



## **PUBLIC DISCLOSURE**

May 2, 2022

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

Community Bank and Trust  
RSSD# 957757

100 South Wood Street  
Neosho, MO 64850

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

**NOTE:** This document is an evaluation of this bank's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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### **INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING**

This institution is rated: **Satisfactory.**  
The Lending Test is rated: **Satisfactory.**  
The Community Development Test is rated: **Satisfactory.**

Community Bank and Trust (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria under the Lending and Community Development Tests.

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

### **SCOPE OF EXAMINATION**

Examiners utilized the Federal Financial Institutions Examination Council's *Interagency Examination Procedures for Intermediate Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. Performance was assessed within the bank's three AAs. The Joplin MO Metropolitan Statistical Area (MSA) AA and Cherokee County AA were assessed using a full-scope review. The McDonald County AA was assessed using a limited-scope review. Examiners reviewed the following data:

- The bank's 18-quarter average NLTD ratio;
- The bank's home purchase, home refinance, home improvement, and multifamily loans reported on the bank's 2019 and 2020 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- The bank's small business and small farm lending from January 1, 2021, through December 31, 2021; a sample of 83 small business loans from a universe of 141 and a sample of 107 small farm loans from a universe of 227;

and CD loans, qualified investments, and CD services from November 27, 2017, through December 31, 2021.

When determining the overall institutional rating, more weight was placed on the Missouri state and the Joplin MO MSA AA ratings given the substantial percentage of loan and deposit volume in these areas. In the lending analysis, home mortgage lending received the most weight followed by small farm lending and small business lending received the least weight. This was largely determined by lending volume and bank strategy.

## **DESCRIPTION OF INSTITUTION**

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

- The bank is a wholly owned subsidiary of Community Bancshares, Inc., Neosho, Missouri, which is owned by Community Bancshares, Inc. Employee Stock Ownership Plan (72 percent) and The Rudolph E. Farber Revocable Trust (28 percent).
- The bank has total assets of \$415.9 million (MM) as of December 31, 2021.
- In addition to its main office, the bank operates two other offices in Neosho and three offices in Joplin, Missouri. The bank has additional offices located in Carl Junction, Carthage, Anderson, Diamond, Grandy, and Seneca, Missouri, and one in Galena, Kansas.
- The bank also operates 9 full-service and 2 cash-only automatic teller machines (ATMs) within the Joplin MSA AA. The bank closed its Joplin Rangeline Operations Center branch on September 30, 2020, but continues to operate a full-service ATM at this location. Additionally, the bank operates one full-service ATM in Anderson, Missouri. Finally, the bank operates one full-service ATM within Galena, Kansas and although the bank closed its Riverton Branch on May 31, 2021, it continues to operate a second cash-only ATM at this location.
- As shown in the table below, the bank's primary business focus is residential real estate lending. It is important to note the bank's significant secondary market lending is not reflected here.

**Table 1**

<b>Composition of Loan Portfolio as of December 31, 2021</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	2,430	1.3
Farmland	33,318	18.3
1- to 4-Family Residential Real Estate	50,150	27.5
Multifamily Residential Real Estate	177	0.1
NonFarm NonResidential Real Estate	28,959	15.9
Agricultural	35,195	19.3
Commercial and Industrial	11,544	6.3
Consumer	5,586	3.1
Other	14,789	8.1
Gross Loans	182,148	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its November 27, 2017 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS<sup>1</sup>**

This performance evaluation first discusses the bank's overall performance, followed by an evaluation of performance in the state of Missouri, the Joplin MO MSA AA (full-scope review) and the McDonald County AA (limited-scope), and finally the state of Kansas and the Cherokee County AA (full-scope).

**LENDING TEST**

The bank's overall performance under the lending test is satisfactory based on a reasonable NLTD ratio, a majority of loans being originated within the bank's AAs, and a reasonable geographic and borrower distribution of loans within each of the bank's three AAs. More consideration was given to the volume of loan originations than the dollar amount, as this represents the number of individuals or entities served. Additionally, for home mortgage lending, emphasis was placed on the bank's performance in comparison to aggregate lending data (aggregate lending), rather than in comparison to respective demographic figures, as aggregate lending is considered representative of credit demand.

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

Additionally, in the Joplin MO MSA AA, home purchase and home refinance were each evaluated independently, while home improvement, multifamily, and other purpose closed/exempt were not evaluated due to a lack of volume, making an analysis not meaningful. Further, due to an overall lack of volume, home mortgage lending was evaluated collectively in the Cherokee County and McDonald County AAs. Similarly, due to low volume small farm and small business lending was not evaluated in these AAs.

**Net Loan-to-Deposit Ratio**

This performance criterion evaluates the bank’s average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison, to similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, and market share within the AAs. The bank’s NLTD ratio is reasonable. While its ratio is below that of the comparison banks, the bank’s relatively high level of secondary market lending, which is lending within the community not reflected in the NLTD, was considered. A majority of the comparison banks do not originate secondary market loans.

**Table 2**

<b>Comparative NLTD Ratios September 30, 2017 – December 31, 2021</b>			
<b>Institution</b>	<b>Location</b>	<b>Asset Size \$(000)</b>	<b>NLTD Ratio (%)</b>
			<b>18 Quarter Average</b>
<b>Community Bank and Trust</b>	Neosho, Missouri	415,896	54.5
<b>Similarly Situated Institutions</b>			
Freedom Bank of Southern Missouri	Cassville, MO	610,055	87.7
The Cornerstone Bank	South West City, MO	179,009	85.1
Mid-Missouri Bank	Springfield, MO	873,959	82.7
Labette Bank	Altamont, KS	512,464	76.4
Southwest Missouri Bank	Carthage, MO	1,102,317	62.6

**Assessment Area Concentration**

This performance criterion evaluates the percentage of lending inside and outside of the AA. The bank originated a majority of loans, by number and dollar, inside the AA. However, the bank originated most of its small farm loans outside its AAs, which is not uncommon due to the distance of farmland from bank locations that are located within cities. Additionally, the percent of small farm loans within the AA is skewed by recently purchased Farm Services Agency loans located throughout the nation.

**Table 3**

<b>Lending Inside and Outside the Assessment Areas</b>								
<b>Loan Type</b>	<b>Inside</b>				<b>Outside</b>			
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>
Home Purchase Conventional	129	85.4	16,316	78.7	22	14.6	4,404	21.3
Home Purchase - FHA	42	93.3	4,922	94.9	3	6.7	266	5.1
Home Improvement	15	100.0	717	100.0	0	0.0	0	0.0
Multi-Family Housing	6	100.0	2,249	100.0	0	0.0	0	0.0
Other Purpose Closed-End	27	96.4	1,702	92.1	1	3.6	146	7.9
Refinancing	247	91.5	33,946	88.0	23	8.5	4,608	12.0
Home Purchase - VA	7	100.0	1,368	100.0	0	0.0	0	0.0
<b>Total HMDA related</b>	<b>473</b>	<b>90.6</b>	<b>61,220</b>	<b>86.7</b>	<b>49</b>	<b>9.4</b>	<b>9,424</b>	<b>13.3</b>
Small Business	93	86.9	4,764	89.9	14	13.1	535	10.1
<b>Total Small Bus. related</b>	<b>93</b>	<b>86.9</b>	<b>4,764</b>	<b>89.9</b>	<b>14</b>	<b>13.1</b>	<b>535</b>	<b>10.1</b>
Small Farm	30	36.1	3,384	23.2	53	63.9	11,218	76.8
<b>Total Small Farm related</b>	<b>30</b>	<b>36.1</b>	<b>3,384</b>	<b>23.2</b>	<b>53</b>	<b>63.9</b>	<b>11,218</b>	<b>76.8</b>
<b>Total Loans</b>	<b>596</b>	<b>83.7</b>	<b>69,368</b>	<b>76.6</b>	<b>116</b>	<b>16.3</b>	<b>21,178</b>	<b>23.4</b>

*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 tract with additional consideration given to the dispersion of loans. The bank’s overall geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AAs. The state ratings for both Missouri and Kansas are consistent with the overall rating.

