



## **PUBLIC DISCLOSURE**

April 19, 2021

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

**Equity Bank  
RSSD# 139656**

**345 North Andover Road  
Andover, Kansas 67002**

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

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

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**INSTITUTION’S COMMUNITY REINVESTMENT ACT RATING**

This institution is rated: **SATISFACTORY**

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

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory		X	X
Needs to Improve			
Substantial Noncompliance			

\* The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

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

**Lending Test**

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

**Investment Test**

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

**Service Test**

- The bank’s delivery systems are reasonably accessible to geographies and/or individuals of different income levels in its AAs.

- The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals.
- The bank provides an adequate level of CD services and is responsive to its available service opportunities.

## **INSTITUTION**

### **SCOPE OF EXAMINATION**

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large Institutions* were utilized to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as AA demographic and economic characteristics, and credit needs. Performance was assessed within the bank's Kansas City Metropolitan, Northern Oklahoma, Northwest Kansas, Ozark Mountain, Western Missouri, and Wichita Metropolitan AAs using a full-scope review. Comparatively, the Benton County Metropolitan, Southeast Kansas, Southwest Kansas, Texas County, Topeka Metropolitan, Tulsa County Metropolitan, and Washita County AAs were assessed using a limited-scope review. The following data was reviewed:

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

When determining the overall institution rating, more weight was placed on the state of Kansas rating, followed by Oklahoma, Missouri, Arkansas, and finally the Kansas City multistate AA. In the lending analysis, commercial and home mortgage lending were weighted equally, while agricultural lending received less weight in most AAs. Product weighting was largely determined by loan volume and business strategy; however, some markets diverged from overall bank trends and therefore weighting varied across select AAs. For those AAs, product weighting is discussed separately in the applicable section of this report.

In addition, more weight was placed on the volume of loan originations than the dollar amount, as this better represents the number of individuals or entities served. Similarly, more weight was given to the bank's performance in comparison to aggregate lending data as it can be considered more representative of credit demand. In most AAs, home purchase and home refinance lending were each

evaluated independently, while home improvement and multifamily lending were not evaluated due to lack of volume, making an analysis not meaningful. However, due to an overall lack of volume, home mortgage lending was evaluated collectively in the Northwest Kansas AA, while small farm lending was not evaluated in the Wichita Metropolitan AA.

Table 1 illustrates the bank’s presence in each AA by number of branches, the percentage of lending and deposits compared to the bank-wide and the state level totals, and the bank’s June 30, 2020 deposit market share as a percentage of all Federal Deposit Insurance Corporation (FDIC)-insured financial institutions.

<b>TABLE 1 REVIEW TYPE AND MARKET SHARE BY AA</b>								
Assessment Area	Review Type	Br. #	Percent of Bank’s Lending by \$ <sup>1</sup>		Percent of Bank’s Deposits by \$ <sup>2</sup>		Deposit Market Share	
			Bank	State	Bank	State	% Market Share <sup>2</sup>	Market Share Rank <sup>3</sup>
<b>Kansas City Metropolitan AA</b>	Full	8	18.2		11.7		0.6	25 of 94
<b>State of Kansas</b>		<b>21</b>	<b>42.4</b>	<b>100.0</b>	<b>44.9</b>	<b>100.0</b>		
Wichita Metropolitan AA	Full	4	28.8	67.8	18.2	40.9	3.3	8 of 39
Northwest Kansas AA	Full	5	5.9	13.8	8.4	19.0	12.0	2 of 23
Topeka Metropolitan AA	Limited	3	1.2	2.8	5.0	10.2	3.1	8 of 19
Southeast Kansas AA	Limited	4	2.0	4.6	3.1	7.0	4.6	9 of 19
Southwest Kansas AA	Limited	5	4.7	11.0	10.2	22.9	30.4	1 of 12
<b>State of Arkansas</b>		<b>5</b>	<b>9.3</b>	<b>100.0</b>	<b>11.6</b>	<b>100.0</b>		
Ozark Mountain AA	Full	4	7.8	84.2	10.8	93.0	20.2	2 of 9
Benton County Metropolitan AA	Limited	1	1.5	15.8	0.8	7.0	0.4	21 of 28
<b>State of Missouri</b>		<b>7</b>	<b>6.0</b>	<b>100.0</b>	<b>16.2</b>	<b>100.0</b>		
Western Missouri AA	Full	7	6.0	100.0	16.2	100.0	15.7	1 of 25
<b>State of Oklahoma</b>		<b>10</b>	<b>24.0</b>	<b>100.0</b>	<b>15.9</b>	<b>100.0</b>		
Northern Oklahoma AA	Full	5	5.2	21.7	7.2	45.4	21.0	3 of 8
Tulsa County Metropolitan AA	Limited	1	16.6	68.9	3.1	19.4	0.3	34 of 46
Texas County AA	Limited	3	2.2	9.1	4.8	29.8	28.2	2 of 4
Washita County AA	Limited	1	0.1	0.3	0.8	5.3	10.0	6 of 9

<sup>1</sup> Based on the bank’s outstanding loan balances as of September 30, 2020.  
<sup>2</sup> Based on the June 30, 2020 FDIC’s Market Share Report.  
<sup>3</sup> Based on the bank’s ranking among FDIC-insured financial institutions in each AA.

**DESCRIPTION OF INSTITUTION**

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

- The bank is a wholly owned subsidiary of Equity Bancshares, Inc.
- The bank had total assets of \$3.9 billion (B) as of September 30, 2020.

- The bank operates 51 branches throughout its geographic footprint that includes 21 locations in Kansas, 10 in Oklahoma, 8 in the Kansas City multistate region, 7 in Missouri, and 5 in Arkansas.
- The bank’s primary business focus is commercial lending.
- Since the prior evaluation, the bank acquired First National Bank of Liberal in Liberal, Kansas, and City Bank and Trust in Guymon, Oklahoma, as well as purchased multiple branches from MidFirst Bank in Cordell, Oklahoma. These changes resulted in the addition of three new AAs: Texas County, Washita County, and Southwest Kansas.
- Additionally, two branches not included in the overall total were purchased in late 2020 that are located adjacent to the Northwest Kansas AA but were not included in this analysis due to their recent acquisition.

<b>TABLE 2 COMPOSITION OF LOAN PORTFOLIO AS OF SEPTEMBER 30, 2020</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Commercial	1,883,107	68.9
Residential Real Estate	570,358	20.9
Agricultural	210,984	7.7
Consumer	60,433	2.2
Other	9,884	0.4
<b>Gross Loans</b>	<b>2,734,766</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its April 15, 2019 performance evaluation. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs of its communities.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

While conclusions with respect to lending performance were evaluated for both years, only 2019 lending tables for AAs that received a full-scope review are reflected in the body of this report. The bank’s 2018 lending data for AAs that received full-scope reviews can be found in Appendix D of this report. Lending data for AAs that received limited-scope reviews can be found in Appendix E. The performance evaluation first discusses the bank’s overall performance followed by an in-depth analysis of the bank’s record of lending, investment, and service activities in each state and specific AA.

**LENDING TEST**

The bank’s overall performance under the lending test is high satisfactory. The lending test performance state ratings for Kansas, Oklahoma, Missouri, Arkansas, and the Kansas City multistate AA are all similarly rated as high satisfactory.

**Lending Activity**

This performance criterion evaluates the bank’s lending volume considering the bank’s resources and business strategy and other information from the performance context. The bank’s overall lending activities reflect good responsiveness to AA credit needs. The bank’s overall loan origination volume has increased since the prior evaluation, driven primarily by acquisitions and the bank’s significant participation in the U.S. Small Business Administration’s (SBA) Paycheck Protection Program (PPP).

<b>TABLE 3 SUMMARY OF LENDING ACTIVITY REVIEWED</b>								
<b>Loan Type</b>	<b>2019</b>				<b>2018</b>			
	<b>#</b>	<b>\$(000)</b>	<b>#%</b>	<b>\$%</b>	<b>#</b>	<b>\$(000)</b>	<b>#%</b>	<b>\$%</b>
Home Purchase	899	174,790	23.7	32.8	737	104,656	22.0	23.3
Home Refinance	484	76,968	12.8	14.5	425	70,586	12.7	15.7
Home Improvement	21	1,283	0.6	0.2	9	429	0.3	0.1
Multifamily	38	13,909	1.0	2.6	37	18,705	1.1	4.2
<b>Total HMDA Loans</b>	<b>1,442</b>	<b>266,950</b>	<b>38.0</b>	<b>50.2</b>	<b>1,208</b>	<b>194,376</b>	<b>36.1</b>	<b>43.2</b>
<b>Small Business Loans</b>	<b>1,267</b>	<b>168,973</b>	<b>33.4</b>	<b>31.8</b>	<b>1,127</b>	<b>160,040</b>	<b>33.7</b>	<b>35.6</b>
<b>Small Farms Loans</b>	<b>1,081</b>	<b>96,271</b>	<b>28.5</b>	<b>18.1</b>	<b>1,014</b>	<b>95,267</b>	<b>30.3</b>	<b>21.2</b>
<b>Total Loans</b>	<b>3,790</b>	<b>532,194</b>	<b>100.0</b>	<b>100.0</b>	<b>3,349</b>	<b>449,683</b>	<b>100.0</b>	<b>100.0</b>

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. Such loans help borrowers who might not otherwise qualify for credit. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank did participate in numerous government-sponsored lending programs, displaying flexibility in serving the credit needs of its communities.

Federal programs offered in all markets for residential real estate lending include Federal Housing Administration (FHA) purchase and refinance loans; Veterans Administration (VA) purchase and refinance loans; and U.S. Department of Agriculture (USDA) Rural Development purchase loans. The bank also provides SBA loans, and although origination volume was minimal during the evaluation period, the bank has hired additional staff to help grow this product. For 2019, the bank originated the following:

- 91 FHA loans totaling \$12.4 million (MM)
- 44 VA loans totaling \$7.2MM
- 117 USDA Rural Development loans totaling \$12.2MM
- 4 SBA loans totaling \$813.4 thousand (M)

The bank offers other flexible, more localized lending programs targeted at supporting homeownership for LMI borrowers in various markets. For example, the bank offers loans through the Homeownership Set-Aside Program via the Federal Home Loan Bank of Topeka, Topeka, Kansas (FHLB). The Homeownership Set-Aside Program provides down payment, closing cost, and rehabilitation assistance to first-time homebuyers earning at, or below, 80.0 percent of the average median income (AMI) for households purchasing or constructing homes in Kansas and Oklahoma. The bank also



provides First Time Homebuyer Program loans through the Kansas Housing Resources Corporation. Similar to the Homeownership Set-Aside Program, the First Time Homebuyer Program provides down payment and closing cost assistance to first-time homebuyers earning at, or below, 80.0 percent of the AMI for households purchasing homes in nonmetropolitan areas in the state of Kansas. Additionally, the bank recently began offering longer-term, fixed rated Farmer Mac loans to its agricultural borrowers.

Furthermore, the bank enacted several critical loan-related initiatives in response to the nationwide public health emergency (the COVID-19 pandemic) declared on January 27, 2020. Except for activity that qualified as community development lending, these lending initiatives will be specifically considered in the bank’s next CRA evaluation as they occurred outside of this evaluation’s review period; however, given the significance of the financial burden related to the health emergency placed on consumers, small businesses, and small farms, the bank’s response measures warrant special mention in this evaluation. In 2020, the bank’s lending-related response measures secured \$2.2B in source-funding for 2,736 PPP loans offered through the SBA. The bank also originated 18 Main Street Lending Program loans totaling \$282.0MM, both inside the bank’s markets and more broadly. Additionally, the bank implemented multiple flexible payment options for both commercial and consumer loan customers by granting principal and/or interest deferrals to provide debt relief without negatively impacting the borrower’s credit. As previously stated, this information will be considered in the next CRA evaluation and was not considered in determining the ratings noted in this report.

**Assessment Area Concentration**

This performance criterion evaluates the percentage of lending extended inside and outside of the bank’s AAs. Overall, a high percentage of the bank’s loans, by number and dollar, were originated inside the bank’s AAs. All products reflect a high percentage of originations within the bank’s AAs.

<b>TABLE 4 LENDING INSIDE AND OUTSIDE THE AAs</b>								
<b>Loan Type</b>	<b>Inside</b>				<b>Outside</b>			
	<b>#</b>	<b>\$(000)</b>	<b>#%</b>	<b>\$%</b>	<b>#</b>	<b>\$(000)</b>	<b>#%</b>	<b>\$%</b>
Home Purchase	1,261	172,462	77.1	61.7	375	106,984	22.9	38.3
Home Refinance	703	92,530	77.3	62.7	206	55,024	22.7	37.3
Home Improvement	26	1,368	86.7	79.9	4	344	13.3	20.1
Multifamily	71	30,249	94.7	92.7	4	2,365	5.3	7.3
<b>Total HMDA Loans</b>	<b>2,061</b>	<b>296,609</b>	<b>77.8</b>	<b>64.3</b>	<b>589</b>	<b>164,717</b>	<b>22.2</b>	<b>35.7</b>
<b>Small Business Loans</b>	<b>1,945</b>	<b>256,216</b>	<b>81.2</b>	<b>77.9</b>	<b>449</b>	<b>72,797</b>	<b>18.8</b>	<b>22.1</b>
<b>Small Farm Loans</b>	<b>1,733</b>	<b>164,629</b>	<b>82.7</b>	<b>86.0</b>	<b>362</b>	<b>26,909</b>	<b>17.3</b>	<b>14.0</b>
<b>Total Loans</b>	<b>5,739</b>	<b>717,454</b>	<b>80.4</b>	<b>73.1</b>	<b>1,400</b>	<b>264,423</b>	<b>19.6</b>	<b>26.9</b>

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

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

**Geographic Distribution of Loans**

This performance criterion evaluates the bank’s distribution of lending within its AAs by income level of

census tracts. The bank’s overall geographic distribution of lending reflects good penetration throughout its AAs. The state ratings for Oklahoma and Missouri are consistent with the overall rating, while the bank’s performance in Kansas and Arkansas is adequate and the Kansas City multistate AA is considered excellent.

**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 sizes. The bank’s lending has an overall good penetration among individuals of different income levels and businesses and farms of different sizes. The state ratings for Oklahoma, Kansas, Arkansas, and the Kansas City multistate AA are consistent with the overall rating, while the bank’s performance in Missouri is considered excellent.

**Community Development Lending**

This performance criterion evaluates the bank’s level of CD lending. The bank makes a relatively high level of CD loans. The state ratings for Kansas and the Kansas City multistate AA are consistent with the overall rating, while the bank’s performance in Oklahoma, Missouri, and Arkansas is at an adequate level. Additionally, based on the bank adequately meeting the credit and CD needs of the communities within its AAs, consideration also was given to activities originated outside of the bank's AAs, but within a broader regional or statewide area. Seven such loans totaling \$25.8MM were included in the bank's state and overall number and dollar figures, as they meet one of the purpose tests for qualification as CD and are responsive to area credit needs.

- Fourteen CD loans totaling approximately \$35.4MM supported affordable housing initiatives, which is considered a critical need in many of the bank’s AAs.
- Eighteen of the bank’s CD loans were PPP loans that were utilized by local businesses to retain their employees and continue operations in LMI census tracts throughout the pandemic or for small businesses to retain LMI employees.
- Kansas reported the highest volume of CD loans, led by the Wichita Metropolitan AA. The Kansas City multistate AA reported the next highest total, while in Oklahoma, the highest volume was in the Northern Oklahoma AA. Missouri reported the next highest volume, followed by Arkansas, where all CD loans were in the Ozark Mountain AA.

<b>TABLE 5 COMMUNITY DEVELOPMENT LOANS ALL AAs</b>		
<b>Community Development Purpose</b>	<b>#</b>	<b>\$(000's)</b>
Affordable Housing	14	35,439
Community Services	1	10
Economic Development	14	38,091
Revitalization and Stabilization	21	66,792
<b>TOTAL LOANS</b>	<b>50</b>	<b>140,331</b>

**INVESTMENT TEST**

The bank’s overall performance under the investment test is low satisfactory. In the Kansas City multistate AA, the investment test was rated as high satisfactory, while the state ratings for Kansas and Arkansas are consistent with the overall rating. In comparison, the state of Missouri was rated as needs to improve, and the state of Oklahoma was rated as substantial noncompliance.

This performance criterion evaluates the bank’s level of qualifying investments, grants, donations, or in-kind contributions of property made since the prior evaluation that have a primary purpose of community development. Overall, the bank has an adequate level of qualified CD investments and grants and is occasionally in a leadership position. Additionally, the bank makes occasional use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AAs. Based on the bank adequately meeting the credit and CD needs of most communities within its AAs, consideration also was given to activities originated outside of the bank's AAs, but within a broader regional or statewide area. Seven such investments totaling \$2.1MM are included within the Investments, Grants, and Donations summary table below. However, due to less than satisfactory performance in Oklahoma and Missouri, investments outside of the bank’s AAs in these states were not included in the totals.

<b>TABLE 6 INVESTMENTS, GRANTS, AND DONATIONS</b>								
<b>Community Development Purpose</b>	<b>Prior Period Investments<sup>1</sup></b>		<b>Current Investments<sup>2</sup></b>		<b>Donations</b>		<b>Total<sup>3</sup></b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	13	7,141	2	3,848	2	7	17	10,996
Community Services	4	2,466	0	0	62	216	66	2,682
Economic Development	1	400	0	0	6	33	7	433
Revitalization and Stabilization	8	2,719	0	0	8	13	16	2,732
<b>TOTAL</b>	<b>26</b>	<b>12,727</b>	<b>2</b>	<b>3,848</b>	<b>78</b>	<b>269</b>	<b>106</b>	<b>16,843</b>

<sup>1</sup> Book Value of Investment  
<sup>2</sup> Original Market Value of Investment  
<sup>3</sup> Totals may be off by one due to rounding

**SERVICE TEST**

The bank’s overall performance under the service test is low satisfactory. The state ratings for Kansas and Missouri are consistent with the overall rating. In comparison, the state of Arkansas was rated as high satisfactory, while the bank’s performance in Oklahoma and the Kansas City multistate AA was rated as needs to improve.

**Retail Banking Services**

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

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in each AA. Including its headquarters, the bank operates 51 traditional branch offices and 55 automated teller machines (ATMs), of which 8 are full-service ATMs. The bank operates 40 of its ATMs at branch locations, while 15 are stand-alone, cash-only units. The availability of drive-through services and on-site ATMs varies across branches; however, these services are generally provided by at least one location in most AAs and are reasonably accessible. In addition, the bank offers online and mobile banking services to consumer and business customers, including mobile deposit and online loan applications. During the COVID-19 pandemic throughout most of 2020, the bank made a concerted effort to ensure customers had access to their money via the bank's various delivery channels. ATM cash limits were increased, along with the amount of cash in all ATMs, and the bank added deposit-taking functionality to nine ATMs. The bank also increased staffing in its customer care and call centers to better serve customers and assist with online banking enrollments.

The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Four branch closures occurred during the evaluation period, one of which included an on-site, full-service ATM. However, one closure was effectively a branch relocation, as a new branch was opened nearby. Customers of the remaining three branches were able to be served by nearby existing branches with little disruption.

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. While branch hours vary across markets, branches generally operate nine hours on weekdays and extended drive-through and/or Saturday hours are generally provided by at least one location in most AAs. During the COVID-19 pandemic throughout most of 2020, the bank made a concerted effort to ensure customers had access to banking services. Bank lobbies were opened and closed in phases across the bank's footprint according to market infection rates; however, consistent service was maintained at all branches either by appointment or using drive-through facilities. Using this method, most of the bank's lobbies were closed for only a few weeks during the peak of the pandemic. Additionally, customer fees were waived on an ad-hoc basis to support customers during this unprecedented time.

**TABLE 7  
RETAIL BANKING AND COMMUNITY DEVELOPMENT SERVICES  
ALL AAs**

Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	3.9	17.6	60.8	17.6	0.0	100.0	11.6	23.0	36.8	26.6	1.9	100.0
Branch Accessibility	Location of ATMs by Tract (%)						Percent of Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	12.5	75.0	12.5	0.0	100.0	11.6	23.0	36.8	26.6	1.9	100.0
Changes in Branch Location	Number of Branches (#)			Net Change in Branch Locations (#)								
	Total Branches	Openings (#)	Closings (#)	Low	Mod	Mid	Upp	Unk	Total			
	51	1	4	0	0	(2)	(1)	0	(3)			
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	9	54	13	3	79	45						

<sup>1</sup> Based on 2019 FFIEC census tract definitions.  
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

**Community Development Services**

This performance criterion evaluates the bank’s level of CD services. The bank provides an adequate level of CD services. A majority of qualified activities were attributed to several bank representatives providing financial expertise or serving in key positions, such as board members or treasurers, for organizations that focus on providing community services targeted to LMI individuals. In total, the bank performed over half of its bank-wide CD services in the state of Kansas, followed by a relatively high amount of services in the state of Arkansas when compared to the bank’s market presence. Comparatively, the bank’s performance in the state of Missouri was consistent with the overall rating, while few CD services were noted in the state of Oklahoma and the Kansas City multistate MSA.

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

An evaluation of the bank’s fair lending activities was conducted during the examination to determine compliance with the substantive provisions of antidiscrimination laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**KANSAS CITY METROPOLITAN ASSESSMENT AREA  
MULTISTATE METROPOLITAN AREA**

<b>CRA RATING FOR KANSAS CITY METROPOLITAN<sup>5</sup>:</b>	<b>Satisfactory</b>
<i>The lending test is rated:</i>	<i>High Satisfactory</i>
<i>The investment test is rated:</i>	<i>High Satisfactory</i>
<i>The service test is rated:</i>	<i>Needs to Improve</i>

Major factors supporting the rating include:

Lending Test

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

Investment Test

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

Service Test

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

<sup>5</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained in the multistate metropolitan area.

**SCOPE OF EXAMINATION**

The scope of the review for the Kansas City Metropolitan AA was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. Refer to the chart in Appendix A for further detail.

**DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN THE KANSAS CITY METROPOLITAN AA**

The bank’s AA includes 6 of the 14 counties comprising the Kansas City, Missouri-Kansas Multistate Metropolitan Statistical Area (MSA). The AA is comprised of Wyandotte County and Johnson County in Kansas, and Platte County, Clay County, Jackson County, and Lafayette County in Missouri, all in their entireties. Refer to Appendix C for a map of the AA.

- The AA is comprised of 78 low-, 105 moderate-, 140 middle-, 128 upper-, and 19 unknown-income census tracts. Census tract designations have not changed since the prior examination.
- Eight of the bank’s branches are located in the AA; all but one location has an on-site ATM and all branches offer drive-through services.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 0.6 percent market share, ranking 25<sup>th</sup> out of 94 FDIC-insured depository institutions operating in the AA.
- Three previously conducted community contacts were referenced during the evaluation. One contact was a representative from an affordable housing support program serving LMI residents in the AA. The second contact was from an organization focused on economic development, and the third contact was a representative of an area housing authority.

**TABLE 8  
POPULATION CHANGE**

Area	2010 Population	2015 Population	Percent Change
Kansas City Metropolitan AA	1,720,484	1,765,196	2.6
Johnson County, KS	544,179	566,814	4.2
Wyandotte County, KS	157,505	160,806	2.1
Clay County, MO	221,939	230,361	3.8
Jackson County, MO	674,158	680,905	1.0
Lafayette County, MO	33,381	32,916	(1.4)
Platte County, MO	89,322	93,394	4.6
Kansas City, MO-KS MSA	2,009,342	2,055,675	2.3
State of Kansas	2,853,118	2,892,987	1.4
State of 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

**TABLE 9  
MEDIAN FAMILY INCOME CHANGE**

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Kansas City Metropolitan AA	75,891	73,042	(3.8)
Johnson County, KS	98,419	94,850	(3.6)
Wyandotte County, KS	51,892	47,117	(9.2)
Clay County, MO	77,325	75,104	(2.9)
Jackson County, MO	64,064	61,076	(4.7)
Lafayette County, MO	63,679	64,480	1.3
Platte County, MO	86,541	84,309	(2.6)
Kansas City, MO-KS MSA	74,970	72,623	(3.1)
State of Kansas	67,977	66,389	(2.3)
State of 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.

- According to the 2015 American Community Survey (ACS), the percent of families living below the poverty threshold varied, with the highest percentages in the counties of Wyandotte and Jackson at 19.1 percent and 13.5 percent, respectively, compared to the AA at 9.3 percent.
- Wyandotte County reports the lowest median family income in the AA and also experienced the largest percentage decrease from 2010 to 2015. A member of the community noted this county is largely populated with “blue collar” workers, with the lowest-income individuals living in the eastern part of the county.
- The community member also noted that incomes in Wyandotte County had increased from 2015 to 2019 but have since plateaued.



**TABLE 10  
HOUSING COSTS CHANGE**

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Kansas City Metropolitan AA	160,160	160,843	0.4	762	847	11.2
Johnson County, KS	209,900	215,600	2.7	857	947	10.5
Wyandotte County, KS	97,600	89,200	(8.6)	698	777	11.3
Clay County, MO	153,900	154,900	0.6	736	828	12.5
Jackson County, MO	129,900	125,500	(3.4)	723	807	11.6
Lafayette County, MO	121,000	117,400	(3.0)	566	634	12.0
Platte County, MO	185,100	190,300	2.8	809	880	8.8
Kansas City, MO-KS MSA	158,603	159,473	0.5	760	844	11.1
State of Kansas	122,600	132,000	7.7	671	757	12.8
State of Missouri	137,700	138,400	0.5	667	746	11.8

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

- According to the 2015 ACS, the highest percentage of the population with housing rental costs above 30 percent of their income was in Wyandotte County and Jackson County, at 48.0 percent and 47.7 percent, respectively, as compared to 44.1 percent within the AA. Higher rental costs can adversely impact consumers' ability to save for a down payment to purchase a home.
- The affordability ratio within the AA indicates that the area is relatively less affordable at 35.7 percent than the state of Kansas at 39.6 percent. The least affordable county is Johnson County at 35.3 percent, while the most affordable is Wyandotte County at 45.0 percent.
- The age of housing stock varies widely across the AA, with an average age in Platte County and Johnson County of 28 and 31 years, respectively, compared to Wyandotte County and Jackson County at 55 and 48 years, respectively. Older homes may be inaccessible to LMI individuals who cannot afford to do major remodeling or improvements.
- A community member noted the most significant barrier to increasing the amount of affordable housing is the cost of housing development in the AA, as few developers are willing to pass up the huge profit margins gained from building market rate properties. Additionally, the community member mentioned another barrier to the creation of affordable housing is the limited amount of Low-Income Housing Tax Credits that usually fund one small- to medium-sized project per year.
- A community member also stated that an unmet credit need for senior and LMI homeowners is low-fee and low-cost home improvement loans, which would help them stay in their homes. When LMI homeowners are forced to move because their homes fall into disrepair, higher income individuals quickly purchase and renovate the property, raising the value and potentially pricing out other LMI individuals.
- A community member also noted that many LMI individuals have been priced out of more desirable areas of Kansas City (i.e. Johnson County) and have moved into neighboring counties.

**TABLE 11  
UNEMPLOYMENT RATES**

<b>Region</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Kansas City Metropolitan AA	4.8	4.3	3.8	3.3	3.2
Johnson County, KS	3.4	3.3	3.0	2.8	2.8
Wyandotte County, KS	6.0	5.6	5.2	4.8	4.3
Clay County, MO	4.6	3.9	3.6	2.9	2.9
Jackson County, MO	5.9	5.1	4.4	3.7	3.7
Lafayette County, MO	4.9	4.3	3.8	3.2	3.1
Platte County, MO	4.2	3.6	3.2	2.5	2.7
Kansas City, MO-KS MSA	4.8	4.3	3.8	3.3	3.3
State of Kansas	4.2	4.0	3.6	3.3	3.2
State of Missouri	5.0	4.6	3.7	3.2	3.3

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The major public employers in the AA include the federal government, University of Kansas Health System, city and county governments, and various public-school systems. In the private sector, medical institutions are the main employers and include Cerner, Midwest Health, St. Luke’s Health System, and Children’s Mercy, followed by a Ford assembly plant, Hallmark Cards, Honeywell Manufacturing, and Garmin.
- As noted in Table 11, Wyandotte County has historically had the highest unemployment rate within the AA. A community member stated that although unemployment spiked at 16 percent in Wyandotte County during the height of the pandemic, it has returned to more normal levels in early 2021. While major employers are planning expansions in the area, the community member noted that many of the created jobs will require higher education in technology fields.
- Regarding area credit needs, a community member stated that the needs of qualifying businesses and individuals are being met, but opportunities remain for innovative programs, such as loan pools to help small businesses in LMI areas.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS CITY METROPOLITAN AA**

**LENDING TEST**

The bank’s performance under the lending test in the Kansas City Metropolitan AA is high satisfactory.

**Lending Activity**

The bank’s lending activities reflect good responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. Such loans help borrowers who might not otherwise qualify for credit. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous government-sponsored lending programs, displaying flexibility in the way the bank serves its communities. Federal lending programs offered in the AA include FHA, VA, USDA Rural

Development, and SBA loans. Additionally, the bank offers loans through the Homeownership Set-Aside Program in Kansas.

### **Geographic Distribution of Loans**

The geographic distribution of lending reflects excellent penetration throughout the AA.

#### Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The bank's 2019 loan originations in low-income census tracts were above aggregate lending data by number and by dollar and were comparable to the percentage of owner-occupied housing units (the demographic figure) by number. Lending in moderate-income census tracts was above aggregate lending data by number and by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was consistent with 2019.

The dispersion of home mortgage lending is evaluated independently for each product, and some lending gaps were identified. Refer to the separate lending products below for a detailed analysis.

#### Home Purchase Loans

The geographic distribution of home purchase lending is good. The bank's 2019 loan originations in low-income census tracts was comparable to aggregate lending data by number and above by dollar and was comparable to the demographic figure by number. Lending in moderate-income census tracts was comparable to aggregate lending data by number and above by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was stronger than 2019, as lending in moderate-income census tracts was above aggregate lending data by number and by dollar.

When evaluating loan dispersion within the AA, some gaps in lending in LMI census tracts in the urban core of Kansas City were identified. However, this can be explained by the distance from these census tracts to the bank's branches. Additionally, competition is high with 94 financial institutions serving the AA.

Home Refinance Loans

The geographic distribution of home refinance lending is good. The bank's 2019 loan originations in low-income census tracts was comparable to aggregate lending data by number and by dollar but was below the demographic figure by number. Lending in moderate-income census tracts was comparable to aggregate lending data by number and above by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was stronger than 2019, as lending in moderate-income census tracts was above aggregate lending data by number and comparable by dollar.

When evaluating loan dispersion within the AA, some gaps in lending in LMI census tracts in the urban core of Kansas City were identified. However, this can be explained by the distance from these census tracts to the bank's branches. Additionally, competition is high with 94 financial institutions serving the AA.

**TABLE 12  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
KANSAS CITY METROPOLITAN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	8	2,149	5.1	7.4	3.0	2.1	6.4
Moderate	33	6,605	21.0	22.8	14.8	10.0	18.1
Middle	83	12,034	52.9	41.5	35.9	31.8	36.5
Upper	33	8,222	21.0	28.3	46.1	56.0	38.8
Unknown	0	0	0.0	0.0	0.2	0.2	0.2
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	4	509	4.3	3.1	3.6	1.8	6.4
Moderate	19	3,171	20.7	19.3	17.1	10.5	18.1
Middle	51	8,085	55.4	49.2	37.3	32.2	36.5
Upper	18	4,657	19.6	28.4	41.8	55.4	38.8
Unknown	0	0	0.0	0.0	0.1	0.1	0.2
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	1	34	1.9	0.4	1.9	1.0	6.4
Moderate	7	717	13.5	9.4	11.5	7.0	18.1
Middle	29	3,340	55.8	43.6	34.6	28.4	36.5
Upper	15	3,565	28.8	46.6	51.8	63.4	38.8
Unknown	0	0	0.0	0.0	0.2	0.2	0.2
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	2.9	2.0	6.4
Moderate	2	130	50.0	42.3	10.9	7.9	18.1
Middle	2	177	50.0	57.7	32.3	28.1	36.5
Upper	0	0	0.0	0.0	53.8	62.0	38.8
Unknown	0	0	0.0	0.0	0.2	0.1	0.2
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	3	1,606	33.3	34.7	17.9	9.3	14.7
Moderate	5	2,587	55.6	55.9	32.9	20.0	25.9
Middle	1	432	11.1	9.3	32.9	44.8	37.1
Upper	0	0	0.0	0.0	15.0	25.6	20.7
Unknown	0	0	0.0	0.0	1.2	0.2	1.6
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.

### Small Business Lending

The geographic distribution of small business lending is good. The bank's 2019 loan originations in low-income census tracts were above aggregate lending data by number and by dollar and were above the percentage of businesses (the demographic figure) by number. Lending in moderate-income census tracts was comparable to aggregate lending data by number and by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was weaker than 2019, as lending in low-income census tracts was comparable to aggregate lending data by number and by dollar, as well as comparable to the demographic figure.

When evaluating loan dispersion within the AA, no significant gaps were identified.

### Small Farm Lending

The geographic distribution of small farm lending is excellent. The bank's 2019 loan originations in low-income census tracts were comparable to aggregate lending data by number and by dollar and were comparable to the percentage of farms (the demographic figure) by number. Lending in moderate-income census tracts was above aggregate lending data by number and by dollar and was above the demographic figure.

The bank's lending performance for 2018 was consistent with 2019.

When evaluating loan dispersion within the AA, some lending gaps were identified in the urban areas of the AA. However, this can be explained by the high population density and lack of farms in these areas.

**TABLE 13  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
KANSAS CITY METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
Low	16	4,863	9.6	16.4	7.1	9.3	7.5
Moderate	27	5,508	16.3	18.6	17.4	18.2	19.4
Middle	64	8,456	38.6	28.6	29.8	27.3	33.4
Upper	56	9,757	33.7	33.0	42.1	38.6	37.7
Unknown	3	984	1.8	3.3	2.5	6.2	2.0
Not Reported	0	0	0.0	0.0	1.2	0.4	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	2.1	0.5	2.1
Moderate	23	2,154	37.1	41.6	14.9	16.0	13.0
Middle	33	2,828	53.2	54.6	49.7	41.7	48.0
Upper	6	199	9.7	3.8	32.6	41.6	36.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.1
Not Reported	0	0	0.0	0.0	0.7	0.2	0.0

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.

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

The bank’s lending has a good penetration among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is good. The bank's 2019 loan originations to low-income borrowers were above aggregate lending data by number and by dollar but below the percentage of families (the demographic figure) by number. Lending to moderate-income borrowers was comparable to aggregate lending data by number and above by dollar and was above the demographic figure.

The bank’s lending performance for 2018 was weaker than 2019, as lending to LMI borrowers was comparable to aggregate lending data by number and by dollar.

Additional performance context considered in the overall rating for this product included the high numbers of loans to individuals with unknown incomes, as this skewed the breakdown of the bank’s data for comparison purposes. When factoring out loans with unknown incomes from both the bank’s lending and aggregate lending data, the bank outperformed aggregate lenders.

### Home Purchase Loans

The borrower distribution of home purchase lending is good. The bank's 2019 loan originations to low-income borrowers were above aggregate lending data by number and by dollar and were comparable to the demographic figure. Lending to moderate-income borrowers was above aggregate lending data by number and by dollar and was above the demographic figure.

The bank's lending performance for 2018 was weaker than 2019, as lending to low-income borrowers was comparable to aggregate lending data by number but below the demographic figure. Additionally, lending to moderate-income borrowers was comparable to aggregate lending data by number.

### Home Refinance Loans

The borrower distribution of home refinance lending is adequate. The bank's 2019 loan originations to low-income borrowers were below aggregate lending data by number and by dollar and were below the demographic figure. Lending to moderate-income borrowers was comparable to aggregate lending data by number and above by dollar and was comparable to the demographic figure. Additional performance context considered in this analysis was the significant numbers of loans originated to individuals with unknown incomes. This was particularly impactful to the bank's home refinance product, where loans with unknown incomes comprised 44.2 percent of the bank's originations, as compared to only 17.8 percent for aggregate data reporters.

The bank's lending performance for 2018 was weaker than 2019. Lending to low-income borrowers was comparable to aggregate lending data by number but below by dollar and below the demographic figure. Additionally, lending to moderate-income borrowers was below aggregate lending data by number and by dollar and was below the demographic figure.



**TABLE 14  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
KANSAS CITY METROPOLITAN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	16	1,496	10.2	5.2	8.1	3.9	21.4
Moderate	34	4,538	21.7	15.6	18.2	12.3	17.3
Middle	25	4,938	15.9	17.0	21.6	18.2	20.1
Upper	32	8,921	20.4	30.8	37.5	44.9	41.2
Unknown	50	9,117	31.8	31.4	14.7	20.7	0.0
<b>Home Purchase Loans</b>							
Low	14	1,328	15.2	8.1	9.6	5.0	21.4
Moderate	25	3,493	27.2	21.3	21.7	15.9	17.3
Middle	17	3,777	18.5	23.0	22.6	21.2	20.1
Upper	19	5,405	20.7	32.9	34.5	47.2	41.2
Unknown	17	2,419	18.5	14.7	11.5	10.7	0.0
<b>Home Refinance Loans</b>							
Low	2	168	3.8	2.2	6.6	3.3	21.4
Moderate	8	985	15.4	12.9	15.2	10.2	17.3
Middle	7	1,044	13.5	13.6	21.1	18.2	20.1
Upper	12	3,246	23.1	42.4	39.3	50.5	41.2
Unknown	23	2,213	44.2	28.9	17.8	17.7	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	6.4	4.3	21.4
Moderate	1	60	25.0	19.5	13.1	10.7	17.3
Middle	1	117	25.0	38.1	20.7	17.4	20.1
Upper	0	0	0.0	0.0	54.6	60.4	41.2
Unknown	2	130	50.0	42.3	5.2	7.2	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	21.4
Moderate	0	0	0.0	0.0	0.3	0.0	17.3
Middle	0	0	0.0	0.0	0.9	0.2	20.1
Upper	1	270	11.1	5.8	3.8	1.0	41.2
Unknown	8	4,355	88.9	94.2	95.0	98.8	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.

Small Business Lending

The borrower distribution of small business lending is adequate. The bank's 2019 loan originations to businesses with revenues of \$1MM or less was comparable to aggregate lending data by number and by dollar but below the percentage of small businesses by number.

