



## **PUBLIC DISCLOSURE**

September 25, 2023

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

American Exchange Bank  
RSSD# 1014451

151 North 4th Street  
Elmwood, Nebraska 68349

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**

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

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

## **SCOPE OF EXAMINATION**

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs.

Lending performance was assessed within the bank's single AA. In addition, available CRA aggregate data for the most recent three years (2019, 2020, and 2021) was referenced for additional perspective to gauge credit demand within the bank's AA. Examiners reviewed the following data:

- The bank's 18-quarter average NLTD ratio;
- The universe of 77 small business loans originated between April 17, 2019 and December 31, 2022; and
- The universe of 39 agricultural loans originated between April 17, 2019 and December 31, 2022.

For this evaluation, greater weight was placed on small business lending than agricultural lending based on the higher number of small business loans originated during the evaluation period. Furthermore, greater consideration was given to the volume of loan originations rather than the dollar amount, as it is considered more representative of the number of entities served.

**DESCRIPTION OF INSTITUTION**

The bank is a community bank headquartered in Elmwood, Nebraska. The bank’s characteristics include:

- The bank is a wholly owned subsidiary of American Exchange Company, a one-bank holding company also headquartered in Elmwood, Nebraska.
- The bank has total assets of \$68.4 million as of March 31, 2023.
- In addition to its main office in Elmwood, the bank has one additional office located in Eagle, Nebraska.
- The bank maintains two cash-only automated teller machines, one inside the Eagle branch and one located in a local convenience store in Elmwood.
- As shown in the table below, the bank’s primary business focus is commercial and agricultural lending.

**Table 1**

<b>Composition of Loan Portfolio as of March 31, 2023</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	11	0.0
Farmland	7,308	21.8
1- to 4- Family Residential Real Estate	5,976	17.8
Multifamily Residential Real Estate	0	0.0
Nonfarm Nonresidential Real Estate	7,481	22.3
Agricultural	3,592	10.7
Commercial and Industrial	7,828	23.4
Consumer	1,238	3.7
Other	68	0.2
Gross Loans	<b>33,502</b>	<b>100.0</b>

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

The bank was rated Satisfactory under the CRA at its April 16, 2019 performance evaluation. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its communities.

**DESCRIPTION OF ASSESSMENT AREA**

The bank’s Omaha-Council Bluffs Metropolitan AA consists of the entirety of Cass County and two census tracts in western Otoe County (see Appendix A for an AA map and Appendix B for additional demographic data).

- The AA delineation remains unchanged since the prior performance evaluation.
- The AA is comprised of eight census tracts: one moderate-, four middle-, and three upper-income census tracts. Since the prior performance evaluation, the

income designations of census tracts included in the AA changed as of 2022 due to changes resulting from the 2016-2020 American Community Survey (2020 ACS). Prior to 2022, the bank’s AA consisted of six middle- and two upper-income census tracts.

- According to the June 30, 2022 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank ranked 10th of 17 FDIC-insured depository institutions operating in the AA, with a deposit market share of 5.1 percent.
- An interview with a community member that was previously conducted in conjunction with the CRA evaluation of another financial institution was reviewed for meaningful performance context related to area economic conditions and credit needs. The community member represented an agricultural organization that serves a county in the AA.

**Table 2**

<b>Population Change</b>			
<b>Assessment Area: Omaha-Council Bluffs Metropolitan</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percent Change</b>
Omaha-Council Bluffs Metropolitan	41,202	42,510	3.2
Cass County, NE	25,360	26,598	4.9
Otoe County, NE	15,842	15,912	0.4
NonMSA Nebraska	679,331	672,190	(1.1)
Omaha-Council Bluffs, NE-IA MSA	895,919	967,604	8.0
Nebraska	1,869,365	1,961,504	4.9
<i>Source: 2020 U.S. Census Bureau: Decennial Census 2011 - 2015 U.S. Census Bureau: American Community Survey</i>			
<i>All data is presented at the county level and some values may be different than expected for this AA which includes a partial county.</i>			

- According to the 2020 ACS, the largest population center in the AA is the town of Plattsmouth in Cass County, with a population of 6,544 residents.
- The bank’s offices are in the small towns of Elmwood and Eagle, with populations of 727 and 1,038 residents, respectively.
- The population in NonMSA Nebraska, which represents rural areas throughout the state, has experienced a moderate decline, while metropolitan areas in Nebraska and the state of Nebraska have experienced an overall increase in population.
- Population growth in Cass County was consistent with the State of Nebraska figure at 4.9 percent, while the population of Otoe County experienced a limited increase.