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

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses and farms of different revenue sizes. The bank’s lending has an overall reasonable penetration among individuals of different income levels and businesses and farms of different sizes. The state ratings for both Missouri and Kansas are consistent with the overall rating.

**COMMUNITY DEVELOPMENT TEST**

The CD test evaluates the bank’s responsiveness to CD needs of its AAs through CD loans, qualified investments, and CD services, considering the bank’s capacity and the need and availability of such opportunities. The bank’s performance for CD lending, qualified investments and donations, and CD services was reviewed for all three AAs. The bank’s overall CD performance is satisfactory and demonstrates adequate responsiveness. The state ratings for both Missouri and Kansas are consistent with the overall rating.

- All but one of the CD loans were Paycheck Protection Program (PPP) loans utilized by local businesses to continue operations through the pandemic in LMI census tracts or by small businesses to retain LMI employees.
- Missouri had the highest volume of CD qualifying activities, led by the Joplin MO MSA AA, followed by Kansas and the Cherokee County AA. The McDonald County AA had the lowest volume.

**TABLE 4**

Community Development Activity Assessment Area: All AAs									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
	#	\$(000)	Investments		Donations		Total Investments		
			#	\$(000)	#	\$(000)	#	\$(000)	
Affordable Housing	-	-	-	-	-	-	-	-	-
Community Services	1	407	-	-	14	8	14	8	3
Economic Development	27	515	-	-	2	10	2	10	2
Revitalization and Stabilization	36	967	-	-	-	-	-	-	1
<b>Totals</b>	<b>64</b>	<b>1,889</b>	<b>-</b>	<b>-</b>	<b>1,636</b>	<b>18</b>	<b>16</b>	<b>18</b>	<b>6</b>

**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 the 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 MISSOURI**

CRA rating for Missouri: ***Satisfactory.***  
The Lending Test is rated: ***Satisfactory.***  
The Community Development Test is rated: ***Satisfactory.***

This rating is based on the following conclusions with respect to the performance criteria under the Lending and Community Development Tests:

- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable distribution among individuals of different income levels, including LMI, and businesses and farms of different sizes.
- CD activity reflects adequate responsiveness to CD needs of its AAs.

## **SCOPE OF EXAMINATION**

The scope of the review for the state of Missouri was consistent with the overall scope for the institution. A full-scope review was conducted for the Joplin MO MSA AA and it received most of the weight in the state rating. A limited-scope review was conducted for the McDonald County AA to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state evaluation. Refer to the chart in Appendix A for further detail.

## **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN MISSOURI**

The bank delineates two of its three AAs and operates 12 of its 13 locations in the state of Missouri. Loan and deposit products and services offered in the state mirror those discussed in the overall institution section of the report. The Joplin MO MSA AA is a major regional metropolitan hub and the location of the majority of the bank's branches and lending. Comparatively, operations within the rural McDonald County AA are limited and lending volume is significantly lower. Detailed descriptions of the bank's operations are provided in each AA analysis.

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

### **LENDING TEST**

The bank's overall lending test performance in the state of Missouri is satisfactory. The rating for the Joplin MO MSA AA is also reasonable and drove the overall state rating, and performance in the McDonald County AA is consistent.

**Geographic Distribution of Loans**

The bank’s overall geographic distribution of loans within Missouri reflects reasonable distribution among the different census tracts and dispersion throughout the AAs. The distribution of loans across different geographies is adequate in the Joplin MO MSA AA and performance in the McDonald County AA is consistent.

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

The bank’s lending has an overall reasonable distribution among individuals of different income levels and businesses and farms of different sizes. The distribution of loans across different income levels and revenue sizes is adequate in the Joplin MO MSA AA and performance in the McDonald County AA is consistent.

**COMMUNITY DEVELOPMENT TEST**

The bank’s overall CD test performance in the state of Missouri is satisfactory and demonstrates adequate responsiveness. The bank originated 60 CD loans within the state and all but one was associated with the PPP lending program. The bank also made \$20,000 in donations to qualifying organizations. Additionally, the bank provided six qualifying services within the Missouri AAs.

**Table 5**

Community Development Activity Assessment Area: All Missouri AAs									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	-	-	-	-	-	-	-	-	-
Community Services	1	407	-	-	9	7	9	7	3
Economic Development	26	507	-	-	2	10	2	10	2
Revitalization and Stabilization	33	903	-	-	-	-	-	-	1
<b>Totals</b>	<b>60</b>	<b>1,817</b>	<b>-</b>	<b>-</b>	<b>11</b>	<b>17</b>	<b>11</b>	<b>17</b>	<b>6</b>

**JOPLIN MO MSA ASSESSMENT AREA  
METROPOLITAN AREA  
(Full-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN JOPLIN MO MSA AA**

The bank's Joplin MO MSA AA consists of the entire Joplin MO MSA, which includes Jasper and Newton Counties (see Appendix B for an AA map and Appendix C for additional demographic data).

- There have been no changes to the AA delineation since the prior examination.
- The AA is comprised of 6 moderate-, 23 middle-, and 5 upper-income census tracts. At the prior evaluation, the AA consisted of 5 moderate-, 26 middle-, and 3 upper-income census tracts.
- According to the June 30, 2021, FDIC Summary of Deposits Market Share Report, the bank ranked 6<sup>th</sup> of 16 FDIC-insured depository institutions operating in the AA, with a total deposit market share of 6.8 percent.
- Two recently conducted interviews with members of the communities in which the bank operates, conducted as part of the public evaluations of other financial institutions in the AA, were referenced during the evaluation. One community member was a representative from an organization that works to find affordable housing for LMI individuals and prevent homelessness. The other community member works for an organization supporting small business owners and helping them succeed.

**Table 6**

<b>Population Change</b>			
<b>Assessment Area: Joplin MO MSA AA</b>			
<b>Area</b>	<b>2010 Population</b>	<b>2015 Population</b>	<b>Percent Change</b>
Joplin MO MSA AA	175,518	175,961	0.3
Jasper County, MO	117,404	117,184	(0.2)
Newton County, MO	58,114	58,777	1.1
Missouri	5,988,927	6,045,448	0.9

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

- The major population centers in the AA include the cities of Joplin, Carthage, and Neosho at 50,956, 14,732, and 12,116 estimated residents in 2020, respectively.
- A community member stated that the population has been growing over recent years, driven by retirees moving to be closer to health care providers within the urban areas of the MSA.

**Table 7**

<b>Median Family Income Change</b>			
<b>Assessment Area: Joplin MO MSA AA</b>			
<b>Area</b>	<b>2010 Median Family Income</b>	<b>2015 Median Family Income</b>	<b>Percent Change</b>
Joplin MO MSA AA	50,507	51,752	2.5
Jasper County, MO	49,312	52,242	5.9
Newton County, MO	52,813	50,742	(3.9)
Missouri	62,790	60,809	(3.2)

*Source: 2006 - 2010 U.S. Census Bureau: American Community Survey  
2011 - 2015 U.S. Census Bureau: American Community Survey*

*Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.*

**Table 8**

<b>Housing Cost Burden</b>						
<b>Assessment Area: Joplin MO MSA AA</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Joplin MO MSA AA	76.8	49.5	39.6	58.4	31.7	15.9
Jasper County, MO	79.8	50.2	41.5	57.1	31.1	15.5
Newton County, MO	68.2	48.1	34.7	61.2	32.7	16.7
Missouri	74.0	31.5	40.6	59.9	30.3	18.0

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

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

- The median gross rent in the AA at \$688 is lower than the statewide figure of \$746.
- The median housing value in the AA at \$107,996 is lower than the statewide figure of \$138,400.
- According to a community member, despite ten years passing since the 2011 tornado devastated the area, impacted communities are still working to rebuild homes, businesses, and infrastructure. Further, reconstruction has been fraught with fraud, especially regarding rebuilding individual residences for LMI and seniors.

