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		1.7
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.7
Total	0	0.0		0	0.0		1	100.0		105	100.0		100.0
By Loan Size													
$100,000 or Less	0	0.0	93.0	0	0.0	52.3	0	0.0	88.1	0	0.0	36.5	
$100,001 - $250,000	0	0.0	3.5	0	0.0	13.4	1	100.0	8.3	105	100.0	31.1	
$250,001 - $500,000	0	0.0	3.5	0	0.0	34.3	0	0.0	3.6	0	0.0	32.4	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	105	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
$100,001 - $250,000	0	0.0		0	0.0		1	100.0		105	100.0		
$250,001 - $500,000	0	0.0		0	0.0		0	0.0		0	0.0		
Total	0	0.0		0	0.0		1	100.0		105	100.0		

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-31

Geographic Income Level	2020 Bank #	2020 Bank #%	2020 Agg #%	2020 Bank $(000)	2020 Bank $%	2020 Agg $%	2021 Bank #	2021 Bank #%	2021 Agg #%	2021 Bank $(000)	2021 Bank $%	2021 Agg $%	Owner Occupied Units %
Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography — Assessment Area: Reno County													
	Bank And Aggregate Loans By Year												
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	19	51.4	20.7	1,274	40.7	12.8	6	31.6	22.9	277	18.9	14.6	22.5
Middle	11	29.7	44.4	910	29.0	40.0	13	68.4	43.2	1,188	81.1	42.2	47.7
Upper	7	18.9	34.9	950	30.3	47.2	0	0.0	34.0	0	0.0	43.2	29.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	37	100.0	100.0	3,134	100.0	100.0	19	100.0	100.0	1,465	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	7	12.1	10.2	281	4.3	6.3	3	15.0	13.8	90	4.9	9.4	22.5
Middle	31	53.4	46.2	2,931	44.7	41.7	11	55.0	47.2	891	48.6	44.2	47.7
Upper	20	34.5	43.6	3,342	51.0	52.0	6	30.0	39.0	851	46.5	46.4	29.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	58	100.0	100.0	6,554	100.0	100.0	20	100.0	100.0	1,832	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	8.8	0	0.0	5.5	0	0.0	20.8	0	0.0	10.2	22.5
Middle	3	60.0	41.2	242	76.8	32.9	2	100.0	41.7	50	100.0	40.8	47.7
Upper	2	40.0	50.0	73	23.2	61.6	0	0.0	37.5	0	0.0	49.0	29.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	315	100.0	100.0	2	100.0	100.0	50	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	25.0	0	0.0	9.9	0	0.0	0.0	0	0.0	0.0	21.6
Middle	0	0.0	66.7	0	0.0	87.5	0	0.0	60.0	0	0.0	34.6	56.2
Upper	1	100.0	8.3	222	100.0	2.6	0	0.0	40.0	0	0.0	65.4	22.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	222	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	26	25.5	15.8	1,555	15.1	9.7	9	21.4	18.5	367	10.6	11.9	22.5
Middle	45	44.1	45.1	4,083	39.6	42.3	26	61.9	45.3	2,129	61.3	42.8	47.7
Upper	31	30.4	39.0	4,684	45.4	48.0	7	16.7	36.3	976	28.1	45.3	29.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	102	100.0	100.0	10,322	100.0	100.0	42	100.0	100.0	3,472	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-32

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Reno County													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	46	21.0	19.2	5,672	28.2	26.8	49	19.8	19.2	3,623	25.0	22.5	19.3
Middle	117	53.4	57.8	12,224	60.8	61.0	139	56.0	57.7	7,968	55.0	60.5	59.4
Upper	56	25.6	22.4	2,216	11.0	12.0	60	24.2	22.5	2,904	20.0	17.0	21.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.6	0	0.0	0.2	0	0.0	0.7	0	0.0	0.1	
Total	219	100.0	100.0	20,112	100.0	100.0	248	100.0	100.0	14,495	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-33

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography Assessment Area: Reno County													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.8	0	0.0	0.0	0.9
Middle	31	91.2	88.9	3,547	88.8	87.9	33	94.3	88.0	4,341	95.2	93.9	88.1
Upper	3	8.8	11.1	446	11.2	12.1	2	5.7	11.2	221	4.8	6.1	11.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	34	100.0	100.0	3,993	100.0	100.0	35	100.0	100.0	4,562	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-34