**Table 3**

<b>Median Family Income Change</b>			
<b>Assessment Area: Omaha-Council Bluffs Metropolitan</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Omaha-Council Bluffs Metropolitan	80,043	83,539	4.4
Cass County, NE	84,927	87,091	2.5
Otoe County, NE	70,840	79,404	12.1
NonMSA Nebraska	67,146	71,424	6.4
Omaha-Council Bluffs, NE-IA MSA	80,449	87,733	9.1
Nebraska	73,448	80,125	9.1

*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.  
All data is presented at the county level and some values may be different than expected for this AA which includes a partial county.*

- Median family income growth in the AA was driven by the significant increase in Otoe County, although growth in the AA and Cass County was outpaced by rural areas statewide and the state of Nebraska.
- The portion of families in the AA living below the poverty level based on the 2016-2020 ACS, at 3.5 percent, was below the figures for the state of Nebraska and rural areas statewide, at 6.6 percent and 7.0 percent, respectively. The portion of AA families living below the poverty level ranged from 3.8 percent in Cass County to 7.7 percent in Otoe County.

**Table 4**

<b>Housing Cost Burden</b>						
<b>Assessment Area: Omaha-Council Bluffs Metropolitan</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Omaha-Council Bluffs Metropolitan	62.6	9.3	29.0	64.8	28.5	18.6
Cass County, NE	74.0	8.5	35.3	67.6	27.4	18.0
Otoe County, NE	51.3	10.0	23.2	60.4	31.0	19.8
NonMSA Nebraska	61.2	15.0	30.6	53.1	18.7	14.8
Omaha-Council Bluffs, NE-IA MSA	74.6	28.6	39.5	64.7	32.0	17.0
Nebraska	71.0	23.4	36.8	58.9	26.4	15.8

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

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

*All data is presented at the county level and some values may be different than expected for this AA which includes a partial county.*

- The housing affordability ratio<sup>1</sup> in the AA, at 39.5 percent, was between the figures for the state of Nebraska and rural areas statewide, at 38.4 percent and 44.0 percent, respectively. Housing affordability ratios for the two AA counties ranged from 37.7 in Cass County to 44.6 percent in Otoe County.
- The median housing value in the AA of \$185,452 was above rural areas statewide and the state of Nebraska, with respective figures of \$126,095 and \$164,000. The median housing value in the AA ranged from \$145,100 in Otoe County to \$195,500 in Cass County.

**Table 5**

<b>Unemployment Rates</b>					
<b>Assessment Area: Omaha-Council Bluffs Metropolitan</b>					
<b>Area</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Omaha-Council Bluffs Metropolitan	3.3	3.0	3.3	4.0	2.5
Cass County, NE	3.2	3.1	3.4	4.3	2.7
Otoe County, NE	3.4	2.9	3.2	3.5	2.3
NonMSA Nebraska	2.9	2.8	3.0	3.4	2.1
Omaha-Council Bluffs, NE-IA MSA	3.1	3.0	3.1	4.7	3.0
Nebraska	3.0	2.9	3.0	4.1	2.5

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

*All data is presented at the county level and some values may be different than expected for this AA which includes a partial county.*

- Overall, unemployment in the AA has been relatively stable and commensurate with rural areas statewide, as well as the state of Nebraska. The spike in unemployment during 2020 resulting from the Coronavirus Disease 2019 pandemic was reflected in the state of Nebraska’s unemployment rate of 4.1 percent but was less pronounced in the AA.
- Major industries in the area include transportation and utilities, manufacturing, leisure and hospitality, education and health services, and construction.
- The largest employers in the area include local governments and schools, Hy-Vee, Ash Grove Cement Company, the Nebraska Masonic Home, and Frontier Cooperative Company.
- A community member stated that economic conditions in the area are better than pre-pandemic and that unemployment rates are at historic lows.
- The community member also stated that although local banks do an adequate job of underwriting small business loans, there is still a need for additional credit opportunities for start-up businesses.