**Table 9**

<b>Unemployment Rates</b>					
<b>Assessment Area: Joplin MO MSA AA</b>					
<b>Region</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
Joplin MO MSA AA	4.2	3.5	2.9	3.1	5.7
Jasper County, MO	4.1	3.4	2.8	3.0	5.7
Newton County, MO	4.3	3.7	3.1	3.3	5.8
Missouri	4.5	3.8	3.2	3.3	6.1

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*

- According to a community member, the largest industries in the AA are manufacturing, health care and social assistance, retail trade, warehousing, and transportation.
- Community members also stated that the largest employers in the AA include Freeman Health System, TAMKO Building Products, Owens Corning, Cox Health, CFI Transportation, Eagle Pincher Technologies, Jasper Products, and Missouri Southern State University.
- The contact indicated county and local governments are emphasizing support for workforce development in an effort to retain and attract businesses; however, a major setback to success is the ongoing lack of affordable housing in the AA.
- Agriculture is an important industry in the MSA; however, a majority of farms have annual sales of less than \$10,000 in Jasper and Newton County, at 62 percent and 57 percent, respectively, according to the 2017 Census of Agriculture. Agricultural sales by Jasper County producers are roughly split between crops and livestock/poultry products, which Newton County producers are almost exclusively selling livestock and poultry products.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN JOPLIN MO MSA AA**

**LENDING TEST**

The bank’s performance under the lending test in the Joplin MO MS AA is reasonable. In this AA, the geographic distribution was weighted equally with the borrower distribution. In addition, consistent with the overall scope, an evaluation of the bank’s home improvement, multifamily, other purpose lines of credit, other purpose closed-end, and purpose not applicable loans were not considered meaningful for the geographic and borrower distribution analyses due to a low volume of originations.

## **Geographic Distribution of Loans**

The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA. While small business lending distribution was poor, lending distribution of the other two products was reasonable.

### Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The bank's 2020 lending in moderate-income census tracts by number volume was comparable to both aggregate lenders and the percentage of owner-occupied units (demographic figure). Total home mortgage lending in 2019 was consistent with 2020 performance. In addition, an evaluation of the dispersion of home mortgage loans revealed no significant lending gaps or lapses throughout the AA.

### Home Purchase Lending

The geographic distribution of home purchase lending is reasonable. In 2020, the bank's home purchase lending in moderate-income census tracts by number volume was comparable to aggregate lenders and above the demographic figure. The bank's 2019 geographic distribution of home purchase loans was generally consistent with 2020 performance. In addition, an evaluation of the dispersion of home purchase loans revealed no significant lending gaps or lapses throughout the AA.

### Home Refinance Loans

The geographic distribution of home refinance loans is reasonable. In 2020, the bank's home refinance loans in moderate-income census tracts by number volume was comparable to both aggregate lenders and the demographic figure. The bank's geographic distribution of 2019 home refinance loans was above 2020 performance. Performance in 2020 was weighted heavier for this product due to higher volume of lending that year. In addition, an evaluation of the dispersion of home refinance loans revealed no significant lending gaps or lapses throughout the AA.

**Table 10**

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Joplin MO MSA AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	10	11.1	12.8	970	9.1	9.0	11	14.5	12.8	1,179	11.2	8.7	10.7
Middle	71	78.9	65.9	8,822	82.5	66.1	49	64.5	65.9	6,599	62.5	67.3	71.0
Upper	9	10.0	21.3	904	8.5	24.9	16	21.1	21.3	2,774	26.3	24.0	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	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>90</b>	<b>100.0</b>	<b>100.0</b>	<b>10,696</b>	<b>100.0</b>	<b>100.0</b>	<b>76</b>	<b>100.0</b>	<b>100.0</b>	<b>10,552</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
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	11.1	8.5	865	12.8	5.8	13	7.5	6.5	1,182	4.7	4.5	10.7
Middle	36	66.7	68.5	3,853	57.0	68.4	126	72.8	70.9	17,545	70.5	70.4	71.0
Upper	12	22.2	23.1	2,037	30.2	25.8	34	19.7	22.5	6,175	24.8	25.1	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	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>54</b>	<b>100.0</b>	<b>100.0</b>	<b>6,755</b>	<b>100.0</b>	<b>100.0</b>	<b>173</b>	<b>100.0</b>	<b>100.0</b>	<b>24,902</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
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	14.5	0	0.0	12.2	3	30.0	17.7	151	27.0	11.4	10.7
Middle	1	100.0	61.6	29	100.0	63.0	6	60.0	62.0	383	68.4	69.6	71.0
Upper	0	0.0	23.8	0	0.0	24.8	1	10.0	20.3	26	4.6	19.0	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	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>29</b>	<b>100.0</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>560</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
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	35.7	0	0.0	34.9	0	0.0	41.7	0	0.0	36.5	31.7
Middle	4	100.0	51.8	1,67	100.0	44.8	2	100.0	45.8	578	100.0	45.5	58.9
Upper	0	0.0	12.5	0	0.0	20.2	0	0.0	12.5	0	0.0	18.0	9.4
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	
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>1,67</b>	<b>100.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>578</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	18	11.3	11.7	1,911	9.7	9.4	30	10.8	10.5	2,653	7.0	8.4	10.7
Middle	120	75.0	66.4	14,799	75.2	65.7	193	69.7	67.6	25,955	68.7	67.4	71.0
Upper	22	13.8	21.9	2,962	15.1	24.9	54	19.5	21.9	9,165	24.3	24.2	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	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>160</b>	<b>100.0</b>	<b>100.0</b>	<b>19,672</b>	<b>100.0</b>	<b>100.0</b>	<b>277</b>	<b>100.0</b>	<b>100.0</b>	<b>37,773</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

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

Note: Percentages may not total 100.0 percent due to rounding. 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. The bank’s small business lending in moderate-income census tracts was below the percentage of small businesses located in moderate-income census tracts. In addition, an evaluation of the dispersion of small business lending revealed significant lending gaps to the moderate-income census tracts located in the cities of Joplin and Carthage. After reviewing numerous potential performance context items, it was determined that no external barriers to lending exist.

**Table 11**

<b>Distribution of 2021 Small Business Lending By Income Level of Geography</b>					
<b>Assessment Area: Joplin MO MSA AA</b>					
<b>Geographic Income Level</b>	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	
<b>Low</b>	0	0.0	0	0.0	0.0
<b>Moderate</b>	6	7.0	1,111	23.6	19.4
<b>Middle</b>	70	81.4	2,741	58.3	67.1
<b>Upper</b>	10	11.6	847	18.0	13.5
<b>Unknown</b>	0	0.0	0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	86	100.0	4,699	100.0	100.0
<i>Source: 2021 FFIEC Census Data 2021 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Small Farm Lending

The geographic distribution of small farm lending is reasonable. The bank did not originate any small farm loans in moderate-income census tracts; however, this was considered comparable to the small percentage of small farms located in moderate-income census tracts. In addition, an evaluation of the dispersion of small farm lending revealed no significant lending gaps or lapses throughout the AA.



**Table 12**

Distribution of 2021 Small Farm Lending By Income Level of Geography					
Assessment Area: Joplin MO MSA AA					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	2.4
Middle	20	100.0	1,424	100.0	92.9
Upper	0	0.0	0	0.0	4.7
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	20	100.0	1,424	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 reasonable distribution among individuals of different income levels and businesses and farms of different sizes. While the bank’s small business lending reflects an excellent distribution to businesses of different sizes, lending among individuals of different income levels and farms of different sizes was reasonable.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. In 2020, home mortgage lending by number volume to low-income borrowers was above aggregate data but below the percent of low-income families (demographic figure). Lending to moderate-income borrowers was comparable to both aggregate lenders and the demographic figure. In 2019, total home mortgage lending to LMI borrowers was generally consistent with 2020 performance.