The bank's lending performance for 2018 was consistent with 2019.

Small Farm Lending

The borrower distribution of small farm lending is excellent. The bank's 2019 loan originations to farms with revenues of \$1MM or less was above aggregate lending data by number and comparable by dollar and was comparable to the percentage of small farms by number.

The bank's lending performance for 2018 was consistent with 2019.

<b>TABLE 15 DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING BY REVENUE SIZE OF BUSINESSES AND FARMS KANSAS CITY METROPOLITAN AA</b>							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	75	11,268	45.2	38.1	45.8	30.9	90.0
<b>Over \$1MM</b>	90	18,215	54.2	61.6	Not Reported		9.2
<b>Unknown</b>	1	85	0.6	0.3	Not Reported		0.8
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	59	4,784	95.2	92.3	55.6	75.1	97.5
<b>Over \$1MM</b>	3	397	4.8	7.7	Not Reported		2.0
<b>Unknown</b>	0	0	0.0	0.0	Not Reported		0.5

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.

**Community Development Lending**

The bank provides a relatively high level of CD loans. The bank originated 12 CD loans totaling \$35.3MM in the AA.

- Three of the CD loans were PPP loans utilized by local businesses to retain their employees and continue operations in LMI census tracts throughout the pandemic or for small businesses to retain LMI employees.
- Four of the CD loans were participations in a CD fund that supported the acquisition and rehabilitation of affordable housing, which is a critical need in the AA.

## **INVESTMENT TEST**

The bank's performance under the investment test in the Kansas City Metropolitan AA is high satisfactory. The bank has a significant level of qualified CD investments and grants and is occasionally in a leadership position. Additionally, the bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to the credit and CD needs of its AA.

- Investments included one current period mortgage-backed security (MBS) that totaled \$1.3MM and contained pools of mortgage loans targeted to LMI individuals within the AA.
- Qualified investments included seven prior period investments totaling \$3.4MM and six qualifying donations totaling \$88.9M.
- A total of \$81.7M in donations was made to an organization that provides short- and long-term housing for LMI individuals and families in need of lodging while relatives receive medical care.
- A \$5.0M donation was made to an organization that provides multiple community services targeted to LMI women.

## **SERVICE TEST**

The bank's performance under the service test in the Kansas City Metropolitan AA is needs to improve given the bank's overall lack of service activity in relation to its branch presence and significant deposit and loan volume in the AA.

### **Retail Banking Services**

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates eight branches, of which six possess on-site cash-only ATMs and all offer drive-through facilities. Five branch locations are spread along the southern outskirts of the AA, one branch is in the northwest portion of the AA, and the remaining branch is located near the eastern boundary of the AA. Two branch facilities are located in moderate-income census tracts. The distribution of branches is generally proportional to the percent of census tracts by income level.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. During the evaluation period, the bank closed one branch and opened one new branch within a few miles of the original location, resulting in no significant change in accessibility.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Branch hours typically range from 9:00 am to 5:00 pm Monday through Friday and 9:00 am to 12:00 pm on Saturday. All branches also offer similar, slightly expanded drive-through hours.

**TABLE 16  
RETAIL AND COMMUNITY DEVELOPMENT SERVICES  
KANSAS CITY METROPOLITAN AA**

Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	25.0	37.5	37.5	0.0	100.0	16.6	22.3	29.8	27.2	4.0	100.0
Branch Accessibility	Location of Full-Service ATMs by Tract (%)						Percent of Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	0.0	0.0	0.0	0.0	16.6	22.3	29.8	27.2	4.0	100.0
Changes in Branch Location	Number of Branches (#)			Net Change in Branch Locations (#)								
	Total Branches	Openings (#)	Closings (#)	Low	Mod	Mid	Upp	Unk	Total			
	8	1	1	0	0	0	0	0	0			
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	0	0	2	0	2	1						

<sup>1</sup> Based on 2019 FFIEC census tract definitions.  
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

**Community Development Services**

The bank provides few, if any, CD services.

- One individual representing the bank served as a board member for an economic development organization focused on attracting and retaining jobs and business investments in the area.

**STATE OF KANSAS**

**CRA RATING FOR KANSAS:**

*The lending test is rated:*

*The investment test is rated:*

*The service test is rated:*

**Satisfactory**

*High Satisfactory*

*Low Satisfactory*

*Low Satisfactory*

Major factors supporting the rating include:

Lending Test

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

Investment Test

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

Service Test

- The bank's delivery systems are reasonably accessible to geographies and/or individuals of different income levels throughout its AAs.
- The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals.
- The bank provides an adequate level of CD services within its Kansas AAs and is responsive to its available service opportunities.

**SCOPE OF EXAMINATION**

The scope of the review for the state of Kansas was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests.

Full-scope reviews were conducted for the Wichita Metropolitan and Northwest Kansas AAs. The overall state rating was based predominantly on the bank's performance in the two aforementioned

AAs, with the most weight given to the bank's performance in the Wichita Metropolitan AA.

Limited-scope reviews were conducted for the Topeka Metropolitan, Southeast Kansas, and Southwest Kansas AAs to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state.

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

The bank delineates 5 of its 13 AAs and operates 21 of its 51 branches in the state of Kansas. Loan and deposit products and services offered in the state mirror those discussed in the overall institution section of this report, with a primary emphasis on commercial and residential real estate lending in the Wichita Metropolitan, Topeka Metropolitan, and Southeast Kansas AAs. Alternatively, the bank's primary emphasis is agricultural lending in its more rural Northwest Kansas and Southwest Kansas AAs. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

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

### **LENDING TEST**

The bank's performance under the lending test in the state of Kansas is high satisfactory. The rating for the Northwest Kansas AA is consistent with the overall state rating, while the bank's performance in the Wichita Metropolitan AA is considered adequate. The ratings for all limited-scope AAs were consistent with the overall state rating, which had a positive impact on the overall state rating.

### **Lending Activity**

The bank's lending activities in the state of Kansas reflect good responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. Such loans help borrowers who might not otherwise qualify for credit. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous government-sponsored lending programs, displaying flexibility in the way the bank serves its communities.

Federal lending programs offered in the bank's Kansas AAs include FHA, VA, USDA Rural Development, and SBA loans. The bank also offers additional flexible lending programs in its Kansas markets, including the Homeownership Set-Aside Program via the FHLB and the First Time Homebuyer Program through the Kansas Housing Resources Corporation. However, none of these loans were originated during the evaluation period. For 2019, the bank originated the following:

- 47 FHA loans totaling \$6.4MM
- 15 VA loans totaling \$2.4MM
- 33 USDA Rural Development loans totaling \$2.9MM

- 2 SBA loans totaling \$223.0M
- 26 Homeownership Set-Aside Program loans totaling \$2.4MM

### **Geographic Distribution of Loans**

The bank's overall geographic distribution of lending within the state of Kansas reflects adequate penetration throughout its AAs. The distribution of loans across different geographies is adequate in the Wichita Metropolitan AA but poor in the Northwest Kansas AA. However, as detailed above, the Northwest Kansas AA received less weight in determining the bank's overall state performance.

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

The bank's lending within the state of Kansas has an overall good penetration among individuals of different income levels and businesses and farms of different sizes. Additionally, the distribution of loans to borrowers of different income levels and to businesses and farms of different sizes is good in both the Wichita Metropolitan AA and the Northwest Kansas AA.

### **Community Development Lending**

In the state of Kansas, the bank provides a relatively high level of CD loans. The bank originated 20 CD loans totaling \$63.1MM within the state. This included five loans supporting affordable housing for \$4.2MM; five loans supporting economic development for \$20.5MM; and ten loans supporting revitalization and stabilization efforts for \$38.4MM.

- Seven of the CD loans were PPP loans utilized by local businesses to retain their employees and continue operations in LMI census tracts throughout the pandemic or for small businesses to retain LMI employees.
- While the bank's community development lending within its Northwest Kansas and Wichita Metropolitan AAs was considered adequate, the bank's overall CD lending test rating was positively impacted by the performance within its limited-scope AAs.

### **INVESTMENT TEST**

The bank's performance under the investment test in the state of Kansas is low satisfactory. The performance is adequate in both the Wichita Metropolitan AA and the Northwest Kansas AA.

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

- Many of the bank's qualified CD investments benefited multiple AAs or broader areas within the state of Kansas.

- Investments included 11 prior period investments totaling \$7.4MM and 42 donations totaling \$149.3M.
- A majority of donations were made to organizations providing community services to LMI individuals or areas, totaling \$107.7M.

## **SERVICE TEST**

The bank's performance under the service test in the state of Kansas is low satisfactory. The performance is adequate in both the Wichita Metropolitan AA and the Northwest Kansas AA.

### **Retail Banking Services**

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in each AA. The availability of drive-through services and on-site ATMs varies across the branch locations within the bank's Kansas markets, which includes five stand-alone, cash-only ATMs in the Southwest Kansas AA. The distribution of branches within the Kansas AAs is generally proportional to the percent of census tracts by income level. During the COVID-19 pandemic, the bank also converted two on-site ATMs in the Southwest Kansas AA to full-service ATMs in support of its customers.

The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the prior evaluation, the bank did not open or close any branches in the state.

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. Lobby and drive-through hours vary across the bank's markets, with reduced hours in rural areas. All locations generally operate approximately eight hours on weekdays and three hours on Saturday, with extended drive-through hours. All full-service branches offer similar products and services.

### **Community Development Services**

The bank provides an adequate level of CD services in its Kansas AAs. Bank staff provided 45 CD services within the Kansas AAs. While the level of services in the Wichita Metropolitan, Northwest Kansas, Topeka Metropolitan, and Southeast Kansas AAs is consistent with the overall state performance, the Southwest Kansas AA exceeded the state performance.



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

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE WICHITA METROPOLITAN AA**

The bank's AA includes two of the five counties in the Wichita, Kansas MSA and is comprised of Sedgwick County and Butler County in their entirety. Refer to Appendix C for a map of the AA.

- The AA is comprised of 15 low-, 38 moderate-, 41 middle-, and 43 upper-income census tracts. Comparatively, the AA in 2018 was comprised of 16 low-, 38 moderate-, 45 middle-, and 38 upper-income census tracts, which is consistent with the prior evaluation.
- Four of the bank's branches are located in the AA; all but one location has an on-site ATM and all branches offer drive-through services.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 3.3 percent market share, ranking 8<sup>th</sup> out of 39 FDIC-insured depository institutions operating in the AA.
- Two recently conducted community contacts were referenced during the evaluation. One contact was a representative from an economic development organization in the AA. The other contact represented an organization focused on supporting local businesses and entrepreneurship.

**TABLE 17  
POPULATION CHANGE**

<b>Area</b>	<b>2010 Population</b>	<b>2015 Population</b>	<b>Percent Change</b>
Wichita Metropolitan AA	564,245	572,621	1.5
Butler County	65,880	66,092	0.3
Sedgwick County	498,365	506,529	1.6
Wichita, KS MSA	623,061	631,094	1.3
State of 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

- Wichita is the most populous city in the state of Kansas, although the MSA contains only about a third of the population compared to the Kansas City Multistate MSA.

**TABLE 18  
MEDIAN FAMILY INCOME CHANGE**

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Wichita Metropolitan AA	67,050	64,455	(3.9)
Butler County	72,503	72,774	0.4
Sedgwick County	66,575	63,779	(4.2)
Wichita, KS MSA	67,016	64,331	(4.0)
State of 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.

- Consistent with the trends in median family income displayed in Table 18, the percentage of families living below poverty in Sedgwick County is significantly higher than in the more affluent Butler County, at 11.0 percent versus 7.2 percent, respectively.

**TABLE 19  
HOUSING COSTS CHANGE**

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Wichita Metropolitan AA	117,807	127,390	8.1	641	733	14.4
Butler County	121,200	134,500	11.0	664	756	13.9
Sedgwick County	117,300	126,500	7.8	639	731	14.4
Wichita, KS MSA	114,382	124,842	9.1	635	728	14.6
State of Kansas	122,600	132,000	7.7	671	757	12.8

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

- Housing unit types vary between the two counties in the AA. Butler County has a higher percentage of housing units that are owner-occupied and a lower percentage of rental units at 67.5 percent and 24.7 percent, as compared to Sedgwick County at 57.9 percent and 32.5 percent, respectively.

**TABLE 20  
UNEMPLOYMENT RATES**

Region	2015	2016	2017	2018	2019
Wichita Metropolitan AA	4.7	4.6	4.2	3.7	3.4
Butler County	4.3	4.2	3.8	3.4	3.2
Sedgwick County	4.8	4.7	4.3	3.7	3.5
Wichita, KS MSA	4.7	4.6	4.2	3.6	3.4
State of Kansas	4.2	4.0	3.6	3.3	3.2

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Aerospace is a primary industry in Wichita and the Boeing 737 Max airplane issues in 2020 caused tremendous job loss, impacting many local aerospace suppliers and other support companies. Healthcare, transportation and logistics, advanced manufacturing, agriculture, information technology, and cybersecurity are also considered key industries.
- A community member stated some businesses had difficulty accessing credit during the COVID-19 pandemic if they did not already have established relationships with lenders. However, the community member indicated that many local financial institutions participated in PPP lending, which helped small business owners.
- The community member also mentioned that grants, funding, and financing for start-up businesses is an area of need, and that financing is particularly hard to find if the company is doing something unconventional or innovative that requires more effort to research and understand. However, the community member went on to say that capital is readily available for qualifying borrowers and that financial institutions are doing a good job of meeting the credit needs of the community.
- Another community member stated that several economic development projects to revitalize the Wichita MSA have been initiated in recent years. They include a new riverfront stadium along with a hotel, apartments, and mixed-used buildings constructed nearby to support it; four older buildings in downtown Wichita are being redeveloped for a medical school, student housing, dining hall/culinary school, and hotel; the Northwest Water Treatment Facility will replace an 80-year-old plant; and the first phases of the Green Project. The Green Project will replace aging pavement, structurally deficient bridges over the Little Arkansas River, and the functionally obsolete bridge over Arkansas Avenue and Broadway Avenue to alleviate major traffic congestion.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WICHITA METROPOLITAN AA**

### **LENDING TEST**

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

#### **Lending Activity**

The bank's lending activities reflect good responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. Such loans help borrowers who might not otherwise qualify for credit. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous government-sponsored lending programs, displaying flexibility in the way the bank serves its communities. Federal lending programs offered in the AA include FHA, VA, USDA Rural Development, and SBA loans.

## **Geographic Distribution of Loans**

The geographic distribution of lending reflects adequate penetration throughout the AA.

### Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The bank's 2019 loan originations in low-income census tracts were comparable to aggregate lending data by number and by dollar and were below the demographic figure by number. Lending in moderate-income census tracts was comparable to aggregate lending data by number and below by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was consistent with 2019.

The dispersion of home mortgage lending is evaluated independently for each product, and no significant lending gaps were identified for either product.

### Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The bank's 2019 loan originations in low-income census tracts was below aggregate lending data by number and comparable by dollar and was below the demographic figure by number. However, lending in moderate-income census tracts was comparable to aggregate lending data by number and by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was stronger than 2019, as lending in low-income census tracts was comparable to aggregate lending data by number and by dollar. Additionally, lending in moderate-income census tracts was above aggregate lending data by dollar but below the demographic figure.

When evaluating loan dispersion within the AA, no significant gaps in lending were identified.

### Home Refinance Loans

The geographic distribution of home refinance lending is good. The bank's 2019 loan originations in low-income census tracts were above aggregate lending data by number but comparable by dollar and were below the demographic figure by number. Lending in moderate-income census tracts was above aggregate lending data by number and comparable by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was weaker than 2019, as lending in low-income census tracts was below aggregate lending data by number. Comparatively, lending in moderate-income census tracts was above the demographic figure.

When evaluating loan dispersion within the AA, no significant gaps in lending were identified.

**TABLE 21  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
WICHITA METROPOLITAN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	3	191	2.4	0.8	2.8	1.7	5.1
Moderate	20	1,700	15.9	7.1	14.4	11.3	17.9
Middle	33	5,332	26.2	22.3	30.4	24.6	32.4
Upper	70	16,707	55.6	69.8	52.4	62.4	44.6
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	1	48	1.1	0.3	2.7	1.3	5.1
Moderate	14	1,199	15.7	8.1	15.7	8.5	17.9
Middle	29	4,172	32.6	28.3	31.2	25.9	32.4
Upper	45	9,316	50.6	63.2	50.4	64.3	44.6
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	1	47	2.9	0.6	1.9	0.9	5.1
Moderate	6	501	17.1	6.1	11.0	5.6	17.9
Middle	3	306	8.6	3.7	29.1	23.3	32.4
Upper	25	7,391	71.4	89.6	58.0	70.2	44.6
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	4.1	1.2	5.1
Moderate	0	0	0.0	0.0	13.2	10.2	17.9
Middle	0	0	0.0	0.0	28.0	25.5	32.4
Upper	0	0	0.0	0.0	54.7	63.1	44.6
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	1	96	50.0	10.1	17.2	6.4	9.4
Moderate	0	0	0.0	0.0	38.7	45.2	34.0
Middle	1	854	50.0	89.9	23.7	19.3	38.7
Upper	0	0	0.0	0.0	20.4	29.1	17.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business lending is good. The bank's 2019 loan originations in low-income census tracts were below aggregate lending data by number and by dollar and were below the demographic figure by number. However, lending in moderate-income census tracts was above aggregate lending data by number and comparable by dollar and was above the demographic figure.

The bank's lending performance for 2018 was comparable to 2019.

When evaluating loan dispersion within the AA, no significant gaps in lending were identified.

**TABLE 22  
DISTRIBUTION OF 2019 SMALL BUSINESS LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
WICHITA METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
Low	1	500	1.2	2.4	5.1	5.7	5.8
Moderate	29	7,083	35.8	34.1	26.0	31.8	27.8
Middle	16	3,317	19.8	16.0	27.2	25.4	29.5
Upper	35	9,892	43.2	47.6	39.7	36.5	36.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	2.0	0.6	0.0

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.

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

The bank's lending has good penetration among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is excellent. The bank's 2019 loan originations to low-income borrowers were above aggregate lending data by number and by dollar but were below the demographic figure by number. Lending to moderate-income borrowers was above aggregate lending data by number and by dollar and was above the demographic figure.

The bank's lending performance for 2018 was consistent with 2019.

Home Purchase Loans

The borrower distribution of home purchase lending is excellent. The bank's 2019 loan originations to low-income borrowers were above aggregate lending data by number and by dollar but were below the

demographic figure by number. Lending to moderate-income borrowers was above aggregate lending data by number and by dollar and was above the demographic figure.

The bank's lending performance for 2018 was weaker than 2019, as lending to low-income borrowers was comparable to aggregate lending data by number and by dollar.

#### Home Refinance Loans

The borrower distribution of home refinance lending is adequate. The bank's 2019 loan originations to low-income borrowers were above aggregate lending data by number and by dollar but were below the demographic figure. Lending to moderate-income borrowers was below aggregate lending data by number and by dollar and was below the demographic figure. Additional performance context considered in determining the rating for this product included the high number of loans to individuals with unknown incomes, as this skewed the breakdown of the bank's data for comparison purposes. When factoring out loans with unknown incomes from both the bank's lending and aggregate lending data, the bank's lending performance to low-income borrowers was above aggregate lending data by number and comparable for moderate-income borrowers.

The bank's lending performance for 2018 was consistent with 2019.

**TABLE 23  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
WICHITA METROPOLITAN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	14	1,273	11.1	5.3	7.0	3.2	20.5
Moderate	31	3,993	24.6	16.7	18.0	12.0	17.5
Middle	23	3,642	18.3	15.2	21.3	17.8	21.1
Upper	43	10,479	34.1	43.8	34.0	41.1	40.9
Unknown	15	4,543	11.9	19.0	19.7	25.9	0.0
<b>Home Purchase Loans</b>							
Low	11	963	12.4	6.5	7.8	3.9	20.5
Moderate	28	3,742	31.5	25.4	20.5	15.2	17.5
Middle	19	2,906	21.3	19.7	22.4	21.4	21.1
Upper	27	6,457	30.3	43.8	31.2	43.6	40.9
Unknown	4	667	4.5	4.5	18.1	15.9	0.0
<b>Home Refinance Loans</b>							
Low	3	310	8.6	3.8	5.6	2.8	20.5
Moderate	3	251	8.6	3.0	15.5	9.9	17.5
Middle	4	736	11.4	8.9	20.6	16.4	21.1
Upper	14	3,072	40.0	37.3	39.1	49.5	40.9
Unknown	11	3,876	31.4	47.0	19.1	21.5	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	8.0	5.3	20.5
Moderate	0	0	0.0	0.0	16.1	12.5	17.5
Middle	0	0	0.0	0.0	18.9	18.8	21.1
Upper	0	0	0.0	0.0	46.3	52.3	40.9
Unknown	0	0	0.0	0.0	10.7	11.1	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.5	0.0	20.5
Moderate	0	0	0.0	0.0	0.0	0.0	17.5
Middle	0	0	0.0	0.0	1.6	0.2	21.1
Upper	2	950	100.0	100.0	4.8	1.2	40.9
Unknown	0	0	0.0	0.0	93.0	98.6	0.0
Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 percent due to rounding.							

Small Business Lending

The borrower distribution of small business lending is adequate. The bank's 2019 loan originations to businesses with revenues of \$1MM or less were comparable to aggregate lending data by number but below by dollar and were below the demographic figure by number. While the bank's lending in 2019 was near the lower bound of what is considered comparable to aggregate lending data, additional performance context helped support the adequate rating. Statements from community leaders indicated that financial institutions are meeting the credit needs of businesses. The market is highly competitive



with numerous other financial institutions focused on commercial lending. Additionally, the percentage of small businesses in the AA is also comprised of start-ups or other small business entities that do not always qualify under traditional bank underwriting models, which attributes to the lending gap between overall demographic data and aggregate lending data.

The bank’s lending performance for 2018 was consistent with 2019; however, the bank’s performance was notably closer to aggregate lending data in 2018 and is weighted more heavily due to higher loan volume.

<b>TABLE 24 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES WICHITA METROPOLITAN AA</b>							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	23	3,295	28.4	15.8	40.4	32.6	88.9
<b>Over \$1MM</b>	57	17,396	70.4	83.7	Not Reported		10.4
<b>Unknown</b>	1	101	1.2	0.5	Not Reported		0.7
<i>Source: 2019 FFIEC Census Data 2019 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 percent due to rounding.</i>							

**Community Development Lending**

The bank makes an adequate level of CD loans. The bank originated eight CD loans totaling \$28.2MM in the AA. This included one loan supporting affordable housing for \$436.3M, three loans supporting economic development for \$16.4MM, and four loans supporting revitalization and stabilization efforts for \$11.4MM.

- Four of the CD loans were PPP loans utilized by local businesses to retain their employees and continue operations in LMI census tracts throughout the pandemic or for small businesses to retain LMI employees.

**INVESTMENT TEST**

The bank’s performance under the investment test in the Wichita Metropolitan AA is adequate. The bank has an adequate level of qualified CD investments and grants and is occasionally in a leadership position. Additionally, the bank makes occasional use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AA.

- Investments within the AA included five prior period investments totaling \$3.6MM.
- Ten donations totaling \$54.1M were made to qualifying CD organizations serving the AA.

- One donation for \$25.3M was made to a community service organization serving children living in poverty within the AA.
- Donations totaling \$11.3M were made to an organization supporting workforce development through job expansion and retention, and talent development.

## **SERVICE TEST**

The bank's performance under the service test in the Wichita Metropolitan AA is adequate.

### **Retail Banking Services**

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates four branches, including its head office, in the AA. Three of the branches possess on-site ATMs and all locations provide drive-through facilities. The branches are spread across the outskirts of Wichita, and one branch is in a moderate-income census tract. The distribution of branches is generally proportional to the percent of tracts by income level.

The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank did not open or close any branches since the prior evaluation.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby and drive-through hours are generally consistent, operating from 9:00 am to 5:00 pm on weekdays, and all but one location operates from 9:00 am to 12:00 pm on Saturday. Drive-through hours are similar but extended, and all but one location offers Saturday drive-through hours. All full-service branches offer similar products and services. While the branch located in a moderate-income census tract does not offer Saturday hours, another branch located approximately two miles away is open on Saturdays.

**TABLE 25  
RETAIL AND COMMUNITY DEVELOPMENT SERVICES  
WICHITA METROPOLITAN AA**

Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	25.0	25.0	50.0	0.0	100.0	10.9	27.7	29.9	31.4	0.0	100.0
Branch Accessibility	Location of Full-Service ATMs by Tract (%)						Percent of Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	0.0	0.0	0.0	0.0	10.9	27.7	29.9	31.4	0.0	100.0
Changes in Branch Location	Number of Branches (#)			Net Change in Branch Locations (#)								
	Total Branches	Openings (#)	Closings (#)	Low	Mod	Mid	Upp	Unk	Total			
	4	0	0	0	0	0	0	0	0			
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	0	13	0	0	13	7						

<sup>1</sup> Based on 2019 FFIEC census tract definitions.  
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

**Community Development Services**

The bank provides an adequate level of CD services.

- Multiple individuals representing the bank served as board members for organizations providing community services to LMI individuals.
- A commercial lender organized multiple fundraising events for different community non-profit organizations that support LMI individuals, providing leadership and financial expertise.

**OTHER KANSAS METROPOLITAN ASSESSMENT AREA  
(Limited-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE KANSAS METROPOLITAN AREA**

**TOPEKA METROPOLITAN AA**

The bank's AA is comprised of Shawnee County in its entirety, which is one of the five counties comprising the Topeka, Kansas MSA. Refer to Appendix C for a map of the AA.

- The AA is comprised of 5 low-, 10 moderate-, 17 middle-, and 11 upper-income census tracts. Census tract designations have not changed since the prior evaluation.
- Based on 2015 ACS data, the population in the AA was 178,792, which represented a 0.5 percent increase from the 2010 figure.
- Three of the bank's branches are located in the AA; all but one location offers an on-site ATM, and all branches provide drive-through services.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 3.1 percent market share, ranking 8<sup>th</sup> out of 19 FDIC-insured depository institutions operating in the AA.
- A previously conducted community contact was referenced during the evaluation. The individual represented an affordable housing organization serving LMI residents in the AA.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LIMITED-SCOPE KANSAS METROPOLITAN AREA**

The one Kansas metropolitan AA listed in the table below was reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures; aggregate lending comparisons; and demographic information. The conclusions regarding the bank's performance did impact the overall state rating and are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Topeka Metropolitan AA	exceeds	consistent	exceeds

**NORTHWEST KANSAS ASSESSMENT AREA  
NONMETROPOLITAN AREA  
(Full-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE NORTHWEST KANSAS AA**

The bank's AA is comprised of Trego, Ellis, Gove, Logan, Sheridan, Thomas, Decatur, and Rawlins Counties in their entirety. Refer to Appendix C for a map of the AA.

- The AA is comprised of 1 moderate-, 13 middle-, and 3 upper-income census tracts. Comparatively, the AA in 2018 was comprised of no moderate-, 14 middle-, and 3 upper-income census tracts, which is consistent with the prior evaluation.
- Five of the bank's branches are located in the AA; only one location has an on-site, cash-only ATM and three branches offer drive-through services.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 12.0 percent market share, ranking 2<sup>nd</sup> out of 23 FDIC-insured depository institutions operating in the AA.
- One previously conducted community contact was referenced during the evaluation. The contact was from an organization focused on supporting small businesses and entrepreneurship. A second community contact was conducted with a representative from an agency focused on supporting new and/or small agricultural entities in the area.

**TABLE 26  
POPULATION CHANGE**

Area	2010 Population	2015 Population	Percent Change
Northwest Kansas AA	52,840	53,378	1.0
Decatur County, KS	2,961	2,905	(1.9)
Ellis County, KS	28,452	28,993	1.9
Gove County, KS	2,695	2,735	1.5
Logan County, KS	2,756	2,793	1.3
Rawlins County, KS	2,519	2,545	1.0
Sheridan County, KS	2,556	2,531	(1.0)
Thomas County, KS	7,900	7,925	0.3
Trego County, KS	3,001	2,951	(1.7)
NonMSA Kansas	929,981	922,403	(0.8)
State of 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

- While the AA's population remained stable from 2010 to 2015, a member of the community commented that Western Kansas has been experiencing a declining population more recently.

**TABLE 27  
MEDIAN FAMILY INCOME CHANGE**

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Northwest Kansas AA	63,247	63,007	(0.4)
Decatur County, KS	48,282	54,511	12.9
Ellis County, KS	67,707	64,131	(5.3)
Gove County, KS	51,792	54,688	5.6
Logan County, KS	62,070	64,561	4.0
Rawlins County, KS	55,264	58,125	5.2
Sheridan County, KS	57,555	62,500	8.6
Thomas County, KS	70,196	68,432	(2.5)
Trego County, KS	55,809	64,500	15.6
NonMSA Kansas	57,322	57,229	(0.2)
State of Kansas	67,977	66,389	(2.3)

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

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

- While the average income of the AA changed very little from 2010 to 2015, the change in average income within each county varied significantly.
- According to the 2015 ACS, the percent of families living below the poverty threshold also varies, with the highest percentage in Logan County, at 7.9 percent, and the lowest percentage in Trego County, at 3.0 percent, compared to the AA at 6.2 percent.

**TABLE 28  
HOUSING COSTS CHANGE**

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Northwest Kansas AA	92,098	113,130	22.8	543	599	10.3
Decatur County, KS	57,300	55,900	(2.4)	424	557	31.4
Ellis County, KS	123,800	150,200	21.3	611	634	3.8
Gove County, KS	66,500	76,300	14.7	465	559	20.2
Logan County, KS	66,600	79,200	18.9	457	675	47.7
Rawlins County, KS	57,600	75,600	31.3	391	582	48.8
Sheridan County, KS	81,600	91,400	12.0	533	479	(10.1)
Thomas County, KS	83,900	105,100	25.3	448	463	3.3
Trego County, KS	69,700	86,900	24.7	481	542	12.7
NonMSA Kansas	81,447	88,625	8.8	560	623	11.3
State of Kansas	122,600	132,000	7.7	671	757	12.8

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

- The AA is less affordable than other nonmetropolitan areas of the state, with an affordability ratio of 40.9 percent compared to 50.0 percent. This is driven by the most populous counties in the AA, Ellis and Thomas, having affordability ratios of 30.4 percent and 46.2 percent, respectively.

<b>TABLE 29 UNEMPLOYMENT RATES</b>					
<b>Region</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Northwest Kansas AA	2.9	3.0	2.5	2.4	2.3
Decatur County, KS	3.6	4.0	3.1	2.9	3.0
Ellis County, KS	3.0	3.1	2.5	2.3	2.3
Gove County, KS	2.5	2.4	2.3	2.1	2.1
Logan County, KS	2.5	2.6	2.2	2.1	2.0
Rawlins County, KS	2.3	2.4	2.2	2.0	2.2
Sheridan County, KS	2.2	2.4	2.3	2.2	2.2
Thomas County, KS	2.7	2.7	2.6	2.5	2.3
Trego County, KS	3.5	4.0	3.4	3.1	2.8
NonMSA Kansas	4.1	4.1	3.5	3.1	3.1
State of Kansas	4.2	4.0	3.6	3.3	3.2

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

- Within the city of Hays (Ellis County), major employers include Hays Medical Center, Fort Hays State University, the local school district, and local government.
- According to a community member, agriculture is a major industry in Ellis County and the surrounding area. The main agricultural products are grain, sorghum, wheat, and cow/calf operations. For local agricultural producers, the federal government’s COVID-19 payments helped tremendously. Additionally, grain prices have increased. Between these two factors, 2020 was a good year for local farmers and ranchers. The community member also indicated how this has shifted agricultural credit demand to loans for purchasing new machinery and land. However, unmet credit needs for small and new farmers continue to be an issue and an opportunity exists to educate the population on financing, business strategy, and credit.
- A community member stated that to slow the AA’s declining population, some communities are trying to energize the local economy. However, the community member stated that moderate- to high-risk financing often needed by entrepreneurs or start-up businesses is an unfulfilled credit need. Historically, small community banks have originated small dollar personal loans to help community members start a business, but currently, the local lending environment has made it very challenging for start-up businesses to receive funding.

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**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NORTHWEST KANSAS AA**

**LENDING TEST**

The bank's performance under the lending test in the Northwest Kansas AA is good.

**Lending Activity**

The bank's lending activities reflect good responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. Such loans help borrowers who might not otherwise qualify for credit. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous government-sponsored lending programs, displaying flexibility in the way the bank serves its communities. Federal lending programs offered in the AA include FHA, VA, USDA Rural Development, and SBA loans.

**Geographic Distribution of Loans**

The geographic distribution of lending reflects poor penetration throughout the AA. As noted previously, the AA contained no LMI tracts in 2018, while the AA only contained one moderate-income census tract in 2019. Thus, due to the overall lack of LMI tracts, the geographic distribution received less weight than the borrower distribution in the overall lending test rating and had limited impact on the overall lending activity rating.

Home Mortgage Lending

The geographic distribution of home mortgage lending is poor. The bank's 2019 loan originations in the AA's moderate-income census tract were below aggregate lending data by number and by dollar and were below the demographic figure by number.

The bank's lending performance for 2018 was stronger than 2019; however, the AA only contained middle- and upper-income census tracts in 2018.

When evaluating loan dispersion within the AA, no significant gaps in lending were identified.



**TABLE 30  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
NORTHWEST KANSAS AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Moderate</b>	1	58	3.0	1.2	7.4	8.0	5.9
<b>Middle</b>	27	4,042	81.8	84.1	51.2	44.9	63.6
<b>Upper</b>	5	707	15.2	14.7	41.4	47.1	30.5
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business lending is poor. The bank's 2019 loan originations in its moderate-income census tract were below aggregate lending data by number and by dollar and were below the demographic figure by number.

The bank's lending performance for 2018 was stronger than 2019; however, the AA only contained middle- and upper-income census tracts in 2018.

When evaluating loan dispersion within the AA, no significant gaps in lending were identified.

Small Farm Lending

The geographic distribution of small farm lending is adequate. The bank's 2019 loan originations in its moderate-income census tract were comparable to aggregate lending data by number and by dollar and were comparable to the demographic figure by number.

The bank's lending performance for 2018 was consistent with 2019.

When evaluating loan dispersion within the AA, no significant gaps in lending were identified.

**TABLE 31  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
NORTHWEST KANSAS AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Moderate</b>	11	1,449	7.7	12.6	13.4	21.2	12.0
<b>Middle</b>	124	8,822	86.7	76.5	56.2	54.1	59.9
<b>Upper</b>	8	1,268	5.6	11.0	26.9	23.5	28.1
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	3.5	1.3	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Moderate</b>	2	430	0.5	1.0	0.8	0.9	1.0
<b>Middle</b>	360	42,032	97.0	97.5	89.0	91.9	81.0
<b>Upper</b>	9	634	2.4	1.5	9.9	7.2	18.0
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	0.3	0.0	0.0

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

*NOTE: Percentages may not add up to 100.0 percent due to rounding.*

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

The bank’s lending has a good penetration among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The bank's 2019 loan originations to low-income borrowers were comparable to aggregate lending data by number and by dollar but were below the demographic figure by number. Lending to moderate-income borrowers was comparable to aggregate lending data by number but below by dollar and was comparable to the demographic figure.

The bank’s lending performance for 2018 was stronger than 2019. Lending to low-income borrowers was above aggregate lending data by number and by dollar and was comparable to the demographic figure. Additionally, lending to moderate-income borrowers was above aggregate lending data by dollar.

**TABLE 32  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
NORTHWEST KANSAS AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	3	160	9.1	3.3	7.5	4.2	16.5
<b>Moderate</b>	4	270	12.1	5.6	18.1	12.8	16.0
<b>Middle</b>	5	575	15.2	12.0	22.3	20.1	22.3
<b>Upper</b>	15	2,477	45.5	51.5	35.7	41.6	45.2
<b>Unknown</b>	6	1,325	18.2	27.6	16.4	21.4	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.

Small Business Lending

The borrower distribution of small business lending is good. The bank's 2019 loan originations to businesses with revenues of \$1MM or less were above aggregate lending data by number and comparable by dollar and were comparable to the demographic figure by number.

The bank's lending performance for 2018 was weaker than 2019. Lending to businesses with revenues of \$1MM or less was comparable to aggregate lending data by number and by dollar but below the demographic figure.

Small Farm Lending

The borrower distribution of small farm lending is excellent. The bank's 2019 loan originations to farms with revenues of \$1MM or less were above aggregate lending data by number and comparable by dollar and were comparable to the demographic figure by number.

The bank's lending performance for 2018 was consistent with 2019.

**TABLE 33  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
NORTHWEST KANSAS AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	106	6,215	74.1	53.9	48.0	47.3	90.5
<b>Over \$1MM</b>	32	5,270	22.4	45.7	Not Reported		7.5
<b>Unknown</b>	5	54	3.5	0.5			1.9
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	301	30,462	81.1	70.7	60.3	70.1	98.4
<b>Over \$1MM</b>	64	11,727	17.3	27.2	Not Reported		1.6
<b>Unknown</b>	6	907	1.6	2.1			0.0

*Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey*  
**NOTE:** Percentages may not add up to 100.0 percent due to rounding.

**Community Development Lending**

The bank makes an adequate level of CD loans. The bank originated three CD loans totaling \$5.6MM in the AA. This included two loans supporting economic development for \$4.1MM and one loan supporting revitalization and stabilization efforts for \$1.5MM.

- One CD loan was a PPP loan for a local business to retain their employees and continue its operations in an underserved middle-income census tract throughout the pandemic.
- Two CD loans were SBA 7(a) loans that supported job creation by a small business in the area.

**INVESTMENT TEST**

The bank’s performance under the investment test in the Northwest Kansas AA is adequate. The bank has an adequate level of qualified CD investments and grants and is occasionally in a leadership position. Additionally, the bank makes occasional use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AA.

- Investments within the AA included one prior period investment totaling \$1.4MM.
- Eleven donations totaling \$24.2M were made to qualifying CD organizations serving the AA.
- One donation for \$5.0M supported an organization providing revitalization and stabilization activities in an underserved and distressed county.
- One donation for \$5.0M was to a hospital to support healthcare in an underserved county.

**SERVICE TEST**

The bank’s performance under the service test in the Northwest Kansas AA is adequate.