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

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA**

The bank’s overall lending test performance is Satisfactory. This conclusion was reached based on a reasonable NLTD ratio, a majority of loans originated within the bank’s AA, a reasonable geographic distribution of loans, and a reasonable borrower distribution of loans. Additionally, performance context was considered when evaluating the bank’s lending performance.

**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 FDIC-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, portfolio composition, and area of operations in proximity to the bank’s AA.

The bank’s NLTD ratio is reasonable. The bank’s 18-quarter average NLTD ratio fell within those of four similarly situated institutions with ratios ranging from 56.8 percent to 74.0 percent.

**Table 6**

Comparative NLTD Ratios December 31, 2018 – March 31, 2023			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			18 Quarter Average
<b>American Exchange Bank</b>	Elmwood, NE	68,355	66.8
<b>Similarly Situated Institutions</b>			
Cerescobank	Ceresco, NE	68,079	65.1
Bank of Mead	Mead, NE	35,412	56.8
Countryside Bank	Unadilla, NE	118,515	61.7
Bank of Prague	Prague, NE	39,275	74.0

**Assessment Area Concentration**

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

Although the bank's overall distribution of lending is a majority inside the AA, less than a majority of the bank’s small business loans were originated inside the AA by both number and dollar volume. The largest portion of lending outside of the AA occurred within the eastern portion of Lancaster County, which is located directly west of the delineated AA and is close to the bank’s Eagle branch, which is fewer than two miles from the county border. A majority of the bank’s small farm loans, by both number and dollar volume, were originated inside the AA.



As previously noted, greater consideration was given to the volume of loan originations rather than the dollar amount, as it is more representative of the number of entities served. Additionally, the bank diversifies their loan portfolio by obtaining commercial loan participations from a bank located in Lincoln, Nebraska, outside of the bank’s AA.

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

**Table 7**

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Small Business	34	44.2	2,755	23.2	43	55.8	9,122	76.8
Small Farm	35	89.7	5,209	85.1	4	10.3	914	14.9
<b>Total Loans</b>	69	59.5	7,964	44.2	47	40.5	10,036	55.8

*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 AA by income level of census tracts with consideration given to the dispersion of loans throughout the AA. The bank’s geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA.

In 2022, the bank did not originate any loans in the AA’s sole moderate-income census tract. This performance is still considered reasonable as the bank’s closest branch in Elmwood is approximately 24 miles from the moderate-income census tract, which is in eastern Cass County. Additionally, there are limited lending opportunities for both small business and small farm lending in this tract, as only 9.4 percent of area businesses and 1.9 percent of area farms are located in this tract.

Prior to 2022 and the associated changes in income level of geographies in the AA, the AA was comprised of only middle- and upper-income census tracts. Accordingly, performance from 2019 to 2021 was evaluated on lending among middle- and upper-income census tracts only.

**Small Business Lending**

The geographic distribution of small business lending is reasonable. The distribution of 2022 small business loans in the moderate-income census tract was below the demographic figure of total businesses. As noted above, small business lending opportunities in the moderate-income census tract are limited. A review of 2022 Dun & Bradstreet data indicated there were only 143 businesses operating in the moderate-income tract. Limited lending opportunities, coupled with the distance from the nearest branch, contributed to the overall reasonable rating for small business lending.

A review of the dispersion of small business loans was conducted and revealed a conspicuous gap that included the moderate-income tract; however, this gap was not considered significant and did not impact the conclusion given the bank's distance from the census tract. The gap also included middle- and upper-income tracts.

The geographic distribution of small business lending from 2019-2021 was consistent with 2022 lending patterns.