Home Purchase Lending

The borrower distribution of home purchase lending is reasonable. In 2020, the bank’s home purchase lending by number volume to low-income borrowers was comparable to aggregate lenders but below the demographic figure. The bank’s home mortgage lending to moderate-income borrowers was comparable to aggregate lenders and above the demographic figure. In 2019, the bank’s home purchase lending to LMI borrowers was generally consistent with 2020 performance.

Home Refinance Lending

The borrower distribution of home refinance lending is excellent. In 2020, the bank's home refinance loans by number volume to low-income borrowers was above aggregate lenders but below the demographic figure. Lending to moderate-income borrowers by number volume was above aggregate lenders and comparable to the demographic figure. In 2019, the bank's home refinance loans to LMI borrowers were generally consistent with 2020 performance.

**Table 13**

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Joplin MO MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	%	%	#	%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	6	6.7	7.4	386	3.6	4.5	9	11.8	9.7	645	6.1	5.9	19.9
Moderate	24	26.7	22.5	2,339	21.9	18.0	20	26.3	24.5	2,067	19.6	19.5	18.3
Middle	19	21.1	21.4	2,306	21.6	20.9	12	15.8	21.3	1,649	15.6	21.0	21.2
Upper	31	34.4	30.5	4,960	46.4	39.9	26	34.2	28.0	5,213	49.4	38.2	40.6
Unknown	10	11.1	18.2	705	6.6	16.6	9	11.8	16.5	978	9.3	15.4	0.0
<b>Total</b>	<b>90</b>	<b>100.0</b>	<b>100.0</b>	<b>10,696</b>	<b>100.0</b>	<b>100.0</b>	<b>76</b>	<b>100.0</b>	<b>100.0</b>	<b>10,552</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	5	9.3	8.2	330	4.9	4.0	15	8.7	5.3	1,218	4.9	2.6	19.9
Moderate	9	16.7	13.3	968	14.3	9.3	36	20.8	13.7	3,256	13.1	8.9	18.3
Middle	7	13.0	17.5	844	12.5	16.1	24	13.9	18.1	2,881	11.6	15.3	21.2
Upper	32	59.3	41.4	4,518	66.9	49.7	96	55.5	39.3	17,405	69.9	48.1	40.6
Unknown	1	1.9	19.6	95	1.4	20.9	2	1.2	23.7	142	0.6	25.1	0.0
<b>Total</b>	<b>54</b>	<b>100.0</b>	<b>100.0</b>	<b>6,755</b>	<b>100.0</b>	<b>100.0</b>	<b>173</b>	<b>100.0</b>	<b>100.0</b>	<b>24,902</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	9.3	0	0.0	6.5	1	10.0	8.9	40	7.1	6.6	19.9
Moderate	1	100.0	17.4	29	100.0	13.5	2	20.0	15.2	47	8.4	9.9	18.3
Middle	0	0.0	15.1	0	0.0	13.9	2	20.0	18.4	64	11.4	19.3	21.2
Upper	0	0.0	49.4	0	0.0	59.1	5	50.0	45.6	409	73.0	56.0	40.6
Unknown	0	0.0	8.7	0	0.0	6.9	0	0.0	12.0	0	0.0	8.2	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>29</b>	<b>100.0</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>560</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	12	7.7	7.8	739	4.1	4.4	26	9.5	7.5	1,935	5.2	4.3	19.9
Moderate	36	23.1	19.2	3,412	19.0	15.2	61	22.2	19.0	5,544	14.9	14.3	18.3
Middle	26	16.7	19.8	3,150	17.5	19.3	41	14.9	19.4	4,766	12.8	18.1	21.2
Upper	70	44.9	34.0	9,825	54.6	42.7	132	48.0	32.8	23,488	63.1	42.4	40.6
Unknown	12	7.7	19.2	875	4.9	18.3	15	5.5	21.2	1,462	3.9	20.9	0.0
<b>Total</b>	<b>156</b>	<b>100.0</b>	<b>100.0</b>	<b>18,001</b>	<b>100.0</b>	<b>100.0</b>	<b>275</b>	<b>100.0</b>	<b>100.0</b>	<b>37,195</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis. 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 bank's lending to businesses with revenues of \$1MM or less by number volume was comparable to the percent of small businesses in the AA.

Performance context items was considered when rating this product. Four loans were originated to businesses with unknown revenue, all of which were in amounts less than \$250,000, a proxy for small business lending. If included in the bank's lending to businesses with revenues of \$1MM or less that figure would become 93.1 percent.

**Table 14**

<b>Distribution of 2021 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Joplin MO MSA AA</b>					
	<b>Bank Loans</b>				<b>Total Businesses</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	76	88.4	2,782	59.2	91.2
<b>Over \$1 Million</b>	6	7.0	1,771	37.7	7.7
<b>Revenue Unknown</b>	4	4.7	146	3.1	1.1
<b>Total</b>	86	100.0	4,699	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	76	88.4	1,698	36.1	
<b>\$100,001 - \$250,000</b>	6	7.0	926	19.7	
<b>\$250,001 - \$1 Million</b>	4	4.7	2,076	44.2	
<b>Total</b>	86	100.0	4,699	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	71	93.4	1,621	58.3	
<b>\$100,001 - \$250,000</b>	4	5.3	711	25.6	
<b>\$250,001 - \$1 Million</b>	1	1.3	450	16.2	
<b>Total</b>	76	100.0	2,782	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

**Small Farm Lending**

The borrower distribution of small farm lending is reasonable. The bank's lending to farms with revenues of \$1MM or less by number volume was comparable to the percent of small farms in the AA.

**Table 15**

<b>Distribution of 2021 Small Farm Lending By Revenue Size of Farms</b>					
<b>Assessment Area: Joplin MO MSA AA</b>					
	<b>Bank Loans</b>				<b>Total Farms</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	19	95.0	1,325	93.0	99.1
<b>Over \$1 Million</b>	1	5.0	100	7.0	0.9
<b>Revenue Unknown</b>	0	0.0	0	0.0	0.0
<b>Total</b>	20	100.0	1,424	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	17	85.0	748	52.5	
<b>\$100,001 - \$250,000</b>	2	10.0	323	22.7	
<b>\$250,001 - \$500,000</b>	1	5.0	354	24.9	
<b>Total</b>	20	100.0	1,424	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	16	84.2	648	48.9	
<b>\$100,001 - \$250,000</b>	2	10.5	323	24.4	
<b>\$250,001 - \$500,000</b>	1	5.3	354	26.7	
<b>Total</b>	19	100.0	1,325	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

**COMMUNITY DEVELOPMENT TEST**

The CD test evaluates the bank’s responsiveness to the CD needs of its AA through CD loans, qualified investments, and CD services, considering the bank’s capacity and the need and availability of such opportunities in the bank’s AA. The bank’s CD performance demonstrates adequate responsiveness. Table 16 outlines the bank’s CD activities. All but one of the bank’s CD loan originations were PPP loans.