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Reno County													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	4	10.8	9.2	296	9.4	4.4	1	5.3	6.6	54	3.7	3.9	17.3
Moderate	6	16.2	24.4	488	15.6	18.8	2	10.5	19.4	78	5.3	15.0	20.8
Middle	8	21.6	24.1	811	25.9	23.6	6	31.6	19.4	679	46.3	18.9	22.9
Upper	8	21.6	27.8	838	26.7	39.8	5	26.3	22.2	364	24.8	31.4	39.0
Unknown	11	29.7	14.5	701	22.4	13.4	5	26.3	32.3	290	19.8	30.7	0.0
Total	37	100.0	100.0	3,134	100.0	100.0	19	100.0	100.0	1,465	100.0	100.0	100.0
Refinance Loans													
Low	3	5.2	5.2	348	5.3	2.5	4	20.0	5.2	290	15.8	3.0	17.3
Moderate	7	12.1	14.9	677	10.3	9.6	5	25.0	12.7	326	17.8	8.7	20.8
Middle	10	17.2	19.0	1,162	17.7	15.7	1	5.0	16.3	39	2.1	14.7	22.9
Upper	30	51.7	43.6	3,030	46.2	52.4	8	40.0	29.0	949	51.8	37.0	39.0
Unknown	8	13.8	17.2	1,337	20.4	19.7	2	10.0	36.7	228	12.4	36.5	0.0
Total	58	100.0	100.0	6,554	100.0	100.0	20	100.0	100.0	1,832	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	11.8	0	0.0	7.6	1	50.0	12.5	31	62.0	5.4	17.3
Moderate	0	0.0	17.6	0	0.0	11.4	0	0.0	8.3	0	0.0	6.0	20.8
Middle	1	20.0	29.4	50	15.9	18.9	1	50.0	29.2	19	38.0	23.1	22.9
Upper	1	20.0	29.4	23	7.3	49.5	0	0.0	33.3	0	0.0	45.4	39.0
Unknown	3	60.0	11.8	242	76.8	12.6	0	0.0	16.7	0	0.0	20.1	0.0
Total	5	100.0	100.0	315	100.0	100.0	2	100.0	100.0	50	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	7	6.9	6.9	644	6.4	3.3	6	14.3	5.9	375	10.8	3.5	17.3
Moderate	13	12.9	19.2	1,165	11.5	13.8	7	16.7	15.5	404	11.6	11.8	20.8
Middle	19	18.8	21.0	2,023	20.0	19.0	9	21.4	17.9	862	24.8	16.8	22.9
Upper	40	39.6	35.3	3,988	39.5	46.1	13	31.0	25.0	1,313	37.8	33.6	39.0
Unknown	22	21.8	17.5	2,280	22.6	17.7	7	16.7	35.8	518	14.9	34.3	0.0
Total	101	100.0	100.0	10,100	100.0	100.0	42	100.0	100.0	3,472	100.0	100.0	100.0

Source: 2021 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.
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 E-35

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses Assessment Area: Reno County													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	119	54.3	46.5	7,088	35.2	32.2	202	81.5	57.6	9,861	68.0	46.0	87.8
Over $1 Million	51	23.3		10,407	51.7		35	14.1		4,248	29.3		10.8
Revenue Unknown	49	22.4		2,617	13.0		11	4.4		386	2.7		1.4
Total	219	100.0		20,112	100.0		248	100.0		14,495	100.0		100.0
By Loan Size													
$100,000 or Less	169	77.2	86.8	5,827	29.0	29.8	210	84.7	92.6	6,519	45.0	39.8	
$100,001 - $250,000	29	13.2	6.8	4,681	23.3	18.1	31	12.5	4.6	5,014	34.6	19.6	
$250,001 - $1 Million	21	9.6	6.4	9,604	47.8	52.1	7	2.8	2.8	2,962	20.4	40.5	
Total	219	100.0	100.0	20,112	100.0	100.0	248	100.0	100.0	14,495	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	102	85.7		3,188	45.0		181	89.6		5,266	53.4		
$100,001 - $250,000	10	8.4		1,676	23.6		18	8.9		3,173	32.2		
$250,001 - $1 Million	7	5.9		2,224	31.4		3	1.5		1,422	14.4		
Total	119	100.0		7,088	100.0		202	100.0		9,861	100.0		

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-36

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms Assessment Area: Reno County													
	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	33	97.1	56.5	3,767	94.3	86.1	32	91.4	44.8	4,247	93.1	86.4	100.0
Over $1 Million	1	2.9		226	5.7		3	8.6		315	6.9		0.0
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.0
Total	34	100.0		3,993	100.0		35	100.0		4,562	100.0		100.0
By Loan Size													
$100,000 or Less	16	47.1	71.3	559	14.0	19.3	20	57.1	80.8	783	17.2	21.5	
$100,001 - $250,000	16	47.1	21.3	2,775	69.5	45.5	10	28.6	11.2	1,809	39.7	31.6	
$250,001 - $500,000	2	5.9	7.4	659	16.5	35.2	5	14.3	8.0	1,970	43.2	46.9	
Total	34	100.0	100.0	3,993	100.0	100.0	35	100.0	100.0	4,562	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	16	48.5		559	14.8		18	56.3		648	15.3		
$100,001 - $250,000	15	45.5		2,549	67.7		9	28.1		1,629	38.4		
$250,001 - $500,000	2	6.1		659	17.5		5	15.6		1,970	46.4		
Total	33	100.0		3,767	100.0		32	100.0		4,247	100.0		