**Table 8**

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Omaha-Council Bluffs Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	9.4
Middle	10	76.9	1,008	83.6	54.6
Upper	3	23.1	198	16.4	36.0
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	13	100.0	1,206	100.0	100.0

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

**Small Farm Lending**

The geographic distribution of small farm lending is reasonable. Although the bank did not originate any loans in the AA's sole moderate-income census tract, the bank's performance was comparable to the demographic figure of percentage of total farms located in the census tract. The percentage of total farms in this tract is less than two percent, indicating a lack of opportunity for small farm lending. Therefore, the bank's lack of lending in the moderate-income census tract is considered reasonable.

The geographic distribution of small farm loans from 2019 to 2021 reflected penetration levels consistent with 2022 lending patterns.

A review of the dispersion of small farm loans was conducted and revealed a conspicuous gap that included the moderate-income census tract. Consistent with the dispersion of small business lending, the bank's loans were generally concentrated near its branch locations, and the gaps identified also included middle- and upper-income tracts.

**Table 9**

Distribution of 2022 Small Farm Lending By Income Level of Geography					
Assessment Area: Omaha-Council Bluffs Metropolitan					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	1.6
Middle	18	81.8	2,874	84.6	44.5
Upper	4	18.2	525	15.4	53.9
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	22	100.0	3,399	100.0	100.0

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

**Lending to Businesses and Farms of Different Sizes**

This performance criterion evaluates the bank’s lending to businesses and farms of different revenue sizes. The bank’s lending has a reasonable distribution among businesses and farms of different sizes.

Small Business Lending

The borrower distribution of small business lending is reasonable. The distribution of loans originated in 2022 to businesses with annual revenues of \$1 million or less was below the demographic figure of percentage of total businesses. Although not a direct comparator, as the bank does not report CRA data, a three-year analysis of aggregate lending data from 2019 to 2021 filed by all CRA reporters in the AA was utilized to gauge credit demand of business with revenues of \$1 million or less. The analysis indicated an average lending distribution of 50.9 percent by number, which was commensurate with the bank’s performance of 53.8 percent by number. While aggregate CRA data is not a direct comparator in evaluating the bank’s performance, the data reflects overall demand for small business lending in the AA and supports the bank’s reasonable small business lending performance.

The borrower distribution of small business lending from 2019 to 2021 reflected performance consistent with 2022 lending patterns.

**Table 10**

<b>Distribution of 2022 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Omaha-Council Bluffs Metropolitan</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>	7	53.8	548	45.4	92.7
<b>Over \$1 Million</b>	6	46.2	658	54.6	5.1
<b>Revenue Unknown</b>	0	0.0	0	0.0	2.3
<b>Total</b>	13	100.0	1,206	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	8	61.5	339	28.1	
<b>\$100,001 - \$250,000</b>	4	30.8	617	51.2	
<b>\$250,001 - \$1 Million</b>	1	7.7	250	20.7	
<b>Total</b>	13	100.0	1,206	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	5	71.4	145	26.5	
<b>\$100,001 - \$250,000</b>	1	14.3	153	27.9	
<b>\$250,001 - \$1 Million</b>	1	14.3	250	45.6	
<b>Total</b>	7	100.0	548	100.0	
<i>Source: 2022 FFIEC Census Data 2022 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

**Small Farm Lending**

The borrower distribution of small farm lending is reasonable. The bank’s lending to small farms with gross annual revenues of \$1 million or less was comparable to the demographic figure.

The borrower distribution of small farm lending from 2019-2021 reflected performance consistent with 2022 lending patterns.