**Table 16**

<b>Community Development Activity Assessment Area: Joplin MO MSA AA</b>									
<b>Community Development Purpose</b>	<b>Community Development Loans</b>		<b>Qualified Investments</b>						<b>Community Development Services</b>
			<b>Investments</b>		<b>Donations</b>		<b>Total Investments</b>		
	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>
<b>Affordable Housing</b>	-	-	-	-	-	-	-	-	-
<b>Community Services</b>	1	407	-	-	5	6	5	6	3
<b>Economic Development</b>	23	499	-	-	2	10	2	10	2
<b>Revitalization and Stabilization</b>	33	903	-	-	-	-	-	-	1
<b>Totals</b>	<b>57</b>	<b>1,809</b>	<b>-</b>	<b>-</b>	<b>7</b>	<b>16</b>	<b>7</b>	<b>16</b>	<b>6</b>

**MCDONALD COUNTY ASSESSMENT AREA  
NONMETROPOLITAN AREA  
(Limited-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN MCDONALD COUNTY AA**

- There have been no changes to the AA delineation since the prior examination.
- The AA is comprised of four middle-income census tracts. At the prior evaluation, the AA consisted of one moderate- and three middle-income census tracts.
- The bank operates one branch and one full-service ATM in Anderson, Missouri.
- According to the June 30, 2021 FDIC Summary of Deposits Market Share Report, the bank ranked fourth of four FDIC insured depository institutions in the AA with a market share of 7.9 percent.
- According to the 2015 American Community Survey (ACS), the AA's population is 22,763.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MCDONALD COUNTY AA**

The institution's performance in the McDonald County AA was reviewed using the limited-scope examination procedures. The institution's lending and CD performance in the AA is consistent with the institution's performance overall. The lending test was limited to evaluating only the borrower distribution, since the AA consists of only middle-income census tracts. For the evaluation, the bank's lending activity in this AA included nine HMDA-related loans from 2019 and three HMDA-related loans from 2020. Additionally, the bank made three CD loans totaling \$8,200 and five donations totaling \$950. Demographic and lending tables for this AA are included in Appendix D.

**STATE OF KANSAS/CHEROKEE COUNTY AA  
NONMETROPOLITAN AREA**

CRA rating for Kansas: ***Satisfactory.***  
The Lending Test is rated: ***Satisfactory.***  
The Community Development Test is rated: ***Satisfactory.***

This rating is based on the following conclusions with respect to the performance criteria under the Lending and Community Development Tests:

- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable distribution among individuals of different income levels, including LMI.
- CD activity reflects adequate responsiveness to CD needs of its AAs.

**SCOPE OF EXAMINATION**

The scope of the review for the state of Kansas was limited to HMDA-related products due to low volume in small business and small farm lending. A full-scope review was conducted for the Cherokee County AA, the bank's only delineated AA in the state of Kansas. The overall state rating was based exclusively on the bank's performance in this AA. As such, the statewide performance will be discussed concurrently with the AA evaluation. For the evaluation, the bank's lending activity included 5 HMDA-related loans from 2019 and 19 HMDA-related loans from 2020.

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN KANSAS/CHEROKEE COUNTY AA**

The bank delineates one of its three AAs and operates 1 of its 13 locations in the Cherokee County AA. Additionally, one full-service and one cash-only ATM is offered within the AA.

The bank's Cherokee County AA consists of the entire county of Cherokee (see Appendix B for an AA map and Appendix C for additional demographic data).

- There have been no changes to the AA delineation since the prior examination.
- The AA is comprised of one moderate- and five middle-income census tracts. At the prior evaluation the AA consisted of six middle-income census tracts.
- According to the June 30, 2021 FDIC Summary of Deposits Market Share Report, the bank ranked fifth of eight FDIC-insured depository institutions operating in the AA, with a total deposit market share of 9.6 percent.
- One contact was made during the examination with an individual from an organization focused on small business development within the AA.



**Table 17**

<b>Population Change</b>			
<b>Assessment Area: Cherokee County AA</b>			
<b>Area</b>	<b>2010 Population</b>	<b>2015 Population</b>	<b>Percent Change</b>
Cherokee County AA	21,603	20,952	(3.0)
NonMSA Kansas	929,981	922,403	(0.8)
Kansas	2,853,118	2,892,987	1.4

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

- The bank’s only branch in the AA is located in Galena (estimated at 2,824 residents in 2020).
- A community member stated the county has a lot of commuters traveling back and forth from the surrounding large cities, such as Joplin.
- Historically locals have been leaving the area and the population was decreasing, but during the pandemic people with family ties in the area appeared to be returning.

**Table 18**

<b>Median Family Income Change</b>			
<b>Assessment Area: Cherokee County AA</b>			
<b>Area</b>	<b>2010 Median Family Income</b>	<b>2015 Median Family Income</b>	<b>Percent Change</b>
Cherokee County AA	52,617	51,579	(2.0)
NonMSA Kansas	57,322	57,229	(0.2)
Kansas	67,977	66,389	(2.3)

*Source: 2006 - 2010 U.S. Census Bureau: American Community Survey  
2011 - 2015 U.S. Census Bureau: American Community Survey*

*Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.*

- According to the 2015 ACS, 42.4 percent of families in the AA are LMI, which is higher than other nonmetropolitan areas in Kansas at 37.9 percent.
- When asked about local wages and the national trend of upward wage pressure, a community member stated that locally, employers are not experiencing as tight of a job market because many can draw employees from neighboring large cities like Joplin.

**Table 19**

<b>Housing Cost Burden</b>						
<b>Assessment Area: Cherokee County AA</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Cherokee County AA	68.9	25.3	38.2	56.2	20.1	17.2
NonMSA Kansas	67.1	26.2	34.1	56.0	23.2	15.7
Kansas	73.0	33.5	38.8	59.9	28.6	16.3

*Cost Burden is housing cost that equals 30 percent or more of household income*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy*

- In Table 22, the much higher cost burden for housing experienced by low-income individuals likely creates a barrier to home ownership, preventing saving for a down payment and negatively impacting the ability to qualify for the size of loan needed.
- A community member stated that the lack of housing supply has been ongoing and only worsened during the pandemic. This is partially due to builders seeking higher revenue potential available in the Joplin area and local builders complete only a few homes annually, while annual need is closer to 100.
- They also commented that housing needs are varied: first time homebuyers struggle to find quality homes in their price range, retirees can't find smaller homes requiring less maintenance, renters cannot find newer apartments or townhomes with the modern features they desire. Even higher-end housing (\$200,000 and above) is hard to find.

**Table 20**

<b>Unemployment Rates</b>					
<b>Assessment Area: Cherokee County AA</b>					
<b>Region</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
Cherokee County AA	4.4	3.9	3.7	3.4	5.2
NonMSA Kansas	4.0	3.5	3.1	3.1	4.6
Kansas	4.0	3.6	3.3	3.2	5.9

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*

- Major industries in the AA include manufacturing, health care, logistics and distribution, and agriculture.
- Main employers include manufacturers such as Bagcraft Packaging, KMT Waterjet, and Celltron, and a commercial construction company Crossland Construction. Crossland Construction Company is headquartered in Columbus and employs over 1,500 employees regionally. Other employers include Mercy Hospital in Columbus and Mercy Specialty Hospital in Galena, along with local schools and governments.

- A community member said that while agriculture is also important, employment includes mainly owner-operators that also have full-time day jobs, but the Farmers CO-OP, Alpha Pet Food, and the Butterball Feed Mill are notable area employers.
- According to the 2017 Census of Agriculture, sales by Cherokee County producers mainly consist of crops and almost exclusively made up of grains, oilseeds, dry beans, or dry peas.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS/CHEROKEE COUNTY AA**

### **LENDING TEST**

The bank's overall lending test performance in the state of Kansas is satisfactory. The bank's performance under the lending test in the Cherokee County AA is reasonable. Due to the overall low volume of total home mortgage loan originations, an evaluation of the bank's individual mortgage products was not considered meaningful for the geographic and borrower distribution analyses, and these products were analyzed at the total volume level. Similarly, the low volume of small business and small farm originations made the analysis of these products not meaningful.

### **Geographic Distribution of Loans**

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

#### Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The bank's 2020 lending in moderate-income census tracts by number volume was above both aggregate lenders and the percentage of owner-occupied units (demographic figure). Total home mortgage lending in 2019 was consistent with 2020. In addition, an evaluation of the dispersion of home mortgage loans revealed no significant lending gaps or lapses throughout the AA.