**Retail Banking Services**

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank’s various geographies and to individuals of different income levels in the AA. The bank operates five branches in the AA. One branch provides an on-site, cash-only ATM and three branches offer drive-through facilities. The branches are spread across the AA in small, rural towns and the distribution is generally proportional to the percent of tracts by income level, particularly as a significant majority of the census tracts in the AA are middle-income. Additionally, one branch is located adjacent to the only moderate-income tract in the AA.

The bank’s record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank did not open or close any branches since the prior evaluation.

The bank’s products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby and drive-through hours are generally consistent, operating from either 8:30 am to 3:00 pm or 9:00 am to 4:00 pm on weekdays. Drive-through hours are extended, and two branches offer Saturday drive-through hours. All branches offer similar products and services.

**TABLE 34  
RETAIL AND COMMUNITY DEVELOPMENT SERVICES  
NORTHWEST KANSAS AA**

Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	100.0	0.0	0.0	100.0	0.0	5.9	76.5	17.6	0.0	100.0
Changes in Branch Location	Location of Full-Service ATMs by Tract (%)						Percent of Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	0.0	0.0	0.0	0.0	0.0	5.9	76.5	17.6	0.0	100.0
Community Development Services	Number of Branches (#)			Net Change in Branch Locations (#)								
	Total Branches	Openings (#)	Closings (#)	Low	Mod	Mid	Upp	Unk	Total			
	5	0	0	0	0	0	0	0	0			
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	3	0	2	0	5	3						

<sup>1</sup> Based on 2019 FFIEC census tract definitions.  
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

### **Community Development Services**

The bank provides an adequate level of CD services.

- Multiple individuals representing the bank served as board members or in other officer roles at economic development and affordable housing organizations within the AA.

**OTHER KANSAS NONMETROPOLITAN ASSESSMENT AREAS**  
(Limited-Scope Reviews)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE KANSAS  
NONMETROPOLITAN AREAS**

**SOUTHEAST KANSAS AA**

The bank's AA is comprised of Wilson, Montgomery, Crawford, and Neosho Counties in their entireties. Refer to Appendix C for a map of the AA.

- The AA is comprised of 11 moderate-, 21 middle-, and 1 upper-income census tract. Census tract delineations have not changed since the prior evaluation.
- Based on 2015 ACS data, the population in the AA was 98,972, which represented a 1.5 percent decrease from the 2010 figure.
- Four of the bank's branches are located in the AA; all locations offer an on-site, cash-only ATM and drive-through services.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 4.6 percent market share, ranking 9th out of 19 FDIC-insured depository institutions operating in the AA.
- A previously conducted community contact was referenced during the evaluation. The contact was a city representative involved in CD and affordable housing in the AA.

**SOUTHWEST KANSAS AA**

The bank's AA is comprised of Meade, Morton, Seward, Stanton, and Stevens Counties in their entireties. Refer to Appendix C for a map of the AA.

- The AA is comprised of two moderate-, eight middle-, and one upper-income census tract. Comparatively, the AA in 2018 was comprised of two moderate-, seven middle-, and two upper-income census tracts, which is consistent with the prior evaluation.
- Based on 2015 ACS data, the population in the AA was 38,684, which was consistent with the 2010 figure of 38,719.
- Five of the bank's branches are located in the AA; all locations offer an on-site ATM and all but one branch provide drive-through services. Two of the ATMs are full-service.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 30.4 percent market share, ranking 1<sup>st</sup> out of 12 FDIC-insured depository institutions operating in the AA.
- A previously conducted community contact was referenced during the evaluation. The individual represented an organization focused on supporting businesses and entrepreneurship in the AA.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LIMITED-SCOPE KANSAS  
NONMETROPOLITAN AREAS**

The two Kansas AAs listed in the table below were reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance did impact the overall state rating and are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Southeast Kansas AA	exceeds	consistent	consistent
Southwest Kansas AA	consistent	below	exceeds



**STATE OF ARKANSAS**

**CRA RATING FOR ARKANSAS:**

*The lending test is rated:*

*The investment test is rated:*

*The service test is rated:*

**Satisfactory**

*High Satisfactory*

*Low Satisfactory*

*High Satisfactory*

Major factors supporting the rating include:

Lending Test

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

Investment Test

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

Service Test

- The bank's delivery systems are reasonably accessible to geographies and/or individuals of different income levels throughout its AAs.
- The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals.
- The bank provides a relatively high level of CD services within its Arkansas AAs and is responsive to its available service opportunities.

**SCOPE OF EXAMINATION**

The scope of the review for the state of Arkansas was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests.

A full-scope review was conducted for the Ozark Mountain AA. The overall state rating was based predominantly on the bank's performance in this AA.

A limited-scope review was conducted for the Benton County Metropolitan AA to ascertain if the bank's performance in this area was generally consistent with its performance in the overall state.

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

The bank delineates 2 of its 13 AAs and operates 5 of its 51 branches in the state of Arkansas. Loan and deposit products and services offered in the state mirror those discussed in the overall institution section of this report, with a primary emphasis on commercial and residential real estate lending, and to a lesser extent, agricultural lending. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

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

### **LENDING TEST**

The bank's performance under the lending test in the state of Arkansas is high satisfactory. The Ozark Mountain AA rating is good.

#### **Lending Activity**

The bank's lending activities in the state of Arkansas reflect good responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. Such loans help borrowers who might not otherwise qualify for credit. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous government-sponsored lending programs, displaying flexibility in the way the bank serves its communities. Federal lending programs offered in the bank's Arkansas AAs include FHA, VA, USDA Rural Development, and SBA loans. For 2019, the bank originated the following:

- 14 FHA loans totaling \$1.8MM
- 9 VA loans totaling \$1.2MM
- 37 USDA Rural Development loans totaling \$4.4MM

#### **Geographic Distribution of Loans**

The bank's overall geographic distribution of lending within Arkansas reflects adequate penetration throughout its AAs. The distribution of loans across different geographies also is adequate in the Ozark Mountain AA.

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

The bank's lending within Arkansas has an overall good penetration among individuals of different income levels and businesses and farms of different sizes. Additionally, the distribution of loans to borrowers of different income levels and to businesses and farms of different sizes is good in the Ozark Mountain AA.

### **Community Development Lending**

In the state of Arkansas, the bank provides an adequate level of CD loans. The bank originated three CD loans totaling \$7.3MM in its AAs within the state. This included one loan supporting affordable housing for \$3.4MM, one loan supporting community services for \$10.0M, and one loan supporting economic development for \$3.8MM.

- One of the CD loans was a PPP loan utilized by a local small business to retain LMI employees and continue its operations throughout the pandemic.

### **INVESTMENT TEST**

The bank's performance under the investment test in the state of Arkansas is low satisfactory. The Ozark Mountain AA rating is adequate.

The bank has an adequate level of qualified CD investments and grants and is occasionally in a leadership position. Additionally, the bank makes occasional use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AAs.

- Investments included 7 prior period investments totaling \$1.4MM and 11 donations totaling \$8.6M.
- Five of the qualified CD investments benefited areas outside the bank's Arkansas AAs, comprising \$975.0M of the total.
- Most donations were made to organizations that provide community services to LMI individuals or areas, totaling \$3.7M.

### **SERVICE TEST**

The bank's performance under the service test in the state of Arkansas is high satisfactory. The Ozark Mountain AA rating is good.

### **Retail Banking Services**

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of

different income levels in each AA. All branches offer drive-through services and on-site ATMs, of which two ATMs are full-service. Additionally, seven stand-alone, cash-only ATMs are available across the AAs. The distribution of branches within the bank's Arkansas AAs is generally proportional to the percent of tracts by income level.

The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the prior evaluation, the bank did not open or close any branches in the state.

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. Lobby and drive-through hours are generally consistent across the AAs, operating from 8:00 am to 5:00 pm on weekdays, with more extended drive-through hours. Additionally, all but one branch offers Saturday hours, and all locations offer similar products and services.

### **Community Development Services**

The bank provides a relatively high level of CD services in its Arkansas AAs. Bank staff provided 12 CD services within the Arkansas AAs. While the bank provides a relatively high level of CD services in the Ozark Mountain AA, no qualified services were provided in the bank's limited-scope Benton County Metropolitan AA.

**OZARK MOUNTAIN ASSESSMENT AREA  
NONMETROPOLITAN AREA  
(Full-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE OZARK MOUNTAIN AA**

The bank's AA is comprised of Boone County and Carroll County in their entireties. Refer to Appendix C for a map of the AA.

- The AA is comprised of 10 middle- and 2 upper-income census tracts. Census tract delineations have not changed since the prior evaluation.
- Four of the bank's branches are located in the AA; all branches offer an on-site ATM and drive-through services.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 20.2 percent market share, ranking second out of nine FDIC-insured depository institutions operating in the AA.
- One previously conducted community contact was referenced during the evaluation. The individual represented an organization focused on economic development in the region. A second contact was conducted with a representative of a business development organization in the AA.

**TABLE 35  
POPULATION CHANGE**

<b>Area</b>	<b>2010 Population</b>	<b>2015 Population</b>	<b>Percent Change</b>
Ozark Mountain AA	64,349	64,862	0.8
Boone County, AR	36,903	37,227	0.9
Carroll County, AR	27,446	27,635	0.7
NonMSA Arkansas	1,145,380	1,133,475	(1.0)
State of Arkansas	2,915,918	2,958,208	1.5

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

- In 2019, the largest town in Boone County was Harrison, with a population of 13,080, and is the location of two bank branches. In Carroll County, the largest town was Berryville, with a population of 5,550, where the bank has a third branch location.
- A community contact stated that during the COVID-19 pandemic the city of Harrison experienced an influx of new residents.

**TABLE 36  
MEDIAN FAMILY INCOME CHANGE**

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Ozark Mountain AA	48,063	45,895	(4.5)
Boone County, AR	50,097	46,267	(7.6)
Carroll County, AR	45,770	45,548	(0.5)
NonMSA Arkansas	45,275	45,047	(0.5)
State of Arkansas	52,804	51,782	(1.9)

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.

- The affordability ratio within the AA indicates that the area is relatively less affordable, at 33.7 percent, than other nonmetropolitan areas in the state at 41.0 percent. Within the AA, Carroll County is the least affordable county at 31.8 percent.
- A community member stated that wages have recently increased approximately \$2.50/hour to try and attract the unemployed to rejoin the workforce post-pandemic.

**TABLE 37  
HOUSING COSTS CHANGE**

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Ozark Mountain AA	110,918	113,259	2.1	543	603	11.0
Boone County, AR	105,700	111,700	5.7	532	596	12.0
Carroll County, AR	119,500	116,200	(2.8)	556	622	11.9
NonMSA Arkansas	78,904	85,869	8.8	535	588	9.9
State of Arkansas	102,300	111,400	8.9	617	677	9.7

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

- The AA has a higher percentage of owner-occupied housing than other nonmetropolitan areas in the state, with 62.2 percent of housing owner-occupied compared to 56.4 percent in other nonmetropolitan areas.
- A community contact stated affordable housing is an ongoing need, as median housing costs in the AA remain higher than other nonmetropolitan areas in the state.
- Another community member stated the city of Harrison and other surrounding towns lack both starter homes and second homes for new residents and workers attracted to the AA. Current local builders are choosing to construct only large custom homes; therefore, government and local economic development organizations are working to attract regional suburban home builders. The community member further stated there are multiple areas available and zoned for large housing developments locally.
- Another housing need mentioned by a community member is higher-end apartments for single professionals or families that are new to the area. Available apartment complexes currently are located in low-income areas.

**TABLE 38  
UNEMPLOYMENT RATES**

<b>Region</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Ozark Mountain AA	4.7	3.6	3.4	3.3	3.2
Boone County, AR	4.9	3.7	3.4	3.5	3.2
Carroll County, AR	4.6	3.6	3.3	3.2	3.1
NonMSA Arkansas	6.0	4.9	4.4	4.3	4.3
State of Arkansas	5.0	4.0	3.7	3.6	3.5

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Manufacturing is a major industry in the AA. Primary industrial and manufacturing employers include the FedEx global headquarters and freight operations, Pace Industries, Claridge Products, Wabash National, and multiple injection molding companies. Other main employers include a regional hospital, local community college, and public-school system.
- Tourism and agriculture also are important economic drivers in the AA. The area offers access to the Ozark Mountains, Buffalo River, and five major sport fishing lakes, making outdoor tourism important to local businesses. The AA’s primary agricultural products are cattle and poultry.
- A community member stated the local economy is currently strong, only losing one retail business during the COVID-19 pandemic. Currently, businesses are struggling to find workers to fill both manufacturing and retail jobs, and some businesses have resorted to hiring temporary contract workers from other states.
- A community contact stated that local community banks are successfully serving the financial needs of area residents and businesses and are the preferred lenders locally, rather than large national banks. The community contact further stated that creditworthy applicants have no trouble receiving loans locally.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE OZARK MOUNTAIN AA**

**LENDING TEST**

The bank’s performance under the lending test in the Ozark Mountain AA is good.

**Lending Activity**

The bank’s lending activities reflect good responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. Such loans help borrowers who might not otherwise qualify for credit. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous government-sponsored lending programs, displaying flexibility in the way the bank serves its communities. Federal lending programs offered in the AA include FHA, VA, USDA Rural Development, and SBA loans.

## **Geographic Distribution of Loans**

The geographic distribution of lending reflects adequate penetration throughout the AA. While a geographic distribution analysis was performed, less weight was placed on this performance standard in the overall lending test rating because only middle- and upper-income census tracts were present in the AA.

### Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The bank's 2019 loan originations in middle-income census tracts were comparable to aggregate lending data by number and by dollar and were comparable to the demographic figure by number. Lending in upper-income census tracts was comparable to aggregate lending data by number and by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was consistent with 2019.

The dispersion of home mortgage lending is evaluated independently for each product, and no significant lending gaps were identified for either product.

### Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The bank's 2019 loan originations in middle-income census tracts were comparable to aggregate lending data by number and by dollar and were comparable to the demographic figure by number. Lending in upper-income census tracts was comparable to aggregate lending data by number and by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was consistent with 2019.

When evaluating loan dispersion within the AA, no significant gaps in lending were identified.

### Home Refinance Loans

The geographic distribution of home refinance lending is adequate. The bank's 2019 loan originations in middle-income census tracts were comparable to aggregate lending data by number and by dollar and were comparable to the demographic figure by number. Lending in upper-income census tracts was comparable to aggregate lending data by number and by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was consistent with 2019.

When evaluating loan dispersion within the AA, no significant gaps in lending were identified.



**TABLE 39  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
OZARK MOUNTAIN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
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	186	21,980	76.2	71.9	74.0	68.2	75.3
Upper	58	8,580	23.8	28.1	26.0	31.8	24.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
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	111	14,518	74.5	73.4	74.3	68.7	75.3
Upper	38	5,274	25.5	26.6	25.7	31.3	24.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
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	66	6,144	78.6	66.2	73.4	66.2	75.3
Upper	18	3,135	21.4	33.8	26.6	33.8	24.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
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	4	366	100.0	100.0	84.8	77.2	75.3
Upper	0	0	0.0	0.0	15.2	22.8	24.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
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	5	952	71.4	84.8	72.7	79.5	83.3
Upper	2	171	28.6	15.2	27.3	20.5	16.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business lending is adequate. The bank's 2019 loan originations in middle-income census tracts were comparable to aggregate lending data by number and by dollar and were comparable to the demographic figure by number. Lending in upper-income census tracts was comparable to aggregate lending data by number and above by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was consistent with 2019.

When evaluating loan dispersion within the AA, no significant gaps in lending were identified.

Small Farm Lending

The geographic distribution of small farm lending is adequate. The bank's 2019 loan originations in middle-income census tracts were comparable to aggregate lending data by number and by dollar and were comparable to the demographic figure by number. Lending in upper-income census tracts was comparable to aggregate lending data by number and by dollar and was above the demographic figure.

The bank's lending performance for 2018 was consistent with 2019.

When evaluating loan dispersion within the AA, no significant gaps in lending were identified.

**TABLE 40  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
OZARK MOUNTAIN AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
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	161	13,119	78.9	70.8	76.9	80.9	82.9
Upper	43	5,400	21.1	29.2	20.7	18.7	17.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	2.4	0.3	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
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	116	6,128	76.8	78.5	79.2	79.7	82.1
Upper	35	1,682	23.2	21.5	20.1	20.2	17.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.7	0.1	0.0

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.

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

The bank’s lending has a good penetration among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is good. The bank's 2019 loan originations to low-income borrowers were above aggregate lending data by number and by dollar but were below the demographic figure by number. Lending to moderate-income borrowers was above aggregate lending data by number and by dollar and exceeded the demographic figure.

The bank’s lending performance for 2018 was weaker than 2019. Lending to low-income borrowers was comparable to aggregate lending data by number and by dollar. Additionally, lending to moderate-income borrowers was comparable to aggregate lending data by number.

Home Purchase Loans

The borrower distribution of home purchase lending is good. The bank's 2019 loan originations to low-income borrowers were above aggregate lending data by number and by dollar but were below the

demographic figure by number. Lending to moderate-income borrowers was above aggregate lending data by number and by dollar and was above the demographic figure.

The bank's lending performance for 2018 was weaker than 2019. Lending to low-income borrowers was comparable to aggregate lending data by number and by dollar. Additionally, lending to moderate-income borrowers was comparable to the demographic figure.

#### Home Refinance Loans

The borrower distribution of home refinance lending is good. The bank's 2019 loan originations to low-income borrowers were above aggregate lending data by number and by dollar but were below the demographic figure by number. Lending to moderate-income borrowers was comparable to aggregate lending data by number and above by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was weaker than 2019. Lending to low-income borrowers was comparable to aggregate lending data by number and by dollar. Additionally, lending to moderate-income borrowers was comparable to aggregate lending data by dollar.

**TABLE 41  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
OZARK MOUNTAIN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	17	1,156	7.0	3.8	4.1	2.0	17.7
Moderate	49	4,792	20.1	15.7	15.6	10.7	18.1
Middle	40	4,804	16.4	15.7	17.1	14.4	23.3
Upper	102	15,783	41.8	51.6	42.8	50.9	41.0
Unknown	36	4,025	14.8	13.2	20.4	22.0	0.0
<b>Home Purchase Loans</b>							
Low	8	696	5.4	3.5	3.6	2.0	17.7
Moderate	34	3,438	22.8	17.4	17.7	12.5	18.1
Middle	35	4,415	23.5	22.3	18.5	16.5	23.3
Upper	60	9,800	40.3	49.5	40.1	49.8	41.0
Unknown	12	1,443	8.1	7.3	20.1	19.3	0.0
<b>Home Refinance Loans</b>							
Low	8	443	9.5	4.8	4.8	2.1	17.7
Moderate	12	1,024	14.3	11.0	13.0	8.7	18.1
Middle	5	389	6.0	4.2	15.2	12.0	23.3
Upper	39	5,627	46.4	60.6	48.6	57.5	41.0
Unknown	20	1,796	23.8	19.4	18.4	19.7	0.0
<b>Home Improvement Loans</b>							
Low	1	17	25.0	4.6	6.5	2.1	17.7
Moderate	1	53	25.0	14.5	15.2	11.2	18.1
Middle	0	0	0.0	0.0	17.4	16.8	23.3
Upper	2	296	50.0	80.9	47.8	61.6	41.0
Unknown	0	0	0.0	0.0	13.0	8.2	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	17.7
Moderate	2	0	28.6	24.7	9.1	3.1	18.1
Middle	0	0	0.0	0.0	0.0	0.0	23.3
Upper	1	60	14.3	5.3	13.6	16.2	41.0
Unknown	4	786	57.1	70.0	77.3	80.7	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.

### Small Business Lending

The borrower distribution of small business lending is excellent. The bank's 2019 loan originations to businesses with revenues of \$1MM or less were above aggregate lending data by number and by dollar and were comparable to the demographic figure by number.

The bank's lending performance for 2018 was consistent with 2019.

Small Farm Lending

The borrower distribution of small farm lending is good. The bank's 2019 loan originations to farms with revenues of \$1MM or less were comparable to aggregate lending data by number and by dollar and were comparable to the demographic figure by number.

The bank's lending performance for 2018 was weaker than 2019.

<b>TABLE 42 DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING BY REVENUE SIZE OF BUSINESSES AND FARMS OZARK MOUNTAIN AA</b>							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	156	12,597	76.5	68.0	51.3	50.2	92.6
<b>Over \$1MM</b>	37	5,314	18.1	28.7	Not Reported		6.1
<b>Unknown</b>	11	608	5.4	3.3	Not Reported		1.4
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	138	6,995	91.4	89.6	77.3	77.4	98.1
<b>Over \$1MM</b>	3	439	2.0	5.6	Not Reported		0.6
<b>Unknown</b>	10	376	6.6	4.8	Not Reported		1.3

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.

**Community Development Lending**

The bank makes an adequate level of CD loans. The bank originated three CD loans totaling \$7.3MM in the AA. This included one loan supporting affordable housing for \$3.4MM, one loan supporting community services for \$10.M, and one loan supporting economic development for \$3.8MM.

- One CD loan was a PPP loan utilized by a local small business to retain LMI employees and continue its operations throughout the pandemic.

## **INVESTMENT TEST**

The bank's performance under the investment test in the Ozark Mountain AA is adequate. The bank has an adequate level of qualified CD investments and grants and is occasionally in a leadership position. Additionally, the bank makes occasional use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AA.

- Investments within the AA included two prior period investments totaling \$437.7M.
- Eleven donations totaling \$8.7M were made to qualifying CD organizations serving the AA.
- One donation for \$5.0M was made to an affordable housing organization focused on education, providing community members with resources and connections to financial institutions, and to stimulate development.

## **SERVICE TEST**

The bank's performance under the service test in the Ozark Mountain AA is good.

### **Retail Banking Services**

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates four branches in the AA. All branches provide on-site ATMs and drive-through facilities, and the bank operates seven additional stand-alone, cash-only ATMs in the AA. The branches are spread across the AA in small, rural towns and the distribution is generally proportional to the percent of tracts by income level, particularly as a significant majority of the census tracts in the AA are middle-income. During the COVID-19 pandemic, the bank also converted two on-site ATMs to full-service in support of its customers.

The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank did not open or close any branches since the prior evaluation.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours are generally consistent, operating from 8:00 am to 5:00 pm on weekdays, and one branch location also offers Saturday hours. Drive-through hours are extended, with all but one location offering drive-through hours on Saturday. The branch without Saturday hours is located approximately two miles from another branch. All branches offer similar products and services.

<b>TABLE 43 RETAIL AND COMMUNITY DEVELOPMENT SERVICES OZARK MOUNTAIN AA</b>												
<b>Branch Accessibility</b>	<b>Location of Branches by Tract (%)</b>						<b>Percent of Tracts<sup>1</sup> (%)</b>					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	100.0	0.0	0.0	100.0	0.0	0.0	83.3	16.7	0.0	100.0
	<b>Location of Full-Service ATMs by Tract (%)</b>						<b>Percent of Tracts<sup>1</sup> (%)</b>					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	0.0	100.0	0.0	0.0	100.0	0.0	0.0	83.3	16.7	0.0	100.0	
<b>Changes in Branch Location</b>	<b>Number of Branches (#)</b>			<b>Net Change in Branch Locations (#)</b>								
	Total Branches	Openings (#)	Closings (#)	Low	Mod	Mid	Upp	Unk	Total			
	4	0	0	0	0	0	0	0	0			
<b>Community Development Services</b>	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	3	8	1	0	12	5						
<sup>1</sup> Based on 2019 FFIEC census tract definitions. (NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)												

**Community Development Services**

The bank provides a relatively high level of CD services.

- Many individuals representing the bank have served as long-standing board members at impactful community service and affordable housing organizations within the AA. Specifically, a regional president served on the board of an organization that provides affordable housing for individuals who receive Medicaid assistance.



**OTHER ARKANSAS METROPOLITAN ASSESSMENT AREA  
(Limited-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE ARKANSAS METROPOLITAN AREA**

**Benton County Metropolitan AA**

The bank's AA is comprised of Benton County in its entirety, which is one of three counties included in the Fayetteville-Springdale-Rogers, Arkansas MSA. Refer to Appendix C for a map of the AA.

- The AA is comprised of 1 low-, 4 moderate-, 27 middle-, and 17 upper-income census tracts. Comparatively, the AA in 2018 was comprised of 1 low-, 2 moderate-, 28 middle-, and 18 upper-income census tracts, which is consistent with the prior evaluation.
- Based on 2015 ACS data, the population for the AA was 238,198, which represented a 7.1 percent increase from the 2010 figure.
- One of the bank's branches is located in the AA and offers an on-site ATM and drive-through services.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 0.4 percent market share, ranking 21<sup>st</sup> out of 28 FDIC-insured depository institutions operating in the AA.
- One previously conducted community contact was referenced during the evaluation. The individual represented an organization focused on economic development in the region.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LIMITED-SCOPE ARKANSAS METROPOLITAN AREA**

The Arkansas AA listed in the table below was reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance did not significantly impact the overall state rating and are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Benton County Metropolitan AA	consistent	below	below

**STATE OF MISSOURI / WESTERN MISSOURI ASSESSMENT AREA  
NONMETROPOLITAN AREA  
(Full-Scope Review)**

***CRA RATING FOR MISSOURI:***

*The lending test is rated:*

*The investment test is rated:*

*The service test is rated:*

***Satisfactory***

***High Satisfactory***

***Needs to Improve***

***Low Satisfactory***

Major factors supporting the rating include:

Lending Test

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

Investment Test

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

Service Test

- The bank's delivery systems are reasonably accessible to geographies and/or individuals of different income levels throughout its AA.
- The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals.
- The bank provides an adequate level of CD services within its Missouri AA and is responsive to its available service opportunities.

## **SCOPE OF EXAMINATION**

The scope of the review for the state of Missouri was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. Additionally, a full-scope review was conducted for the Western Missouri AA, the bank's only delineated AA in the state of Missouri. 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.

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

The bank delineates 1 of its 13 AAs and operates 7 of its 51 branches in the state of Missouri. Loan and deposit products and services offered in the state differ slightly from those discussed in the overall institution section of this report due to market demand and conditions. Equal emphasis was given to commercial, residential real estate, and agricultural lending due in determining overall conclusions. Detailed descriptions of the bank's operations in the Western Missouri AA are provided in the section that follows.

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

The bank's AA is comprised of Saline, Pettis, Benton, Henry, and Johnson Counties in their entireties. Refer to Appendix C for a map of the AA.

- The AA is comprised of 1 low-, 4 moderate-, 29 middle-, and 6 upper-income census tracts. Census tract delineations have not changed since the prior evaluation.
- Seven of the bank's branches are located in the AA. All but one location has an on-site ATM, and all branches offer drive-through services.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 15.7 percent market share, ranking 1<sup>st</sup> out of 25 FDIC-insured depository institutions operating in the AA.
- Two previously conducted community contacts were referenced during the evaluation. One contact was a representative from an economic development organization. The other contact was from an organization that assists with workforce development, housing, and other community services within the AA.

**TABLE 44  
POPULATION CHANGE**

Area	2010 Population	2015 Population	Percent Change
Western Missouri AA	159,494	160,592	0.7
Benton County, MO	19,056	18,854	(1.1)
Henry County, MO	22,272	22,034	(1.1)
Johnson County, MO	52,595	54,155	3.0
Pettis County, MO	42,201	42,215	0.0
Saline County, MO	23,370	23,334	(0.2)
NonMSA Missouri	1,556,057	1,550,288	(0.4)
State of 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

- In 2019, the largest town in the AA was Sedalia (Pettis County) with a population 21,629 and where the bank operates one branch. In Johnson County, the largest town was Warrensburg, with a population of 20,418 containing another bank branch.
- A community member stated there has been significant population growth in Sedalia recently due to local job and income growth.

**TABLE 45  
MEDIAN FAMILY INCOME CHANGE**

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Western Missouri AA	53,637	52,224	(2.6)
Benton County, MO	46,675	41,531	(11.0)
Henry County, MO	50,544	52,813	4.5
Johnson County, MO	62,024	61,236	(1.3)
Pettis County, MO	53,782	50,183	(6.7)
Saline County, MO	50,224	48,778	(2.9)
NonMSA Missouri	49,277	48,341	(1.9)
State of 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.

- A community member stated the population in Benton County and Henry County mainly consists of LMI individuals and individuals who own vacation lake houses but live primarily in larger cities.

**TABLE 46  
HOUSING COSTS CHANGE**

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Western Missouri AA	102,851	110,998	7.9	585	687	17.4
Benton County, MO	97,500	111,200	14.1	554	593	7.0
Henry County, MO	103,300	91,100	(11.8)	515	669	29.9
Johnson County, MO	133,100	141,400	6.2	653	728	11.5
Pettis County, MO	93,200	101,400	8.8	581	682	17.4
Saline County, MO	84,000	89,700	6.8	511	616	20.5
NonMSA Missouri	94,539	100,293	6.1	532	611	14.8
State of Missouri	137,700	138,400	0.5	667	746	11.8

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

- Benton County reports a significant level of vacant housing units at 41.9 percent, as compared to 16.4 percent for the AA. A community member stated the elevated number of vacant housing units in Benton County is attributed to the county encompassing a significant portion of the Lake of the Ozarks, which contains a significant number of vacation and second homes for individuals.
- Another community member mentioned that many people living in larger cities moved into their vacation lake houses in the AA during the COVID-19 pandemic; however, this is expected to be a temporary shift.

**TABLE 47  
UNEMPLOYMENT RATES**

Region	2015	2016	2017	2018	2019
Western Missouri AA	5.4	5.0	4.2	3.7	3.7
Benton County, MO	6.5	6.1	5.1	4.5	4.8
Henry County, MO	5.5	5.0	4.1	3.5	3.7
Johnson County, MO	5.4	4.9	4.4	3.6	3.7
Pettis County, MO	5.3	4.9	4.1	4.1	3.5
Saline County, MO	4.8	4.7	3.5	3.0	3.2
NonMSA Missouri	5.9	5.5	4.4	3.7	4.0
State of Missouri	5.0	4.6	3.7	3.2	3.3

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- A community member stated the leading employers in Sedalia are Tyson Foods, Stanley Black and Decker, and Interstate Studios, and manufacturing is a major industry. Additionally, Nucor Steel recently built a new steel mill which created an additional 250 new jobs for the area.
- The community member also mentioned that multiple small businesses have opened in Sedalia; however, finding operating capital when starting a business is always a challenge. The community member further stated there is a small business development center that works with the SBA and local banks to provide this needed financing, and that local banks are interested in helping to support this economic growth.

- A community member speaking about the southern portion of the AA stated that individuals and businesses generally have access to financial services, but the area has unfulfilled small farm, small business, home mortgage, and consumer credit needs. The community member further stated that financial institutions readily provide credit to current customers and those with good credit scores, but those ongoing relationships are becoming less common as larger banks acquire smaller institutions and close rural branches, particularly given that much of the local population lacks good credit quality. The community member indicated opportunities exist for banks to invest in revolving loan funds to help support the improvement of individual credit scores or support the underbanked in other innovative ways.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI / WESTERN MISSOURI AA**

### **LENDING TEST**

The bank's performance under the lending test in the state of Missouri is high satisfactory. The Western Missouri AA lending test rating is good.

#### **Lending Activity**

The bank's lending activities reflect good responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. Such loans help borrowers who might not otherwise qualify for credit. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous government-sponsored lending programs, displaying flexibility in the way the bank serves its communities. Federal lending programs offered by the bank within its Missouri markets include FHA, VA, USDA Rural Development, and SBA loans. For 2019, the bank originated the following:

- 21 FHA loans totaling \$2.9MM
- 14 VA loans totaling \$2.4MM
- 40 USDA Rural Development loans totaling \$4.1MM
- 2 SBA loans totaling \$590.4M

#### **Geographic Distribution of Loans**

The geographic distribution of lending reflects good penetration throughout the AA.

#### Home Mortgage Lending

The geographic distribution of home mortgage lending is good. The bank's 2019 loan originations in low-income census tracts were comparable to aggregate lending data by number and by dollar and were comparable to the demographic figure by number. Lending in moderate-income census tracts was above aggregate lending data by number and by dollar and was above the demographic figure.

The bank's lending performance for 2018 was weaker than 2019. Lending in moderate-income census tracts was comparable to aggregate lending data by number and the demographic figure.

The dispersion of home mortgage lending is evaluated independently for each product, and no significant lending gaps were identified for either product.

#### Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The bank's 2019 loan originations in low-income census tracts were comparable to aggregate lending data by number and comparable by dollar and were comparable to the demographic figure by number. Lending in moderate-income census tracts was comparable to aggregate lending data by number and by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was weaker than 2019, as lending in moderate-income census tracts was below aggregate lending data by number and by dollar and was below the demographic figure.

When evaluating loan dispersion within the AA, no significant gaps in lending were identified.

#### Home Refinance Loans

The geographic distribution of home refinance lending is excellent. While the bank originated no home refinance loans in low-income census tracts in 2019, the bank's performance was comparable to aggregate lending data by number and by dollar and was comparable to the demographic figure. Comparatively, the bank's lending in moderate-income census tracts was above aggregate lending data by number and by dollar and was above the demographic figure.

The bank's lending performance for 2018 was consistent with 2019.

When evaluating loan dispersion within the AA, no significant gaps in lending were identified.

**TABLE 48  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
WESTERN MISSOURI AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	1	42	0.6	0.3	0.5	0.6	0.9
Moderate	19	1,543	12.1	9.3	7.9	6.0	8.5
Middle	110	11,556	70.1	69.7	61.2	55.8	65.3
Upper	27	3,438	17.2	20.7	30.2	37.5	25.2
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.2	0.1	0.0
<b>Home Purchase Loans</b>							
Low	1	42	1.2	0.4	0.6	0.4	0.9
Moderate	5	720	6.0	7.3	8.1	6.1	8.5
Middle	64	6,897	76.2	69.8	63.6	57.3	65.3
Upper	14	2,220	16.7	22.5	27.5	36.1	25.2
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.1	0.1	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	0.2	0.1	0.9
Moderate	12	765	20.3	17.0	7.4	5.6	8.5
Middle	36	2,792	61.0	62.1	56.7	51.5	65.3
Upper	11	940	18.6	20.9	35.5	42.7	25.2
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.2	0.1	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	0.7	0.5	0.9
Moderate	2	58	25.0	17.1	10.7	9.1	8.5
Middle	5	241	62.5	71.1	62.7	71.4	65.3
Upper	1	40	12.5	11.8	26.0	18.9	25.2
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	0	0	0.0	0.0	1.9	7.0	5.2
Moderate	0	0	0.0	0.0	5.6	7.5	4.0
Middle	5	1,626	83.3	87.2	42.6	58.0	80.6
Upper	1	238	16.7	12.8	50.0	27.6	10.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.



### Small Business Lending

The geographic distribution of small business lending is good. The bank's 2019 loan originations in low-income census tracts were comparable to aggregate lending data by number and by dollar and were comparable to the demographic figure by number. Lending in moderate-income census tracts was comparable to aggregate lending data by number and by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was stronger than 2019, as lending in moderate-income census tracts was above aggregate lending data by number and the demographic figure.

When evaluating loan dispersion within the AA, no significant gaps in lending were identified.

### Small Farm Lending

The geographic distribution of small farm lending is excellent. While the bank originated no small farm loans in low-income census tracts in 2019, the bank's performance was comparable to aggregate lending data by number and by dollar and was comparable to the demographic figure. The bank's lending in moderate-income census tracts was comparable to aggregate lending data by number and by dollar and was above the demographic figure.

The bank's lending performance for 2018 was stronger than 2019, as lending in moderate-income census tracts was above aggregate lending data by number and by dollar and was above the demographic figure.

When evaluating loan dispersion within the AA, no significant gaps in lending were identified.

**TABLE 49  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
WESTERN MISSOURI AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	3	70	2.3	0.5	0.9	0.6	1.0
<b>Moderate</b>	11	1,011	8.5	7.0	7.1	7.5	8.5
<b>Middle</b>	96	11,163	74.4	77.4	65.9	69.8	68.7
<b>Upper</b>	19	2,172	14.7	15.1	24.0	21.4	21.8
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	2.1	0.7	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Moderate</b>	11	1,165	6.1	8.4	5.3	6.9	1.9
<b>Middle</b>	125	8,937	69.8	64.5	65.4	58.9	69.5
<b>Upper</b>	43	3,761	24.0	27.1	29.0	34.2	28.6
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	0.3	0.0	0.0

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.

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

The bank's lending has an excellent penetration among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is excellent. The bank's 2019 loan originations to low-income borrowers were above aggregate lending data by number and by dollar but were below the demographic figure by number. Lending to moderate-income borrowers was above aggregate lending data by number and by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was weaker than 2019, as lending to low-income borrowers was comparable to aggregate lending data by number and by dollar.

Home Purchase Loans

The borrower distribution of home purchase lending is excellent. The bank's 2019 loan originations to low-income borrowers were above aggregate lending data by number and by dollar but were below the demographic figure by number. Lending to moderate-income borrowers was above aggregate lending data by number and by dollar and was above the demographic figure.

The bank's lending performance for 2018 was consistent with 2019.

Home Refinance Loans

The borrower distribution of home refinance lending is good. The bank's 2019 loan originations to low-income borrowers were above aggregate lending data by number and by dollar but were below the demographic figure by number. Lending to moderate-income borrowers was above aggregate lending data by number and by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was weaker than 2019. Lending to low-income borrowers was comparable to aggregate lending data by number but below by dollar and was below the demographic figure. Additionally, lending to moderate-income borrowers was below aggregate lending data by number and by dollar and was below the demographic figure.

**TABLE 50  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
WESTERN MISSOURI AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	14	791	8.9	4.8	4.4	2.2	17.3
Moderate	30	2,279	19.1	13.7	12.9	8.2	17.7
Middle	36	4,096	22.9	24.7	19.9	16.7	20.8
Upper	59	7,239	37.6	43.7	40.0	45.1	44.2
Unknown	18	2,174	11.5	13.1	22.8	27.8	0.0
<b>Home Purchase Loans</b>							
Low	6	417	7.1	4.2	4.1	2.1	17.3
Moderate	19	1,743	22.6	17.6	14.9	9.9	17.7
Middle	25	3,015	29.8	30.5	23.3	21.0	20.8
Upper	28	4,005	33.3	40.5	37.2	46.4	44.2
Unknown	6	699	7.1	7.1	20.4	20.5	0.0
<b>Home Refinance Loans</b>							
Low	5	244	8.5	5.4	4.3	2.0	17.3
Moderate	10	506	16.9	11.3	9.1	5.7	17.7
Middle	11	1,081	18.6	24.0	15.2	11.2	20.8
Upper	25	2,041	42.4	45.4	44.3	47.7	44.2
Unknown	8	625	13.6	13.9	27.1	33.4	0.0
<b>Home Improvement Loans</b>							
Low	3	130	37.5	38.3	8.7	5.1	17.3
Moderate	1	30	12.5	8.8	14.7	11.0	17.7
Middle	0	0	0.0	0.0	10.7	10.7	20.8
Upper	3	104	37.5	30.7	60.7	59.6	44.2
Unknown	1	75	12.5	22.1	5.3	13.7	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	1.9	3.0	17.3
Moderate	0	0	0.0	0.0	0.0	0.0	17.7
Middle	0	0	0.0	0.0	1.9	1.1	20.8
Upper	3	1,089	50.0	58.4	46.3	14.3	44.2
Unknown	3	775	50.0	41.6	50.0	81.6	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.