**Table 11**

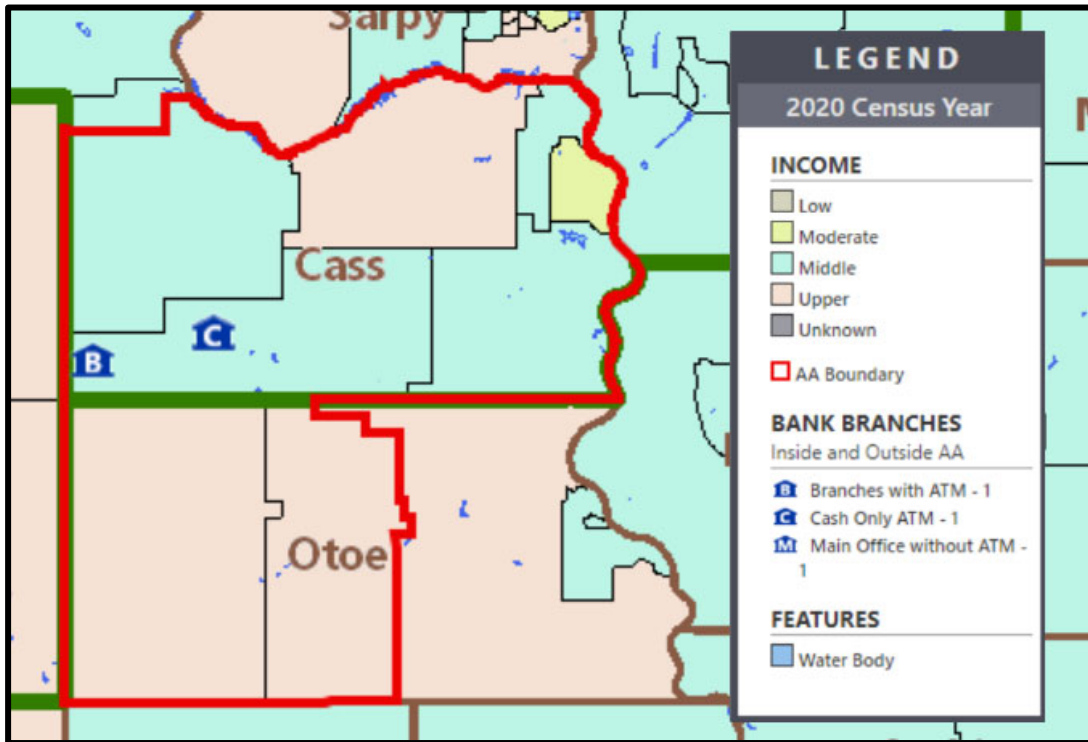
<b>Distribution of 2022 Small Farm Lending By Revenue Size of Farms</b>					
<b>Assessment Area: Omaha-Council Bluffs Metropolitan</b>					
	<b>Bank Loans</b>				<b>Total Farms</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>%</b>
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	18	81.8	2,217	65.2	99.2
<b>Over \$1 Million</b>	4	18.2	1,182	34.8	0.4
<b>Revenue Unknown</b>	0	0.0	0	0.0	0.4
<b>Total</b>	22	100.0	3,399	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	11	50.0	381	11.2	
<b>\$100,001 - \$250,000</b>	5	22.7	912	26.8	
<b>\$250,001 - \$500,000</b>	6	27.3	2,106	62.0	
<b>Total</b>	22	100.0	3,399	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	11	61.1	381	17.2	
<b>\$100,001 - \$250,000</b>	4	22.2	712	32.1	
<b>\$250,001 - \$500,000</b>	3	16.7	1,124	50.7	
<b>Total</b>	18	100.0	2,217	100.0	
<i>Source: 2022 FFIEC Census Data 2022 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