**Table 21**

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Cherokee County AA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>Low</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Moderate</b>	2	40.0	13.1	62	26.3	11.7	6	31.6	14.6	307	17.0	12.8	15.9
<b>Middle</b>	3	60.0	86.9	174	73.7	88.3	13	68.4	85.4	1,501	83.0	87.2	84.1
<b>Upper</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	5	100.0	100.0	236	100.0	100.0	19	100.0	100.0	1,808	100.0	100.0	100.0

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

**Lending to Borrowers of Different Income Levels**

The bank’s lending has an reasonable distribution among individuals of different income levels.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. In 2020, home mortgage lending by number volume to low-income borrowers was comparable to aggregate data but below the percent of low-income families (demographic figure). Lending to moderate-income borrowers was comparable to aggregate lenders but above the demographic figure. In 2019, home mortgage lending was generally consistent with 2020 performance.

**Table 22**

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													Families by Family Income %
Assessment Area: Cherokee County AA													
Borrower Income Level	Bank And Aggregate Loans By Year												
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Low</b>	1	20.0	13.9	12	5.1	8.9	2	10.5	10.7	95	5.3	6.5	22.0
<b>Moderate</b>	0	0.0	21.5	0	0.0	18.1	5	26.3	25.4	363	20.1	20.8	20.4
<b>Middle</b>	2	40.0	20.4	132	55.9	20.7	8	42.1	20.4	693	38.3	19.6	24.4
<b>Upper</b>	2	40.0	27.0	92	39.0	31.3	4	21.1	28.0	657	36.3	37.3	33.2
<b>Unknown</b>	0	0.0	17.2	0	0.0	20.9	0	0.0	15.6	0	0.0	15.8	0.0
<b>Total</b>	5	100.0	100.0	236	100.0	100.0	19	100.0	100.0	1,808	100.0	100.0	100.0

Source: 2020 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.  
Multifamily loans are not included in the borrower distribution analysis.

**COMMUNITY DEVELOPMENT TEST**

The bank’s CD performance demonstrates adequate responsiveness. While the bank had no qualified services, this was considered reasonable given the banks limited presence in the AA and newness to the Intermediate Small Bank CRA evaluation requirements.

**Table 23**

Community Development Activity									
Assessment Area: Cherokee County AA									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
	#	\$(000)	Investments		Donations		Total Investments		
			#	\$(000)	#	\$(000)	#	\$(000)	
<b>Affordable Housing</b>	-	-	-	-	-	-	-	-	-
<b>Community Services</b>	-	-	-	-	5	1	5	1	-
<b>Economic Development</b>	1	8	-	-	-	-	-	-	-
<b>Revitalization and Stabilization</b>	3	64	-	-	-	-	-	-	-
<b>Totals</b>	4	72	-	-	516	1	5	1	-

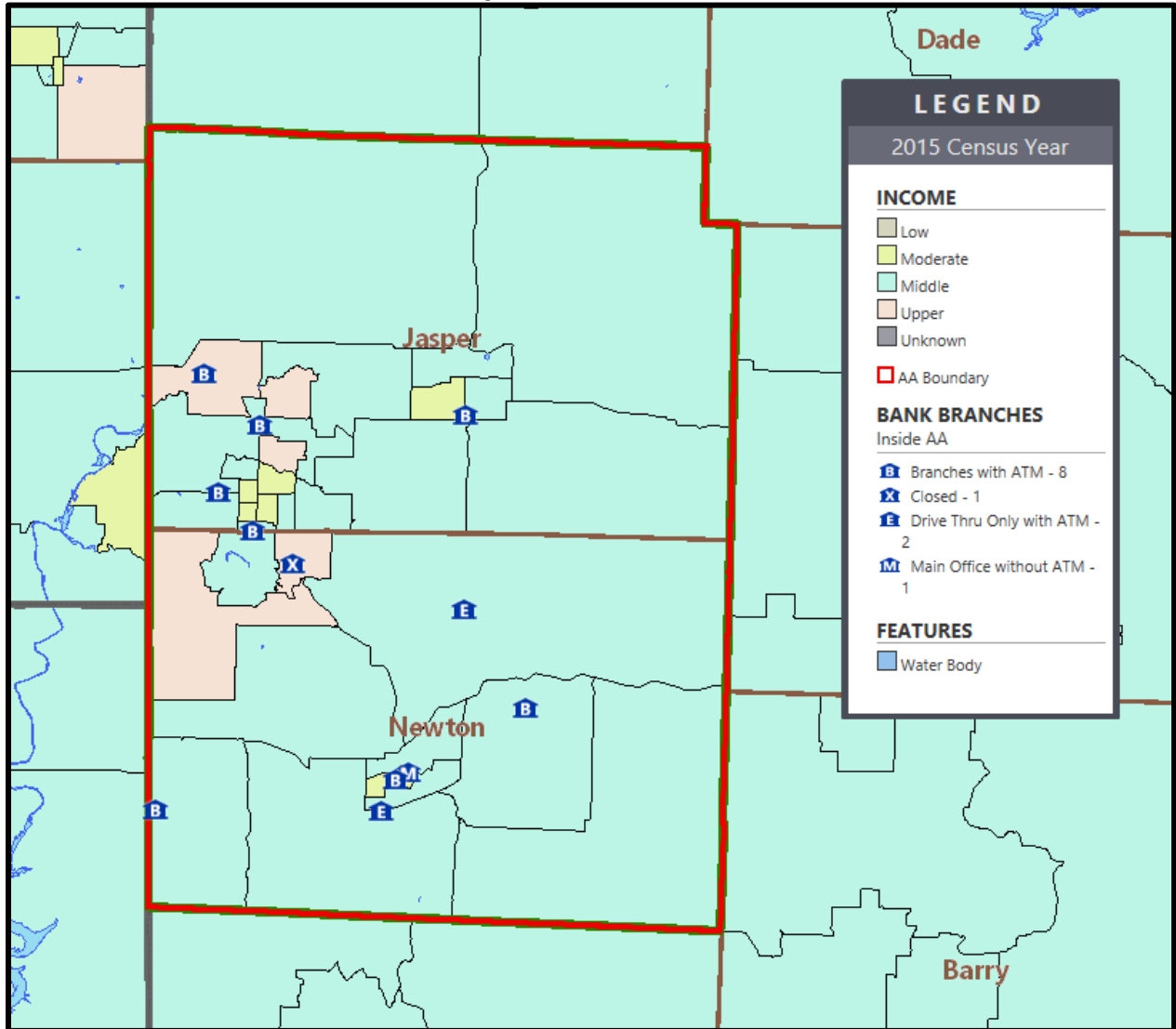
**APPENDIX A – SCOPE OF EXAMINATION TABLE**