### Small Business Lending

The borrower distribution of small business lending is excellent. The bank's 2019 loan originations to businesses with revenues of \$1MM or less were above aggregate lending data by number and by dollar and were comparable to the demographic figure by number.

The bank's lending performance for 2018 was consistent with 2019.

Small Farm Lending

The borrower distribution of small farm lending is excellent. The bank's 2019 loan originations to farms with revenues of \$1MM or less were above aggregate lending data by number and comparable by dollar and were comparable to the demographic figure by number.

The bank's lending performance for 2018 was consistent with 2019.

<b>TABLE 51 DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING BY REVENUE SIZE OF BUSINESSES AND FARMS WESTERN MISSOURI AA</b>							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	101	7,254	78.3	50.3	49.0	37.3	91.5
<b>Over \$1MM</b>	28	7,162	21.7	49.7	Not Reported		7.0
<b>Unknown</b>	0	0	0.0	0.0	Not Reported		1.5
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	168	12,585	93.9	90.8	70.8	85.6	98.3
<b>Over \$1MM</b>	6	1,077	3.4	7.8	Not Reported		1.3
<b>Unknown</b>	5	201	2.8	1.4	Not Reported		0.4

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.

**Community Development Lending**

The bank makes an adequate level of CD loans. The bank originated five CD loans totaling \$8.1MM in the AA. This included one loan supporting affordable housing for \$1.6MM, two loans supporting economic development for \$3.9MM, and two loans supporting revitalization and stabilization efforts for \$2.7MM.

- One CD loan was an SBA 504 loan to a small business to construct a building and ultimately expand its operations, creating LMI jobs in the AA.
- Another CD loan will help construct a new grain handling facility, in line with a government revitalization plan for a distressed and underserved area.

## **INVESTMENT TEST**

The bank's performance under the investment test in the state of Missouri is needs to improve. The Western Missouri AA investment test rating is poor. The bank has a poor level of qualified CD investments and grants and is rarely in a leadership position. Additionally, the bank makes rare use of innovative and/or complex investments and exhibits poor responsiveness to the credit and CD needs of its AA.

- Investments within the AA included one prior period investment totaling \$445.9M and seven donations totaling \$5.6M.
- Due to the bank's significant deposit and loan volume in the AA, coupled with the bank's lack of performance improvement since the prior evaluation, the level of investment activity is considered poor.

## **SERVICE TEST**

The bank's performance under the service test in the state of Missouri is low satisfactory. The Western Missouri AA service test rating is adequate.

### **Retail Banking Services**

Branch locations and alternative delivery systems, such as drive-through facilities, and online and mobile banking are reasonably accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates seven branches in the AA. All but one location has an on-site ATM, and all branches offer drive-through facilities. The bank also maintains one stand-alone, cash-only ATM in the AA. The branches are spread across the AA in small, rural towns and the distribution is generally proportional to the percent of tracts by income level, particularly as a significant majority of the census tracts are middle-income. During the COVID-19 pandemic, the bank also converted two on-site ATMs to full-service in support of its customers.

The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank closed two branches, including one with a full-service ATM, since the prior evaluation; however, customers continue to be served by nearby branches with little disruption.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours are generally consistent, operating from 9:00 am to 5:00 pm on weekdays, and from 9:00 am to 12:00 pm on Saturday. Drive-through hours are extended, and all locations offer Saturday drive-through hours. All branches offer similar products and services.

<b>TABLE 52 RETAIL AND COMMUNITY DEVELOPMENT SERVICES WESTERN MISSOURI AA</b>												
<b>Branch Accessibility</b>	<b>Location of Branches by Tract (%)</b>						<b>Percent of Tracts<sup>1</sup> (%)</b>					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	100.0	0.0	0.0	100.0	2.5	10.0	72.5	15.0	0.0	100.0
	<b>Location of Full-Service ATMs by Tract (%)</b>						<b>Percent of Tracts<sup>1</sup> (%)</b>					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	0.0	100.0	0.0	0.0	100.0	2.5	10.0	72.5	15.0	0.0	100.0	
<b>Changes in Branch Location</b>	<b>Number of Branches (#)</b>						<b>Net Change in Branch Locations (#)</b>					
	<b>Total Branches</b>		<b>Openings (#)</b>		<b>Closings (#)</b>		Low	Mod	Mid	Upp	Unk	Total
	7		0		2		0	0	(1)	(1)	0	(2)
<b>Community Development Services</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalization &amp; Stabilization</b>		<b>Total Services</b>		<b>Total Organizations</b>	
	0		2		4		2		8		6	
<sup>1</sup> Based on 2019 FFIEC census tract definitions. (NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)												

**Community Development Services**

The bank provides an adequate level of CD services.

- Multiple individuals representing the bank served as board members or in other officer roles at impactful economic development or revitalization and stabilization organizations within the AA.

**STATE OF OKLAHOMA**

***CRA RATING FOR OKLAHOMA:***

*The lending test is rated:*

*The investment test is rated:*

*The service test is rated:*

***Needs to Improve***

*High Satisfactory*

*Substantial Noncompliance*

*Needs to Improve*

Major factors supporting the rating include:

**Lending Test**

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

**Investment Test**

- The bank makes few, if any, qualified CD investments and grants and is rarely in a leadership position. In addition, the bank makes no use of innovative and/or complex investments to support CD initiatives and exhibits very poor responsiveness to CD needs throughout its Oklahoma AAs.

**Service Test**

- The bank's delivery systems are reasonably accessible to geographies and/or individuals of different income levels throughout its AAs.
- The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals.
- The bank provides few, if any, CD services within its Oklahoma AAs and is not responsive to its available service opportunities.

**SCOPE OF EXAMINATION**

The scope of the review for the state of Oklahoma was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests.

A full-scope review was conducted for the Northern Oklahoma AA. The overall state rating was based predominantly on the bank's performance in this AA.



Limited-scope reviews also were conducted for the Texas County, Tulsa County Metropolitan, and Washita County AAs to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state evaluation.

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

The bank delineates 4 of its 13 AAs and operates 10 of its 51 branches in the state of Oklahoma. Loan and deposit products and services offered in the state differ slightly from those discussed in the overall institution section of this report due to market conditions and demand, with equal emphasis placed on commercial, residential real estate, and agricultural lending. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

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

### **LENDING TEST**

The bank's performance under the lending test in the state of Oklahoma is high satisfactory. The Northern Oklahoma AA lending test rating is good.

#### **Lending Activity**

The bank's lending activities reflect good responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. Such loans help borrowers who might not otherwise qualify for credit. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous government-sponsored lending programs, displaying flexibility in the way the bank serves its communities. Federal lending programs offered in the bank's Oklahoma AAs include FHA, VA, USDA Rural Development, and SBA loans. For 2019, the bank originated the following:

- 9 FHA loans totaling \$1.1MM
- 6 VA loans totaling \$1.2MM
- 7 USDA Rural Development loans totaling \$808.1M

The bank also offered additional flexible lending programs in its Oklahoma markets through the Homeownership Set-Aside Program via the FHLB. However, none of these loans were originated during the evaluation period.

#### **Geographic Distribution of Loans**

The bank's overall geographic distribution of lending within the state of Oklahoma reflects good penetration throughout its AAs. The distribution of loans across different geographies is adequate in

the Northern Oklahoma AA; however, the overall state rating was positively influenced by the bank's performance in its limited-scope AAs.

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

The bank's lending within the state of Oklahoma has an overall good penetration among individuals of different income levels and businesses and farms of different sizes. Additionally, the distribution of loans to borrowers of different income levels and to businesses and farms of different sizes is good in the Northern Oklahoma AA.

### **Community Development Lending**

In the state of Oklahoma, the bank provides an adequate level of CD loans. The bank originated eight CD loans totaling \$24.3MM in its AAs within the state. This included one loan supporting affordable housing for \$2.0MM, two loans supporting economic development for \$3.1MM, and five loans supporting revitalization and stabilization efforts for \$19.2MM.

- Five of the CD loans were PPP loans utilized by local businesses to retain their employees and continue operations in LMI census tracts throughout the pandemic or for small businesses to retain LMI employees.

### **INVESTMENT TEST**

The bank's performance under the investment test in the state of Oklahoma is substantial noncompliance. The Northern Oklahoma AA investment test rating is very poor.

The bank has few, if any, qualified CD investments and grants and is rarely in a leadership position. Additionally, the bank makes no use of innovative and/or complex investments and exhibits very poor responsiveness to the credit and CD needs of its AAs.

- The bank reported one mortgage as part of a current period MBS located in the Tulsa County Metropolitan AA; however, the investment is allocated to the Kansas City Multistate MSA given that a significant majority of the mortgages were in that AA.
- No qualified investments were made during the evaluation period in the state, and the bank reported only 12 donations totaling \$16.1M.

Given the bank's branch presence and significant deposit and loan volume within the state, as well as the length of time since the bank first entered this market, the bank's level of investment activity is considered very poor.

## **SERVICE TEST**

The bank's performance under the service test in the state of Oklahoma is needs to improve. The Northern Oklahoma AA service test rating is poor.

### **Retail Banking Services**

Branch locations and alternative delivery systems, such as drive-through facilities, and online and mobile banking are reasonably accessible to the bank's various geographies and to individuals of different income levels in each AA. The availability of drive-through services and on-site ATMs varies across the bank's branch locations within its Oklahoma AAs. The distribution of branches within the Oklahoma AAs is generally proportional to the percent of census tracts by income level.

The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the prior evaluation, the bank closed one branch in a middle-income census tract in the Texas County AA; however, customers of this branch continue to be served by nearby locations.

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. Lobby and drive-through hours are generally consistent across the bank's AAs, operating approximately eight hours on weekdays and providing extended drive-through hours. Approximately half of the branches offer Saturday hours, and most branches offer similar products and services. One limited-service and two drive-through locations do not offer loan products.

### **Community Development Services**

The bank provides a limited level of CD services in its Oklahoma AAs. Performance was consistent across all AAs in the state, except in one limited-scope AA where performance exceeded the rest of the state.

- A regional manager in one market held multiple board memberships at qualifying organizations that provide community services to LMI individuals, economic development, and small business support services.

Given the bank's branch presence and significant deposit and loan volume within the state, as well as the length of time since the bank first entered this market, CD service performance is considered poor.

**NORTHERN OKLAHOMA ASSESSMENT AREA  
NONMETROPOLITAN ASSESSMENT AREA  
(Full-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE NORTHERN OKLAHOMA AA**

The bank's AA is comprised of Kay County in its entirety. Refer to Appendix C for a map of the AA.

- The AA is comprised of three moderate-, six middle-, and two upper-income census tracts. This AA is new since the prior evaluation.
- Five of the bank's branches are located in the AA, and all but one location has an on-site ATM and offers drive-through services.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 21.0 percent market share, ranking third out of eight FDIC-insured depository institutions operating in the AA.
- Two previously conducted interviews with a single community contact were referenced during the evaluation. The contact was a representative from an organization that focuses on retaining jobs, growing the local workforce, and assisting with expansion opportunities in the AA.

<b>TABLE 53 POPULATION CHANGE</b>			
<b>Area</b>	<b>2010 Population</b>	<b>2015 Population</b>	<b>Percent Change</b>
Northern Oklahoma AA	46,562	45,587	(2.1)
NonMSA Oklahoma	1,327,624	1,333,350	0.4
State of Oklahoma	3,751,351	3,849,733	2.6

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

- Within the AA, four of the bank's branches are in Ponca City, which is the largest city in the AA with a population of 24,134. The bank's remaining branch is in Newkirk, a town of 2,170 that is located approximately ten miles north of Ponca City.

<b>TABLE 54 MEDIAN FAMILY INCOME CHANGE</b>			
<b>Area</b>	<b>2010 Median Family Income</b>	<b>2015 Median Family Income</b>	<b>Percent Change</b>
Northern Oklahoma AA	54,253	51,352	(5.3)
NonMSA Oklahoma	51,664	51,491	(0.3)
State of Oklahoma	58,375	58,029	(0.6)

*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.*

- The 2015 ACS indicates the level of families living below poverty in the AA, at 13.6 percent, is consistent with other nonmetropolitan areas at 14.1 percent. However, three middle-income census tracts encompassing portions of Ponca City were designated as distressed due to poverty levels exceeding 20.0 percent.
- One community member stated that area banks could do more to serve the credit needs of LMI individuals, as few banks have innovative or flexible lending programs targeted at serving this population in the AA.

**TABLE 55  
HOUSING COSTS CHANGE**

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Northern Oklahoma AA	74,667	78,761	5.5	578	620	7.3
NonMSA Oklahoma	81,740	91,490	11.9	552	634	14.9
State of Oklahoma	104,300	117,900	13.0	633	727	14.8

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

- While home prices in the AA are lower than other nonmetropolitan areas in the state, the median age of housing stock in the AA is significantly higher at 60 years, as compared to 40 years. This suggests potential demand for home improvement loans, although some homes may be too dilapidated to warrant renovating, and LMI families may potentially not have the funds to afford renovations.
- A community member stated there is low housing inventory in the area; however, the cost to build homes is significantly higher than the home could sell for once completed.

**TABLE 56  
UNEMPLOYMENT RATES**

Region	2015	2016	2017	2018	2019
Northern Oklahoma AA	5.7	6.3	5.4	4.7	4.3
NonMSA Oklahoma	5.0	5.4	4.5	3.6	3.6
State of Oklahoma	4.4	4.8	4.2	3.4	3.3

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Oil and gas is a major industry that drives the local economy, supporting approximately 25.0 percent of local jobs. A community member stated local businesses are “downstream” in the process whereby they purchase oil from producers and then turn it into a finished product. This part of the industry was largely insulated from the recent drop in oil prices, resulting in businesses not experiencing any real losses in their operations.
- In addition to oil and gas, the community member indicated Ponca City manufacturers generate products for the agriculture, commercial and residential building, and food industries. Additionally, because Ponca City provides a wireless network free of charge, the community member stated business service companies in the community continue to grow and did not experience any significant impact from the COVID-19 pandemic.

- Regarding the area workforce, a community member stated there are far more job openings in the region than there are available people to fill them, particularly at large manufacturing companies. Many of these open positions would benefit LMI individuals.
- A member of the community stated there are unmet credit needs and CD opportunities in the AA. Credit needs include loans for small businesses and LMI individuals that may have less than ideal credit profiles, and loans for potential home builders to fund new home construction. CD needs include working with local organizations and government offices to support local economic growth, small businesses, and community services for LMI individuals.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NORTHERN OKLAHOMA AA**

### **LENDING TEST**

The bank's performance under the lending test in the Northern Oklahoma AA is good.

#### **Lending Activity**

The bank's lending activities reflect good responsiveness to AA credit needs. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. Such loans help borrowers who might not otherwise qualify for credit. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous government-sponsored lending programs, displaying flexibility in the way the bank serves its communities. Federal lending programs offered by the bank include FHA, VA, USDA Rural Development, and SBA loans. Additionally, the bank offered loans to its customers through the Homeownership Set-Aside Program via the FHLB, which provides down payment, closing cost, and rehabilitation assistance to first-time homebuyers earning at, or below, 80.0 percent of the average median income for households purchasing or constructing homes in Oklahoma.

#### **Geographic Distribution of Loans**

The geographic distribution of lending reflects adequate penetration throughout the AA.

#### Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The bank's 2019 loan originations in moderate-income census tracts was below aggregate lending data by number and by dollar and was below the demographic figure by number. However, additional performance context considered in this analysis was the distance from one of the three moderate-income census tracts in the AA to the bank's branches in Ponca City and Newkirk, as well as market competition presented by other local financial institutions serving that tract.

The bank's lending performance for 2018 was stronger than 2019, as lending in moderate-income census tracts was comparable to aggregate lending data by number and by dollar and was comparable to the demographic figure.

The dispersion of home mortgage lending is evaluated independently for each product, and gaps in lending were identified. Refer to the separate lending products below for a detailed analysis.

#### Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The bank's 2019 loan originations in moderate-income census tracts were below aggregate lending data by number and by dollar and were below the demographic figure by number.

The bank's lending performance for 2018 was stronger than 2019, as lending in moderate-income census tracts was comparable to aggregate lending data by number.

When evaluating loan dispersion within the AA, a gap in home purchase lending in the moderate-income census tract northwest of Ponca City was identified. However, this lending gap is explained by the distance from this census tract to the bank's branches in Ponca City and Newkirk. Additionally, multiple financial institutions serve this census tract, resulting in more market competition. Given this performance context, the bank's geographic distribution of home purchase lending is considered adequate.

#### Home Refinance Loans

The geographic distribution of home refinance lending is adequate. The bank's 2019 loan originations in moderate-income census tracts were above aggregate lending data by number and comparable by dollar but were below the demographic figure by number.

The bank's lending performance for 2018 was weaker than 2019, as lending in moderate-income census tracts was comparable to aggregate lending data by number.

When evaluating loan dispersion within the AA, a gap in home refinance lending in the moderate-income census tract northwest of Ponca City was identified. However, this lending gap is explained by the distance from this census tract to the bank's branches in Ponca City and Newkirk. Additionally, multiple financial institutions serve this census tract, resulting in more market competition. Given this performance context, the bank's geographic distribution of home refinance lending is considered adequate.

**TABLE 57  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
NORTHERN OKLAHOMA AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	5	308	8.1	3.7	14.8	11.1	20.5
Middle	35	2,639	56.5	31.3	57.5	47.6	58.1
Upper	22	5,489	35.5	65.1	27.8	41.3	21.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	3	231	7.5	4.5	15.9	11.3	20.5
Middle	23	1,672	57.5	32.6	57.1	48.2	58.1
Upper	14	3,224	35.0	62.9	26.9	40.5	21.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	2	77	10.5	4.5	7.8	5.0	20.5
Middle	10	662	52.6	38.7	59.2	47.0	58.1
Upper	7	972	36.8	56.8	33.0	48.0	21.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	33.3	22.5	20.5
Middle	0	0	0.0	0.0	51.9	52.0	58.1
Upper	0	0	0.0	0.0	14.8	25.6	21.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	30.0	30.1	10.9
Middle	2	305	66.7	19.1	50.0	39.8	80.7
Upper	1	1,293	33.3	80.9	20.0	30.1	8.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.



### Small Business Lending

The geographic distribution of small business lending is excellent. The bank's 2019 loan originations in moderate-income census tracts was comparable to aggregate lending data by number and by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was stronger than 2019, as lending in moderate-income census tracts was above aggregate lending data by number and by dollar and was above the demographic figure.

When evaluating loan dispersion within the AA, no significant gaps in lending were identified.

### Small Farm Lending

The geographic distribution of small farm lending is adequate. The bank's 2019 loan originations in moderate-income census tracts was below aggregate lending data by number and by dollar and was below the demographic figure.

The bank's lending performance for 2018 was consistent with 2019.

When evaluating loan dispersion within the AA, a gap in small farm lending in the moderate-income census tract northwest of Ponca City was identified. However, this lending gap, including the impact to the bank's geographic distribution of loans, is explained by the distance from this census tract to the bank's branches in Ponca City and Newkirk. Additionally, multiple financial institutions serve this census tract, resulting in more market competition. Given this performance context, the bank's geographic distribution of small farm lending is considered adequate.

**TABLE 58  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
NORTHERN OKLAHOMA AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Moderate</b>	18	1,619	23.7	18.8	21.3	19.0	24.6
<b>Middle</b>	38	4,286	50.0	49.8	54.2	61.2	57.2
<b>Upper</b>	20	2,702	26.3	31.4	22.6	19.3	18.2
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	1.9	0.4	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Moderate</b>	3	280	5.0	8.5	14.4	23.6	10.0
<b>Middle</b>	47	2,388	78.3	72.6	69.8	64.4	73.8
<b>Upper</b>	10	623	16.7	18.9	15.8	12.0	16.2
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	0.0	0.0	0.0

*Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey*  
**NOTE:** Percentages may not add up to 100.0 percent due to rounding.

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

The bank’s lending has a good penetration among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The bank's 2019 loan originations to low-income borrowers were above aggregate lending data by number and comparable by dollar but were below the demographic figure by number. Lending to moderate-income borrowers was comparable to aggregate lending data by number and by dollar and was comparable to the demographic figure.

The bank’s lending performance for 2018 was consistent with 2019.

Home Purchase Loans

The borrower distribution of home purchase lending is good. The bank's 2019 loan originations to low-income borrowers were above aggregate lending data by number and by dollar but were below the demographic figure by number. Lending to moderate-income borrowers was comparable to aggregate lending data by number and by dollar and was comparable to the demographic figure.

The bank's lending performance for 2018 was weaker than 2019. Lending to low-income borrowers was comparable to aggregate lending data by dollar. Additionally, lending to moderate-income borrowers was below aggregate lending data by number and by dollar and was below the demographic figure.

#### Home Refinance Loans

The borrower distribution of home refinance lending is poor, as the bank originated no home refinance loans to low- or moderate-income borrowers in 2019. Despite this lack of lending, the bank's performance with respect to low-income borrowers was comparable to aggregate lending data by number and by dollar due to the very small percentage of loans reported but was below the demographic figure. The bank's lending performance to moderate-income borrowers was below aggregate lending data by number and by dollar and was below the demographic figure.

The bank's lending performance for 2018 was stronger than 2019, as lending to moderate-income borrowers was above aggregate lending data by number and comparable by dollar and was comparable to the demographic figure. While the bank's 2018 performance was better, the lack of any home refinance loans to LMI individuals in 2019 warranted an overall poor rating for this product.

**TABLE 59  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
NORTHERN OKLAHOMA AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	4	215	6.5	2.5	4.0	1.9	21.2
<b>Moderate</b>	8	700	12.9	8.3	15.5	10.7	18.4
<b>Middle</b>	23	1,827	37.1	21.7	21.0	16.8	19.7
<b>Upper</b>	18	3,708	29.0	44.0	32.8	42.4	40.7
<b>Unknown</b>	9	1,986	14.5	23.5	26.7	28.3	0.0
<b>Home Purchase Loans</b>							
<b>Low</b>	4	215	10.0	4.2	4.9	2.5	21.2
<b>Moderate</b>	8	700	20.0	13.7	17.9	12.9	18.4
<b>Middle</b>	12	1,010	30.0	19.7	22.1	18.9	19.7
<b>Upper</b>	12	3,031	30.0	59.1	31.8	44.2	40.7
<b>Unknown</b>	4	171	10.0	3.3	23.4	21.5	0.0
<b>Home Refinance Loans</b>							
<b>Low</b>	0	0	0.0	0.0	1.9	0.9	21.2
<b>Moderate</b>	0	0	0.0	0.0	13.1	9.0	18.4
<b>Middle</b>	11	817	57.9	47.7	23.8	18.4	19.7
<b>Upper</b>	5	441	26.3	25.8	40.3	46.6	40.7
<b>Unknown</b>	3	453	15.8	26.5	20.9	25.1	0.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0	0.0	0.0	7.4	4.0	21.2
<b>Moderate</b>	0	0	0.0	0.0	3.7	2.3	18.4
<b>Middle</b>	0	0	0.0	0.0	14.8	13.0	19.7
<b>Upper</b>	0	0	0.0	0.0	37.0	59.1	40.7
<b>Unknown</b>	0	0	0.0	0.0	37.0	21.6	0.0
<b>Multifamily Loans</b>							
<b>Low</b>	0	0	0.0	0.0	0.0	0.0	21.2
<b>Moderate</b>	0	0	0.0	0.0	0.0	0.0	18.4
<b>Middle</b>	0	0	0.0	0.0	0.0	0.0	19.7
<b>Upper</b>	1	236	33.3	14.8	50.0	27.7	40.7
<b>Unknown</b>	2	1,362	66.7	85.2	50.0	72.3	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.

Small Business Lending

The borrower distribution of small business lending is excellent. The bank's 2019 loan originations to businesses with revenues of \$1MM or less were above aggregate lending data by number and comparable by dollar and were comparable to the demographic figure by number.

The bank's lending performance for 2018 was consistent with 2019.

Small Farm Lending

The borrower distribution of small farm lending is good. The bank's 2019 loan originations to farms with revenues of \$1MM or less were comparable to aggregate lending data by number and by dollar and were comparable to the demographic figure by number.

The bank's lending performance for 2018 was consistent with 2019.

<b>TABLE 60 DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING BY REVENUE SIZE OF BUSINESSES AND FARMS NORTHERN OKLAHOMA AA</b>							
Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	48	2,656	63.2	30.9	49.3	33.4	88.8
<b>Over \$1MM</b>	25	5,726	32.9	66.5	Not Reported		9.7
<b>Unknown</b>	3	225	3.9	2.6	Not Reported		1.5
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	57	3,214	95.0	97.7	85.9	89.4	100.0
<b>Over \$1MM</b>	1	35	1.7	1.1	Not Reported		0.0
<b>Unknown</b>	2	42	3.3	1.3	Not Reported		0.0

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 percent due to rounding.

**Community Development Lending**

The bank makes a relatively high level of CD loans. The bank originated five CD loans totaling \$19.2MM that all supported revitalization and stabilization efforts in the AA.

- The five CD loans were PPP loans utilized by local businesses to retain their employees and continue operations in LMI census tracts throughout the pandemic or for small businesses to retain LMI employees.

**INVESTMENT TEST**

The bank's performance under the investment test in the Northern Oklahoma AA is very poor. The bank makes few, if any, qualified CD investments and grants and is rarely in a leadership position. Additionally, the bank makes no use of innovative and/or complex investments and exhibits very poor responsiveness to the credit and CD needs of its AA.

- No qualified investments were made during the evaluation period, and the bank made only two donations totaling \$5.1M.
- One donation for \$5.0M was made as part of an annual campaign to an organization that supports various other entities that provide community services and programs targeted to LMI individuals and communities.

## **SERVICE TEST**

The bank's performance under the service test in the Northern Oklahoma AA is poor.

### **Retail Banking Services**

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates five branches in the AA, with one location providing drive-through services only, and all but one location has an on-site ATM and offers drive-through services. The bank also maintains one stand-alone, cash-only ATM in the AA. Four branches are in Ponca City and one is approximately ten miles north in the town of Newkirk. The distribution of branches is generally proportional to the percent of tracts by income level. During the COVID-19 pandemic, the bank also converted two on-site ATMs to full-service in support of its customers.

The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank did not open or close any branches since the prior evaluation.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours are from 9:00 am to 4:00 or 5:00 pm weekdays, and one location offers Saturday lobby hours. Drive-through hours are extended, and all but one location offers Saturday drive-through hours. The one branch without a drive-through is within a block of the drive-through only location.

**TABLE 61  
RETAIL AND COMMUNITY DEVELOPMENT SERVICES  
NORTHERN OKLAHOMA AA**

Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	40.0	60.0	0.0	0.0	100.0	0.0	27.3	54.5	18.2	0.0	100.0
	Location of Full-Service ATMs by Tract (%)						Percent of Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	50.0	50.0	0.0	0.0	100.0	0.0	27.3	54.5	18.2	0.0	100.0	
Changes in Branch Location	Number of Branches (#)					Net Change in Branch Locations (#)						
	Total Branches	Openings (#)	Closings (#)	Low	Mod	Mid	Upp	Unk	Total			
	5	0	0	0	0	0	0	0	0			
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	0	2	0	0	2	1						

<sup>1</sup> Based on 2019 FFIEC census tract definitions.  
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

**Community Development Services**

The bank provides few, if any CD services.

- One individual representing the bank served as a board member for two consecutive years for a community service organization focused on housing LMI children.

**OTHER OKLAHOMA NONMETROPOLITAN ASSESSMENT AREAS**  
(Limited-Scope Reviews)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE OKLAHOMA  
NONMETROPOLITAN AREAS**

**TEXAS COUNTY AA**

The bank's AA is comprised of Texas County in its entirety. Refer to Appendix C for a map of the AA.

- The AA is comprised of five middle-income census tracts. This AA is new since the prior evaluation.
- Based on 2015 ACS data, the population in the AA was 21,588, which represented a 4.5 percent increase from the 2010 figure.
- Three of the bank's branches are located in the AA. All but one location has an on-site ATM, and one branch offers drive-through services.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 28.2 percent market share, ranking second out of four FDIC-insured depository institutions operating in the AA.
- One previously conducted community contact was referenced during the evaluation. The contact represented an organization focused on economic development in the regional area.

**WASHITA COUNTY AA**

The bank's AA is comprised of Washita County in its entirety. Refer to Appendix C for a map of the AA.

- The AA is comprised of three middle- and one upper-income census tract. This AA is new since the prior evaluation.
- Based on 2015 ACS data, the population in the AA was 11,649, which was consistent with the 2010 figure of 11,629.
- One of the bank's branches is located in the AA and it offers an on-site ATM and drive-through services.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 10.0 percent market share, ranking sixth out of nine FDIC-insured depository institutions operating in the AA.
- One previously conducted community contact was referenced during the evaluation. The contact was from an organization focused on community services, housing, and business development.



**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LIMITED-SCOPE OKLAHOMA  
NONMETROPOLITAN AREAS**

The two Oklahoma AAs listed in the table below were reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance did significantly impact the overall state rating and are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Texas County AA	consistent	consistent	exceeds
Washita County AA	consistent	consistent	consistent

**OTHER OKLAHOMA METROPOLITAN ASSESSMENT AREA  
(Limited-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE OKLAHOMA METROPOLITAN AREA**

**TULSA COUNTY METROPOLITAN AA**

The bank's AA is comprised of Tulsa County in its entirety, which is one of seven counties included in the Tulsa, Oklahoma MSA. Refer to Appendix C for a map of the AA.

- The AA is comprised of 17 low-, 54 moderate-, 51 middle-, and 53 upper-income census tracts. This AA is new since the prior evaluation.
- Based on 2015 ACS data, the population in the AA was 623,335, which represented a 3.3 percent increase from the 2010 figure.
- One of the bank's branches is located in the AA and offers drive-through services.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank had a 0.3 percent market share, ranking 34<sup>th</sup> out of 46 FDIC-insured depository institutions operating in the AA.
- One previously conducted community contact was referenced during the evaluation. The contact represented a local government department focused on economic development and services for small businesses.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LIMITED-SCOPE OKLAHOMA METROPOLITAN AREA**

The Oklahoma AA listed in the table below was reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance did significantly impact the overall state rating and are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Tulsa County Metropolitan AA	consistent	consistent	consistent

**APPENDIX A**

<b>SCOPE OF EXAMINATION</b>			
<b>FINANCIAL INSTITUTION</b> Equity Bank Andover, Kansas		<b>PRODUCTS/SERVICES REVIEWED</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</li> <li>• Qualified Investments and Donations</li> <li>• Community Development Services</li> </ul>	
<b>TIME PERIODS REVIEWED</b> HMDA LAR and CRA SB and SF Loans: January 1, 2018 to December 31, 2019 Community Development Activities: January 1, 2019 to December 31, 2020			
<b>LIST OF AFFILIATES CONSIDERED IN THIS EVALUATION</b>			
AFFILIATES	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
EQUITY BANCSHARES, INC.	Holding Company	None	
EBAC LLC	Sub of Holding Company	None	
COMMUNITY FIRST (AR) STATUTORY TRUST I	Sub of Holding Company	None	
FCB CAPITAL TRUST II	Sub of Holding Company	None	
FCB CAPITAL TRUST III	Sub of Holding Company	None	
EBHQ LLC	Sub of Bank	None	
SA HOLDINGS, INC.	Sub of Bank	None	
<b>LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION</b>			
ASSESSMENT AREA	TYPE OF EXAM	BRANCHES VISITED	COMMUNITY CONTACTS
<u>Multistate MSA</u> MSA 28140 (Kansas City Metropolitan)	Full Review	None	2 prior
<u>Kansas</u> MSA 48620 (Wichita Metropolitan) MSA 99999 (Northwest Kansas) MSA 45820 (Topeka Metropolitan) MSA 99999 (Southeast Kansas) MSA 99999 (Southwest Kansas)	Full Review Full Review Limited Review Limited Review Limited Review	None None None None None	2 prior 1 current, 1 prior 1 prior 1 prior 1 prior
<u>Arkansas</u> MSA 99999 (Ozark Mountain) MSA 22220 (Benton County Metropolitan)	Full Review Limited Review	None None	1 current, 1 prior 1 prior
<u>Missouri</u> MSA 99999 (Western Missouri)	Full Review	None	2 prior
<u>Oklahoma</u> MSA 99999 (Northern Oklahoma) MSA 99999 (Texas County) MSA 46140 (Tulsa County Metropolitan) MSA 99999 (Washita County)	Full Review Limited Review Limited Review Limited Review	None None None None	2 prior 1 prior 1 prior 1 prior

**APPENDIX B**

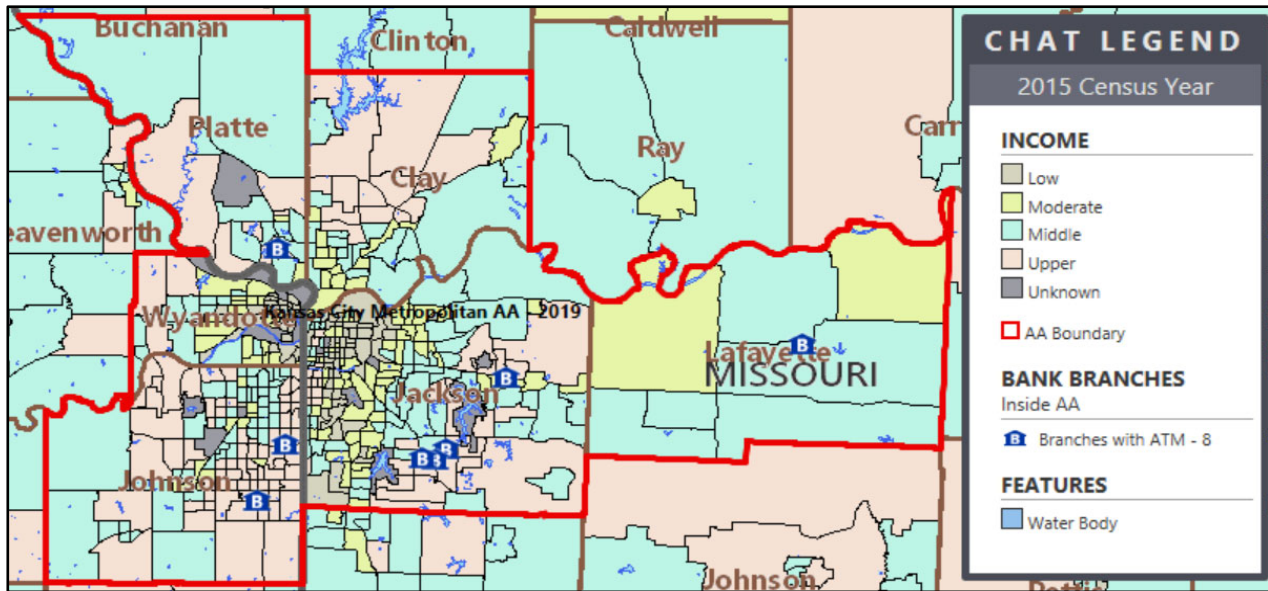
**SUMMARY OF STATE AND MULTISTATE METROPOLITAN AREA RATINGS**

<b>STATE OR MULTISTATE METROPOLITAN AREA NAME</b>	<b>LENDING TEST RATING</b>	<b>INVESTMENT TEST RATING</b>	<b>SERVICE TEST RATING</b>	<b>OVERALL RATING</b>
Kansas	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Oklahoma	High Satisfactory	Substantial Noncompliance	Needs to Improve	Needs to Improve
Missouri	High Satisfactory	Needs to Improve	Low Satisfactory	Satisfactory
Arkansas	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Kansas City Multistate Metropolitan Area	High Satisfactory	High Satisfactory	Needs to Improve	Satisfactory