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

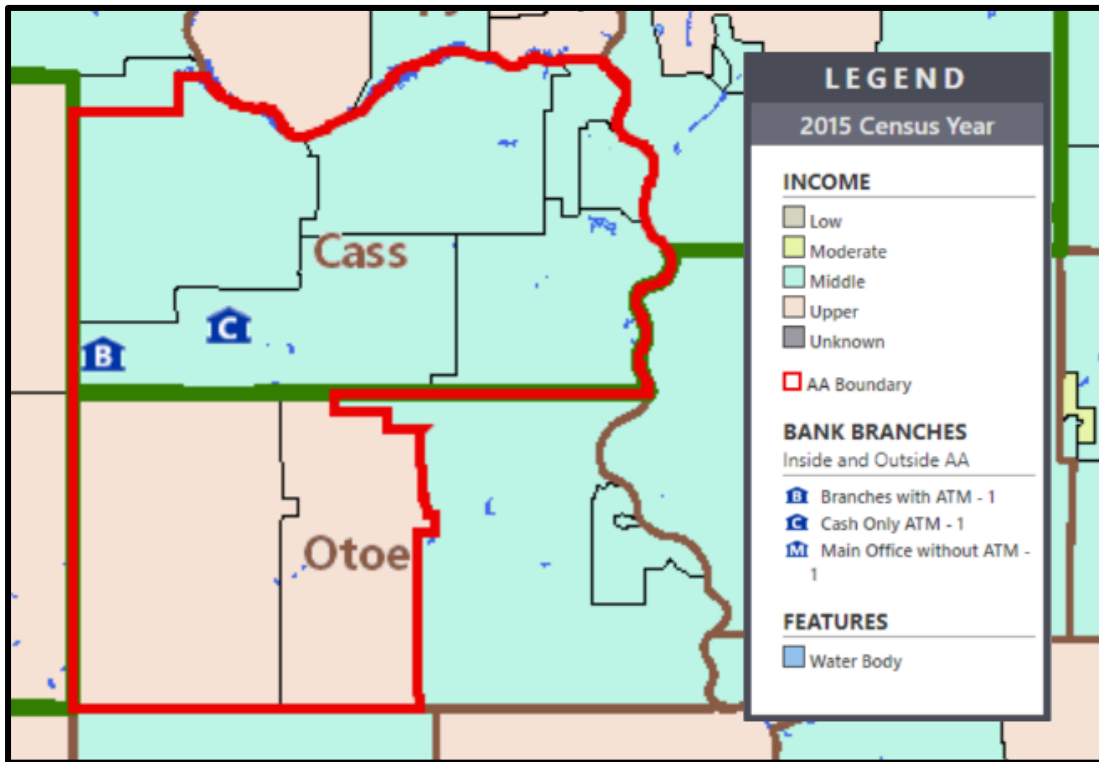
Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited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

APPENDIX A – MAP OF THE ASSESSMENT AREA

2022 Omaha-Council Bluffs Metropolitan



2019-2021 Omaha-Council Bluffs Metropolitan



APPENDIX B – DEMOGRAPHIC INFORMATION

Table B-1

2022 Omaha-Council Bluffs Metropolitan 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	1,373	15.3
Moderate	1	12.5	1,098	12.3	93	8.5	1,713	19.1
Middle	4	50.0	4,501	50.3	131	2.9	2,066	23.1
Upper	3	37.5	3,351	37.4	86	2.6	3,798	42.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>8</b>	<b>100.0</b>	<b>8,950</b>	<b>100.0</b>	<b>310</b>	<b>3.5</b>	<b>8,950</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	1,942	1,211	11.8	62.4	589	30.3	142	7.3
Middle	7,364	5,291	51.6	71.8	961	13.0	1,112	15.1
Upper	5,119	3,746	36.6	73.2	806	15.7	567	11.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>14,425</b>	<b>10,248</b>	<b>100.0</b>	<b>71.0</b>	<b>2,356</b>	<b>16.3</b>	<b>1,821</b>	<b>12.6</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	143	9.4	136	9.6	7	9.1	0	0.0
Middle	832	54.6	759	53.8	48	62.3	25	71.4
Upper	549	36.0	517	36.6	22	28.6	10	28.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,524</b>	<b>100.0</b>	<b>1,412</b>	<b>100.0</b>	<b>77</b>	<b>100.0</b>	<b>35</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.7</b>		<b>5.1</b>		<b>2.3</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	4	1.6	4	1.6	0	0.0	0	0.0
Middle	113	44.5	112	44.4	0	0.0	1	100.0
Upper	137	53.9	136	54.0	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>254</b>	<b>100.0</b>	<b>252</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>99.2</b>		<b>0.4</b>		<b>0.4</b>
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								