**Table A-1**

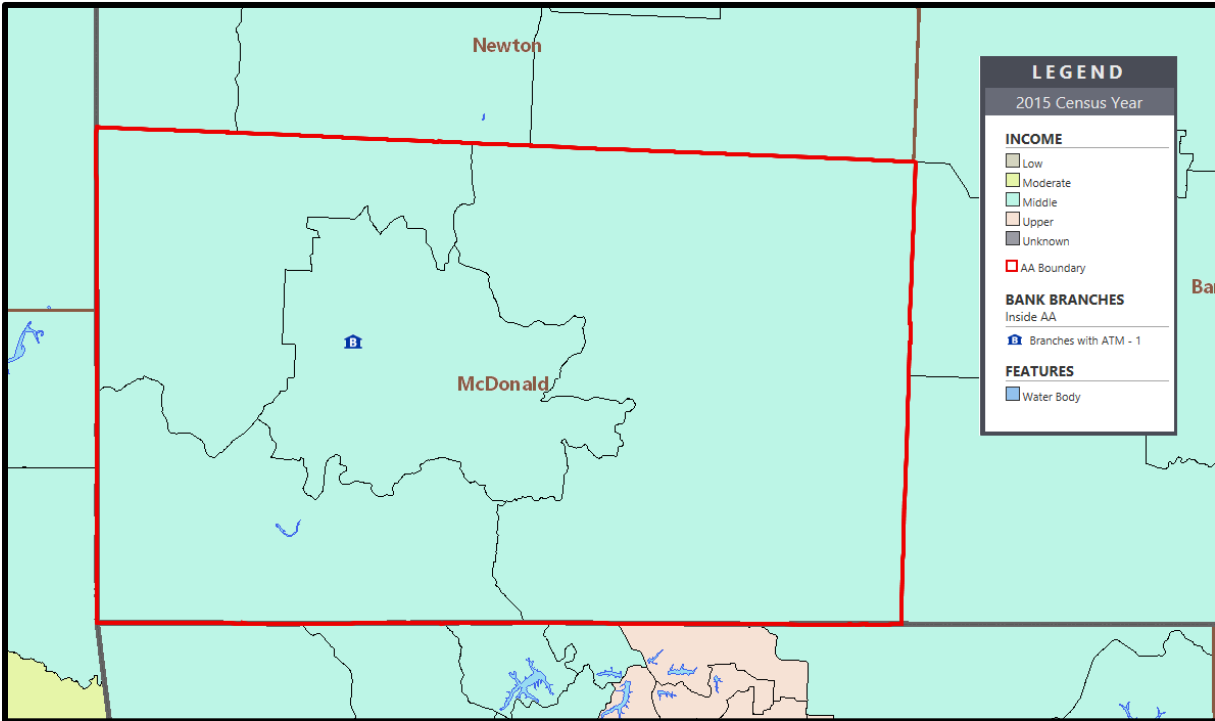
<b>SCOPE OF EXAMINATION</b>			
<b><u>FINANCIAL INSTITUTION</u></b> Community Bank and Trust Neosho, Missouri		<b><u>PRODUCTS/SERVICES REVIEWED</u></b> <ul style="list-style-type: none"> <li>• Home Purchase Loans</li> <li>• Home Refinance Loans</li> <li>• Home Improvement Loans</li> <li>• Multifamily Loans</li> <li>• Small Business Loans</li> <li>• Small Farm Loans</li> <li>• Community Development Loans, Qualified Investments and Donations, and Community Development Services</li> </ul>	
<b><u>TIME PERIODS REVIEWED</u></b>			
<u>HMDA LAR:</u>		January 1, 2019 to December 31, 2020	
<u>Small Business and Small Farm Loans:</u>		January 1, 2021 to December 31, 2021	
<u>Community Development Activities:</u>		November 27, 2017 to December 31, 2021.	
<b>LIST OF AFFILIATES CONSIDERED IN THIS EVALUATION</b>			
AFFILIATES	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
NA	NA	NA	
<b>LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION</b>			
ASSESSMENT AREA	TYPE OF EXAM	BRANCHES VISITED	OTHER INFORMATION
<u>Missouri</u> MSA 27900 Joplin MO MSA AA MSA 99999 McDonald County AA	Full Review Limited Review	NA	
<u>Kansas</u> MSA 99999 Cherokee County AA	Full Review	NA	

APPENDIX B – MAPS OF THE ASSESSMENT AREAS

Joplin MO MSA AA

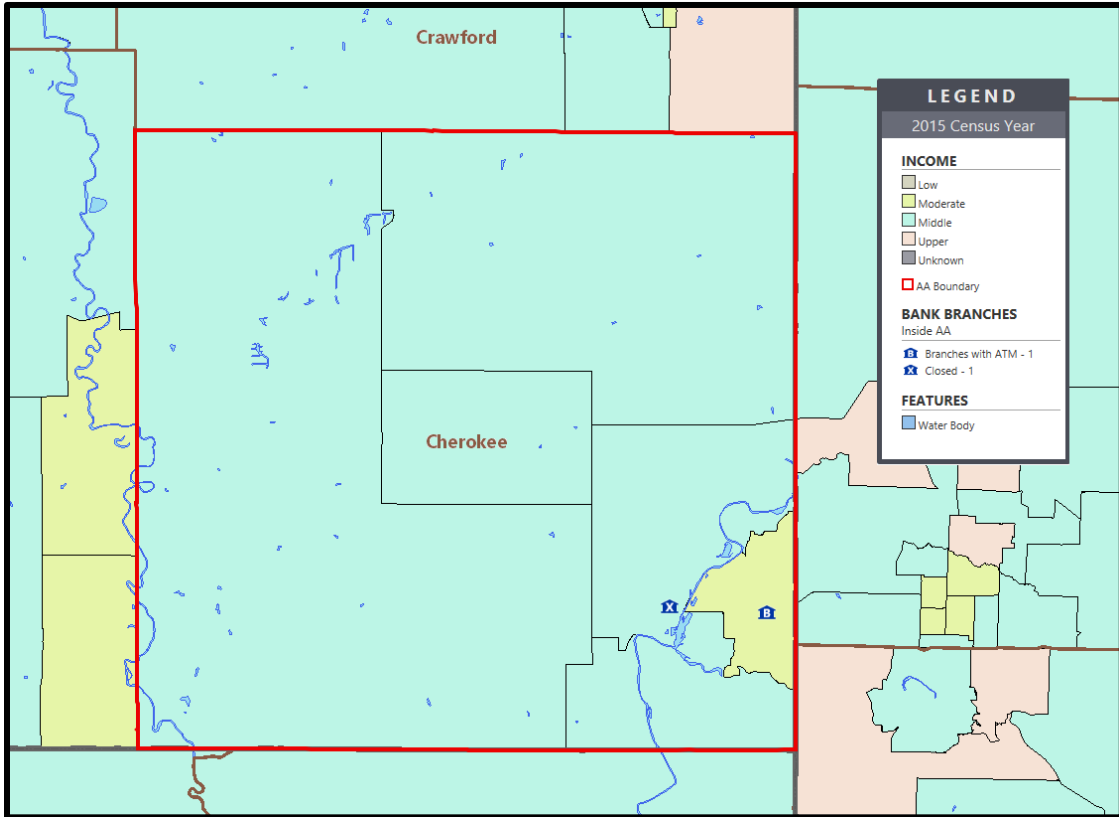


McDonald County AA





Cherokee County AA



**APPENDIX C – DEMOGRAPHIC INFORMATION**

**Table C-1**

2021 Joplin MO 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	9,062	19.9
Moderate	6	17.6	5,739	12.6	1,184	20.6	8,307	18.3
Middle	23	67.6	31,783	69.9	3,318	10.4	9,655	21.2
Upper	5	14.7	7,957	17.5	714	9.0	18,455	40.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>34</b>	<b>100.0</b>	<b>45,479</b>	<b>100.0</b>	<b>5,216</b>	<b>11.5</b>	<b>45,479</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	12,339	4,834	10.7	39.2	5,470	44.3	2,035	16.5
Middle	51,122	31,961	71.0	62.5	14,181	27.7	4,980	9.7
Upper	11,987	8,249	18.3	68.8	2,920	24.4	818	6.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>75,448</b>	<b>45,044</b>	<b>100.0</b>	<b>59.7</b>	<b>22,571</b>	<b>29.9</b>	<b>7,833</b>	<b>10.4</b>
	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	1,211	19.4	1,068	18.8	129	26.7	14	20.3
Middle	4,189	67.1	3,843	67.5	302	62.5	44	63.8
Upper	844	13.5	781	13.7	52	10.8	11	15.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>6,244</b>	<b>100.0</b>	<b>5,692</b>	<b>100.0</b>	<b>483</b>	<b>100.0</b>	<b>69</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.2</b>		<b>7.7</b>		<b>1.1</b>
	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	5	2.4	5	2.4	0	0.0	0	0.0
Middle	196	92.9	194	92.8	2	100.0	0	0.0
Upper	10	4.7	10	4.8	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>211</b>	<b>100.0</b>	<b>209</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>99.1</b>		<b>0.9</b>		<b>0.0</b>
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 C-2**

2020 Joplin MO 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	9,062	19.9		
Moderate	6	17.6	5,739	12.6	1,184	20.6	8,307	18.3		
Middle	23	67.6	31,783	69.9	3,318	10.4	9,655	21.2		
Upper	5	14.7	7,957	17.5	714	9.0	18,455	40.6		
Unknown	0	0.0	0	0.0	0	0.0	0	0.0		
<b>Total AA</b>	<b>34</b>	<b>100.0</b>	<b>45,479</b>	<b>100.0</b>	<b>5,216</b>	<b>11.5</b>	<b>45,479</b>	<b>100.0</b>		
	Housing Units by Tract	Housing Type by Tract								
		Owner-occupied			Rental		Vacant			
		#	% by tract	% by unit	#	% by unit	#	% by unit		
Low	0	0	0.0	0.0	0	0.0	0	0.0		
Moderate	12,339	4,834	10.7	39.2	5,470	44.3	2,035	16.5		
Middle	51,122	31,961	71.0	62.5	14,181	27.7	4,980	9.7		
Upper	11,987	8,249	18.3	68.8	2,920	24.4	818	6.8		
Unknown	0	0	0.0	0.0	0	0.0	0	0.0		
<b>Total AA</b>	<b>75,448</b>	<b>45,044</b>	<b>100.0</b>	<b>59.7</b>	<b>22,571</b>	<b>29.9</b>	<b>7,833</b>	<b>10.4</b>		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.										