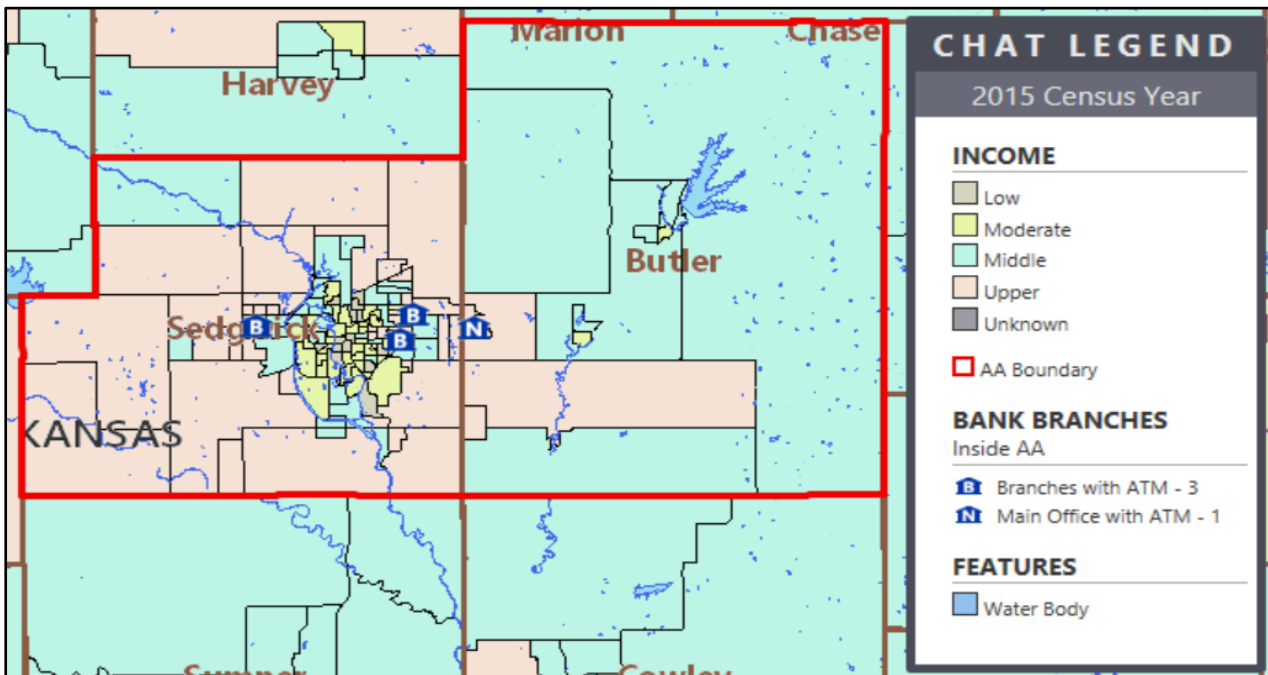
APPENDIX C

MAPS OF THE ASSESSMENT AREAS

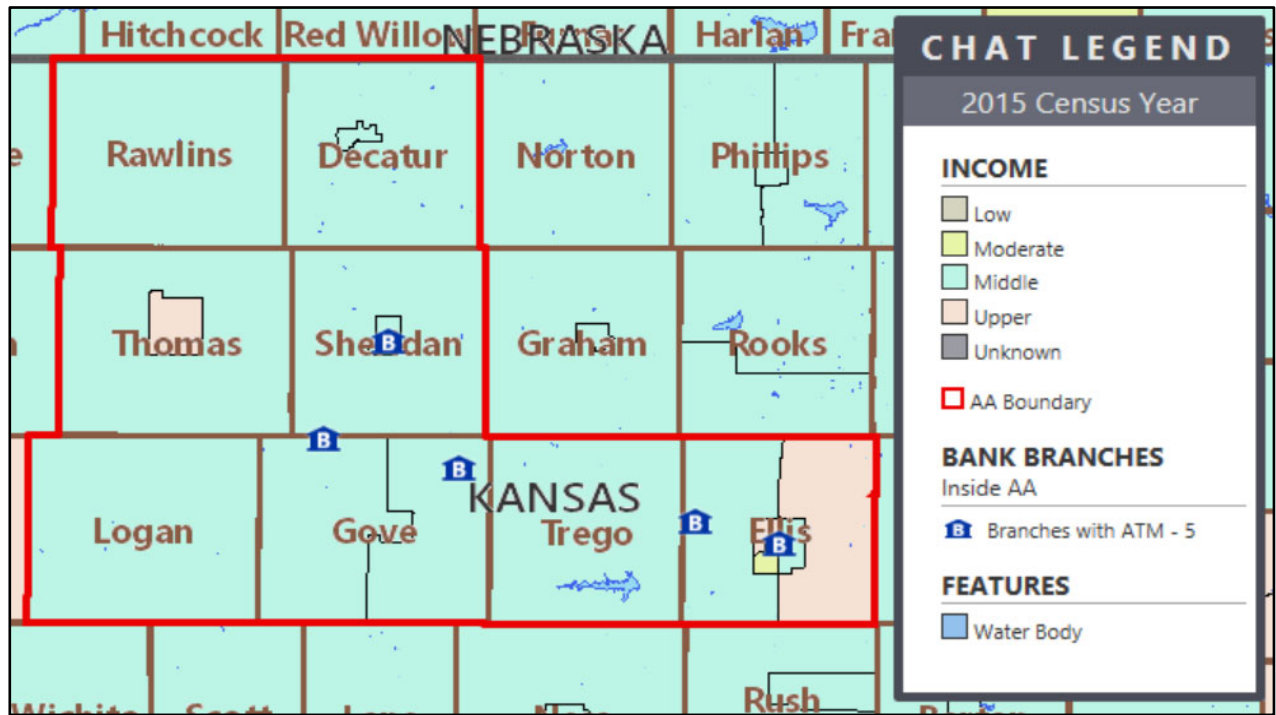
Kansas City Metropolitan AA



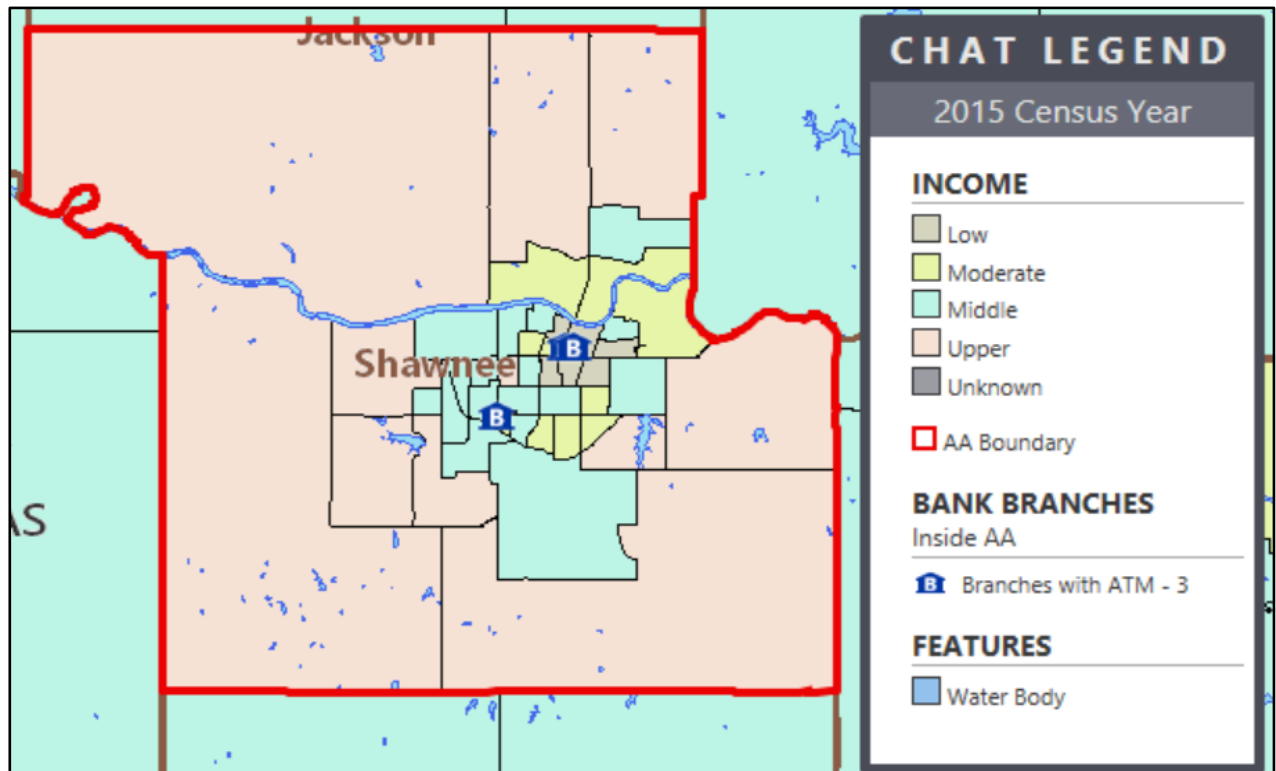
Wichita Metropolitan AA



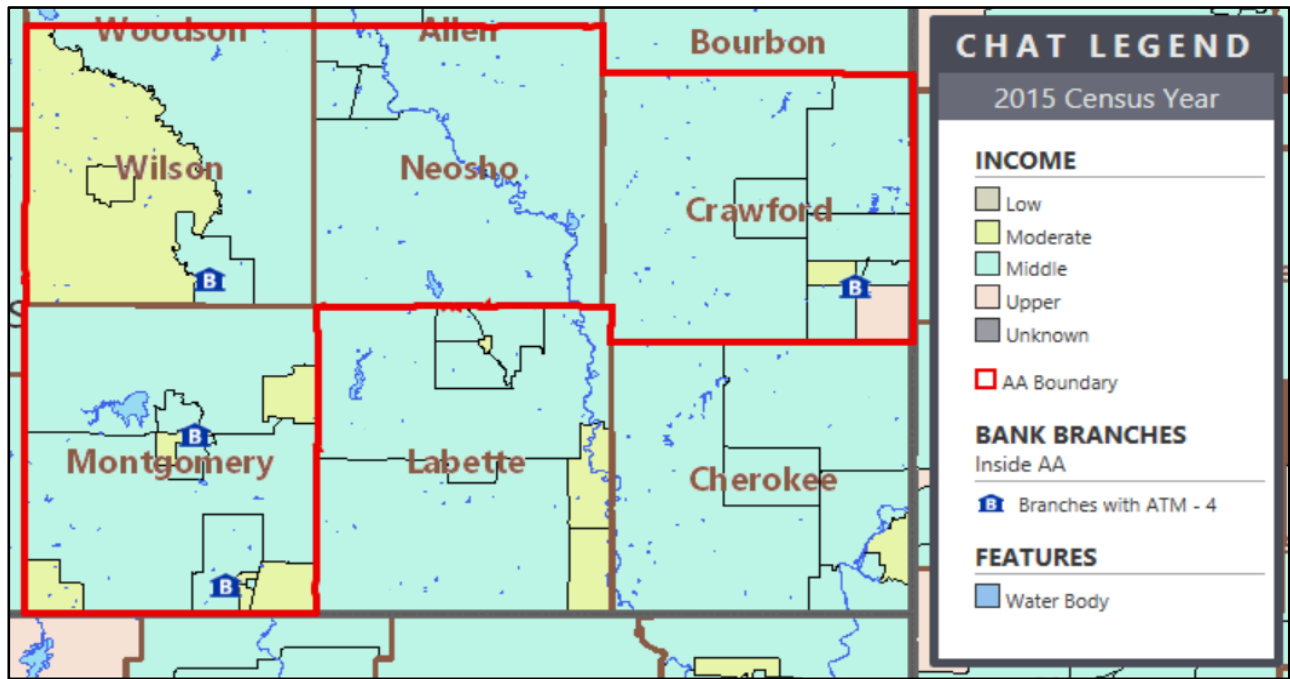
Northwest Kansas AA



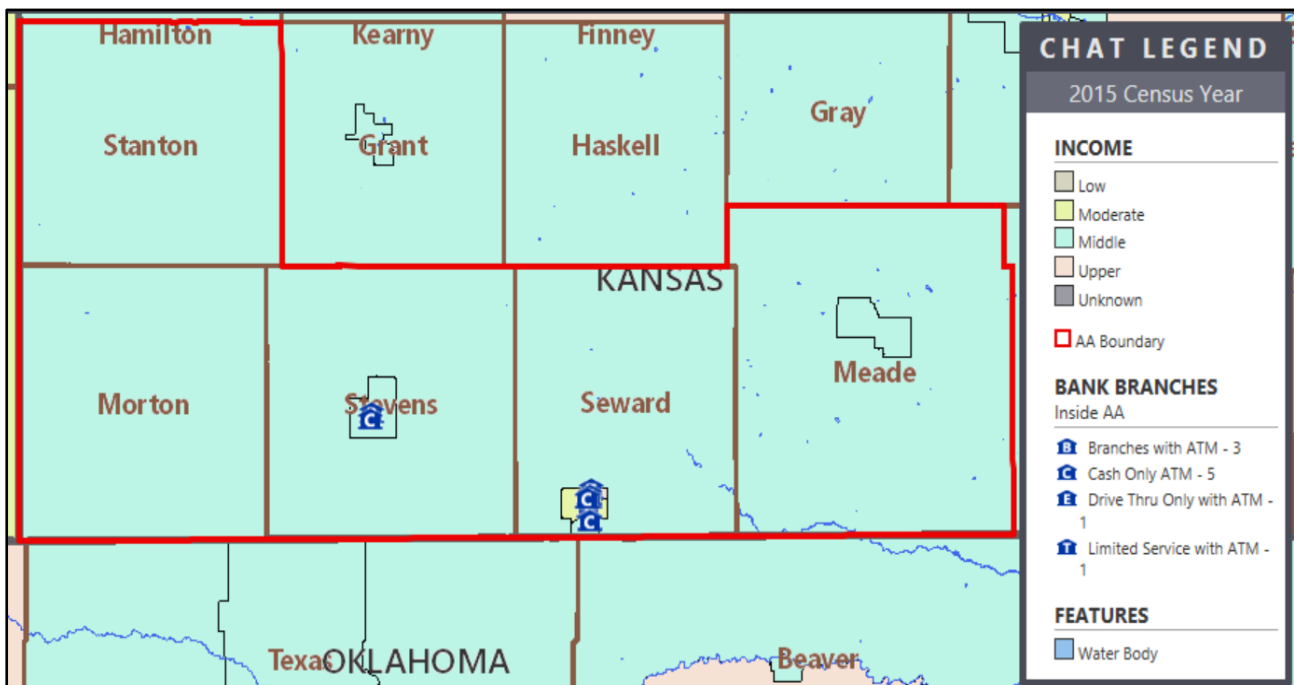
Topeka Metropolitan AA



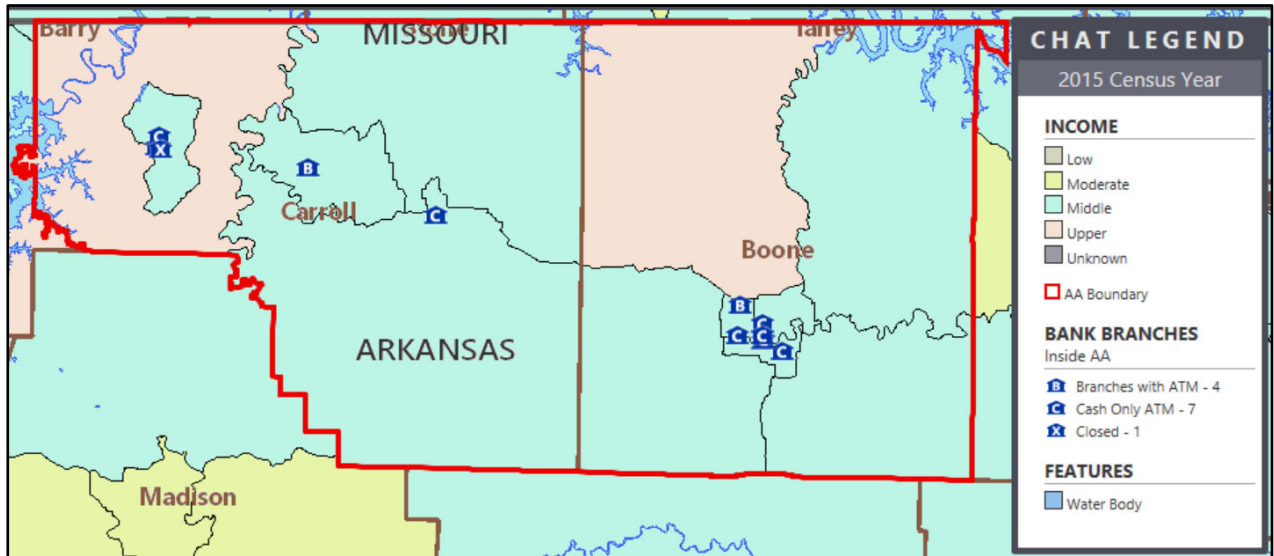
Southeast Kansas AA



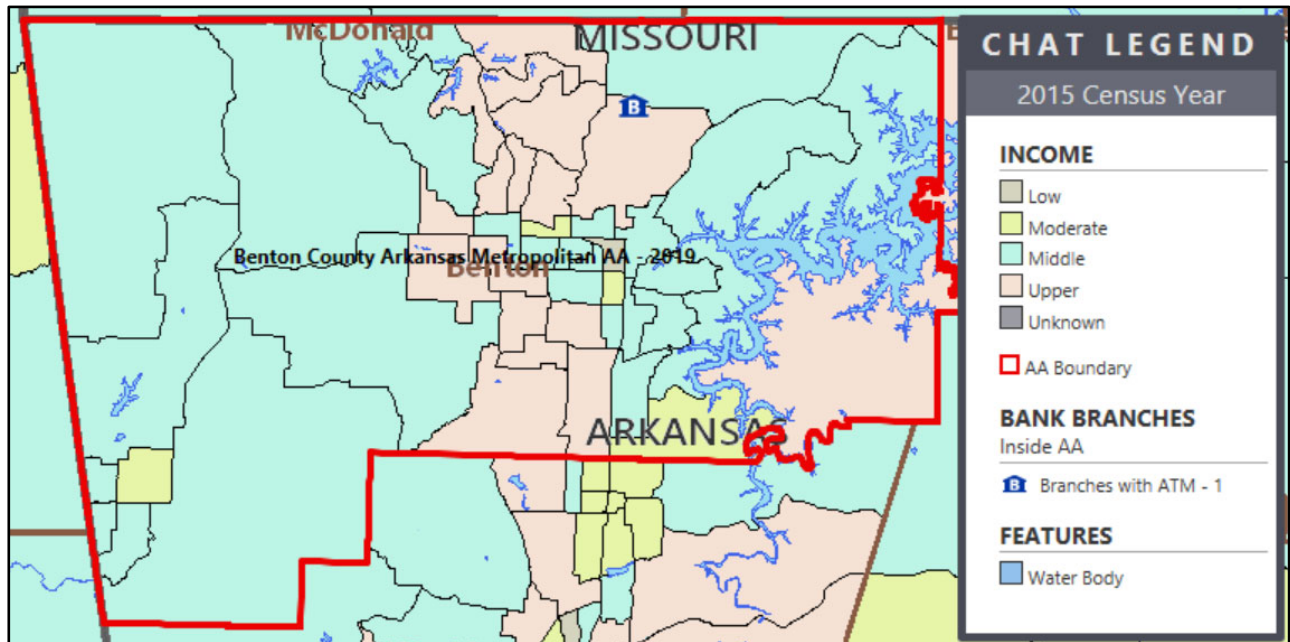
Southwest Kansas AA



Ozark Mountain AA

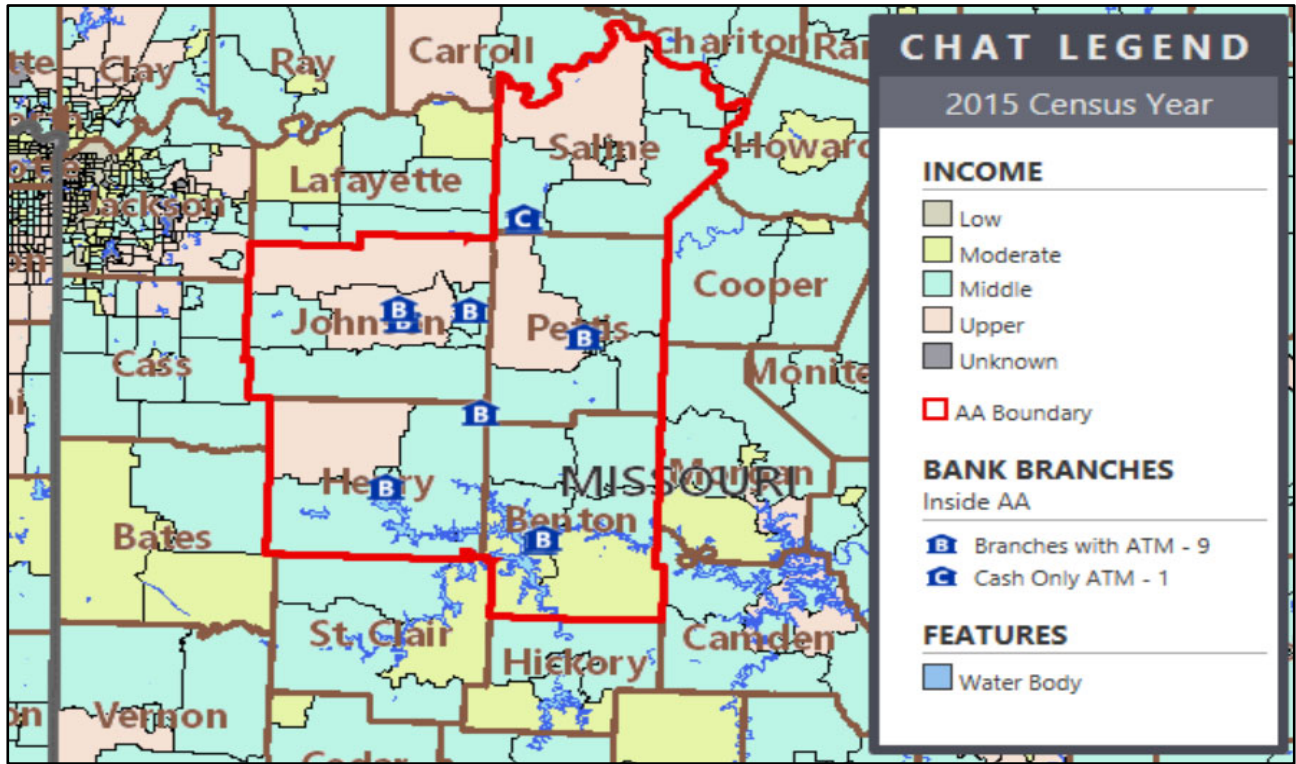


Benton County Metropolitan AA

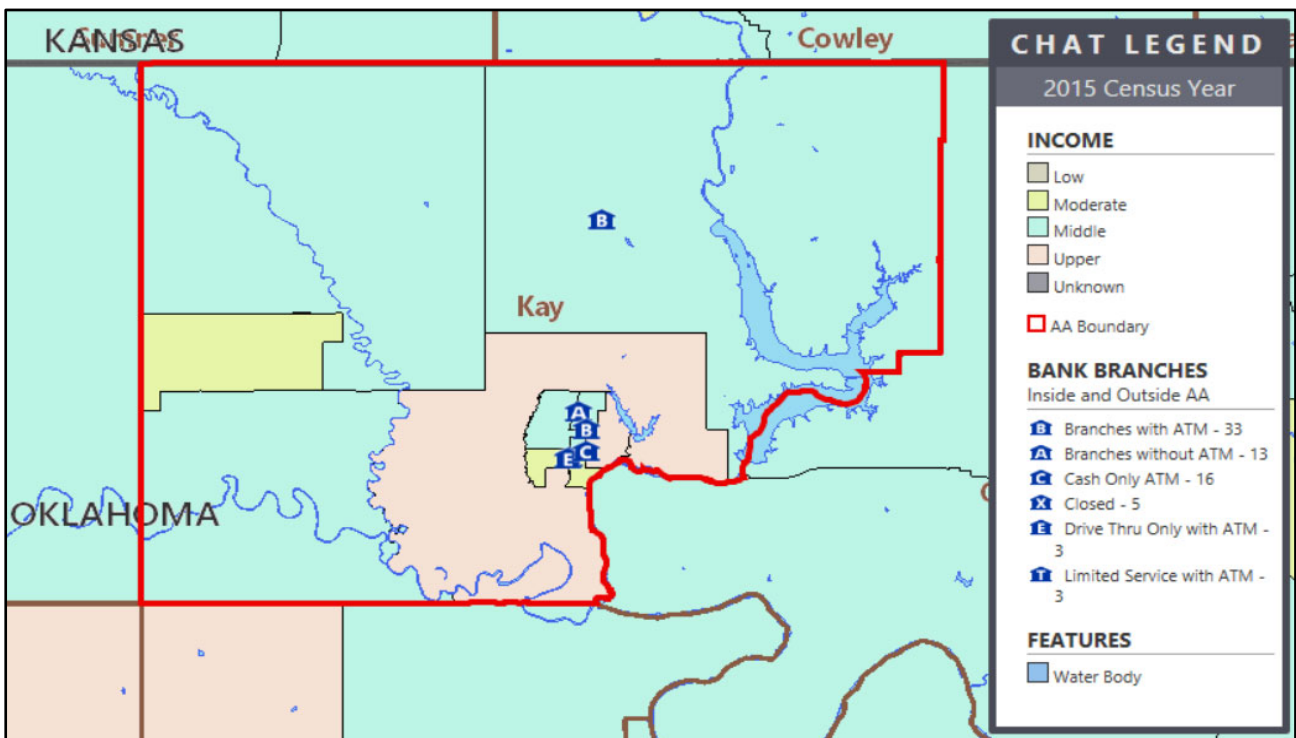




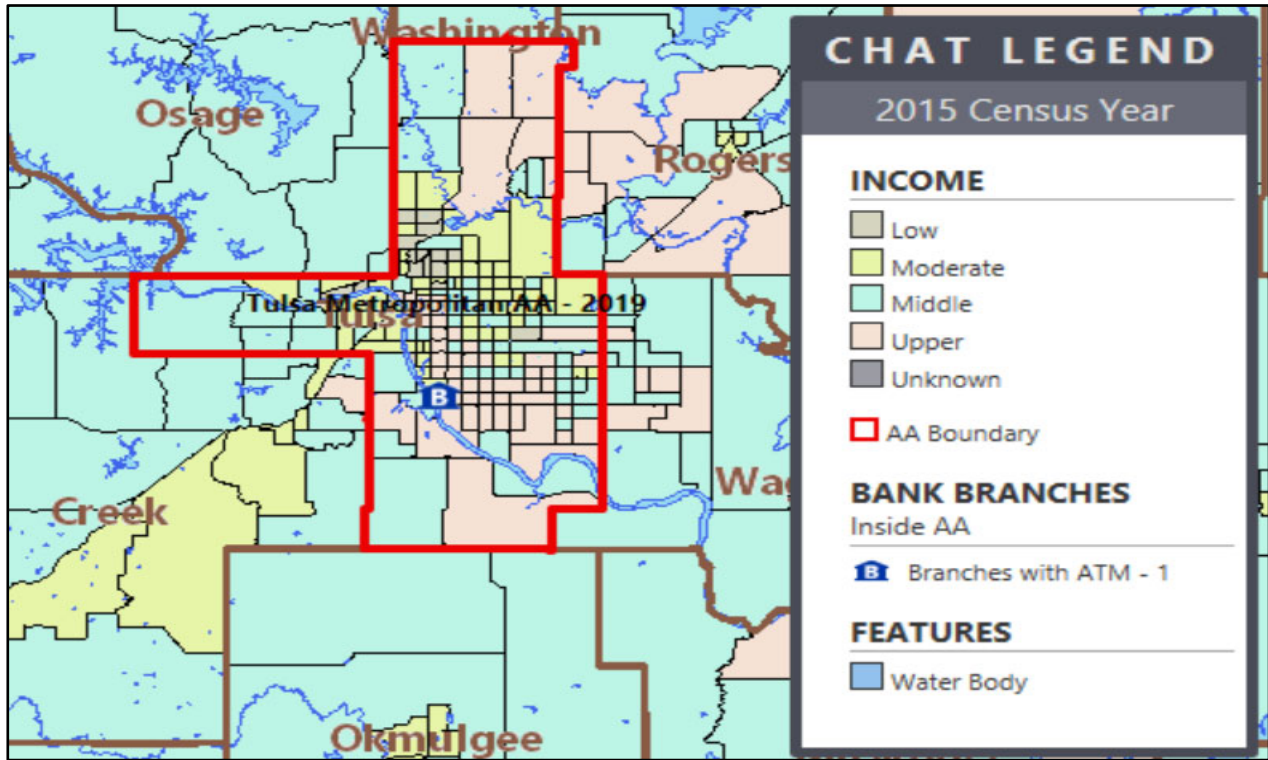
Western Missouri AA



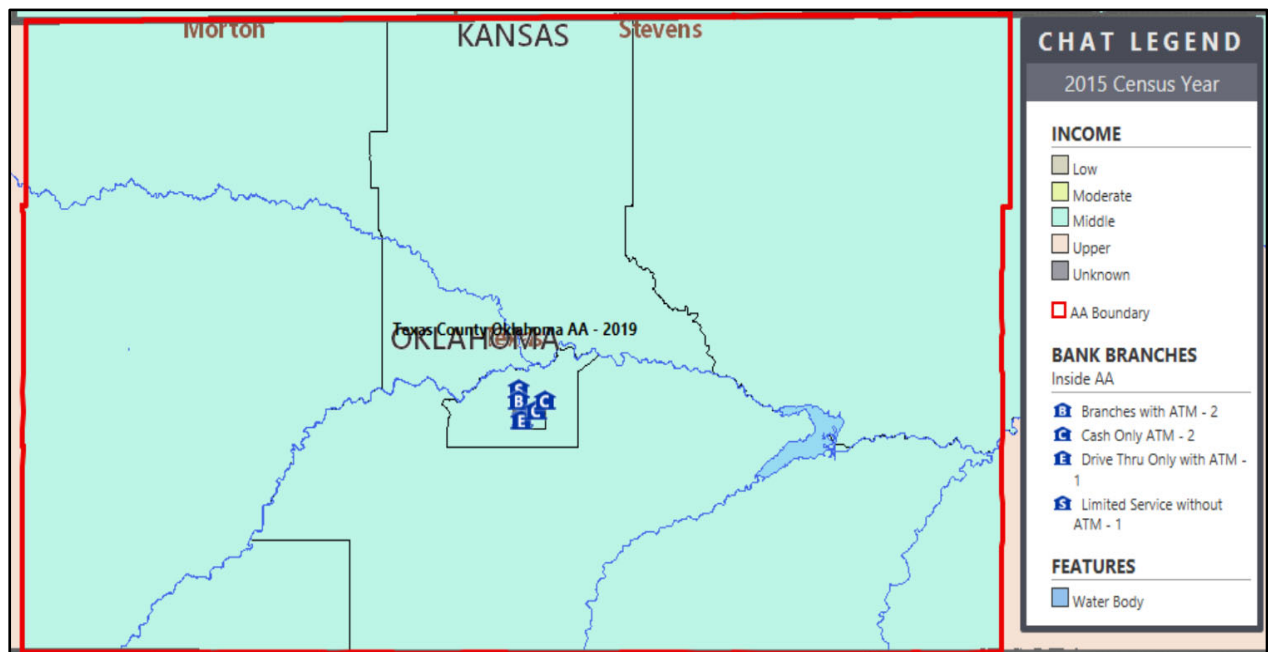
Northern Oklahoma AA



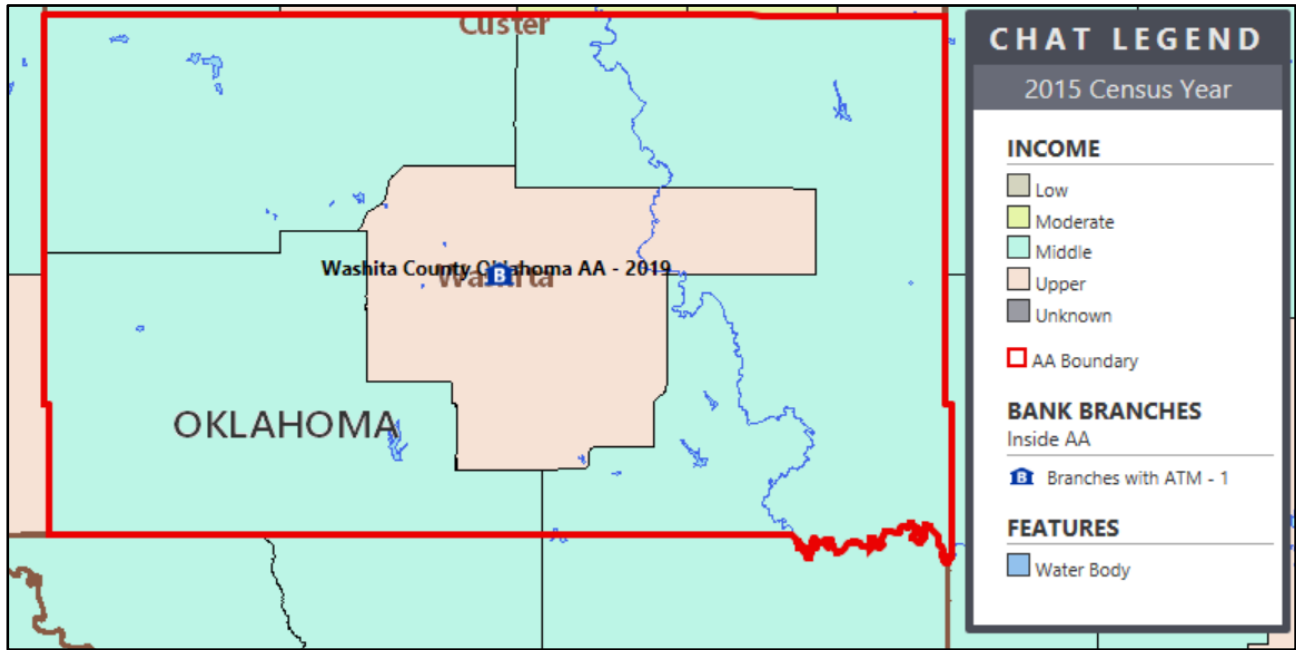
Tulsa County Metropolitan AA



Texas County AA



Washita County AA



APPENDIX D

DEMOGRAPHIC AND 2018 LENDING TABLES FOR FULL-SCOPE ASSESSMENT AREAS

A. Kansas City Metropolitan AA (Full-Scope Review) – 2018 and 2019 Demographic Tables and 2018 Lending Tables

TABLE D-1 KANSAS CITY METROPOLITAN AA 2019 DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	78	16.6	38,810	8.8	13,572	35.0	94,878	21.4
Moderate	105	22.3	89,370	20.2	13,743	15.4	76,671	17.3
Middle	140	29.8	156,596	35.4	9,922	6.3	89,034	20.1
Upper	128	27.2	157,223	35.5	3,271	2.1	182,404	41.2
Unknown	19	4.0	988	0.2	451	45.6	0	0.0
<b>Total AA</b>	<b>470</b>	<b>100.0</b>	<b>442,987</b>	<b>100.0</b>	<b>40,959</b>	<b>9.2</b>	<b>442,987</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	91,021	28,654	6.4	31.5	42,815	47.0	19,552	21.5
Moderate	174,103	80,514	18.1	46.2	73,770	42.4	19,819	11.4
Middle	268,350	162,699	36.5	60.6	85,998	32.0	19,653	7.3
Upper	223,791	172,920	38.8	77.3	41,497	18.5	9,374	4.2
Unknown	4,019	863	0.2	21.5	1,780	44.3	1,376	34.2
<b>Total AA</b>	<b>761,284</b>	<b>445,650</b>	<b>100.0</b>	<b>58.5</b>	<b>245,860</b>	<b>32.3</b>	<b>69,774</b>	<b>9.2</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	6,343	7.5	5,459	7.1	844	10.7	40	6.1
Moderate	16,461	19.4	14,841	19.4	1,524	19.4	96	14.7
Middle	28,369	33.4	25,690	33.6	2,462	31.4	217	33.2
Upper	32,041	37.7	29,337	38.4	2,419	30.8	285	43.6
Unknown	1,686	2.0	1,068	1.4	603	7.7	15	2.3
<b>Total AA</b>	<b>84,900</b>	<b>100.0</b>	<b>76,395</b>	<b>100.0</b>	<b>7,852</b>	<b>100.0</b>	<b>653</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>90.0</b>		<b>9.2</b>		<b>0.8</b>	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	22	2.1	20	2.0	1	4.8	1	20.0
Moderate	135	13.0	133	13.1	0	0.0	2	40.0
Middle	500	48.0	491	48.3	8	38.1	1	20.0
Upper	384	36.9	372	36.6	11	52.4	1	20.0
Unknown	1	0.1	0	0.0	1	4.8	0	0.0
<b>Total AA</b>	<b>1,042</b>	<b>100.0</b>	<b>1,016</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>97.5</b>		<b>2.0</b>		<b>0.5</b>	
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.								