**Table B-2**

2019 - 2021 Omaha-Council Bluffs Metropolitan 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	1,185	13.6
Moderate	0	0.0	0	0.0	0	0.0	1,421	16.3
Middle	6	75.0	7,000	80.3	339	4.8	2,236	25.7
Upper	2	25.0	1,712	19.7	85	5.0	3,870	44.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>8</b>	<b>100.0</b>	<b>8,712</b>	<b>100.0</b>	<b>424</b>	<b>4.9</b>	<b>8,712</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	11,225	7,880	80.3	70.2	1,876	16.7	1,469	13.1
Upper	2,689	1,932	19.7	71.8	526	19.6	231	8.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>13,914</b>	<b>9,812</b>	<b>100.0</b>	<b>70.5</b>	<b>2,402</b>	<b>17.3</b>	<b>1,700</b>	<b>12.2</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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1,189	78.7	1,102	78.6	58	79.5	29	82.9
Upper	321	21.3	300	21.4	15	20.5	6	17.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,510</b>	<b>100.0</b>	<b>1,402</b>	<b>100.0</b>	<b>73</b>	<b>100.0</b>	<b>35</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.8</b>		<b>4.8</b>		<b>2.3</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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	162	64.8	161	64.7	0	0.0	1	100.0
Upper	88	35.2	88	35.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>250</b>	<b>100.0</b>	<b>249</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>99.6</b>		<b>0.0</b>		<b>0.4</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.								

**APPENDIX C – ADDITIONAL LENDING TABLES**

**Table C-1**

<b>Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography</b>									
<b>Assessment Area: Omaha-Council Bluffs Metropolitan</b>									
<b>Geographic Income Level</b>	<b>Bank Loans By Year</b>								<b>Total Businesses %</b>
	<b>2020</b>				<b>2021</b>				
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	
<b>Low</b>	0	0.0	0	0.0	0	0.0	0	0.0	0.0
<b>Moderate</b>	0	0.0	0	0.0	0	0.0	0	0.0	0.0
<b>Middle</b>	2	50.0	73	31.6	10	76.9	802	91.7	78.7
<b>Upper</b>	2	50.0	159	68.8	3	23.1	72	8.2	21.3
<b>Unknown</b>	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	
<b>Total</b>	4	100.0	231	100.0	13	100.0	875	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 C-2**

<b>Distribution of 2019 Small Business Lending By Income Level of Geography</b>					
<b>Assessment Area: Omaha-Council Bluffs Metropolitan</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>	0	0.0	0	0.0	0.0
<b>Middle</b>	3	75.0	427	96.4	79.4
<b>Upper</b>	1	25.0	17	3.8	20.6
<b>Unknown</b>	0	0.0	0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	4	100.0	443	100.0	100.0

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

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

**Table C-3**

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography Assessment Area: Omaha-Council Bluffs Metropolitan									
Geographic Income Level	Bank Loans By Year								Total Farms %
	2020				2021				
	#	#%	\$(000)	%	#	#%	\$(000)	%	
Low	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
Middle	3	75.0	535	95.7	4	66.7	508	54.2	64.8
Upper	1	25.0	24	4.3	2	33.3	430	45.8	35.2
Unknown	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	
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>559</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>938</b>	<b>100.0</b>	<b>100.0</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-4**

Distribution of 2019 Small Farm Lending By Income Level of Geography Assessment Area: Omaha-Council Bluffs Metropolitan					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	3	100.0	313	100.0	64.8
Upper	0	0.0	0	0.0	35.2
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>313</b>	<b>100.0</b>	<b>100.0</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-5**