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-37

2022 Northeast Oklahoma AA Demographics

Income Categories	Tract Distribution #	Tract Distribution %	Families by Tract Income #	Families by Tract Income %	Families < Poverty Level as % of Families by Tract #	Families < Poverty Level as % of Families by Tract %	Families by Family Income #	Families by Family Income %
Low	0	0.0	0	0.0	0	0.0	6,113	23.3
Moderate	4	14.3	2,584	9.8	445	17.2	4,729	18.0
Middle	21	75.0	21,094	80.3	3,015	14.3	5,306	20.2
Upper	3	10.7	2,580	9.8	257	10.0	10,110	38.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**28**	**100.0**	**26,258**	**100.0**	**3,717**	**14.2**	**26,258**	**100.0**

	Housing Units by Tract	Housing Type by Tract: Owner-occupied #	Owner-occupied % by tract	Owner-occupied % by unit	Rental #	Rental % by unit	Vacant #	Vacant % by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	6,414	2,593	9.0	40.4	1,414	22.0	2,407	37.5
Middle	40,316	22,953	80.1	56.9	7,971	19.8	9,392	23.3
Upper	5,124	3,127	10.9	61.0	429	8.4	1,568	30.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**51,854**	**28,673**	**100.0**	**55.3**	**9,814**	**18.9**	**13,367**	**25.8**

	Total Businesses by Tract #	Total Businesses by Tract %	Businesses by Tract & Revenue Size: Less Than or = $1 Million #	Less Than or = $1 Million %	Over $1 Million #	Over $1 Million %	Revenue Not Reported #	Revenue Not Reported %
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	296	13.3	269	13.6	21	11.0	6	10.3
Middle	1,720	77.3	1,522	77.0	148	77.5	50	86.2
Upper	209	9.4	185	9.4	22	11.5	2	3.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2,225**	**100.0**	**1,976**	**100.0**	**191**	**100.0**	**58**	**100.0**
Percentage of Total Businesses:				**88.8**		**8.6**		**2.6**

	Total Farms by Tract #	Total Farms by Tract %	Farms by Tract & Revenue Size: Less Than or = $1 Million #	Less Than or = $1 Million %	Over $1 Million #	Over $1 Million %	Revenue Not Reported #	Revenue Not Reported %
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1	0.7	1	0.7	0	0.0	0	0.0
Middle	114	85.1	114	85.1	0	0.0	0	0.0
Upper	19	14.2	19	14.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**134**	**100.0**	**134**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**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 E-38

2021 Northeast Oklahoma 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	6,148	23.5
Moderate	3	13.0	3,401	13.0	775	22.8	4,722	18.0
Middle	18	78.3	19,572	74.8	3,032	15.5	5,802	22.2
Upper	2	8.7	3,188	12.2	270	8.5	9,489	36.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**23**	**100.0**	**26,161**	**100.0**	**4,077**	**15.6**	**26,161**	**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	6,164	3,131	11.1	50.8	2,061	33.4	972	15.8
Middle	40,195	21,785	77.4	54.2	6,823	17.0	11,587	28.8
Upper	4,450	3,231	11.5	72.6	688	15.5	531	11.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**50,809**	**28,147**	**100.0**	**55.4**	**9,572**	**18.8**	**13,090**	**25.8**
	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	549	16.7	490	16.5	49	20.1	10	12.5
Middle	2,442	74.3	2,208	74.5	169	69.3	65	81.3
Upper	297	9.0	266	9.0	26	10.7	5	6.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3,288**	**100.0**	**2,964**	**100.0**	**244**	**100.0**	**80**	**100.0**
Percentage of Total Businesses:				**90.1**		**7.4**		**2.4**
	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	11	6.3	11	6.4	0	0.0	0	0.0
Middle	126	72.4	126	72.8	0	0.0	0	0.0
Upper	37	21.3	36	20.8	0	0.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**174**	**100.0**	**173**	**100.0**	**0**	**0.0**	**1**	**100.0**
Percentage of Total Farms:				**99.4**		**0.0**		**0.6**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-39

2020 Northeast Oklahoma 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	6,148	23.5
Moderate	3	13.0	3,401	13.0	775	22.8	4,722	18.0
Middle	18	78.3	19,572	74.8	3,032	15.5	5,802	22.2
Upper	2	8.7	3,188	12.2	270	8.5	9,489	36.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**23**	**100.0**	**26,161**	**100.0**	**4,077**	**15.6**	**26,161**	**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	6,164	3,131	11.1	50.8	2,061	33.4	972	15.8
Middle	40,195	21,785	77.4	54.2	6,823	17.0	11,587	28.8
Upper	4,450	3,231	11.5	72.6	688	15.5	531	11.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**50,809**	**28,147**	**100.0**	**55.4**	**9,572**	**18.8**	**13,090**	**25.8**
	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	570	16.9	514	16.8	47	19.5	9	11.7
Middle	2,503	74.3	2,273	74.5	168	69.7	62	80.5
Upper	296	8.8	264	8.7	26	10.8	6	7.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3,369**	**100.0**	**3,051**	**100.0**	**241**	**100.0**	**77**	**100.0**
Percentage of Total Businesses:				**90.6**		**7.2**		**2.3**
	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	13	7.1	13	7.2	0	0.0	0	0.0
Middle	136	73.9	134	74.0	2	100.0	0	0.0
Upper	35	19.0	34	18.8	0	0.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**184**	**100.0**	**181**	**100.0**	**2**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.4**		**1.1**		**0.5**

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.