**TABLE D-2  
KANSAS CITY METROPOLITAN AA 2018 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	78	16.6	38,810	8.8	13,572	35.0	94,878	21.4
Moderate	105	22.3	89,370	20.2	13,743	15.4	76,671	17.3
Middle	140	29.8	156,596	35.4	9,922	6.3	89,034	20.1
Upper	128	27.2	157,223	35.5	3,271	2.1	182,404	41.2
Unknown	19	4.0	988	0.2	451	45.6	0	0.0
<b>Total AA</b>	<b>470</b>	<b>100.0</b>	<b>442,987</b>	<b>100.0</b>	<b>40,959</b>	<b>9.2</b>	<b>442,987</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	91,021	28,654	6.4	31.5	42,815	47.0	19,552	21.5
Moderate	174,103	80,514	18.1	46.2	73,770	42.4	19,819	11.4
Middle	268,350	162,699	36.5	60.6	85,998	32.0	19,653	7.3
Upper	223,791	172,920	38.8	77.3	41,497	18.5	9,374	4.2
Unknown	4,019	863	0.2	21.5	1,780	44.3	1,376	34.2
<b>Total AA</b>	<b>761,284</b>	<b>445,650</b>	<b>100.0</b>	<b>58.5</b>	<b>245,860</b>	<b>32.3</b>	<b>69,774</b>	<b>9.2</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	6,153	7.3	5,239	6.9	868	10.8	46	5.9
Moderate	16,269	19.2	14,563	19.2	1,583	19.6	123	15.8
Middle	28,350	33.5	25,570	33.7	2,513	31.2	267	34.3
Upper	32,299	38.1	29,482	38.8	2,491	30.9	326	41.8
Unknown	1,676	2.0	1,054	1.4	605	7.5	17	2.2
<b>Total AA</b>	<b>84,747</b>	<b>100.0</b>	<b>75,908</b>	<b>100.0</b>	<b>8,060</b>	<b>100.0</b>	<b>779</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>89.6</b>		<b>9.5</b>		<b>0.9</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	20	1.9	18	1.7	1	4.5	1	16.7
Moderate	141	13.2	139	13.4	0	0.0	2	33.3
Middle	506	47.4	496	47.7	8	36.4	2	33.3
Upper	398	37.3	386	37.2	11	50.0	1	16.7
Unknown	2	0.2	0	0.0	2	9.1	0	0.0
<b>Total AA</b>	<b>1,067</b>	<b>100.0</b>	<b>1,039</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>97.4</b>		<b>2.1</b>		<b>0.6</b>	

Source: 2018 FFIEC Census Data  
2018 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-3  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
KANSAS CITY METROPOLITAN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	6	1,067	4.2	3.6	3.2	2.4	6.4
Moderate	32	6,466	22.2	21.8	16.1	11.1	18.1
Middle	72	11,790	50.0	39.8	36.5	32.0	36.5
Upper	34	10,307	23.6	34.8	44.1	53.9	38.8
Unknown	0	0	0.0	0.0	0.2	0.6	0.2
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	2	100	2.5	0.8	3.2	1.5	6.4
Moderate	17	2,309	21.5	19.0	16.9	10.3	18.1
Middle	41	5,241	51.9	43.2	36.9	31.5	36.5
Upper	19	4,484	24.1	37.0	43.0	56.6	38.8
Unknown	0	0	0.0	0.0	0.0	0.1	0.2
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	2	502	3.4	4.0	3.0	1.6	6.4
Moderate	12	1,209	20.7	9.6	15.3	9.4	18.1
Middle	29	5,009	50.0	39.9	37.2	32.2	36.5
Upper	15	5,823	25.9	46.4	44.3	56.6	38.8
Unknown	0	0	0.0	0.0	0.2	0.2	0.2
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	1	40	50.0	83.3	2.6	2.3	6.4
Moderate	1	8	50.0	16.7	10.1	7.7	18.1
Middle	0	0	0.0	0.0	32.5	29.6	36.5
Upper	0	0	0.0	0.0	54.6	60.2	38.8
Unknown	0	0	0.0	0.0	0.2	0.2	0.2
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	1	425	20.0	8.7	21.8	10.4	14.7
Moderate	2	2,940	40.0	59.9	27.9	20.7	25.9
Middle	2	1,540	40.0	31.4	31.6	36.8	37.1
Upper	0	0	0.0	0.0	16.3	27.0	20.7
Unknown	0	0	0.0	0.0	2.5	5.1	1.6
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-4  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
KANSAS CITY METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
Low	12	2,940	7.6	9.7	7.0	9.3	7.3
Moderate	33	7,974	20.9	26.2	17.0	16.7	19.2
Middle	66	11,021	41.8	36.2	30.2	28.7	33.5
Upper	43	7,576	27.2	24.9	42.3	39.0	38.1
Unknown	4	946	2.5	3.1	2.6	6.0	2.0
Not Reported	0	0	0.0	0.0	1.0	0.3	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	0.8	0.8	1.9
Moderate	22	1,662	41.5	36.5	15.1	16.1	13.2
Middle	28	2,742	52.8	60.1	51.0	48.2	47.4
Upper	3	155	5.7	3.4	31.8	34.6	37.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.2
Not Reported	0	0	0.0	0.0	1.4	0.4	0.0

Source: 2018 FFIEC Census Data  
2018 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-5  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
KANSAS CITY METROPOLITAN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	12	1,126	8.3	3.8	8.1	4.0	21.4
<b>Moderate</b>	26	3,257	18.1	11.0	19.6	13.4	17.3
<b>Middle</b>	23	3,987	16.0	13.5	21.6	18.4	20.1
<b>Upper</b>	52	13,090	36.1	44.2	35.4	42.0	41.2
<b>Unknown</b>	31	8,170	21.5	27.6	15.3	22.2	0.0
<b>Home Purchase Loans</b>							
<b>Low</b>	8	713	10.1	5.9	8.4	4.2	21.4
<b>Moderate</b>	20	2,572	25.3	21.2	21.3	15.4	17.3
<b>Middle</b>	14	2,415	17.7	19.9	22.2	20.8	20.1
<b>Upper</b>	26	4,912	32.9	40.5	33.9	46.3	41.2
<b>Unknown</b>	11	1,522	13.9	12.5	14.1	13.2	0.0
<b>Home Refinance Loans</b>							
<b>Low</b>	4	413	6.9	3.3	9.1	5.2	21.4
<b>Moderate</b>	6	685	10.3	5.5	19.8	14.8	17.3
<b>Middle</b>	9	1,572	15.5	12.5	22.3	20.4	20.1
<b>Upper</b>	26	8,178	44.8	65.2	35.0	46.6	41.2
<b>Unknown</b>	13	1,695	22.4	13.5	13.8	13.0	0.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0	0.0	0.0	5.5	3.7	21.4
<b>Moderate</b>	0	0	0.0	0.0	13.1	9.4	17.3
<b>Middle</b>	0	0	0.0	0.0	21.1	18.0	20.1
<b>Upper</b>	0	0	0.0	0.0	53.9	58.5	41.2
<b>Unknown</b>	2	48	100.0	100.0	6.4	10.4	0.0
<b>Multifamily Loans</b>							
<b>Low</b>	0	0	0.0	0.0	0.0	0.0	21.4
<b>Moderate</b>	0	0	0.0	0.0	0.0	0.0	17.3
<b>Middle</b>	0	0	0.0	0.0	0.6	0.1	20.1
<b>Upper</b>	0	0	0.0	0.0	5.2	0.4	41.2
<b>Unknown</b>	5	4,905	100.0	100.0	94.2	99.5	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.



**TABLE D-6  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
KANSAS CITY METROPOLITAN AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	67	9,535	42.4	31.3	43.0	28.3	89.6
<b>Over \$1MM</b>	83	19,856	52.5	65.2	Not Reported		9.5
<b>Unknown</b>	8	1,066	5.1	3.5			0.9
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	51	4,465	96.2	97.9	51.2	70.3	97.4
<b>Over \$1MM</b>	2	94	3.8	2.1	Not Reported		2.1
<b>Unknown</b>	0	0	0.0	0.0			0.6

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

B. Wichita Metropolitan AA (Full-Scope Review) – 2018 and 2019 Demographic Tables and 2018 Lending Tables

TABLE D-7 WICHITA METROPOLITAN AA 2019 DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	15	10.9	10,259	7.2	3,615	35.2	29,112	20.5
Moderate	38	27.7	29,358	20.7	6,122	20.9	24,847	17.5
Middle	41	29.9	44,469	31.3	3,541	8.0	29,902	21.1
Upper	43	31.4	57,886	40.8	1,645	2.8	58,111	40.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>137</b>	<b>100.0</b>	<b>141,972</b>	<b>100.0</b>	<b>14,923</b>	<b>10.5</b>	<b>141,972</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	22,180	7,163	5.1	32.3	11,145	50.2	3,872	17.5
Moderate	59,965	25,334	17.9	42.2	26,342	43.9	8,289	13.8
Middle	77,776	45,860	32.4	59.0	25,534	32.8	6,382	8.2
Upper	80,108	63,025	44.6	78.7	12,831	16.0	4,252	5.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>240,029</b>	<b>141,382</b>	<b>100.0</b>	<b>58.9</b>	<b>75,852</b>	<b>31.6</b>	<b>22,795</b>	<b>9.5</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,222	5.8	1,054	5.6	167	7.6	1	0.7
Moderate	5,894	27.8	5,007	26.6	856	38.8	31	21.4
Middle	6,258	29.5	5,589	29.6	621	28.2	48	33.1
Upper	7,829	36.9	7,202	38.2	562	25.5	65	44.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>21,203</b>	<b>100.0</b>	<b>18,852</b>	<b>100.0</b>	<b>2,206</b>	<b>100.0</b>	<b>145</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>88.9</b>		<b>10.4</b>		<b>0.7</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	5	0.9	5	1.0	0	0.0	0	0.0
Moderate	32	6.0	32	6.1	0	0.0	0	0.0
Middle	199	37.5	196	37.3	3	50.0	0	0.0
Upper	295	55.6	292	55.6	3	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>531</b>	<b>100.0</b>	<b>525</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>98.9</b>		<b>1.1</b>		<b>0.0</b>
<p>Source: 2019 FFIEC Census Data 2019 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>NOTE: Percentages may not add up to 100.0 due to rounding.</p>								

**TABLE D-8  
WICHITA METROPOLITAN AA 2018 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	16	11.7	10,592	7.5	3,718	35.1	29,500	20.8
Moderate	38	27.7	30,377	21.4	6,406	21.1	25,056	17.6
Middle	45	32.8	48,714	34.3	3,331	6.8	29,928	21.1
Upper	38	27.7	52,289	36.8	1,468	2.8	57,488	40.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>137</b>	<b>100.0</b>	<b>141,972</b>	<b>100.0</b>	<b>14,923</b>	<b>10.5</b>	<b>141,972</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	23,154	7,458	5.3	32.2	11,575	50.0	4,121	17.8
Moderate	61,466	26,152	18.5	42.5	26,878	43.7	8,436	13.7
Middle	83,513	50,618	35.8	60.6	26,491	31.7	6,404	7.7
Upper	71,896	57,154	40.4	79.5	10,908	15.2	3,834	5.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>240,029</b>	<b>141,382</b>	<b>100.0</b>	<b>58.9</b>	<b>75,852</b>	<b>31.6</b>	<b>22,795</b>	<b>9.5</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,426	6.8	1,204	6.5	220	9.8	2	1.3
Moderate	5,727	27.3	4,862	26.2	833	37.0	32	21.2
Middle	6,868	32.8	6,142	33.1	669	29.7	57	37.7
Upper	6,930	33.1	6,343	34.2	527	23.4	60	39.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>20,951</b>	<b>100.0</b>	<b>18,551</b>	<b>100.0</b>	<b>2,249</b>	<b>100.0</b>	<b>151</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>88.5</b>		<b>10.7</b>		<b>0.7</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	4	0.7	4	0.8	0	0.0	0	0.0
Moderate	32	5.9	31	5.8	1	14.3	0	0.0
Middle	212	39.3	208	39.0	4	57.1	0	0.0
Upper	292	54.1	290	54.4	2	28.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>540</b>	<b>100.0</b>	<b>533</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>			<b>98.7</b>		<b>1.3</b>		<b>0.0</b>	

Source: 2018 FFIEC Census Data  
2018 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-9  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
WICHITA METROPOLITAN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	2	155	2.3	0.8	3.0	1.5	5.3
Moderate	14	5,113	15.9	27.6	15.9	11.5	18.5
Middle	33	4,545	37.5	24.5	35.7	30.7	35.8
Upper	39	8,718	44.3	47.0	45.4	56.3	40.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	2	155	2.9	1.3	2.6	1.2	5.3
Moderate	8	1,553	11.8	13.3	16.2	9.5	18.5
Middle	30	3,957	44.1	34.0	35.9	30.1	35.8
Upper	28	5,984	41.2	51.4	45.3	59.2	40.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	2.9	1.4	5.3
Moderate	4	221	23.5	6.9	13.5	7.6	18.5
Middle	2	269	11.8	8.3	36.1	30.4	35.8
Upper	11	2,734	64.7	84.8	47.5	60.6	40.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	4.3	2.2	5.3
Moderate	0	0	0.0	0.0	13.3	10.1	18.5
Middle	0	0	0.0	0.0	34.0	30.9	35.8
Upper	0	0	0.0	0.0	48.5	56.8	40.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	0	0	0.0	0.0	13.5	3.3	9.5
Moderate	2	3,339	66.7	91.3	38.5	32.1	34.1
Middle	1	319	33.3	8.7	31.3	34.9	41.0
Upper	0	0	0.0	0.0	16.7	29.7	15.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-10  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
WICHITA METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	7.0	7.8	6.8
<b>Moderate</b>	41	12,294	40.6	43.8	24.9	30.3	27.3
<b>Middle</b>	28	7,255	27.7	25.8	33.1	32.2	32.8
<b>Upper</b>	32	8,527	31.7	30.4	33.9	29.5	33.1
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	1.0	0.2	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	0.0	0.0	0.7
<b>Moderate</b>	0	0	0.0	0.0	1.1	2.3	5.9
<b>Middle</b>	2	425	100.0	100.0	55.3	65.7	39.3
<b>Upper</b>	0	0	0.0	0.0	43.3	31.9	54.1
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	0.4	0.0	0.0

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-11  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
WICHITA METROPOLITAN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	10	749	11.4	4.0	8.2	4.1	20.8
Moderate	28	3,719	31.8	20.1	19.3	13.7	17.6
Middle	13	2,058	14.8	11.1	21.0	17.7	21.1
Upper	34	8,602	38.6	46.4	31.6	38.6	40.5
Unknown	3	3,403	3.4	18.4	19.8	26.0	0.0
<b>Home Purchase Loans</b>							
Low	7	592	10.3	5.1	8.5	4.5	20.8
Moderate	28	3,719	41.2	31.9	21.5	16.2	17.6
Middle	11	1,789	16.2	15.4	21.0	19.9	21.1
Upper	22	5,549	32.4	47.6	29.3	41.5	40.5
Unknown	0	0	0.0	0.0	19.8	17.9	0.0
<b>Home Refinance Loans</b>							
Low	3	157	17.6	4.9	8.7	4.8	20.8
Moderate	0	0	0.0	0.0	17.3	12.9	17.6
Middle	2	269	11.8	8.3	23.0	20.2	21.1
Upper	11	2,734	64.7	84.8	37.0	47.5	40.5
Unknown	1	64	5.9	2.0	14.0	14.6	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	7.6	5.6	20.8
Moderate	0	0	0.0	0.0	17.2	13.9	17.6
Middle	0	0	0.0	0.0	22.6	17.4	21.1
Upper	0	0	0.0	0.0	44.9	50.9	40.5
Unknown	0	0	0.0	0.0	7.7	12.2	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	20.8
Moderate	0	0	0.0	0.0	1.6	0.4	17.6
Middle	0	0	0.0	0.0	2.6	0.4	21.1
Upper	1	319	33.3	8.7	17.7	3.3	40.5
Unknown	2	3,339	66.7	91.3	78.1	95.9	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-12  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
WICHITA METROPOLITAN AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	36	6,870	35.6	24.5	41.5	34.2	88.5
<b>Over \$1MM</b>	60	20,445	59.4	72.8	Not Reported		10.7
<b>Unknown</b>	5	761	5.0	2.7			0.7
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	2	425	100.0	100.0	65.1	85.8	98.7
<b>Over \$1MM</b>	0	0	0.0	0.0	Not Reported		1.3
<b>Unknown</b>	0	0	0.0	0.0			0.0

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

C. Northwest Kansas AA (Full-Scope Review) – 2018 and 2019 Demographic Tables and 2018 Lending Tables

TABLE D-13 NORTHWEST KANSAS AA 2019 DEMOGRAPHICS									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	2,195	16.5	
Moderate	1	5.9	861	6.5	152	17.7	2,124	16.0	
Middle	13	76.5	8,380	63.1	487	5.8	2,954	22.3	
Upper	3	17.6	4,030	30.4	178	4.4	5,998	45.2	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>17</b>	<b>100.0</b>	<b>13,271</b>	<b>100.0</b>	<b>817</b>	<b>6.2</b>	<b>13,271</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	2,875	905	5.9	31.5	1,689	58.7	281	9.8	
Middle	15,096	9,818	63.6	65.0	3,317	22.0	1,961	13.0	
Upper	7,588	4,716	30.5	62.2	2,129	28.1	743	9.8	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>25,559</b>	<b>15,439</b>	<b>100.0</b>	<b>60.4</b>	<b>7,135</b>	<b>27.9</b>	<b>2,985</b>	<b>11.7</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	365	12.0	312	11.4	50	21.8	3	5.2	
Middle	1,817	59.9	1,640	59.7	132	57.6	45	77.6	
Upper	853	28.1	796	29.0	47	20.5	10	17.2	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>3,035</b>	<b>100.0</b>	<b>2,748</b>	<b>100.0</b>	<b>229</b>	<b>100.0</b>	<b>58</b>	<b>100.0</b>	
<b>Percentage of Total Businesses:</b>			<b>90.5</b>		<b>7.5</b>		<b>1.9</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	6	1.0	6	1.0	0	0.0	0	0.0	
Middle	504	81.0	494	80.7	10	100.0	0	0.0	
Upper	112	18.0	112	18.3	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>622</b>	<b>100.0</b>	<b>612</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	
<b>Percentage of Total Farms:</b>			<b>98.4</b>		<b>1.6</b>		<b>0.0</b>		
<p>Source: 2019 FFIEC Census Data 2019 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>NOTE: Percentages may not add up to 100.0 due to rounding.</p>									



**TABLE D-14  
NORTHWEST KANSAS AA 2018 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,173	16.4
Moderate	0	0.0	0	0.0	0	0.0	2,104	15.9
Middle	14	82.4	9,241	69.6	639	6.9	2,943	22.2
Upper	3	17.6	4,030	30.4	178	4.4	6,051	45.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>17</b>	<b>100.0</b>	<b>13,271</b>	<b>100.0</b>	<b>817</b>	<b>6.2</b>	<b>13,271</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	17,971	10,723	69.5	59.7	5,006	27.9	2,242	12.5
Upper	7,588	4,716	30.5	62.2	2,129	28.1	743	9.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>25,559</b>	<b>15,439</b>	<b>100.0</b>	<b>60.4</b>	<b>7,135</b>	<b>27.9</b>	<b>2,985</b>	<b>11.7</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	2,186	71.8	1,952	70.9	189	79.4	45	83.3
Upper	858	28.2	800	29.1	49	20.6	9	16.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,044</b>	<b>100.0</b>	<b>2,752</b>	<b>100.0</b>	<b>238</b>	<b>100.0</b>	<b>54</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>90.4</b>		<b>7.8</b>		<b>1.8</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	518	81.4	507	81.1	11	100.0	0	0.0
Upper	118	18.6	118	18.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>636</b>	<b>100.0</b>	<b>625</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>			<b>98.3</b>		<b>1.7</b>		<b>0.0</b>	

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-15  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
NORTHWEST KANSAS AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
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	30	3,276	65.2	58.8	58.4	50.4	69.5
Upper	16	2,298	34.8	41.2	41.5	49.3	30.5
Unknown	0	0	0.0	0.0	0.1	0.3	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
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	18	1,871	58.1	48.6	56.3	49.4	69.5
Upper	13	1,980	41.9	51.4	43.8	50.6	30.5
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
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	1,315	78.6	80.5	62.1	56.3	69.5
Upper	3	318	21.4	19.5	37.4	42.5	30.5
Unknown	0	0	0.0	0.0	0.5	1.2	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
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	0	0	0.0	0.0	46.2	53.4	69.5
Upper	0	0	0.0	0.0	53.8	46.6	30.5
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
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	90	100.0	100.0	69.2	30.9	64.7
Upper	0	0	0.0	0.0	30.8	69.1	35.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-16  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
NORTHWEST KANSAS AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	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
<b>Middle</b>	103	9,189	93.6	92.6	70.7	76.4	71.8
<b>Upper</b>	7	729	6.4	7.4	27.0	22.8	28.2
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	2.3	0.8	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	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
<b>Middle</b>	403	48,901	97.3	97.6	88.9	92.7	81.4
<b>Upper</b>	11	1,194	2.7	2.4	9.6	7.1	18.6
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	1.4	0.2	0.0

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-17  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
NORTHWEST KANSAS AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	6	440	13.0	7.9	10.3	5.9	16.4
Moderate	9	1,106	19.6	19.8	19.6	14.7	15.9
Middle	16	2,096	34.8	37.6	23.0	21.8	22.2
Upper	11	1,782	23.9	32.0	32.0	40.4	45.6
Unknown	4	150	8.7	2.7	15.0	17.2	0.0
<b>Home Purchase Loans</b>							
Low	4	310	12.9	8.0	8.9	5.4	16.4
Moderate	7	808	22.6	21.0	20.3	16.3	15.9
Middle	14	1,884	45.2	48.9	25.7	24.3	22.2
Upper	6	849	19.4	22.0	32.8	42.1	45.6
Unknown	0	0	0.0	0.0	12.3	11.9	0.0
<b>Home Refinance Loans</b>							
Low	2	130	14.3	8.0	15.2	8.8	16.4
Moderate	2	298	14.3	18.2	19.2	13.7	15.9
Middle	2	212	14.3	13.0	19.2	19.4	22.2
Upper	5	933	35.7	57.1	31.8	45.3	45.6
Unknown	3	60	21.4	3.7	14.6	12.7	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	16.4
Moderate	0	0	0.0	0.0	23.1	26.8	15.9
Middle	0	0	0.0	0.0	30.8	34.3	22.2
Upper	0	0	0.0	0.0	46.2	38.9	45.6
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	16.4
Moderate	0	0	0.0	0.0	0.0	0.0	15.9
Middle	0	0	0.0	0.0	0.0	0.0	22.2
Upper	0	0	0.0	0.0	0.0	0.0	45.6
Unknown	1	90	100.0	100.0	100.0	100.0	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-18  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
NORTHWEST KANSAS AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	49	4,493	44.5	45.3	48.7	44.9	90.4
<b>Over \$1MM</b>	24	4,623	21.8	46.6	Not Reported		7.8
<b>Unknown</b>	37	802	33.6	8.1			1.8
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	281	33,906	67.9	67.7	50.7	66.0	98.3
<b>Over \$1MM</b>	91	14,510	22.0	29.0	Not Reported		1.7
<b>Unknown</b>	42	1,679	10.1	3.4			0.0

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

D. Ozark Mountain AA (Full-Scope Review) – 2018 and 2019 Demographic Tables and 2018 Lending Tables

TABLE D-19 OZARK MOUNTAIN AA 2019 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	3,117	17.7	
Moderate	0	0.0	0	0.0	0	0.0	3,180	18.1	
Middle	10	83.3	13,774	78.2	2,035	14.8	4,098	23.3	
Upper	2	16.7	3,831	21.8	305	8.0	7,210	41.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>12</b>	<b>100.0</b>	<b>17,605</b>	<b>100.0</b>	<b>2,340</b>	<b>13.3</b>	<b>17,605</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	23,473	14,266	75.3	60.8	6,022	25.7	3,185	13.6	
Upper	6,990	4,682	24.7	67.0	968	13.8	1,340	19.2	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>30,463</b>	<b>18,948</b>	<b>100.0</b>	<b>62.2</b>	<b>6,990</b>	<b>22.9</b>	<b>4,525</b>	<b>14.9</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	2,548	82.9	2,346	82.5	169	90.4	33	78.6	
Upper	526	17.1	499	17.5	18	9.6	9	21.4	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>3,074</b>	<b>100.0</b>	<b>2,845</b>	<b>100.0</b>	<b>187</b>	<b>100.0</b>	<b>42</b>	<b>100.0</b>	
<b>Percentage of Total Businesses:</b>				<b>92.6</b>		<b>6.1</b>		<b>1.4</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	128	82.1	125	81.7	1	100.0	2	100.0	
Upper	28	17.9	28	18.3	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>156</b>	<b>100.0</b>	<b>153</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	
<b>Percentage of Total Farms:</b>				<b>98.1</b>		<b>0.6</b>		<b>1.3</b>	
<p>Source: 2019 FFIEC Census Data 2019 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>NOTE: Percentages may not add up to 100.0 due to rounding.</p>									

**TABLE D-20  
OZARK MOUNTAIN AA 2018 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	3,119	17.7
Moderate	0	0.0	0	0.0	0	0.0	3,182	18.1
Middle	10	83.3	13,774	78.2	2,035	14.8	4,098	23.3
Upper	2	16.7	3,831	21.8	305	8.0	7,206	40.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>12</b>	<b>100.0</b>	<b>17,605</b>	<b>100.0</b>	<b>2,340</b>	<b>13.3</b>	<b>17,605</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	23,473	14,266	75.3	60.8	6,022	25.7	3,185	13.6
Upper	6,990	4,682	24.7	67.0	968	13.8	1,340	19.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>30,463</b>	<b>18,948</b>	<b>100.0</b>	<b>62.2</b>	<b>6,990</b>	<b>22.9</b>	<b>4,525</b>	<b>14.9</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	2,559	82.9	2,346	82.4	172	90.1	41	80.4
Upper	529	17.1	500	17.6	19	9.9	10	19.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,088</b>	<b>100.0</b>	<b>2,846</b>	<b>100.0</b>	<b>191</b>	<b>100.0</b>	<b>51</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>92.2</b>		<b>6.2</b>		<b>1.7</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	128	80.5	125	80.1	1	100.0	2	100.0
Upper	31	19.5	31	19.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>159</b>	<b>100.0</b>	<b>156</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>98.1</b>		<b>0.6</b>		<b>1.3</b>	

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-21  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
OZARK MOUNTAIN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
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	195	23,626	73.6	66.9	72.9	69.7	75.3
Upper	70	11,697	26.4	33.1	27.1	30.3	24.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
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	123	15,789	78.3	73.3	73.5	68.1	75.3
Upper	34	5,753	21.7	26.7	26.5	31.9	24.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
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	64	6,626	67.4	56.8	70.1	63.6	75.3
Upper	31	5,041	32.6	43.2	29.9	36.4	24.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
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	2	58	66.7	68.2	82.4	81.0	75.3
Upper	1	27	33.3	31.8	17.6	19.0	24.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	6	1,153	60.0	56.8	78.3	94.8	83.3
Upper	4	876	40.0	43.2	21.7	5.2	16.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.



**TABLE D-22  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
OZARK MOUNTAIN AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	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
<b>Middle</b>	153	13,625	76.1	75.6	77.3	83.2	82.9
<b>Upper</b>	48	4,407	23.9	24.4	22.2	16.5	17.1
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	0.5	0.3	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	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
<b>Middle</b>	94	6,343	81.0	86.0	84.4	83.6	80.5
<b>Upper</b>	22	1,036	19.0	14.0	15.6	16.4	19.5
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-23  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
OZARK MOUNTAIN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	17	1,061	6.4	3.0	6.4	3.2	17.7
Moderate	47	4,276	17.7	12.1	14.5	9.5	18.1
Middle	50	4,726	18.9	13.4	18.1	14.1	23.3
Upper	129	23,767	48.7	67.3	42.0	48.7	40.9
Unknown	22	1,493	8.3	4.2	19.1	24.5	0.0
<b>Home Purchase Loans</b>							
Low	7	495	4.5	2.3	4.6	2.5	17.7
Moderate	34	3,287	21.7	15.3	14.8	10.7	18.1
Middle	35	3,624	22.3	16.8	18.3	15.9	23.3
Upper	75	13,549	47.8	62.9	42.2	51.7	40.9
Unknown	6	587	3.8	2.7	20.1	19.2	0.0
<b>Home Refinance Loans</b>							
Low	10	566	10.5	4.9	9.6	5.4	17.7
Moderate	13	989	13.7	8.5	15.1	10.6	18.1
Middle	13	1,030	13.7	8.8	17.7	14.4	23.3
Upper	44	8,189	46.3	70.2	43.0	56.5	40.9
Unknown	15	893	15.8	7.7	14.6	13.1	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	10.3	6.4	17.7
Moderate	0	0	0.0	0.0	10.3	7.1	18.1
Middle	2	72	66.7	84.7	25.0	29.0	23.3
Upper	0	0	0.0	0.0	42.6	45.4	40.9
Unknown	1	13	33.3	15.3	11.8	12.1	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	17.7
Moderate	0	0	0.0	0.0	0.0	0.0	18.1
Middle	0	0	0.0	0.0	0.0	0.0	23.3
Upper	10	2,029	100.0	100.0	52.2	15.6	40.9
Unknown	0	0	0.0	0.0	47.8	84.4	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-24  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
OZARK MOUNTAIN AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	126	10,681	62.7	59.2	48.5	47.7	92.2
<b>Over \$1MM</b>	35	5,504	17.4	30.5	Not Reported		6.2
<b>Unknown</b>	40	1,847	19.9	10.2			1.7
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	68	5,678	58.6	76.9	70.8	82.7	98.1
<b>Over \$1MM</b>	0	0	0.0	0.0	Not Reported		0.6
<b>Unknown</b>	48	1,701	41.4	23.1			1.3

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

E. Western Missouri AA (Full-Scope Review) – 2018 and 2019 Demographic Tables and 2018 Lending Tables

TABLE D-25 WESTERN MISSOURI AA 2019 DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	2.5	494	1.2	204	41.3	7,132	17.3
Moderate	4	10.0	3,368	8.2	520	15.4	7,295	17.7
Middle	29	72.5	27,055	65.6	3,545	13.1	8,596	20.8
Upper	6	15.0	10,326	25.0	601	5.8	18,220	44.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>40</b>	<b>100.0</b>	<b>41,243</b>	<b>100.0</b>	<b>4,870</b>	<b>11.8</b>	<b>41,243</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	982	402	0.9	40.9	341	34.7	239	24.3
Moderate	8,997	3,635	8.5	40.4	1,344	14.9	4,018	44.7
Middle	49,414	27,961	65.3	56.6	14,667	29.7	6,786	13.7
Upper	15,534	10,799	25.2	69.5	3,464	22.3	1,271	8.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>74,927</b>	<b>42,797</b>	<b>100.0</b>	<b>57.1</b>	<b>19,816</b>	<b>26.4</b>	<b>12,314</b>	<b>16.4</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	57	1.0	45	0.8	12	2.9	0	0.0
Moderate	499	8.5	468	8.7	27	6.6	4	4.4
Middle	4,055	68.7	3,677	68.1	305	74.2	73	80.2
Upper	1,289	21.8	1,208	22.4	67	16.3	14	15.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>5,900</b>	<b>100.0</b>	<b>5,398</b>	<b>100.0</b>	<b>411</b>	<b>100.0</b>	<b>91</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>91.5</b>		<b>7.0</b>		<b>1.5</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	10	1.9	10	1.9	0	0.0	0	0.0
Middle	370	69.5	362	69.2	6	85.7	2	100.0
Upper	152	28.6	151	28.9	1	14.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>532</b>	<b>100.0</b>	<b>523</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>98.3</b>		<b>1.3</b>		<b>0.4</b>	
<p>Source: 2019 FFIEC Census Data 2019 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>NOTE: Percentages may not add up to 100.0 due to rounding.</p>								

**TABLE D-26  
WESTERN MISSOURI AA 2018 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	2.5	494	1.2	204	41.3	7,177	17.4
Moderate	4	10.0	3,368	8.2	520	15.4	7,321	17.8
Middle	29	72.5	27,055	65.6	3,545	13.1	8,636	20.9
Upper	6	15.0	10,326	25.0	601	5.8	18,109	43.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>40</b>	<b>100.0</b>	<b>41,243</b>	<b>100.0</b>	<b>4,870</b>	<b>11.8</b>	<b>41,243</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	982	402	0.9	40.9	341	34.7	239	24.3
Moderate	8,997	3,635	8.5	40.4	1,344	14.9	4,018	44.7
Middle	49,414	27,961	65.3	56.6	14,667	29.7	6,786	13.7
Upper	15,534	10,799	25.2	69.5	3,464	22.3	1,271	8.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>74,927</b>	<b>42,797</b>	<b>100.0</b>	<b>57.1</b>	<b>19,816</b>	<b>26.4</b>	<b>12,314</b>	<b>16.4</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	56	0.9	43	0.8	12	2.8	1	0.8
Moderate	500	8.3	466	8.5	27	6.4	7	5.5
Middle	4,135	68.8	3,721	68.2	313	74.0	101	78.9
Upper	1,318	21.9	1,228	22.5	71	16.8	19	14.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>6,009</b>	<b>100.0</b>	<b>5,458</b>	<b>100.0</b>	<b>423</b>	<b>100.0</b>	<b>128</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>90.8</b>		<b>7.0</b>		<b>2.1</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	11	1.9	11	1.9	0	0.0	0	0.0
Middle	389	67.9	383	67.7	4	80.0	2	100.0
Upper	173	30.2	172	30.4	1	20.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>573</b>	<b>100.0</b>	<b>566</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>98.8</b>		<b>0.9</b>		<b>0.3</b>	

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-27  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
WESTERN MISSOURI AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	2	150	1.2	0.8	0.7	0.4	0.9
Moderate	14	2,468	8.2	12.6	8.7	7.1	8.5
Middle	120	13,124	70.6	66.8	61.2	56.0	65.3
Upper	34	3,917	20.0	19.9	29.3	36.4	25.2
Unknown	0	0	0.0	0.0	0.2	0.2	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	2	150	1.9	1.2	0.6	0.3	0.9
Moderate	4	267	3.7	2.2	9.0	6.5	8.5
Middle	84	9,024	78.5	74.6	59.9	52.9	65.3
Upper	17	2,655	15.9	21.9	30.3	40.1	25.2
Unknown	0	0	0.0	0.0	0.2	0.2	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	0.9	0.6	0.9
Moderate	7	475	12.7	10.8	7.2	6.2	8.5
Middle	31	2,657	56.4	60.5	65.6	61.7	65.3
Upper	17	1,262	30.9	28.7	26.4	31.6	25.2
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	0.7	0.5	0.9
Moderate	0	0	0.0	0.0	11.2	11.0	8.5
Middle	1	62	100.0	100.0	51.7	51.0	65.3
Upper	0	0	0.0	0.0	36.4	37.4	25.2
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	0	0	0.0	0.0	0.0	0.0	5.2
Moderate	3	1,726	42.9	55.6	15.7	16.1	4.0
Middle	4	1,381	57.1	44.4	74.5	68.6	80.6
Upper	0	0	0.0	0.0	9.8	15.3	10.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-28  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
WESTERN MISSOURI AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	1.4	1.2	0.9
Moderate	14	813	12.7	9.0	9.7	9.0	8.3
Middle	74	5,909	67.3	65.7	65.2	70.9	68.8
Upper	22	2,275	20.0	25.3	21.6	18.2	21.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	2.1	0.6	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	0.2	0.4	0.0
Moderate	13	1,204	10.8	16.0	5.3	8.0	1.9
Middle	81	4,452	67.5	59.3	63.4	53.4	67.9
Upper	26	1,857	21.7	24.7	31.0	38.2	30.2
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.1	0.1	0.0

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-29  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
WESTERN MISSOURI AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	10	544	5.9	2.8	5.4	2.7	17.4
Moderate	34	2,878	20.0	14.6	15.3	10.0	17.8
Middle	44	4,570	25.9	23.2	19.6	16.0	20.9
Upper	66	8,443	38.8	42.9	37.6	44.4	43.9
Unknown	16	3,224	9.4	16.4	22.1	26.9	0.0
<b>Home Purchase Loans</b>							
Low	7	423	6.5	3.5	4.9	2.6	17.4
Moderate	28	2,552	26.2	21.1	16.7	11.4	17.8
Middle	31	3,527	29.0	29.2	20.2	17.8	20.9
Upper	37	5,324	34.6	44.0	36.1	46.1	43.9
Unknown	4	270	3.7	2.2	22.1	22.1	0.0
<b>Home Refinance Loans</b>							
Low	3	121	5.5	2.8	6.6	4.2	17.4
Moderate	5	264	9.1	6.0	14.6	9.5	17.8
Middle	13	1,043	23.6	23.7	19.6	15.9	20.9
Upper	26	2,536	47.3	57.7	42.9	53.3	43.9
Unknown	8	430	14.5	9.8	16.4	17.1	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	8.4	3.7	17.4
Moderate	1	62	100.0	100.0	8.4	6.3	17.8
Middle	0	0	0.0	0.0	21.7	20.8	20.9
Upper	0	0	0.0	0.0	51.7	58.9	43.9
Unknown	0	0	0.0	0.0	9.8	10.4	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	17.4
Moderate	0	0	0.0	0.0	2.0	0.2	17.8
Middle	0	0	0.0	0.0	3.9	1.2	20.9
Upper	3	583	42.9	18.8	11.8	2.6	43.9
Unknown	4	2,524	57.1	81.2	82.4	96.0	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.



**TABLE D-30  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
WESTERN MISSOURI AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	91	5,147	82.7	57.2	52.9	45.4	90.8
<b>Over \$1MM</b>	12	3,544	10.9	39.4	Not Reported		7.0
<b>Unknown</b>	7	306	6.4	3.4			2.1
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	109	6,888	90.8	91.7	63.4	78.6	98.8
<b>Over \$1MM</b>	6	450	5.0	6.0	Not Reported		0.9
<b>Unknown</b>	5	175	4.2	2.3			0.3

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

F. Northern Oklahoma AA (Full-Scope Review) – 2018 and 2019 Demographic Tables and 2018 Lending Tables

TABLE D-31 NORTHERN OKLAHOMA AA 2019 DEMOGRAPHICS									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	2,452	21.2	
Moderate	3	27.3	2,522	21.8	505	20.0	2,128	18.4	
Middle	6	54.5	6,897	59.7	929	13.5	2,272	19.7	
Upper	2	18.2	2,134	18.5	137	6.4	4,701	40.7	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>11</b>	<b>100.0</b>	<b>11,553</b>	<b>100.0</b>	<b>1,571</b>	<b>13.6</b>	<b>11,553</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	5,052	2,566	20.5	50.8	1,352	26.8	1,134	22.4	
Middle	13,049	7,257	58.1	55.6	3,851	29.5	1,941	14.9	
Upper	3,525	2,665	21.3	75.6	424	12.0	436	12.4	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>21,626</b>	<b>12,488</b>	<b>100.0</b>	<b>57.7</b>	<b>5,627</b>	<b>26.0</b>	<b>3,511</b>	<b>16.2</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	438	24.6	396	25.1	39	22.7	3	11.1	
Middle	1,017	57.2	890	56.3	108	62.8	19	70.4	
Upper	324	18.2	294	18.6	25	14.5	5	18.5	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>1,779</b>	<b>100.0</b>	<b>1,580</b>	<b>100.0</b>	<b>172</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	
<b>Percentage of Total Businesses:</b>				<b>88.8</b>		<b>9.7</b>		<b>1.5</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	13	10.0	13	10.0	0	0.0	0	0.0	
Middle	96	73.8	96	73.8	0	0.0	0	0.0	
Upper	21	16.2	21	16.2	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>130</b>	<b>100.0</b>	<b>130</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	
<b>Percentage of Total Farms:</b>				<b>100.0</b>		<b>0.0</b>		<b>0.0</b>	
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.									