**Table C-3**

2019 Joplin MO 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	9,062	19.9		
Moderate	6	17.6	5,739	12.6	1,184	20.6	8,307	18.3		
Middle	23	67.6	31,783	69.9	3,318	10.4	9,655	21.2		
Upper	5	14.7	7,957	17.5	714	9.0	18,455	40.6		
Unknown	0	0.0	0	0.0	0	0.0	0	0.0		
<b>Total AA</b>	<b>34</b>	<b>100.0</b>	<b>45,479</b>	<b>100.0</b>	<b>5,216</b>	<b>11.5</b>	<b>45,479</b>	<b>100.0</b>		
	Housing Units by Tract	Housing Type by Tract								
		Owner-occupied			Rental		Vacant			
		#	% by tract	% by unit	#	% by unit	#	% by unit		
Low	0	0	0.0	0.0	0	0.0	0	0.0		
Moderate	12,339	4,834	10.7	39.2	5,470	44.3	2,035	16.5		
Middle	51,122	31,961	71.0	62.5	14,181	27.7	4,980	9.7		
Upper	11,987	8,249	18.3	68.8	2,920	24.4	818	6.8		
Unknown	0	0	0.0	0.0	0	0.0	0	0.0		
<b>Total AA</b>	<b>75,448</b>	<b>45,044</b>	<b>100.0</b>	<b>59.7</b>	<b>22,571</b>	<b>29.9</b>	<b>7,833</b>	<b>10.4</b>		
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.										

**Table C-4**

2020 Cherokee 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	1,274	22.0		
Moderate	1	16.7	990	17.1	105	10.6	1,177	20.4		
Middle	5	83.3	4,789	82.9	575	12.0	1,412	24.4		
Upper	0	0.0	0	0.0	0	0.0	1,916	33.2		
Unknown	0	0.0	0	0.0	0	0.0	0	0.0		
<b>Total AA</b>	<b>6</b>	<b>100.0</b>	<b>5,779</b>	<b>100.0</b>	<b>680</b>	<b>11.8</b>	<b>5,779</b>	<b>100.0</b>		
	Housing Units by Tract	Housing Type by Tract								
		Owner-occupied			Rental		Vacant			
		#	% by tract	% by unit	#	% by unit	#	% by unit		
Low	0	0	0.0	0.0	0	0.0	0	0.0		
Moderate	1,771	963	15.9	54.4	390	22.0	418	23.6		
Middle	8,066	5,080	84.1	63.0	1,555	19.3	1,431	17.7		
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		
<b>Total AA</b>	<b>9,837</b>	<b>6,043</b>	<b>100.0</b>	<b>61.4</b>	<b>1,945</b>	<b>19.8</b>	<b>1,849</b>	<b>18.8</b>		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.										

**Table C-5**

2019 Cherokee 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	1,274	22.0		
Moderate	1	16.7	990	17.1	105	10.6	1,177	20.4		
Middle	5	83.3	4,789	82.9	575	12.0	1,412	24.4		
Upper	0	0.0	0	0.0	0	0.0	1,916	33.2		
Unknown	0	0.0	0	0.0	0	0.0	0	0.0		
<b>Total AA</b>	<b>6</b>	<b>100.0</b>	<b>5,779</b>	<b>100.0</b>	<b>680</b>	<b>11.8</b>	<b>5,779</b>	<b>100.0</b>		
	Housing Units by Tract	Housing Type by Tract								
		Owner-occupied			Rental		Vacant			
		#	% by tract	% by unit	#	% by unit	#	% by unit		
Low	0	0	0.0	0.0	0	0.0	0	0.0		
Moderate	1,771	963	15.9	54.4	390	22.0	418	23.6		
Middle	8,066	5,080	84.1	63.0	1,555	19.3	1,431	17.7		
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		
<b>Total AA</b>	<b>9,837</b>	<b>6,043</b>	<b>100.0</b>	<b>61.4</b>	<b>1,945</b>	<b>19.8</b>	<b>1,849</b>	<b>18.8</b>		
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.										

**APPENDIX D – LIMITED SCOPE REVIEW ASSESSMENT AREA TABLES**

**Table D-1**

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: McDonald County AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Low	1	11.1	6.1	70	5.9	3.5	0	0.0	5.9	0	0.0	3.2	20.9
Moderate	1	11.1	16.0	112	9.4	10.6	0	0.0	14.3	0	0.0	9.7	21.8
Middle	3	33.3	20.7	393	33.1	17.4	1	33.3	16.6	90	16.6	14.6	22.1
Upper	3	33.3	39.4	498	41.9	48.7	2	66.7	40.2	453	83.4	48.8	35.2
Unknown	1	11.1	17.8	115	9.7	19.7	0	0.0	23.0	0	0.0	23.7	0.0
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>1,188</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>543</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2020 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.  
Multifamily loans are not included in the borrower distribution analysis.

**Table D-2**

2020 McDonald 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	1,224	20.9
Moderate	0	0.0	0	0.0	0	0.0	1,280	21.8
Middle	4	100.0	5,865	100.0	924	15.8	1,294	22.1
Upper	0	0.0	0	0.0	0	0.0	2,067	35.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>4</b>	<b>100.0</b>	<b>5,865</b>	<b>100.0</b>	<b>924</b>	<b>15.8</b>	<b>5,865</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	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	9,850	5,847	100.0	59.4	2,471	25.1	1,532	15.6
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
<b>Total AA</b>	<b>9,850</b>	<b>5,847</b>	<b>100.0</b>	<b>59.4</b>	<b>2,471</b>	<b>25.1</b>	<b>1,532</b>	<b>15.6</b>

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

**Table D-3**

2019 McDonald 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	1,224	20.9
Moderate	0	0.0	0	0.0	0	0.0	1,280	21.8
Middle	4	100.0	5,865	100.0	924	15.8	1,294	22.1
Upper	0	0.0	0	0.0	0	0.0	2,067	35.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>4</b>	<b>100.0</b>	<b>5,865</b>	<b>100.0</b>	<b>924</b>	<b>15.8</b>	<b>5,865</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	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	9,850	5,847	100.0	59.4	2,471	25.1	1,532	15.6
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
<b>Total AA</b>	<b>9,850</b>	<b>5,847</b>	<b>100.0</b>	<b>59.4</b>	<b>2,471</b>	<b>25.1</b>	<b>1,532</b>	<b>15.6</b>
<i>Source: 2019 FFIEC Census Data 2019 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								



## APPENDIX E – GLOSSARY

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

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

**Community development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

**Consumer loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

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

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

**Limited-scope review:** Performance is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**Market share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

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

**Middle-income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

**Moderate-income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

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

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

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

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

**Rated area:** A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

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

**Small loan(s) to farm(s):** A loan included in 'loans to small farms' as defined in the Consolidated Reports of Condition and Income (Call Report) instructions. These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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