Table E-40

2022 Payne County AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	8.7	127	0.8	109	85.8	2,978	17.8
Moderate	6	26.1	3,355	20.1	571	17.0	2,896	17.3
Middle	7	30.4	6,352	38.0	857	13.5	2,768	16.6
Upper	6	26.1	6,556	39.2	307	4.7	8,070	48.3
Unknown	2	8.7	322	1.9	39	12.1	0	0.0
Total AA	**23**	**100.0**	**16,712**	**100.0**	**1,883**	**11.3**	**16,712**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,925	17	0.1	0.9	1,443	75.0	465	24.2
Moderate	9,178	2,878	17.8	31.4	4,709	51.3	1,591	17.3
Middle	13,072	5,797	35.8	44.3	5,361	41.0	1,914	14.6
Upper	10,634	7,382	45.6	69.4	2,472	23.2	780	7.3
Unknown	1,790	127	0.8	7.1	1,160	64.8	503	28.1
Total AA	**36,599**	**16,201**	**100.0**	**44.3**	**15,145**	**41.4**	**5,253**	**14.4**
	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	620	38.0	557	37.6	53	40.2	10	62.5
Middle	758	46.5	690	46.5	66	50.0	2	12.5
Upper	203	12.4	189	12.7	11	8.3	3	18.8
Unknown	50	3.1	47	3.2	2	1.5	1	6.3
Total AA	**1,631**	**100.0**	**1,483**	**100.0**	**132**	**100.0**	**16**	**100.0**
Percentage of Total Businesses:				**90.9**		**8.1**		**1.0**
	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	20	36.4	20	37.0	0	0.0	0	0.0
Middle	18	32.7	18	33.3	0	0.0	0	0.0
Upper	16	29.1	15	27.8	1	100.0	0	0.0
Unknown	1	1.8	1	1.9	0	0.0	0	0.0
Total AA	**55**	**100.0**	**54**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.2**		**1.8**		**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 E-41

2021 Payne County AA Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%
Low	2	11.8	404	2.4	96	23.8	3,275	19.8
Moderate	5	29.4	3,719	22.4	848	22.8	2,905	17.5
Middle	6	35.3	7,072	42.7	967	13.7	3,106	18.7
Upper	4	23.5	5,373	32.4	444	8.3	7,282	44.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**17**	**100.0**	**16,568**	**100.0**	**2,355**	**14.2**	**16,568**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,906	85	0.6	2.9	2,155	74.2	666	22.9
Moderate	9,644	3,330	22.0	34.5	5,173	53.6	1,141	11.8
Middle	12,614	6,536	43.1	51.8	4,430	35.1	1,648	13.1
Upper	9,536	5,201	34.3	54.5	3,254	34.1	1,081	11.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**34,700**	**15,152**	**100.0**	**43.7**	**15,012**	**43.3**	**4,536**	**13.1**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	306	10.6	271	10.2	35	16.6	0	0.0
Moderate	847	29.3	777	29.3	65	30.8	5	20.0
Middle	941	32.6	862	32.5	67	31.8	12	48.0
Upper	795	27.5	743	28.0	44	20.9	8	32.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2,889**	**100.0**	**2,653**	**100.0**	**211**	**100.0**	**25**	**100.0**
Percentage of Total Businesses:				**91.8**		**7.3**		**0.9**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.9	1	0.9	0	0.0	0	0.0
Moderate	11	9.8	11	10.1	0	0.0	0	0.0
Middle	61	54.5	58	53.2	3	100.0	0	0.0
Upper	39	34.8	39	35.8	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**112**	**100.0**	**109**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.3**		**2.7**		**0.0**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-42