**TABLE D-32  
NORTHERN OKLAHOMA AA 2018 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,468	21.4
Moderate	3	27.3	2,522	21.8	505	20.0	2,128	18.4
Middle	6	54.5	6,897	59.7	929	13.5	2,276	19.7
Upper	2	18.2	2,134	18.5	137	6.4	4,681	40.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>11</b>	<b>100.0</b>	<b>11,553</b>	<b>100.0</b>	<b>1,571</b>	<b>13.6</b>	<b>11,553</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	5,052	2,566	20.5	50.8	1,352	26.8	1,134	22.4
Middle	13,049	7,257	58.1	55.6	3,851	29.5	1,941	14.9
Upper	3,525	2,665	21.3	75.6	424	12.0	436	12.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>21,626</b>	<b>12,488</b>	<b>100.0</b>	<b>57.7</b>	<b>5,627</b>	<b>26.0</b>	<b>3,511</b>	<b>16.2</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	441	24.6	396	25.1	39	21.9	6	16.7
Middle	1,019	56.9	884	56.0	112	62.9	23	63.9
Upper	332	18.5	298	18.9	27	15.2	7	19.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,792</b>	<b>100.0</b>	<b>1,578</b>	<b>100.0</b>	<b>178</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>88.1</b>	<b>9.9</b>	<b>2.0</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	13	10.0	13	10.1	0	0.0	0	0.0
Middle	96	73.8	95	73.6	0	0.0	1	100.0
Upper	21	16.2	21	16.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>130</b>	<b>100.0</b>	<b>129</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>99.2</b>	<b>0.0</b>	<b>0.8</b>			

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-33  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
NORTHERN OKLAHOMA AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	12	783	15.2	7.4	14.0	8.9	20.5
Middle	43	3,406	54.4	32.1	63.2	56.0	58.1
Upper	24	6,423	30.4	60.5	22.7	35.1	21.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	4	119	11.4	2.0	12.8	8.3	20.5
Middle	18	1,220	51.4	20.9	63.5	54.4	58.1
Upper	13	4,508	37.1	77.1	23.6	37.3	21.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	7	289	16.7	6.9	14.8	6.3	20.5
Middle	24	2,011	57.1	47.7	63.2	61.1	58.1
Upper	11	1,915	26.2	45.4	22.0	32.7	21.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	19.0	8.4	20.5
Middle	0	0	0.0	0.0	52.4	48.6	58.1
Upper	0	0	0.0	0.0	28.6	43.1	21.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	375	50.0	68.2	38.1	32.8	10.9
Middle	1	175	50.0	31.8	52.4	59.3	80.7
Upper	0	0	0.0	0.0	9.5	7.9	8.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-34  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
NORTHERN OKLAHOMA AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Moderate</b>	28	2,969	34.1	28.7	19.8	15.4	24.6
<b>Middle</b>	29	3,549	35.4	34.4	54.9	62.9	56.9
<b>Upper</b>	25	3,810	30.5	36.9	24.0	21.4	18.5
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	1.2	0.3	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Moderate</b>	4	280	6.0	7.9	15.5	25.2	10.0
<b>Middle</b>	55	2,675	82.1	75.3	69.4	62.8	73.8
<b>Upper</b>	8	597	11.9	16.8	15.1	12.0	16.2
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-35  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
NORTHERN OKLAHOMA AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	6	312	7.6	2.9	6.7	3.6	21.4
Moderate	10	641	12.7	6.0	12.1	8.2	18.4
Middle	12	1,103	15.2	10.4	18.8	15.8	19.7
Upper	32	6,672	40.5	62.9	36.1	45.6	40.5
Unknown	19	1,884	24.1	17.8	26.3	26.8	0.0
<b>Home Purchase Loans</b>							
Low	4	234	11.4	4.0	8.2	4.3	21.4
Moderate	1	79	2.9	1.4	11.3	7.9	18.4
Middle	5	454	14.3	7.8	19.5	16.8	19.7
Upper	16	4,442	45.7	76.0	33.7	45.5	40.5
Unknown	9	638	25.7	10.9	27.4	25.5	0.0
<b>Home Refinance Loans</b>							
Low	2	78	4.8	1.9	4.5	2.0	21.4
Moderate	9	562	21.4	13.3	16.1	11.1	18.4
Middle	7	649	16.7	15.4	19.7	16.5	19.7
Upper	16	2,230	38.1	52.9	46.2	56.4	40.5
Unknown	8	696	19.0	16.5	13.5	14.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	21.4
Moderate	0	0	0.0	0.0	9.5	10.7	18.4
Middle	0	0	0.0	0.0	19.1	20.5	19.7
Upper	0	0	0.0	0.0	71.4	68.8	40.5
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	21.4
Moderate	0	0	0.0	0.0	0.0	0.0	18.4
Middle	0	0	0.0	0.0	0.0	0.0	19.7
Upper	0	0	0.0	0.0	9.5	13.3	40.5
Unknown	2	550	100.0	100.0	90.5	86.7	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE D-36  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
NORTHERN OKLAHOMA AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	54	4,294	65.9	41.6	50.8	37.4	88.1
<b>Over \$1MM</b>	20	5,072	24.4	49.1	Not Reported		9.9
<b>Unknown</b>	8	962	9.8	9.3			2.0
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	54	2,690	80.6	75.7	79.8	85.5	99.2
<b>Over \$1MM</b>	5	666	7.5	18.8	Not Reported		0.0
<b>Unknown</b>	8	196	11.9	5.5			0.8

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

APPENDIX E

DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS

A. Topeka Metropolitan AA (Limited-Scope Review) – 2018 and 2019 Demographic and Lending Tables

TABLE E-1 TOPEKA METROPOLITAN AA 2018 DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	11.6	2,843	6.4	1,082	38.1	9,270	20.8
Moderate	10	23.3	7,609	17.0	1,658	21.8	7,684	17.2
Middle	17	39.5	17,221	38.6	1,626	9.4	9,724	21.8
Upper	11	25.6	16,981	38.0	322	1.9	17,976	40.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>43</b>	<b>100.0</b>	<b>44,654</b>	<b>100.0</b>	<b>4,688</b>	<b>10.5</b>	<b>44,654</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	7,169	2,100	4.6	29.3	3,619	50.5	1,450	20.2
Moderate	16,341	7,040	15.3	43.1	6,793	41.6	2,508	15.3
Middle	32,638	17,947	39.1	55.0	11,695	35.8	2,996	9.2
Upper	23,277	18,786	41.0	80.7	3,388	14.6	1,103	4.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>79,425</b>	<b>45,873</b>	<b>100.0</b>	<b>57.8</b>	<b>25,495</b>	<b>32.1</b>	<b>8,057</b>	<b>10.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	999	15.1	782	13.5	165	22.6	52	59.8
Moderate	1,275	19.2	1,092	18.8	178	24.4	5	5.7
Middle	2,643	39.9	2,339	40.3	293	40.1	11	12.6
Upper	1,709	25.8	1,595	27.5	95	13.0	19	21.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>6,626</b>	<b>100.0</b>	<b>5,808</b>	<b>100.0</b>	<b>731</b>	<b>100.0</b>	<b>87</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>87.7</b>		<b>11.0</b>		<b>1.3</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	2	1.6	2	1.6	0	0.0	0	0.0
Moderate	11	8.5	11	8.5	0	0.0	0	0.0
Middle	22	17.1	22	17.1	0	0.0	0	0.0
Upper	94	72.9	94	72.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>129</b>	<b>100.0</b>	<b>129</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>100.0</b>		<b>0.0</b>		<b>0.0</b>
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.								



**TABLE E-2  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
TOPEKA METROPOLITAN AA**

Census Tract Income Level	Bank Loans			Aggregate HMDA Data		% of Owner- Occupied Units	
	#	\$(000)	#%	\$(000)	#%		
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	1.7	1.2	4.6
Moderate	4	169	26.7	4.4	12.1	10.8	15.3
Middle	8	3,247	53.3	84.1	41.8	37.6	39.1
Upper	3	443	20.0	11.5	44.4	50.4	41.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	1.4	0.6	4.6
Moderate	3	148	30.0	12.6	12.3	6.7	15.3
Middle	5	710	50.0	60.5	44.2	38.9	39.1
Upper	2	315	20.0	26.9	42.0	53.8	41.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	2.0	1.4	4.6
Moderate	1	21	25.0	4.2	9.6	4.8	15.3
Middle	2	349	50.0	70.1	37.2	31.4	39.1
Upper	1	128	25.0	25.7	51.1	62.4	41.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	1.3	1.1	4.6
Moderate	0	0	0.0	0.0	10.5	6.1	15.3
Middle	0	0	0.0	0.0	35.6	30.3	39.1
Upper	0	0	0.0	0.0	52.7	62.5	41.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>						<b>% of Multifamily Units</b>	
Low	0	0	0.0	0.0	19.6	4.4	13.6
Moderate	0	0	0.0	0.0	39.2	50.2	26.4
Middle	1	2,188	100.0	100.0	35.3	42.4	49.9
Upper	0	0	0.0	0.0	5.9	3.0	10.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-3  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
TOPEKA METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	2	116	8.0	6.0	11.6	13.4	15.1
<b>Moderate</b>	11	1,276	44.0	65.8	18.6	20.6	19.2
<b>Middle</b>	5	163	20.0	8.4	42.7	49.7	39.9
<b>Upper</b>	7	383	28.0	19.8	26.0	16.0	25.8
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	1.1	0.3	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	0.0	0.0	1.6
<b>Moderate</b>	0	0	0.0	0.0	0.0	0.0	8.5
<b>Middle</b>	0	0	0.0	0.0	11.8	15.7	17.1
<b>Upper</b>	1	100	100.0	100.0	88.2	84.3	72.9
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-4  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
TOPEKA METROPOLITAN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	10.2	5.1	20.8
Moderate	1	21	6.7	0.5	20.5	14.8	17.2
Middle	0	0	0.0	0.0	22.3	20.0	21.8
Upper	8	1,299	53.3	33.7	31.0	37.9	40.3
Unknown	6	2,539	40.0	65.8	16.0	22.2	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	9.9	5.4	20.8
Moderate	0	0	0.0	0.0	23.7	18.2	17.2
Middle	0	0	0.0	0.0	22.2	22.6	21.8
Upper	5	822	50.0	70.1	29.1	40.9	40.3
Unknown	5	351	50.0	29.9	15.1	12.9	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	11.6	6.0	20.8
Moderate	1	21	25.0	4.2	17.4	13.1	17.2
Middle	0	0	0.0	0.0	25.6	22.6	21.8
Upper	3	477	75.0	95.8	35.8	47.7	40.3
Unknown	0	0	0.0	0.0	9.6	10.5	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	14.3	11.0	20.8
Moderate	0	0	0.0	0.0	10.5	7.9	17.2
Middle	0	0	0.0	0.0	20.6	17.9	21.8
Upper	0	0	0.0	0.0	46.0	56.5	40.3
Unknown	0	0	0.0	0.0	8.6	6.8	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	3.9	0.2	20.8
Moderate	0	0	0.0	0.0	0.0	0.0	17.2
Middle	0	0	0.0	0.0	2.0	0.0	21.8
Upper	0	0	0.0	0.0	2.0	1.4	40.3
Unknown	1	2,188	100.0	100.0	92.2	98.4	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-5  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
TOPEKA METROPOLITAN AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	19	1,260	76.0	65.0	40.6	34.2	87.7
<b>Over \$1MM</b>	3	614	12.0	31.7	Not Reported		11.0
<b>Unknown</b>	3	64	12.0	3.3			1.3
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	1	100	100.0	100.0	41.2	65.2	100.0
<b>Over \$1MM</b>	0	0	0.0	0.0	Not Reported		0.0
<b>Unknown</b>	0	0	0.0	0.0			0.0

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-6  
TOPEKA METROPOLITAN AA 2019 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	5	11.6	2,843	6.4	1,082	38.1	9,270	20.8
Moderate	10	23.3	7,609	17.0	1,658	21.8	7,684	17.2
Middle	17	39.5	17,221	38.6	1,626	9.4	9,724	21.8
Upper	11	25.6	16,981	38.0	322	1.9	17,976	40.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>43</b>	<b>100.0</b>	<b>44,654</b>	<b>100.0</b>	<b>4,688</b>	<b>10.5</b>	<b>44,654</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	7,169	2,100	4.6	29.3	3,619	50.5	1,450	20.2
Moderate	16,341	7,040	15.3	43.1	6,793	41.6	2,508	15.3
Middle	32,638	17,947	39.1	55.0	11,695	35.8	2,996	9.2
Upper	23,277	18,786	41.0	80.7	3,388	14.6	1,103	4.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>79,425</b>	<b>45,873</b>	<b>100.0</b>	<b>57.8</b>	<b>25,495</b>	<b>32.1</b>	<b>8,057</b>	<b>10.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	992	15.0	790	13.5	151	21.8	51	56.0
Moderate	1,304	19.7	1,122	19.2	175	25.3	7	7.7
Middle	2,646	39.9	2,358	40.3	273	39.5	15	16.5
Upper	1,686	25.4	1,575	26.9	93	13.4	18	19.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>6,628</b>	<b>100.0</b>	<b>5,845</b>	<b>100.0</b>	<b>692</b>	<b>100.0</b>	<b>91</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>88.2</b>		<b>10.4</b>		<b>1.4</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	2	1.7	2	1.7	0	0.0	0	0.0
Moderate	9	7.5	9	7.5	0	0.0	0	0.0
Middle	20	16.7	20	16.7	0	0.0	0	0.0
Upper	89	74.2	89	74.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>120</b>	<b>100.0</b>	<b>120</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>100.0</b>		<b>0.0</b>		<b>0.0</b>

Source: 2019 FFIEC Census Data  
 2019 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-7  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
TOPEKA METROPOLITAN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	7	515	22.6	18.2	2.0	1.5	4.6
Moderate	11	651	35.5	22.9	11.4	8.6	15.3
Middle	10	880	32.3	31.0	40.2	40.4	39.1
Upper	3	791	9.7	27.9	46.4	49.5	41.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	1	58	10.0	5.9	1.7	0.8	4.6
Moderate	4	240	40.0	24.6	12.8	7.1	15.3
Middle	4	479	40.0	49.1	43.0	36.3	39.1
Upper	1	199	10.0	20.4	42.5	55.8	41.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	2	108	14.3	11.9	1.0	0.4	4.6
Moderate	5	266	35.7	29.4	7.7	3.8	15.3
Middle	6	401	42.9	44.4	37.1	29.3	39.1
Upper	1	129	7.1	14.3	54.2	66.5	41.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	3.3	1.5	4.6
Moderate	1	23	100.0	100.0	11.6	10.9	15.3
Middle	0	0	0.0	0.0	34.4	30.1	39.1
Upper	0	0	0.0	0.0	50.7	57.5	41.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	4	349	66.7	37.4	25.0	4.6	13.6
Moderate	1	122	16.7	13.1	22.9	19.1	26.4
Middle	0	0	0.0	0.0	37.5	69.4	49.9
Upper	1	463	16.7	49.6	14.6	6.9	10.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-8  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
TOPEKA METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	3	547	9.7	29.6	11.6	15.4	15.0
<b>Moderate</b>	10	436	32.3	23.6	18.3	23.0	19.7
<b>Middle</b>	5	494	16.1	26.7	41.3	47.3	39.9
<b>Upper</b>	13	371	41.9	20.1	26.8	14.1	25.4
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	2.0	0.2	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	3.5	1.1	1.7
<b>Moderate</b>	1	68	33.3	39.8	3.5	5.2	7.5
<b>Middle</b>	1	3	33.3	1.8	24.1	17.3	16.7
<b>Upper</b>	1	100	33.3	58.5	69.0	76.3	74.2
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
 2019 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-9  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
TOPEKA METROPOLITAN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	%	#%	%	
<b>Total Home Mortgage Loans</b>							
Low	3	275	9.7	9.7	10.6	4.8	20.8
Moderate	6	268	19.4	9.4	22.8	14.7	17.2
Middle	6	676	19.4	23.8	20.8	16.1	21.8
Upper	3	697	9.7	24.6	28.9	32.2	40.3
Unknown	13	921	41.9	32.5	16.9	32.2	0.0
<b>Home Purchase Loans</b>							
Low	2	189	20.0	19.4	11.9	6.8	20.8
Moderate	2	163	20.0	16.7	26.4	21.7	17.2
Middle	1	199	10.0	20.4	20.6	21.2	21.8
Upper	1	179	10.0	18.3	26.8	38.0	40.3
Unknown	4	246	40.0	25.2	14.3	12.3	0.0
<b>Home Refinance Loans</b>							
Low	1	86	7.1	9.5	9.1	4.2	20.8
Moderate	4	105	28.6	11.6	19.4	12.4	17.2
Middle	3	362	21.4	40.0	21.3	18.1	21.8
Upper	1	55	7.1	6.1	34.5	44.1	40.3
Unknown	5	296	35.7	32.7	15.7	21.2	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	11.6	8.6	20.8
Moderate	0	0	0.0	0.0	21.4	16.5	17.2
Middle	0	0	0.0	0.0	25.5	21.3	21.8
Upper	0	0	0.0	0.0	32.9	44.0	40.3
Unknown	1	23	100.0	100.0	8.6	9.5	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	20.8
Moderate	0	0	0.0	0.0	4.2	0.3	17.2
Middle	2	115	33.3	12.3	6.3	0.1	21.8
Upper	1	463	16.7	49.6	2.1	0.3	40.3
Unknown	3	356	50.0	38.1	87.5	99.3	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.



**TABLE E-10  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
TOPEKA METROPOLITAN AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	%	#%	%	
<b>\$1MM or less</b>	29	1,464	93.5	79.2	43.0	41.6	88.2
<b>Over \$1MM</b>	1	372	3.2	20.1	Not Reported		10.4
<b>Unknown</b>	1	12	3.2	0.6			1.4
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	%	#%	%	
<b>\$1MM or less</b>	3	171	100.0	100.0	51.7	89.9	100.0
<b>Over \$1MM</b>	0	0	0.0	0.0	Not Reported		0.0
<b>Unknown</b>	0	0	0.0	0.0			0.0

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

B. Southeast Kansas AA (Limited-Scope Review) – 2018 and 2019 Demographic and Lending Tables

TABLE E-11 SOUTHEAST KANSAS AA 2018 DEMOGRAPHICS									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	5,495	22.6	
Moderate	11	33.3	5,206	21.4	1,017	19.5	4,716	19.4	
Middle	21	63.6	17,955	73.9	2,018	11.2	5,586	23.0	
Upper	1	3.0	1,138	4.7	171	15.0	8,502	35.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>33</b>	<b>100.0</b>	<b>24,299</b>	<b>100.0</b>	<b>3,206</b>	<b>13.2</b>	<b>24,299</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	11,339	5,511	21.2	48.6	3,277	28.9	2,551	22.5	
Middle	32,203	19,311	74.4	60.0	7,994	24.8	4,898	15.2	
Upper	3,112	1,143	4.4	36.7	1,496	48.1	473	15.2	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>46,654</b>	<b>25,965</b>	<b>100.0</b>	<b>55.7</b>	<b>12,767</b>	<b>27.4</b>	<b>7,922</b>	<b>17.0</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	1,198	32.7	1,050	32.4	134	36.4	14	25.0	
Middle	2,233	61.0	1,984	61.3	207	56.3	42	75.0	
Upper	231	6.3	204	6.3	27	7.3	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>3,662</b>	<b>100.0</b>	<b>3,238</b>	<b>100.0</b>	<b>368</b>	<b>100.0</b>	<b>56</b>	<b>100.0</b>	
<b>Percentage of Total Businesses:</b>			<b>88.4</b>		<b>10.0</b>		<b>1.5</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	42	13.6	40	13.3	2	33.3	0	0.0	
Middle	260	84.4	255	84.7	4	66.7	1	100.0	
Upper	6	1.9	6	2.0	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>308</b>	<b>100.0</b>	<b>301</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	
<b>Percentage of Total Farms:</b>			<b>97.7</b>		<b>1.9</b>		<b>0.3</b>		
<p>Source: 2018 FFIEC Census Data 2018 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>NOTE: Percentages may not add up to 100.0 due to rounding.</p>									

**TABLE E-12  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
SOUTHEAST KANSAS AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	21	1,413	25.3	18.9	19.0	16.3	21.2
Middle	55	5,280	66.3	70.8	72.8	70.1	74.4
Upper	7	764	8.4	10.2	8.3	13.7	4.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	21	1,413	26.3	19.5	19.4	13.8	21.2
Middle	52	5,077	65.0	70.0	72.3	73.9	74.4
Upper	7	764	8.8	10.5	8.3	12.3	4.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	18.0	15.4	21.2
Middle	3	203	100.0	100.0	73.9	70.2	74.4
Upper	0	0	0.0	0.0	8.1	14.4	4.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	15.9	15.5	21.2
Middle	0	0	0.0	0.0	79.5	74.6	74.4
Upper	0	0	0.0	0.0	4.5	10.0	4.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	24.2	34.6	21.2
Middle	0	0	0.0	0.0	51.5	39.4	58.4
Upper	0	0	0.0	0.0	24.2	25.9	20.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-13  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
SOUTHEAST KANSAS AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	3	350	42.9	44.9	30.2	48.8	32.7
Middle	4	429	57.1	55.1	58.8	43.4	61.0
Upper	0	0	0.0	0.0	8.1	7.1	6.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	2.9	0.8	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	17.1	7.8	13.6
Middle	1	150	100.0	100.0	80.1	86.1	84.4
Upper	0	0	0.0	0.0	2.1	5.9	1.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.7	0.1	0.0

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-14  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
SOUTHEAST KANSAS AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	16	834	19.3	11.2	10.2	5.5	22.6
<b>Moderate</b>	20	1,676	24.1	22.5	18.6	13.4	19.4
<b>Middle</b>	22	2,073	26.5	27.8	19.6	18.0	23.0
<b>Upper</b>	25	2,874	30.1	38.5	28.1	35.5	35.0
<b>Unknown</b>	0	0	0.0	0.0	23.6	27.7	0.0
<b>Home Purchase Loans</b>							
<b>Low</b>	16	834	20.0	11.5	10.4	6.2	22.6
<b>Moderate</b>	19	1,646	23.8	22.7	20.5	15.8	19.4
<b>Middle</b>	21	2,025	26.3	27.9	19.2	19.7	23.0
<b>Upper</b>	24	2,749	30.0	37.9	27.6	38.4	35.0
<b>Unknown</b>	0	0	0.0	0.0	22.4	20.0	0.0
<b>Home Refinance Loans</b>							
<b>Low</b>	0	0	0.0	0.0	10.8	5.9	22.6
<b>Moderate</b>	1	30	33.3	14.8	15.3	12.2	19.4
<b>Middle</b>	1	48	33.3	23.6	24.6	21.5	23.0
<b>Upper</b>	1	125	33.3	61.6	33.9	43.9	35.0
<b>Unknown</b>	0	0	0.0	0.0	15.3	16.6	0.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0	0.0	0.0	6.8	5.8	22.6
<b>Moderate</b>	0	0	0.0	0.0	22.7	25.2	19.4
<b>Middle</b>	0	0	0.0	0.0	18.2	14.5	23.0
<b>Upper</b>	0	0	0.0	0.0	43.2	43.1	35.0
<b>Unknown</b>	0	0	0.0	0.0	9.1	11.3	0.0
<b>Multifamily Loans</b>							
<b>Low</b>	0	0	0.0	0.0	3.0	0.1	22.6
<b>Moderate</b>	0	0	0.0	0.0	0.0	0.0	19.4
<b>Middle</b>	0	0	0.0	0.0	9.1	2.5	23.0
<b>Upper</b>	0	0	0.0	0.0	6.1	4.2	35.0
<b>Unknown</b>	0	0	0.0	0.0	81.8	93.1	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-15  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
SOUTHEAST KANSAS AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	4	219	57.1	28.1	43.3	32.0	88.4
<b>Over \$1MM</b>	2	510	28.6	65.5	Not Reported		10.0
<b>Unknown</b>	1	50	14.3	6.4			1.5
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	1	150	100.0	100.0	58.2	82.4	97.7
<b>Over \$1MM</b>	0	0	0.0	0.0	Not Reported		1.9
<b>Unknown</b>	0	0	0.0	0.0			0.3

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-16  
SOUTHEAST KANSAS AA 2019 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	5,540	22.8
Moderate	11	33.3	5,206	21.4	1,017	19.5	4,757	19.6
Middle	21	63.6	17,955	73.9	2,018	11.2	5,586	23.0
Upper	1	3.0	1,138	4.7	171	15.0	8,416	34.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>33</b>	<b>100.0</b>	<b>24,299</b>	<b>100.0</b>	<b>3,206</b>	<b>13.2</b>	<b>24,299</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	11,339	5,511	21.2	48.6	3,277	28.9	2,551	22.5
Middle	32,203	19,311	74.4	60.0	7,994	24.8	4,898	15.2
Upper	3,112	1,143	4.4	36.7	1,496	48.1	473	15.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>46,654</b>	<b>25,965</b>	<b>100.0</b>	<b>55.7</b>	<b>12,767</b>	<b>27.4</b>	<b>7,922</b>	<b>17.0</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	1,180	32.5	1,042	32.5	124	34.2	14	25.9
Middle	2,214	61.1	1,962	61.1	212	58.4	40	74.1
Upper	232	6.4	205	6.4	27	7.4	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,626</b>	<b>100.0</b>	<b>3,209</b>	<b>100.0</b>	<b>363</b>	<b>100.0</b>	<b>54</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>88.5</b>		<b>10.0</b>		<b>1.5</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	37	12.6	35	12.2	2	33.3	0	0.0
Middle	251	85.4	246	85.7	4	66.7	1	100.0
Upper	6	2.0	6	2.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>294</b>	<b>100.0</b>	<b>287</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>97.6</b>		<b>2.0</b>		<b>0.3</b>	

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-17  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
SOUTHEAST KANSAS AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	20	1,652	24.7	22.2	19.5	16.3	21.2
Middle	56	5,327	69.1	71.5	71.5	70.6	74.4
Upper	5	468	6.2	6.3	9.0	13.1	4.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	17	1,374	23.3	20.3	19.2	14.3	21.2
Middle	52	4,969	71.2	73.3	71.3	72.4	74.4
Upper	4	439	5.5	6.5	9.5	13.3	4.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	2	89	28.6	18.7	18.0	13.6	21.2
Middle	4	358	57.1	75.2	73.2	73.4	74.4
Upper	1	29	14.3	6.1	8.8	13.0	4.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	18.6	17.4	21.2
Middle	0	0	0.0	0.0	76.7	79.5	74.4
Upper	0	0	0.0	0.0	4.7	3.1	4.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	189	100.0	100.0	40.7	43.5	21.2
Middle	0	0	0.0	0.0	44.4	39.9	58.4
Upper	0	0	0.0	0.0	14.8	16.6	20.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.



**TABLE E-18  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
SOUTHEAST KANSAS AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Moderate</b>	4	2,039	30.8	84.1	27.4	37.7	32.5
<b>Middle</b>	9	386	69.2	15.9	61.0	46.6	61.1
<b>Upper</b>	0	0	0.0	0.0	7.5	14.6	6.4
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	4.0	1.2	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Moderate</b>	1	20	100.0	100.0	14.3	13.0	12.6
<b>Middle</b>	0	0	0.0	0.0	80.5	85.8	85.4
<b>Upper</b>	0	0	0.0	0.0	5.3	1.2	2.0
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
 2019 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-19  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
SOUTHEAST KANSAS AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	7	365	8.6	4.9	10.2	5.5	22.8
Moderate	28	2,315	34.6	31.1	18.0	13.1	19.6
Middle	20	1,803	24.7	24.2	18.0	17.1	23.0
Upper	24	2,840	29.6	38.1	29.9	40.6	34.6
Unknown	2	124	2.5	1.7	24.0	23.7	0.0
<b>Home Purchase Loans</b>							
Low	6	319	8.2	4.7	10.6	6.2	22.8
Moderate	28	2,315	38.4	34.1	20.6	15.9	19.6
Middle	17	1,505	23.3	22.2	18.6	18.5	23.0
Upper	21	2,562	28.8	37.8	27.8	40.8	34.6
Unknown	1	81	1.4	1.2	22.4	18.5	0.0
<b>Home Refinance Loans</b>							
Low	1	46	14.3	9.7	9.4	4.9	22.8
Moderate	0	0	0.0	0.0	14.9	9.4	19.6
Middle	2	109	28.6	22.9	17.4	15.4	23.0
Upper	3	278	42.9	58.4	36.5	47.5	34.6
Unknown	1	43	14.3	9.0	21.8	22.8	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	11.6	7.7	22.8
Moderate	0	0	0.0	0.0	11.6	7.5	19.6
Middle	0	0	0.0	0.0	16.3	26.8	23.0
Upper	0	0	0.0	0.0	51.2	51.1	34.6
Unknown	0	0	0.0	0.0	9.3	6.9	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	22.8
Moderate	0	0	0.0	0.0	0.0	0.0	19.6
Middle	1	189	100.0	100.0	14.8	5.7	23.0
Upper	0	0	0.0	0.0	14.8	20.7	34.6
Unknown	0	0	0.0	0.0	70.4	73.6	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-20  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
SOUTHEAST KANSAS AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	9	386	69.2	15.9	44.1	40.5	88.5
<b>Over \$1MM</b>	4	2,039	30.8	84.1	Not Reported		10.0
<b>Unknown</b>	0	0	0.0	0.0			1.5
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	1	20	100.0	100.0	52.6	80.4	97.6
<b>Over \$1MM</b>	0	0	0.0	0.0	Not Reported		2.0
<b>Unknown</b>	0	0	0.0	0.0			0.3

Source: 2019 FFIEC Census Data  
 2019 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

C. Southwest Kansas AA (Limited-Scope Review) – 2018 and 2019 Demographic and Lending Tables

TABLE E-21 SOUTHWEST KANSAS AA 2018 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	1,980	20.4	
Moderate	2	18.2	2,024	20.9	438	21.6	1,899	19.6	
Middle	7	63.6	5,973	61.6	702	11.8	2,007	20.7	
Upper	2	18.2	1,692	17.5	159	9.4	3,803	39.3	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>11</b>	<b>100.0</b>	<b>9,689</b>	<b>100.0</b>	<b>1,299</b>	<b>13.4</b>	<b>9,689</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	3,271	1,807	19.6	55.2	1,077	32.9	387	11.8	
Middle	9,035	5,657	61.2	62.6	2,334	25.8	1,044	11.6	
Upper	2,513	1,778	19.2	70.8	537	21.4	198	7.9	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>14,819</b>	<b>9,242</b>	<b>100.0</b>	<b>62.4</b>	<b>3,948</b>	<b>26.6</b>	<b>1,629</b>	<b>11.0</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	301	23.2	270	23.7	29	21.6	2	8.7	
Middle	741	57.2	638	56.1	84	62.7	19	82.6	
Upper	253	19.5	230	20.2	21	15.7	2	8.7	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>1,295</b>	<b>100.0</b>	<b>1,138</b>	<b>100.0</b>	<b>134</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>	
<b>Percentage of Total Businesses:</b>				<b>87.9</b>		<b>10.3</b>		<b>1.8</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	3	1.0	3	1.1	0	0.0	0	0.0	
Middle	271	91.6	256	91.4	15	93.8	0	0.0	
Upper	22	7.4	21	7.5	1	6.3	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>296</b>	<b>100.0</b>	<b>280</b>	<b>100.0</b>	<b>16</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	
<b>Percentage of Total Farms:</b>				<b>94.6</b>		<b>5.4</b>		<b>0.0</b>	
<p>Source: 2018 FFIEC Census Data 2018 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>NOTE: Percentages may not add up to 100.0 due to rounding.</p>									

**TABLE E-22  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
SOUTHWEST KANSAS AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	5	1,005	35.7	68.4	24.9	22.0	19.6
Middle	8	377	57.1	25.6	50.6	49.5	61.2
Upper	1	88	7.1	6.0	23.9	28.1	19.2
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.5	0.5	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	49	16.7	16.0	26.0	21.9	19.6
Middle	4	169	66.7	55.2	48.7	47.2	61.2
Upper	1	88	16.7	28.8	24.5	30.3	19.2
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.8	0.7	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	3	625	50.0	76.0	24.1	21.9	19.6
Middle	3	197	50.0	24.0	55.4	53.9	61.2
Upper	0	0	0.0	0.0	20.5	24.2	19.2
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	19.6
Middle	0	0	0.0	0.0	41.7	43.2	61.2
Upper	0	0	0.0	0.0	58.3	56.8	19.2
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	331	50.0	96.8	33.3	23.0	12.0
Middle	1	11	50.0	3.2	66.7	77.0	47.6
Upper	0	0	0.0	0.0	0.0	0.0	40.5
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-23  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
SOUTHWEST KANSAS AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Moderate</b>	17	1,976	34.7	48.1	20.5	29.7	23.2
<b>Middle</b>	22	1,374	44.9	33.4	58.8	49.9	57.2
<b>Upper</b>	10	760	20.4	18.5	14.8	15.8	19.5
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	6.0	4.6	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	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	1.0
<b>Middle</b>	40	6,336	97.6	99.2	93.2	93.9	91.6
<b>Upper</b>	1	48	2.4	0.8	2.8	5.6	7.4
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	4.0	0.6	0.0

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

NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-24  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
SOUTHWEST KANSAS AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	1	38	7.1	2.6	7.5	4.8	20.4
Moderate	2	48	14.3	3.3	23.9	20.4	19.6
Middle	3	251	21.4	17.1	25.7	23.4	20.7
Upper	6	316	42.9	21.5	28.0	35.6	39.3
Unknown	2	817	14.3	55.6	14.9	15.8	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	6.8	4.5	20.4
Moderate	1	22	16.7	7.2	29.1	25.3	19.6
Middle	2	150	33.3	49.0	26.8	24.1	20.7
Upper	3	134	50.0	43.8	27.5	37.2	39.3
Unknown	0	0	0.0	0.0	9.8	9.0	0.0
<b>Home Refinance Loans</b>							
Low	1	38	16.7	4.6	13.3	7.7	20.4
Moderate	1	26	16.7	3.2	16.9	11.2	19.6
Middle	1	101	16.7	12.3	28.9	27.5	20.7
Upper	2	171	33.3	20.8	33.7	41.1	39.3
Unknown	1	486	16.7	59.1	7.2	12.5	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	20.4
Moderate	0	0	0.0	0.0	16.7	14.8	19.6
Middle	0	0	0.0	0.0	41.7	45.3	20.7
Upper	0	0	0.0	0.0	41.7	39.9	39.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	20.4
Moderate	0	0	0.0	0.0	0.0	0.0	19.6
Middle	0	0	0.0	0.0	0.0	0.0	20.7
Upper	1	11	50.0	3.2	33.3	0.8	39.3
Unknown	1	331	50.0	96.8	66.7	99.2	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-25  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
SOUTHWEST KANSAS AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	37	2,766	75.5	67.3	44.5	48.5	87.9
<b>Over \$1MM</b>	11	1,329	22.4	32.3	Not Reported		10.3
<b>Unknown</b>	1	15	2.0	0.4			1.8
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	30	3,314	73.2	51.9	34.7	47.1	94.6
<b>Over \$1MM</b>	11	3,070	26.8	48.1	Not Reported		5.4
<b>Unknown</b>	0	0	0.0	0.0			0.0

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.