<b>Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses</b>									
<b>Assessment Area: Omaha-Council Bluffs Metropolitan</b>									
	<b>Bank Loans By Year</b>								<b>Total Businesses %</b>
	<b>2020</b>				<b>2021</b>				
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	
<b>By Revenue</b>									
<b>\$1 Million or Less</b>	3	75.0	184	79.7	10	76.9	653	74.6	92.8
<b>Over \$1 Million</b>	1	25.0	48	20.8	3	23.1	222	25.4	4.8
<b>Revenue Unknown</b>	0	0.0	0	0.0	0	0.0	0	0.0	2.3
<b>Total</b>	4	100.0	231	100.0	13	100.0	875	100.0	100.0
<b>By Loan Size</b>									
<b>\$100,000 or Less</b>	3	75.0	88	38.1	9	69.2	254	29.0	
<b>\$100,001 - \$250,000</b>	1	25.0	144	62.3	3	23.1	368	42.1	
<b>\$250,001 - \$1 Million</b>	0	0.0	0	0.0	1	7.7	253	28.9	
<b>Total</b>	4	100.0	231	100.0	13	100.0	875	100.0	
<b>By Loan Size and Revenue \$1 Million or Less</b>									
<b>\$100,000 or Less</b>	2	66.7	40	21.7	7	70.0	162	24.8	
<b>\$100,001 - \$250,000</b>	1	33.3	144	78.3	2	20.0	238	36.4	
<b>\$250,001 - \$1 Million</b>	0	0.0	0	0.0	1	10.0	253	38.7	
<b>Total</b>	3	100.0	184	100.0	10	100.0	653	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>									

**Table C-6**

<b>Distribution of 2019 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Omaha-Council Bluffs Metropolitan</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>	2	50.0	32	7.2	92.8
<b>Over \$1 Million</b>	2	50.0	412	93.0	5.1
<b>Revenue Unknown</b>	0	0.0	0	0.0	2.1
<b>Total</b>	4	100.0	443	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	3	75.0	63	14.2	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	
<b>\$250,001 - \$1 Million</b>	1	25.0	380	85.8	
<b>Total</b>	4	100.0	443	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	2	100.0	32	100.0	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	
<b>\$250,001 - \$1 Million</b>	0	0.0	0	0.0	
<b>Total</b>	2	100.0	32	100.0	
<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>					

**Table C-7**

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms Assessment Area: Omaha-Council Bluffs Metropolitan									
	Bank Loans By Year								Total Farms %
	2020				2021				
	#	#%	\$(000)	%	#	#%	\$(000)	%	
<b>By Revenue</b>									
<b>\$1 Million or Less</b>	3	75.0	524	93.7	6	100.0	938	100.0	99.6
<b>Over \$1 Million</b>	1	25.0	35	6.3	0	0.0	0	0.0	0.0
<b>Revenue Unknown</b>	0	0.0	0	0.0	0	0.0	0	0.0	0.4
<b>Total</b>	4	100.0	559	100.0	6	100.0	938	100.0	100.0
<b>By Loan Size</b>									
<b>\$100,000 or Less</b>	3	75.0	78	14.0	2	33.3	41	4.4	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	2	33.3	257	27.4	
<b>\$250,001 - \$500,000</b>	1	25.0	481	86.0	2	33.3	640	68.2	
<b>Total</b>	4	100.0	559	100.0	6	100.0	938	100.0	
<b>By Loan Size and Revenue \$1 Million or Less</b>									
<b>\$100,000 or Less</b>	2	66.7	43	8.2	2	33.3	41	4.4	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	2	33.3	257	27.4	
<b>\$250,001 - \$500,000</b>	1	33.3	481	91.8	2	33.3	640	68.2	
<b>Total</b>	3	100.0	524	100.0	6	100.0	938	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>									

**Table C-8**

<b>Distribution of 2019 Small Farm Lending By Revenue Size of Farms</b>					
<b>Assessment Area: Omaha-Council Bluffs Metropolitan</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>	2	66.7	88	28.1	99.2
<b>Over \$1 Million</b>	1	33.3	225	71.9	0.4
<b>Revenue Unknown</b>	0	0.0	0	0.0	0.4
<b>Total</b>	3	100.0	313	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	2	66.7	88	28.1	
<b>\$100,001 - \$250,000</b>	1	33.3	225	71.9	
<b>\$250,001 - \$500,000</b>	0	0.0	0	0.0	
<b>Total</b>	3	100.0	313	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	2	100.0	88	100.0	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	
<b>\$250,001 - \$500,000</b>	0	0.0	0	0.0	
<b>Total</b>	2	100.0	88	100.0	
<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 D – GLOSSARY

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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