2020 Payne County AA Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%
Low	2	11.8	404	2.4	96	23.8	3,275	19.8
Moderate	5	29.4	3,719	22.4	848	22.8	2,905	17.5
Middle	6	35.3	7,072	42.7	967	13.7	3,106	18.7
Upper	4	23.5	5,373	32.4	444	8.3	7,282	44.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**17**	**100.0**	**16,568**	**100.0**	**2,355**	**14.2**	**16,568**	**100.0**
	Housing Units by Tract	Housing Type by Tract							
		Owner-occupied			Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,906	85	0.6	2.9	2,155	74.2	666	22.9
Moderate	9,644	3,330	22.0	34.5	5,173	53.6	1,141	11.8
Middle	12,614	6,536	43.1	51.8	4,430	35.1	1,648	13.1
Upper	9,536	5,201	34.3	54.5	3,254	34.1	1,081	11.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**34,700**	**15,152**	**100.0**	**43.7**	**15,012**	**43.3**	**4,536**	**13.1**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	309	10.4	273	10.0	36	16.6	0	0.0
Moderate	863	29.1	790	29.0	68	31.3	5	22.7
Middle	985	33.2	898	32.9	76	35.0	11	50.0
Upper	809	27.3	766	28.1	37	17.1	6	27.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2,966**	**100.0**	**2,727**	**100.0**	**217**	**100.0**	**22**	**100.0**
Percentage of Total Businesses:				**91.9**		**7.3**		**0.7**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.9	1	0.9	0	0.0	0	0.0
Moderate	10	8.8	10	8.9	0	0.0	0	0.0
Middle	61	53.5	59	52.7	2	100.0	0	0.0
Upper	42	36.8	42	37.5	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**114**	**100.0**	**112**	**100.0**	**2**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.2**		**1.8**		**0.0**

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.

Table E-43

2022 Washington 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	2,211	17.0
Moderate	3	21.4	1,382	10.7	337	24.4	2,022	15.6
Middle	7	50.0	7,205	55.6	822	11.4	2,328	18.0
Upper	4	28.6	4,382	33.8	186	4.2	6,408	49.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**14**	**100.0**	**12,969**	**100.0**	**1,345**	**10.4**	**12,969**	**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	3,258	1,010	7.0	31.0	1,364	41.9	884	27.1
Middle	13,504	8,225	56.7	60.9	3,374	25.0	1,905	14.1
Upper	6,977	5,281	36.4	75.7	1,122	16.1	574	8.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**23,739**	**14,516**	**100.0**	**61.1**	**5,860**	**24.7**	**3,363**	**14.2**
	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	442	26.3	394	25.4	45	39.5	3	20.0
Middle	664	39.6	623	40.2	32	28.1	9	60.0
Upper	572	34.1	532	34.3	37	32.5	3	20.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,678**	**100.0**	**1,549**	**100.0**	**114**	**100.0**	**15**	**100.0**
Percentage of Total Businesses:				**92.3**		**6.8**		**0.9**
	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	8	13.6	8	13.6	0	0.0	0	0.0
Middle	35	59.3	35	59.3	0	0.0	0	0.0
Upper	16	27.1	16	27.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**59**	**100.0**	**59**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**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 E-44

2021 Washington County AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	7.7	450	3.2	167	37.1	2,414	17.0
Moderate	2	15.4	1,148	8.1	333	29.0	2,321	16.4
Middle	5	38.5	6,492	45.8	714	11.0	2,554	18.0
Upper	5	38.5	6,078	42.9	324	5.3	6,879	48.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**13**	**100.0**	**14,168**	**100.0**	**1,538**	**10.9**	**14,168**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	981	353	2.3	36.0	351	35.8	277	28.2
Moderate	1,826	918	6.0	50.3	654	35.8	254	13.9
Middle	11,111	6,935	45.6	62.4	2,838	25.5	1,338	12.0
Upper	9,698	6,987	46.0	72.0	1,965	20.3	746	7.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**23,616**	**15,193**	**100.0**	**64.3**	**5,808**	**24.6**	**2,615**	**11.1**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	86	4.4	69	3.8	17	13.1	0	0.0
Moderate	32	1.6	31	1.7	1	0.8	0	0.0
Middle	1,130	57.5	1,053	57.9	64	49.2	13	81.3
Upper	718	36.5	667	36.6	48	36.9	3	18.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,966**	**100.0**	**1,820**	**100.0**	**130**	**100.0**	**16**	**100.0**
Percentage of Total Businesses:				**92.6**		**6.6**		**0.8**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	1.7	1	1.7	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	39	65.0	39	65.0	0	0.0	0	0.0
Upper	20	33.3	20	33.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**60**	**100.0**	**60**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

Source: *2021 FFIEC Census Data*
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: *Percentages may not total 100.0 percent due to rounding.*

Table E-45

2020 Washington County AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	7.7	450	3.2	167	37.1	2,414	17.0
Moderate	2	15.4	1,148	8.1	333	29.0	2,321	16.4
Middle	5	38.5	6,492	45.8	714	11.0	2,554	18.0
Upper	5	38.5	6,078	42.9	324	5.3	6,879	48.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**13**	**100.0**	**14,168**	**100.0**	**1,538**	**10.9**	**14,168**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	981	353	2.3	36.0	351	35.8	277	28.2
Moderate	1,826	918	6.0	50.3	654	35.8	254	13.9
Middle	11,111	6,935	45.6	62.4	2,838	25.5	1,338	12.0
Upper	9,698	6,987	46.0	72.0	1,965	20.3	746	7.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**23,616**	**15,193**	**100.0**	**64.3**	**5,808**	**24.6**	**2,615**	**11.1**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	87	4.4	71	3.9	16	11.7	0	0.0
Moderate	34	1.7	33	1.8	1	0.7	0	0.0
Middle	1,135	57.2	1,053	57.4	70	51.1	12	80.0
Upper	729	36.7	676	36.9	50	36.5	3	20.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**1,985**	**100.0**	**1,833**	**100.0**	**137**	**100.0**	**15**	**100.0**
Percentage of Total Businesses:				**92.3**		**6.9**		**0.8**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	1.7	1	1.7	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	38	65.5	38	65.5	0	0.0	0	0.0
Upper	19	32.8	19	32.8	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**58**	**100.0**	**58**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

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.

Table E-46

2022 Lawrence 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	5,162	19.6
Moderate	7	25.9	5,403	20.6	775	14.3	4,953	18.8
Middle	13	48.1	13,651	51.9	807	5.9	5,939	22.6
Upper	5	18.5	7,085	27.0	131	1.8	10,227	38.9
Unknown	2	7.4	142	0.5	65	45.8	0	0.0
Total AA	**27**	**100.0**	**26,281**	**100.0**	**1,778**	**6.8**	**26,281**	**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	12,581	4,364	17.9	34.7	7,406	58.9	811	6.4
Middle	24,497	13,137	54.0	53.6	10,037	41.0	1,323	5.4
Upper	12,009	6,797	27.9	56.6	4,559	38.0	653	5.4
Unknown	1,952	35	0.1	1.8	1,637	83.9	280	14.3
Total AA	**51,039**	**24,333**	**100.0**	**47.7**	**23,639**	**46.3**	**3,067**	**6.0**
	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	596	20.7	529	20.0	63	29.9	4	15.4
Middle	1,703	59.1	1,566	59.2	118	55.9	19	73.1
Upper	514	17.8	493	18.6	18	8.5	3	11.5
Unknown	69	2.4	57	2.2	12	5.7	0	0.0
Total AA	**2,882**	**100.0**	**2,645**	**100.0**	**211**	**100.0**	**26**	**100.0**
Percentage of Total Businesses:				**91.8**		**7.3**		**0.9**
	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	12	9.9	11	9.2	1	100.0	0	0.0
Middle	87	71.9	87	72.5	0	0.0	0	0.0
Upper	22	18.2	22	18.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**121**	**100.0**	**120**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.2**		**0.8**		**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 E-47

2021 Lawrence MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	9.1	441	1.9	160	36.3	4,537	19.1
Moderate	7	31.8	6,694	28.1	760	11.4	4,666	19.6
Middle	8	36.4	8,410	35.3	604	7.2	4,904	20.6
Upper	5	22.7	8,249	34.7	398	4.8	9,687	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**22**	**100.0**	**23,794**	**100.0**	**1,922**	**8.1**	**23,794**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,024	306	1.3	10.1	2,350	77.7	368	12.2
Moderate	16,053	5,804	25.4	36.2	8,581	53.5	1,668	10.4
Middle	15,114	8,413	36.9	55.7	5,397	35.7	1,304	8.6
Upper	13,621	8,283	36.3	60.8	4,595	33.7	743	5.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**47,812**	**22,806**	**100.0**	**47.7**	**20,923**	**43.8**	**4,083**	**8.5**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	259	5.8	236	5.8	22	6.5	1	2.6
Moderate	1,463	32.7	1,315	32.1	136	40.4	12	30.8
Middle	1,456	32.6	1,339	32.7	100	29.7	17	43.6
Upper	1,292	28.9	1,204	29.4	79	23.4	9	23.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4,470**	**100.0**	**4,094**	**100.0**	**337**	**100.0**	**39**	**100.0**
Percentage of Total Businesses:				**91.6**		**7.5**		**0.9**
	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	24	17.6	23	17.0	1	100.0	0	0.0
Middle	80	58.8	80	59.3	0	0.0	0	0.0
Upper	32	23.5	32	23.7	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**136**	**100.0**	**135**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.3**		**0.7**		**0.0**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-48

2020 Lawrence MSA AA Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%
Low	2	9.1	441	1.9	160	36.3	4,537	19.1
Moderate	7	31.8	6,694	28.1	760	11.4	4,666	19.6
Middle	8	36.4	8,410	35.3	604	7.2	4,904	20.6
Upper	5	22.7	8,249	34.7	398	4.8	9,687	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**22**	**100.0**	**23,794**	**100.0**	**1,922**	**8.1**	**23,794**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,024	306	1.3	10.1	2,350	77.7	368	12.2
Moderate	16,053	5,804	25.4	36.2	8,581	53.5	1,668	10.4
Middle	15,114	8,413	36.9	55.7	5,397	35.7	1,304	8.6
Upper	13,621	8,283	36.3	60.8	4,595	33.7	743	5.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**47,812**	**22,806**	**100.0**	**47.7**	**20,923**	**43.8**	**4,083**	**8.5**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	258	5.7	231	5.6	27	7.6	0	0.0
Moderate	1,473	32.8	1,319	32.2	142	40.1	12	31.6
Middle	1,467	32.6	1,346	32.8	103	29.1	18	47.4
Upper	1,296	28.8	1,206	29.4	82	23.2	8	21.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4,494**	**100.0**	**4,102**	**100.0**	**354**	**100.0**	**38**	**100.0**
Percentage of Total Businesses:				**91.3**		**7.9**		**0.8**
	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	23	16.8	22	16.2	1	100.0	0	0.0
Middle	82	59.9	82	60.3	0	0.0	0	0.0
Upper	32	23.4	32	23.5	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**137**	**100.0**	**136**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.3**		**0.7**		**0.0**

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.

Table E-49

2022 Montgomery County AA Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%
Low	1	8.3	346	4.1	141	40.8	2,227	26.4
Moderate	5	41.7	2,773	32.9	492	17.7	1,539	18.2
Middle	6	50.0	5,315	63.0	438	8.2	1,930	22.9
Upper	0	0.0	0	0.0	0	0.0	2,738	32.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**12**	**100.0**	**8,434**	**100.0**	**1,071**	**12.7**	**8,434**	**100.0**
	Housing Units by Tract	Housing Type by Tract							
		Owner-occupied			Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	976	353	3.7	36.2	510	52.3	113	11.6
Moderate	6,030	2,912	30.4	48.3	1,678	27.8	1,440	23.9
Middle	9,452	6,306	65.9	66.7	2,008	21.2	1,138	12.0
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	**16,458**	**9,571**	**100.0**	**58.2**	**4,196**	**25.5**	**2,691**	**16.4**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	113	11.1	95	10.3	15	18.8	3	21.4
Moderate	408	40.2	377	41.0	25	31.3	6	42.9
Middle	493	48.6	448	48.7	40	50.0	5	35.7
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	**1,014**	**100.0**	**920**	**100.0**	**80**	**100.0**	**14**	**100.0**
Percentage of Total Businesses:				**90.7**		**7.9**		**1.4**
	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	3	5.3	3	5.5	0	0.0	0	0.0
Middle	54	94.7	52	94.5	1	100.0	1	100.0
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	**57**	**100.0**	**55**	**100.0**	**1**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**96.5**		**1.8**		**1.8**

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.

Table E-50

2021 Montgomery 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	1,962	22.7
Moderate	7	53.8	3,190	36.9	691	21.7	1,896	21.9
Middle	6	46.2	5,452	63.1	470	8.6	1,871	21.7
Upper	0	0.0	0	0.0	0	0.0	2,913	33.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**13**	**100.0**	**8,642**	**100.0**	**1,161**	**13.4**	**8,642**	**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	6,798	3,393	36.3	49.9	1,834	27.0	1,571	23.1
Middle	9,676	5,946	63.7	61.5	2,262	23.4	1,468	15.2
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	**16,474**	**9,339**	**100.0**	**56.7**	**4,096**	**24.9**	**3,039**	**18.4**
	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	605	53.8	550	54.2	47	49.5	8	53.3
Middle	520	46.2	465	45.8	48	50.5	7	46.7
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	**1,125**	**100.0**	**1,015**	**100.0**	**95**	**100.0**	**15**	**100.0**
Percentage of Total Businesses:				**90.2**		**8.4**		**1.3**
	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	6	10.2	6	10.5	0	0.0	0	0.0
Middle	53	89.8	51	89.5	1	100.0	1	100.0
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	**59**	**100.0**	**57**	**100.0**	**1**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**96.6**		**1.7**		**1.7**

Source: *2021 FFIEC Census Data*
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: *Percentages may not total 100.0 percent due to rounding.*

Table E-51

2020 Montgomery 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	1,962	22.7
Moderate	7	53.8	3,190	36.9	691	21.7	1,896	21.9
Middle	6	46.2	5,452	63.1	470	8.6	1,871	21.7
Upper	0	0.0	0	0.0	0	0.0	2,913	33.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**13**	**100.0**	**8,642**	**100.0**	**1,161**	**13.4**	**8,642**	**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	6,798	3,393	36.3	49.9	1,834	27.0	1,571	23.1
Middle	9,676	5,946	63.7	61.5	2,262	23.4	1,468	15.2
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	**16,474**	**9,339**	**100.0**	**56.7**	**4,096**	**24.9**	**3,039**	**18.4**
	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	618	53.8	557	53.9	53	52.5	8	57.1
Middle	531	46.2	477	46.1	48	47.5	6	42.9
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	**1,149**	**100.0**	**1,034**	**100.0**	**101**	**100.0**	**14**	**100.0**
Percentage of Total Businesses:				**90.0**		**8.8**		**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	7	10.9	7	11.1	0	0.0	0	0.0
Middle	57	89.1	56	88.9	0	0.0	1	100.0
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	**64**	**100.0**	**63**	**100.0**	**0**	**0.0**	**1**	**100.0**
Percentage of Total Farms:				**98.4**		**0.0**		**1.6**

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.

Table E-52

2022 Reno County AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	5.9	515	3.3	176	34.2	2,772	17.8
Moderate	2	11.8	1,588	10.2	190	12.0	3,176	20.4
Middle	13	76.5	12,223	78.5	816	6.7	3,597	23.1
Upper	1	5.9	1,239	8.0	75	6.1	6,020	38.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**17**	**100.0**	**15,565**	**100.0**	**1,257**	**8.1**	**15,565**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,411	272	1.6	19.3	791	56.1	348	24.7
Moderate	3,479	1,734	9.9	49.8	1,291	37.1	454	13.0
Middle	21,827	13,997	80.1	64.1	5,199	23.8	2,631	12.1
Upper	1,826	1,462	8.4	80.1	224	12.3	140	7.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**28,543**	**17,465**	**100.0**	**61.2**	**7,505**	**26.3**	**3,573**	**12.5**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	328	14.8	279	14.3	46	19.2	3	9.7
Moderate	185	8.3	164	8.4	21	8.8	0	0.0
Middle	1,508	68.1	1,334	68.6	149	62.3	25	80.6
Upper	195	8.8	169	8.7	23	9.6	3	9.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2,216**	**100.0**	**1,946**	**100.0**	**239**	**100.0**	**31**	**100.0**
Percentage of Total Businesses:				**87.8**		**10.8**		**1.4**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	3	1.3	3	1.3	0	0.0	0	0.0
Moderate	1	0.4	1	0.4	0	0.0	0	0.0
Middle	222	94.5	222	94.5	0	0.0	0	0.0
Upper	9	3.8	9	3.8	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**235**	**100.0**	**235**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**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 E-53

2021 Reno 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	2,823	17.3
Moderate	4	23.5	4,031	24.7	553	13.7	3,398	20.8
Middle	10	58.8	7,932	48.5	645	8.1	3,743	22.9
Upper	3	17.6	4,379	26.8	171	3.9	6,378	39.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**17**	**100.0**	**16,342**	**100.0**	**1,369**	**8.4**	**16,342**	**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	7,596	3,793	22.5	49.9	2,857	37.6	946	12.5
Middle	14,107	8,047	47.7	57.0	4,114	29.2	1,946	13.8
Upper	6,571	5,015	29.8	76.3	1,271	19.3	285	4.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**28,274**	**16,855**	**100.0**	**59.6**	**8,242**	**29.2**	**3,177**	**11.2**
	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	428	19.3	375	19.3	49	20.5	4	12.9
Middle	1,316	59.4	1,132	58.2	160	66.9	24	77.4
Upper	472	21.3	439	22.6	30	12.6	3	9.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2,216**	**100.0**	**1,946**	**100.0**	**239**	**100.0**	**31**	**100.0**
Percentage of Total Businesses:				**87.8**		**10.8**		**1.4**
	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	2	0.9	2	0.9	0	0.0	0	0.0
Middle	207	88.1	207	88.1	0	0.0	0	0.0
Upper	26	11.1	26	11.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**235**	**100.0**	**235**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-54

2020 Reno 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	2,823	17.3
Moderate	4	23.5	4,031	24.7	553	13.7	3,398	20.8
Middle	10	58.8	7,932	48.5	645	8.1	3,743	22.9
Upper	3	17.6	4,379	26.8	171	3.9	6,378	39.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**17**	**100.0**	**16,342**	**100.0**	**1,369**	**8.4**	**16,342**	**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	7,596	3,793	22.5	49.9	2,857	37.6	946	12.5
Middle	14,107	8,047	47.7	57.0	4,114	29.2	1,946	13.8
Upper	6,571	5,015	29.8	76.3	1,271	19.3	285	4.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**28,274**	**16,855**	**100.0**	**59.6**	**8,242**	**29.2**	**3,177**	**11.2**
	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	611	16.4	533	16.0	71	21.1	7	11.3
Middle	2,643	70.8	2,358	70.7	233	69.3	52	83.9
Upper	481	12.9	446	13.4	32	9.5	3	4.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3,735**	**100.0**	**3,337**	**100.0**	**336**	**100.0**	**62**	**100.0**
Percentage of Total Businesses:				**89.3**		**9.0**		**1.7**
	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	3	1.2	3	1.2	0	0.0	0	0.0
Middle	215	88.5	214	88.4	1	100.0	0	0.0
Upper	25	10.3	25	10.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**243**	**100.0**	**242**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.6**		**0.4**		**0.0**

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.*

APPENDIX F – 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**.**

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.

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.