**TABLE E-26  
SOUTHWEST KANSAS AA 2019 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	1,996	20.6
Moderate	2	18.2	2,024	20.9	438	21.6	1,910	19.7
Middle	8	72.7	6,437	66.4	731	11.4	2,013	20.8
Upper	1	9.1	1,228	12.7	130	10.6	3,770	38.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>11</b>	<b>100.0</b>	<b>9,689</b>	<b>100.0</b>	<b>1,299</b>	<b>13.4</b>	<b>9,689</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	3,271	1,807	19.6	55.2	1,077	32.9	387	11.8
Middle	9,798	6,176	66.8	63.0	2,488	25.4	1,134	11.6
Upper	1,750	1,259	13.6	71.9	383	21.9	108	6.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>14,819</b>	<b>9,242</b>	<b>100.0</b>	<b>62.4</b>	<b>3,948</b>	<b>26.6</b>	<b>1,629</b>	<b>11.0</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	294	23.2	263	23.7	28	20.9	3	13.6
Middle	793	62.5	684	61.5	90	67.2	19	86.4
Upper	181	14.3	165	14.8	16	11.9	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,268</b>	<b>100.0</b>	<b>1,112</b>	<b>100.0</b>	<b>134</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>87.7</b>		<b>10.6</b>		<b>1.7</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	2	0.7	2	0.7	0	0.0	0	0.0
Middle	270	94.7	255	94.8	15	93.8	0	0.0
Upper	13	4.6	12	4.5	1	6.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>285</b>	<b>100.0</b>	<b>269</b>	<b>100.0</b>	<b>16</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>			<b>94.4</b>		<b>5.6</b>		<b>0.0</b>	

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-27  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
SOUTHWEST KANSAS AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	5	506	27.8	26.8	21.5	17.1	19.6
Middle	8	773	44.4	40.9	56.7	50.0	66.8
Upper	5	610	27.8	32.3	21.8	32.9	13.6
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	22.4	21.4	19.6
Middle	5	593	83.3	81.0	53.1	49.1	66.8
Upper	1	139	16.7	19.0	24.5	29.5	13.6
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	4	470	36.4	41.9	14.1	12.0	19.6
Middle	3	180	27.3	16.1	65.7	64.7	66.8
Upper	4	471	36.4	42.0	20.2	23.3	13.6
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	36	100.0	100.0	100.0	100.0	19.6
Middle	0	0	0.0	0.0	0.0	0.0	66.8
Upper	0	0	0.0	0.0	0.0	0.0	13.6
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	12.0
Middle	0	0	0.0	0.0	40.0	25.1	49.6
Upper	0	0	0.0	0.0	60.0	74.9	38.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-28  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
SOUTHWEST KANSAS AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Moderate</b>	17	1,738	24.6	34.4	21.2	31.8	23.2
<b>Middle</b>	35	2,109	50.7	41.8	55.2	43.1	62.5
<b>Upper</b>	17	1,204	24.6	23.8	14.2	20.7	14.3
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	9.3	4.5	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	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	0.7
<b>Middle</b>	56	7,282	100.0	100.0	96.9	98.5	94.7
<b>Upper</b>	0	0	0.0	0.0	1.3	1.3	4.6
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	1.8	0.2	0.0

Source: 2019 FFIEC Census Data  
 2019 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-29  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
SOUTHWEST KANSAS AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	7.9	4.8	20.6
Moderate	1	28	5.6	1.5	18.6	14.2	19.7
Middle	5	332	27.8	17.6	27.6	23.8	20.8
Upper	8	1,038	44.4	54.9	28.9	32.1	38.9
Unknown	4	491	22.2	26.0	17.1	25.0	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	8.2	5.9	20.6
Moderate	0	0	0.0	0.0	25.3	21.8	19.7
Middle	1	112	16.7	15.3	33.1	32.8	20.8
Upper	3	453	50.0	61.9	26.1	33.3	38.9
Unknown	2	167	33.3	22.8	7.3	6.2	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	10.1	5.8	20.6
Moderate	1	28	9.1	2.5	8.1	5.6	19.7
Middle	3	184	27.3	16.4	21.2	18.0	20.8
Upper	5	585	45.5	52.2	42.4	48.2	38.9
Unknown	2	324	18.2	28.9	18.2	22.3	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	20.6
Moderate	0	0	0.0	0.0	0.0	0.0	19.7
Middle	1	36	100.0	100.0	100.0	100.0	20.8
Upper	0	0	0.0	0.0	0.0	0.0	38.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	20.6
Moderate	0	0	0.0	0.0	0.0	0.0	19.7
Middle	0	0	0.0	0.0	0.0	0.0	20.8
Upper	0	0	0.0	0.0	20.0	4.1	38.9
Unknown	0	0	0.0	0.0	80.0	95.9	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-30  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
SOUTHWEST KANSAS AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	51	2,549	73.9	50.5	43.6	87.7	87.7
<b>Over \$1MM</b>	18	2,502	26.1	49.5	Not Reported		10.6
<b>Unknown</b>	0	0	0.0	0.0			1.7
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	49	5,903	87.5	81.1	40.3	59.9	94.4
<b>Over \$1MM</b>	7	1,379	12.5	18.9	Not Reported		5.6
<b>Unknown</b>	0	0	0.0	0.0			0.0

Source: 2019 FFIEC Census Data  
 2019 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

D. Benton County Metropolitan AA (Limited-Scope Review) – 2018 and 2019 Demographic and Lending Tables

TABLE E-31 BENTON COUNTY METROPOLITAN AA 2018 DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	2.0	955	1.5	383	40.1	11,090	17.5
Moderate	2	4.1	2,472	3.9	390	15.8	10,877	17.1
Middle	28	57.1	35,131	55.3	4,141	11.8	13,401	21.1
Upper	18	36.7	24,991	39.3	761	3.0	28,181	44.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>49</b>	<b>100.0</b>	<b>63,549</b>	<b>100.0</b>	<b>5,675</b>	<b>8.9</b>	<b>63,549</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	1,645	449	0.8	27.3	1,059	64.4	137	8.3
Moderate	3,688	2,171	3.8	58.9	1,123	30.5	394	10.7
Middle	54,122	30,712	53.5	56.7	17,118	31.6	6,292	11.6
Upper	36,934	24,054	41.9	65.1	8,984	24.3	3,896	10.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>96,389</b>	<b>57,386</b>	<b>100.0</b>	<b>59.5</b>	<b>28,284</b>	<b>29.3</b>	<b>10,719</b>	<b>11.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	205	2.3	182	2.2	22	3.4	1	0.9
Moderate	289	3.2	269	3.3	19	3.0	1	0.9
Middle	4,780	53.6	4,303	52.7	413	64.1	64	57.1
Upper	3,642	40.8	3,406	41.7	190	29.5	46	41.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>8,916</b>	<b>100.0</b>	<b>8,160</b>	<b>100.0</b>	<b>644</b>	<b>100.0</b>	<b>112</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>91.5</b>		<b>7.2</b>		<b>1.3</b>	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1	0.6	1	0.6	0	0.0	0	0.0
Moderate	2	1.2	2	1.2	0	0.0	0	0.0
Middle	117	68.8	116	69.0	1	50.0	0	0.0
Upper	50	29.4	49	29.2	1	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>170</b>	<b>100.0</b>	<b>168</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>98.8</b>		<b>1.2</b>		<b>0.0</b>	
<p>Source: 2018 FFIEC Census Data 2018 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>NOTE: Percentages may not add up to 100.0 due to rounding.</p>								

**TABLE E-32  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
BENTON COUNTY METROPOLITAN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	0.6	0.3	0.8
Moderate	0	0	0.0	0.0	3.1	2.5	3.8
Middle	19	2,884	48.7	36.5	44.6	38.2	53.5
Upper	20	5,021	51.3	63.5	51.7	58.9	41.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	0.6	0.3	0.8
Moderate	0	0	0.0	0.0	2.9	2.3	3.8
Middle	7	839	36.8	24.1	42.9	36.1	53.5
Upper	12	2,647	63.2	75.9	53.6	61.2	41.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	0.6	0.3	0.8
Moderate	0	0	0.0	0.0	3.5	2.5	3.8
Middle	11	1,955	61.1	46.0	48.8	42.6	53.5
Upper	7	2,294	38.9	54.0	47.2	54.6	41.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	0.2	0.2	0.8
Moderate	0	0	0.0	0.0	2.4	1.4	3.8
Middle	1	90	100.0	100.0	46.5	47.4	53.5
Upper	0	0	0.0	0.0	50.8	51.1	41.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	0	0	0.0	0.0	4.5	0.4	5.8
Moderate	0	0	0.0	0.0	4.5	3.8	0.1
Middle	0	0	0.0	0.0	63.6	47.2	54.2
Upper	1	80	100.0	100.0	27.3	48.6	39.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-33  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
BENTON COUNTY METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	1.8	3.0	2.3
Moderate	0	0	0.0	0.0	2.8	2.4	3.2
Middle	24	2,159	77.4	68.9	51.6	53.6	53.6
Upper	7	975	22.6	31.1	43.1	40.9	40.8
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.7	0.1	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	0.0	0.0	0.6
Moderate	0	0	0.0	0.0	1.6	1.5	1.2
Middle	7	750	87.5	84.3	80.5	76.5	68.8
Upper	1	140	12.5	15.7	17.8	22.1	29.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.



**TABLE E-34  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
BENTON COUNTY METROPOLITAN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	4	349	10.3	4.4	5.7	2.9	17.5
Moderate	12	1,355	30.8	17.1	15.0	10.1	17.1
Middle	4	693	10.3	8.8	19.1	15.3	21.1
Upper	16	5,087	41.0	64.4	42.8	50.9	44.3
Unknown	3	421	7.7	5.3	17.5	20.9	0.0
<b>Home Purchase Loans</b>							
Low	1	75	5.3	2.2	4.9	2.7	17.5
Moderate	8	925	42.1	26.5	15.7	11.0	17.1
Middle	3	558	15.8	16.0	19.5	16.7	21.1
Upper	6	1,709	31.6	49.0	42.7	53.8	44.3
Unknown	1	219	5.3	6.3	17.3	15.9	0.0
<b>Home Refinance Loans</b>							
Low	3	274	16.7	6.4	8.2	4.4	17.5
Moderate	3	340	16.7	8.0	15.3	10.3	17.1
Middle	1	135	5.6	3.2	19.5	15.1	21.1
Upper	10	3,378	55.6	79.5	42.0	54.5	44.3
Unknown	1	122	5.6	2.9	14.9	15.7	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	5.8	3.0	17.5
Moderate	1	90	100.0	100.0	10.1	6.0	17.1
Middle	0	0	0.0	0.0	15.9	11.9	21.1
Upper	0	0	0.0	0.0	57.1	61.5	44.3
Unknown	0	0	0.0	0.0	11.1	17.5	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	17.5
Moderate	0	0	0.0	0.0	0.0	0.0	17.1
Middle	0	0	0.0	0.0	0.0	0.0	21.1
Upper	0	0	0.0	0.0	11.4	1.2	44.3
Unknown	1	80	100.0	100.0	88.6	98.8	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-35  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
BENTON COUNTY METROPOLITAN AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	25	2,351	80.6	75.0	47.0	45.3	91.5
<b>Over \$1MM</b>	5	733	16.1	23.4	Not Reported		7.2
<b>Unknown</b>	1	50	3.2	1.6			1.3
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	8	890	100.0	100.0	88.7	84.4	98.8
<b>Over \$1MM</b>	0	0	0.0	0.0	Not Reported		1.2
<b>Unknown</b>	0	0	0.0	0.0			0.0

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-36  
BENTON COUNTY METROPOLITAN AA 2019 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	2.0	955	1.5	383	40.1	11,328	17.8
Moderate	4	8.2	4,501	7.1	699	15.5	11,082	17.4
Middle	27	55.1	34,508	54.3	3,856	11.2	13,488	21.2
Upper	17	34.7	23,585	37.1	737	3.1	27,651	43.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>49</b>	<b>100.0</b>	<b>63,549</b>	<b>100.0</b>	<b>5,675</b>	<b>8.9</b>	<b>63,549</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	1,645	449	0.8	27.3	1,059	64.4	137	8.3
Moderate	6,861	3,723	6.5	54.3	2,461	35.9	677	9.9
Middle	53,151	30,931	53.9	58.2	16,017	30.1	6,203	11.7
Upper	34,732	22,283	38.8	64.2	8,747	25.2	3,702	10.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>96,389</b>	<b>57,386</b>	<b>100.0</b>	<b>59.5</b>	<b>28,284</b>	<b>29.3</b>	<b>10,719</b>	<b>11.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	215	2.3	194	2.3	20	3.1	1	1.1
Moderate	670	7.3	609	7.2	58	9.1	3	3.2
Middle	4,677	50.9	4,249	50.3	380	59.4	48	51.1
Upper	3,621	39.4	3,397	40.2	182	28.4	42	44.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>9,183</b>	<b>100.0</b>	<b>8,449</b>	<b>100.0</b>	<b>640</b>	<b>100.0</b>	<b>94</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>92.0</b>		<b>7.0</b>		<b>1.0</b>	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1	0.6	1	0.6	0	0.0	0	0.0
Moderate	4	2.4	4	2.4	0	0.0	0	0.0
Middle	115	68.5	113	68.5	2	66.7	0	0.0
Upper	48	28.6	47	28.5	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>168</b>	<b>100.0</b>	<b>165</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>			<b>98.2</b>		<b>1.8</b>		<b>0.0</b>	

Source: 2019 FFIEC Census Data  
 2019 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-37  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
BENTON COUNTY METROPOLITAN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	0.5	1.0	0.8
Moderate	1	320	3.8	6.9	4.9	4.1	6.5
Middle	15	2,697	57.7	57.8	43.8	40.5	53.9
Upper	10	1,653	38.5	35.4	50.9	54.4	38.8
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	0.4	0.2	0.8
Moderate	1	320	6.3	10.9	4.7	3.8	6.5
Middle	10	1,995	62.5	67.8	42.7	38.4	53.9
Upper	5	627	31.3	21.3	52.3	57.7	38.8
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	0.6	0.3	0.8
Moderate	0	0	0.0	0.0	5.0	3.6	6.5
Middle	5	702	55.6	44.6	45.7	40.6	53.9
Upper	4	871	44.4	55.4	48.7	55.5	38.8
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	0.5	0.8	0.8
Moderate	0	0	0.0	0.0	4.3	4.6	6.5
Middle	0	0	0.0	0.0	48.6	38.6	53.9
Upper	0	0	0.0	0.0	46.6	56.1	38.8
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	0	0	0.0	0.0	4.6	10.3	5.8
Moderate	0	0	0.0	0.0	12.3	8.0	2.7
Middle	0	0	0.0	0.0	49.2	59.7	52.4
Upper	1	155	100.0	100.0	33.8	22.0	39.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-38  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
BENTON COUNTY METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	1.5	2.6	2.3
Moderate	0	0	0.0	0.0	5.8	5.1	7.3
Middle	13	1,604	72.2	62.8	49.2	51.8	50.9
Upper	5	950	27.8	37.2	42.0	40.0	39.4
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	1.5	0.5	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	0.0	0.0	0.6
Moderate	0	0	0.0	0.0	1.9	1.4	2.4
Middle	6	362	66.7	68.7	81.6	81.0	68.5
Upper	3	165	33.3	31.3	15.8	17.5	28.6
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.7	0.1	0.0

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-39  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
BENTON COUNTY METROPOLITAN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	1	47	3.8	1.0	5.3	2.6	17.8
Moderate	4	448	15.4	9.6	15.2	9.6	17.4
Middle	5	749	19.2	16.0	17.4	13.3	21.2
Upper	12	2,966	46.2	63.5	44.7	51.6	43.5
Unknown	4	460	15.4	9.9	17.5	22.9	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	4.6	2.5	17.8
Moderate	3	238	18.8	8.1	16.0	11.1	17.4
Middle	3	459	18.8	15.6	18.5	15.6	21.2
Upper	8	2,097	50.0	71.3	45.6	56.5	43.5
Unknown	2	148	12.5	5.0	15.2	14.2	0.0
<b>Home Refinance Loans</b>							
Low	1	47	11.1	3.0	7.1	3.5	17.8
Moderate	1	210	11.1	13.4	14.2	8.8	17.4
Middle	2	290	22.2	18.4	15.4	11.7	21.2
Upper	3	714	33.3	45.4	43.0	54.0	43.5
Unknown	2	312	22.2	19.8	20.2	22.1	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	5.5	3.4	17.8
Moderate	0	0	0.0	0.0	14.8	10.2	17.4
Middle	0	0	0.0	0.0	18.8	15.3	21.2
Upper	0	0	0.0	0.0	49.9	53.0	43.5
Unknown	0	0	0.0	0.0	11.0	18.1	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	1.5	0.1	17.8
Moderate	0	0	0.0	0.0	0.0	0.0	17.4
Middle	0	0	0.0	0.0	1.5	0.2	21.2
Upper	1	155	100.0	100.0	10.8	1.4	43.5
Unknown	0	0	0.0	0.0	86.2	98.3	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-40  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
BENTON COUNTY METROPOLITAN AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	11	1,784	61.1	69.9	45.1	43.2	92.0
<b>Over \$1MM</b>	6	740	33.3	29.0	Not Reported		7.0
<b>Unknown</b>	1	30	5.6	1.2			1.0
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	7	437	77.8	82.9	72.3	81.2	98.2
<b>Over \$1MM</b>	2	90	22.2	17.1	Not Reported		1.8
<b>Unknown</b>	0	0	0.0	0.0			0.0

Source: 2019 FFIEC Census Data  
 2019 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

E. Tulsa County Metropolitan AA (Limited-Scope Review) – 2018 and 2019 Demographic and Lending Tables

TABLE E-41 TULSA COUNTY METROPOLITAN AA 2018 DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	17	9.7	10,765	6.9	4,413	41.0	34,488	22.0
Moderate	54	30.9	39,165	25.0	8,290	21.2	26,498	16.9
Middle	51	29.1	49,004	31.3	4,194	8.6	30,724	19.6
Upper	53	30.3	57,640	36.8	2,300	4.0	64,864	41.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>175</b>	<b>100.0</b>	<b>156,574</b>	<b>100.0</b>	<b>19,197</b>	<b>12.3</b>	<b>156,574</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	22,903	6,671	4.5	29.1	12,302	53.7	3,930	17.2
Moderate	77,468	30,109	20.5	38.9	36,618	47.3	10,741	13.9
Middle	87,534	48,253	32.9	55.1	31,422	35.9	7,859	9.0
Upper	86,986	61,760	42.1	71.0	18,945	21.8	6,281	7.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>274,891</b>	<b>146,793</b>	<b>100.0</b>	<b>53.4</b>	<b>99,287</b>	<b>36.1</b>	<b>28,811</b>	<b>10.5</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,542	4.0	1,311	3.8	219	6.4	12	4.0
Moderate	8,515	22.1	7,405	21.2	1,056	30.7	54	17.9
Middle	13,416	34.8	12,059	34.6	1,266	36.8	91	30.2
Upper	15,133	39.2	14,092	40.4	897	26.1	144	47.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>38,606</b>	<b>100.0</b>	<b>34,867</b>	<b>100.0</b>	<b>3,438</b>	<b>100.0</b>	<b>301</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>90.3</b>		<b>8.9</b>		<b>0.8</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	4	1.3	3	1.0	1	16.7	0	0.0
Moderate	32	10.5	32	10.8	0	0.0	0	0.0
Middle	106	34.8	104	35.0	2	33.3	0	0.0
Upper	163	53.4	158	53.2	3	50.0	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>305</b>	<b>100.0</b>	<b>297</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>97.4</b>		<b>2.0</b>		<b>0.7</b>	
<p>Source: 2018 FFIEC Census Data 2018 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>NOTE: Percentages may not add up to 100.0 due to rounding.</p>								



**TABLE E-42  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
TULSA COUNTY METROPOLITAN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	%	#%	%	
<b>Total Home Mortgage Loans</b>							
Low	6	661	7.1	3.6	1.6	0.8	4.5
Moderate	20	3,908	23.8	21.3	14.6	12.2	20.5
Middle	26	2,802	31.0	15.2	34.8	29.6	32.9
Upper	32	11,009	38.1	59.9	49.0	57.4	42.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	1.3	0.6	4.5
Moderate	10	2,680	25.0	32.9	14.2	8.7	20.5
Middle	14	1,612	35.0	19.8	35.5	30.1	32.9
Upper	16	3,856	40.0	47.3	49.0	60.6	42.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	5	427	11.9	4.5	2.0	0.8	4.5
Moderate	9	664	21.4	7.0	14.3	8.4	20.5
Middle	12	1,190	28.6	12.6	33.2	28.1	32.9
Upper	16	7,153	38.1	75.8	50.4	62.8	42.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	2.3	1.5	4.5
Moderate	0	0	0.0	0.0	14.4	11.4	20.5
Middle	0	0	0.0	0.0	30.8	25.7	32.9
Upper	0	0	0.0	0.0	52.5	61.4	42.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	1	234	50.0	29.3	11.6	2.0	10.4
Moderate	1	564	50.0	70.7	52.7	47.3	36.4
Middle	0	0	0.0	0.0	23.2	29.5	31.2
Upper	0	0	0.0	0.0	12.5	21.2	22.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-43  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
TULSA COUNTY METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	2	488	4.0	4.2	3.5	3.9	4.0
<b>Moderate</b>	8	2,294	16.0	19.9	21.0	27.3	22.1
<b>Middle</b>	20	4,291	40.0	37.3	33.0	33.0	34.8
<b>Upper</b>	20	4,430	40.0	38.5	40.7	35.4	39.2
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	1.8	0.5	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	1.5	0.2	1.3
<b>Moderate</b>	0	0	0.0	0.0	9.0	18.6	10.5
<b>Middle</b>	0	0	0.0	0.0	35.8	18.7	34.8
<b>Upper</b>	0	0	0.0	0.0	52.2	62.2	53.4
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	1.5	0.4	0.0

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-44  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
TULSA COUNTY METROPOLITAN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	6.0	2.9	22.0
Moderate	3	303	3.6	1.6	16.3	10.9	16.9
Middle	3	468	3.6	2.5	18.4	14.8	19.6
Upper	15	8,547	17.9	46.5	37.8	44.9	41.4
Unknown	63	9,062	75.0	49.3	21.5	26.5	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	5.7	3.0	22.0
Moderate	2	254	5.0	3.1	18.2	13.2	16.9
Middle	2	228	5.0	2.8	19.3	17.4	19.6
Upper	6	2,654	15.0	32.6	35.8	47.5	41.4
Unknown	30	5,012	75.0	61.5	21.0	18.9	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	7.9	3.6	22.0
Moderate	1	49	2.4	0.5	13.6	8.7	16.9
Middle	1	240	2.4	2.5	17.5	12.7	19.6
Upper	9	5,893	21.4	62.5	44.1	57.5	41.4
Unknown	31	3,252	73.8	34.5	16.9	17.4	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	6.2	4.1	22.0
Moderate	0	0	0.0	0.0	12.1	8.9	16.9
Middle	0	0	0.0	0.0	17.3	13.3	19.6
Upper	0	0	0.0	0.0	53.2	56.8	41.4
Unknown	0	0	0.0	0.0	11.1	16.9	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	22.0
Moderate	0	0	0.0	0.0	0.9	0.1	16.9
Middle	0	0	0.0	0.0	0.9	0.1	19.6
Upper	0	0	0.0	0.0	8.0	1.2	41.4
Unknown	2	798	100.0	100.0	90.2	98.6	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-45  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
TULSA COUNTY METROPOLITAN AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	22	4,167	44.0	36.2	40.8	33.5	90.3
<b>Over \$1MM</b>	26	7,146	52.0	62.1	Not Reported		8.9
<b>Unknown</b>	2	190	4.0	1.7			0.8
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	0	0	0.0	0.0	55.2	57.7	97.4
<b>Over \$1MM</b>	0	0	0.0	0.0	Not Reported		2.0
<b>Unknown</b>	0	0	0.0	0.0			0.7

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-46  
TULSA COUNTY METROPOLITAN AA 2019 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	17	9.7	10,765	6.9	4,413	41.0	34,488	22.0
Moderate	54	30.9	39,165	25.0	8,290	21.2	26,498	16.9
Middle	51	29.1	49,004	31.3	4,194	8.6	30,724	19.6
Upper	53	30.3	57,640	36.8	2,300	4.0	64,864	41.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>175</b>	<b>100.0</b>	<b>156,574</b>	<b>100.0</b>	<b>19,197</b>	<b>12.3</b>	<b>156,574</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	22,903	6,671	4.5	29.1	12,302	53.7	3,930	17.2
Moderate	77,468	30,109	20.5	38.9	36,618	47.3	10,741	13.9
Middle	87,534	48,253	32.9	55.1	31,422	35.9	7,859	9.0
Upper	86,986	61,760	42.1	71.0	18,945	21.8	6,281	7.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>274,891</b>	<b>146,793</b>	<b>100.0</b>	<b>53.4</b>	<b>99,287</b>	<b>36.1</b>	<b>28,811</b>	<b>10.5</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1,562	4.0	1,338	3.8	211	6.2	13	5.2
Moderate	8,553	22.0	7,469	21.2	1,042	30.7	42	16.8
Middle	13,509	34.7	12,174	34.5	1,260	37.1	75	30.0
Upper	15,288	39.3	14,289	40.5	879	25.9	120	48.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>38,912</b>	<b>100.0</b>	<b>35,270</b>	<b>100.0</b>	<b>3,392</b>	<b>100.0</b>	<b>250</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>90.6</b>		<b>8.7</b>		<b>0.6</b>	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	3	0.9	2	0.6	1	16.7	0	0.0
Moderate	40	11.8	40	12.0	0	0.0	0	0.0
Middle	122	35.9	120	36.1	2	33.3	0	0.0
Upper	175	51.5	170	51.2	3	50.0	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>340</b>	<b>100.0</b>	<b>332</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>97.6</b>		<b>1.8</b>		<b>0.6</b>	

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-47  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
TULSA COUNTY METROPOLITAN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	1.2	0.9	4.5
Moderate	4	224	22.2	12.7	14.4	9.5	20.5
Middle	10	948	55.6	53.9	34.0	34.1	32.9
Upper	4	586	22.2	33.3	50.4	55.5	42.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	1.1	0.5	4.5
Moderate	1	91	12.5	8.4	14.9	9.0	20.5
Middle	4	509	50.0	47.2	35.6	32.9	32.9
Upper	3	478	37.5	44.3	48.5	57.6	42.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	1.0	0.4	4.5
Moderate	3	133	30.0	19.6	12.0	6.7	20.5
Middle	6	439	60.0	64.6	30.5	24.1	32.9
Upper	1	108	10.0	15.9	56.6	68.8	42.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	2.2	1.2	4.5
Moderate	0	0	0.0	0.0	13.0	9.8	20.5
Middle	0	0	0.0	0.0	31.0	25.9	32.9
Upper	0	0	0.0	0.0	53.7	63.2	42.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
Low	0	0	0.0	0.0	11.3	4.0	10.4
Moderate	0	0	0.0	0.0	40.4	17.0	36.4
Middle	0	0	0.0	0.0	29.8	60.7	31.2
Upper	0	0	0.0	0.0	18.4	18.3	22.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-48  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
TULSA COUNTY METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	3.3	4.5	4.0
<b>Moderate</b>	6	1,857	18.8	18.7	20.3	24.0	22.0
<b>Middle</b>	14	3,454	43.8	34.8	34.1	36.1	34.7
<b>Upper</b>	12	4,615	37.5	46.5	40.0	34.8	39.3
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	2.4	0.6	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	0.0	0.0	0.9
<b>Moderate</b>	0	0	0.0	0.0	9.8	5.2	11.8
<b>Middle</b>	0	0	0.0	0.0	37.3	30.5	35.9
<b>Upper</b>	0	0	0.0	0.0	49.0	63.2	51.5
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	3.9	1.0	0.0

Source: 2019 FFIEC Census Data  
 2019 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-49  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
TULSA COUNTY METROPOLITAN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	6.6	3.1	22.0
Moderate	2	233	11.1	13.3	17.2	10.6	16.9
Middle	1	151	5.6	8.6	19.3	14.8	19.6
Upper	1	54	5.6	3.1	37.9	44.2	41.4
Unknown	14	1,320	77.8	75.1	19.1	27.2	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	7.0	3.8	22.0
Moderate	1	118	12.5	10.9	20.0	14.2	16.9
Middle	1	151	12.5	14.0	20.7	18.8	19.6
Upper	0	0	0.0	0.0	35.6	48.9	41.4
Unknown	6	809	75.0	75.0	16.7	14.3	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	6.5	3.0	22.0
Moderate	1	115	10.0	16.9	12.6	7.3	16.9
Middle	0	0	0.0	0.0	18.3	13.3	19.6
Upper	1	54	10.0	7.9	44.7	56.1	41.4
Unknown	8	511	80.0	75.1	17.9	20.2	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	5.6	3.9	22.0
Moderate	0	0	0.0	0.0	13.0	8.8	16.9
Middle	0	0	0.0	0.0	17.8	13.4	19.6
Upper	0	0	0.0	0.0	51.9	58.0	41.4
Unknown	0	0	0.0	0.0	11.7	15.9	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	22.0
Moderate	0	0	0.0	0.0	0.0	0.0	16.9
Middle	0	0	0.0	0.0	0.7	0.0	19.6
Upper	0	0	0.0	0.0	5.7	0.4	41.4
Unknown	0	0	0.0	0.0	93.6	99.5	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.



**TABLE E-50  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
TULSA COUNTY METROPOLITAN AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	20	5,180	62.5	52.2	44.5	32.5	90.6
<b>Over \$1MM</b>	12	4,746	37.5	47.8	Not Reported		8.7
<b>Unknown</b>	0	0	0.0	0.0			0.6
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	0	0	0.0	0.0	70.6	83.4	97.6
<b>Over \$1MM</b>	0	0	0.0	0.0	Not Reported		1.8
<b>Unknown</b>	0	0	0.0	0.0			0.6

Source: 2019 FFIEC Census Data  
 2019 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

F. Texas County AA (Limited-Scope Review) – 2018 and 2019 Demographic and Lending Tables

TABLE E-51 TEXAS COUNTY AA 2018 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	951	18.7	
Moderate	0	0.0	0	0.0	0	0.0	1,054	20.7	
Middle	5	100.0	5,098	100.0	481	9.4	904	17.7	
Upper	0	0.0	0	0.0	0	0.0	2,189	42.9	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>5</b>	<b>100.0</b>	<b>5,098</b>	<b>100.0</b>	<b>481</b>	<b>9.4</b>	<b>5,098</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	8,181	4,454	100.0	54.4	2,719	33.2	1,008	12.3	
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>8,181</b>	<b>4,454</b>	<b>100.0</b>	<b>54.4</b>	<b>2,719</b>	<b>33.2</b>	<b>1,008</b>	<b>12.3</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	618	100.0	544	100.0	58	100.0	16	100.0	
Upper	0	0.0	0	0.0	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>618</b>	<b>100.0</b>	<b>544</b>	<b>100.0</b>	<b>58</b>	<b>100.0</b>	<b>16</b>	<b>100.0</b>	
<b>Percentage of Total Businesses:</b>				<b>88.0</b>		<b>9.4</b>		<b>2.6</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	105	100.0	91	100.0	14	100.0	0	0.0	
Upper	0	0.0	0	0.0	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>105</b>	<b>100.0</b>	<b>91</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	
<b>Percentage of Total Farms:</b>				<b>86.7</b>		<b>13.3</b>		<b>0.0</b>	
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.									

**TABLE E-52  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
TEXAS COUNTY AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
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	15	1,224	100.0	100.0	98.8	97.3	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	1.2	2.7	0.0
<b>Home Purchase Loans</b>							
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	878	100.0	100.0	99.4	98.0	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.6	2.0	0.0
<b>Home Refinance Loans</b>							
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	5	246	100.0	100.0	96.8	94.4	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	3.2	5.6	0.0
<b>Home Improvement Loans</b>							
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	0	0	0.0	0.0	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
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	100	100.0	100.0	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-53  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
TEXAS COUNTY AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
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	8	406	100.0	100.0	90.6	91.5	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	9.4	8.5	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
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	3	485	100.0	100.0	91.2	96.9	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	8.8	3.1	0.0

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-54  
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
TEXAS COUNTY AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	1	33	6.7	2.7	2.9	1.3	18.7
Moderate	2	142	13.3	11.6	19.5	18.1	20.7
Middle	8	801	53.3	65.4	24.5	24.9	17.7
Upper	3	148	20.0	12.1	33.6	36.7	42.9
Unknown	1	100	6.7	8.2	19.5	19.0	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	1.9	0.6	18.7
Moderate	2	142	22.2	16.2	27.6	23.1	20.7
Middle	6	655	66.7	74.6	26.9	26.0	17.7
Upper	1	81	11.1	9.2	26.3	33.0	42.9
Unknown	0	0	0.0	0.0	17.3	17.3	0.0
<b>Home Refinance Loans</b>							
Low	1	33	20.0	13.4	4.8	3.2	18.7
Moderate	0	0	0.0	0.0	4.8	4.1	20.7
Middle	2	146	40.0	59.3	21.0	20.7	17.7
Upper	2	67	40.0	27.2	51.6	51.4	42.9
Unknown	0	0	0.0	0.0	17.7	20.5	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	18.7
Moderate	0	0	0.0	0.0	0.0	0.0	20.7
Middle	0	0	0.0	0.0	40.0	45.8	17.7
Upper	0	0	0.0	0.0	60.0	54.2	42.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	18.7
Moderate	0	0	0.0	0.0	0.0	0.0	20.7
Middle	0	0	0.0	0.0	0.0	0.0	17.7
Upper	0	0	0.0	0.0	0.0	0.0	42.9
Unknown	1	100	100.0	100.0	100.0	100.0	0.0

Source: 2018 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-55  
DISTRIBUTION OF 2018 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
TEXAS COUNTY AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	5	396	62.5	97.5	36.5	42.0	88.0
<b>Over \$1MM</b>	0	0	0.0	0.0	Not Reported		9.4
<b>Unknown</b>	3	10	37.5	2.5			2.6
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	3	485	100.0	100.0	40.4	58.1	86.7
<b>Over \$1MM</b>	0	0	0.0	0.0	Not Reported		13.3
<b>Unknown</b>	0	0	0.0	0.0			0.0

Source: 2018 FFIEC Census Data  
 2018 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-56  
TEXAS COUNTY AA 2019 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	944	18.5
Moderate	0	0.0	0	0.0	0	0.0	1,051	20.6
Middle	5	100.0	5,098	100.0	481	9.4	904	17.7
Upper	0	0.0	0	0.0	0	0.0	2,199	43.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>5</b>	<b>100.0</b>	<b>5,098</b>	<b>100.0</b>	<b>481</b>	<b>9.4</b>	<b>5,098</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	8,181	4,454	100.0	54.4	2,719	33.2	1,008	12.3
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>8,181</b>	<b>4,454</b>	<b>100.0</b>	<b>54.4</b>	<b>2,719</b>	<b>33.2</b>	<b>1,008</b>	<b>12.3</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	613	100.0	540	100.0	58	100.0	15	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>613</b>	<b>100.0</b>	<b>540</b>	<b>100.0</b>	<b>58</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>88.1</b>		<b>9.5</b>		<b>2.4</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	106	100.0	93	100.0	13	100.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>106</b>	<b>100.0</b>	<b>93</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>			<b>87.7</b>		<b>12.3</b>		<b>0.0</b>	

Source: 2019 FFIEC Census Data  
 2019 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-57  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
TEXAS COUNTY AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
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	64	4,973	100.0	100.0	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
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	29	2,890	100.0	100.0	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	34	2,071	100.0	100.0	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
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	12	100.0	100.0	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
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	0	0	0.0	0.0	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.



**TABLE E-58  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
TEXAS COUNTY AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	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
<b>Middle</b>	47	3,070	100.0	100.0	87.6	95.3	100.0
<b>Upper</b>	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
<b>Not Reported</b>	0	0	0.0	0.0	12.4	4.7	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	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
<b>Middle</b>	13	1,566	100.0	100.0	82.5	95.7	100.0
<b>Upper</b>	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
<b>Not Reported</b>	0	0	0.0	0.0	17.5	4.3	0.0

Source: 2019 FFIEC Census Data  
 2019 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-59  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
TEXAS COUNTY AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	1	47	1.6	0.9	1.5	0.8	18.5
Moderate	28	2,227	43.8	44.8	24.9	19.3	20.6
Middle	16	1,471	25.0	29.6	25.3	22.5	17.7
Upper	13	863	20.3	17.4	29.1	33.2	43.1
Unknown	6	365	9.4	7.3	19.2	24.1	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	0.6	0.6	18.5
Moderate	15	1,432	51.7	49.6	26.6	21.4	20.6
Middle	11	1,248	37.9	43.2	28.9	25.9	17.7
Upper	3	210	10.3	7.3	28.3	36.1	43.1
Unknown	0	0	0.0	0.0	15.6	15.9	0.0
<b>Home Refinance Loans</b>							
Low	1	47	2.9	2.3	4.1	1.8	18.5
Moderate	13	795	38.2	38.4	24.3	17.7	20.6
Middle	5	223	14.7	10.8	20.3	17.9	17.7
Upper	9	641	26.5	31.0	31.1	30.5	43.1
Unknown	6	365	17.6	17.6	20.3	32.1	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	18.5
Moderate	0	0	0.0	0.0	25.0	35.7	20.6
Middle	0	0	0.0	0.0	25.0	18.6	17.7
Upper	1	12	100.0	100.0	50.0	45.7	43.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	18.5
Moderate	0	0	0.0	0.0	0.0	0.0	20.6
Middle	0	0	0.0	0.0	0.0	0.0	17.7
Upper	0	0	0.0	0.0	0.0	0.0	43.1
Unknown	0	0	0.0	0.0	100.0	100.0	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-60  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
TEXAS COUNTY AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	29	1,249	61.7	40.7	44.2	32.2	88.1
<b>Over \$1MM</b>	13	1,537	27.7	50.1	Not Reported		9.5
<b>Unknown</b>	5	284	10.6	9.3			2.4
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	13	1,566	100.0	100.0	52.6	87.6	87.7
<b>Over \$1MM</b>	0	0	0.0	0.0	Not Reported		12.3
<b>Unknown</b>	0	0	0.0	0.0			0.0

Source: 2019 FFIEC Census Data  
 2019 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

G. Washita County AA (Limited-Scope Review) – 2019 Demographic and Lending Tables

TABLE E-61 WASHITA COUNTY AA 2019 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	636	19.3
Moderate	0	0.0	0	0.0	0	0.0	449	13.6
Middle	3	75.0	2,285	69.2	303	13.3	647	19.6
Upper	1	25.0	1,015	30.8	75	7.4	1,568	47.5
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>3,300</b>	<b>100.0</b>	<b>378</b>	<b>11.5</b>	<b>3,300</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	3,836	2,247	67.3	58.6	918	23.9	671	17.5
Upper	1,633	1,092	32.7	66.9	383	23.5	158	9.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>5,469</b>	<b>3,339</b>	<b>100.0</b>	<b>61.1</b>	<b>1,301</b>	<b>23.8</b>	<b>829</b>	<b>15.2</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	215	59.4	178	57.2	22	71.0	15	75.0
Upper	147	40.6	133	42.8	9	29.0	5	25.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>362</b>	<b>100.0</b>	<b>311</b>	<b>100.0</b>	<b>31</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>85.9</b>		<b>8.6</b>		<b>5.5</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	30	60.0	30	61.2	0	0.0	0	0.0
Upper	20	40.0	19	38.8	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>50</b>	<b>100.0</b>	<b>49</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>98.0</b>		<b>2.0</b>		<b>0.0</b>
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.								

**TABLE E-62  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
WASHITA COUNTY AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	%	#%	%	
<b>Total Home Mortgage Loans</b>							
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	79	50.0	88.8	64.6	66.8	67.3
Upper	1	10	50.0	11.2	34.8	33.0	32.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.5	0.2	0.0
<b>Home Purchase Loans</b>							
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	79	50.0	88.8	56.3	61.0	67.3
Upper	1	10	50.0	11.2	42.9	38.6	32.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.9	0.4	0.0
<b>Home Refinance Loans</b>							
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	0	0	0.0	0.0	76.6	74.4	67.3
Upper	0	0	0.0	0.0	23.4	25.6	32.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
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	0	0	0.0	0.0	85.7	77.4	67.3
Upper	0	0	0.0	0.0	14.3	22.6	32.7
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units</b>
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	0	0	0.0	0.0	100.0	100.0	25.7
Upper	0	0	0.0	0.0	0.0	0.0	74.3
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-63  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY INCOME LEVEL OF GEOGRAPHY  
WASHITA COUNTY AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	#%	\$%	#%	\$%	
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	111	25.0	49.8	59.6	71.8	59.4
Upper	3	112	75.0	50.2	33.8	26.1	40.6
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	6.6	2.1	0.0
Census Tract Income Level	Small Farm Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	#%	\$%	#%	\$%	
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	0	0	0.0	0.0	90.4	95.5	60.0
Upper	0	0	0.0	0.0	9.6	4.5	40.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
 2019 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-64  
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVELS  
WASHITA COUNTY AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	4.5	1.9	19.3
Moderate	0	0	0.0	0.0	13.6	9.3	13.6
Middle	1	79	50.0	88.8	17.2	16.0	19.6
Upper	0	0	0.0	0.0	40.4	51.7	47.5
Unknown	1	10	50.0	11.2	24.2	21.2	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	2.7	1.6	19.3
Moderate	0	0	0.0	0.0	15.2	9.8	13.6
Middle	1	79	50.0	88.8	19.6	17.8	19.6
Upper	0	0	0.0	0.0	41.1	52.8	47.5
Unknown	1	10	50.0	11.2	21.4	17.9	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	4.7	1.8	19.3
Moderate	0	0	0.0	0.0	12.5	8.9	13.6
Middle	0	0	0.0	0.0	15.6	13.9	19.6
Upper	0	0	0.0	0.0	45.3	56.2	47.5
Unknown	0	0	0.0	0.0	21.9	19.3	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	14.3	1.4	19.3
Moderate	0	0	0.0	0.0	28.6	30.1	13.6
Middle	0	0	0.0	0.0	0.0	0.0	19.6
Upper	0	0	0.0	0.0	42.9	45.9	47.5
Unknown	0	0	0.0	0.0	14.3	22.6	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	19.3
Moderate	0	0	0.0	0.0	0.0	0.0	13.6
Middle	0	0	0.0	0.0	50.0	38.2	19.6
Upper	0	0	0.0	0.0	0.0	0.0	47.5
Unknown	0	0	0.0	0.0	50.0	61.8	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE E-65  
DISTRIBUTION OF 2019 SMALL BUSINESS AND SMALL FARM LENDING  
BY REVENUE SIZE OF BUSINESSES AND FARMS  
WASHITA COUNTY AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data		% of Businesses by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	4	223	100.0	100.0	41.1	35.3	85.9
<b>Over \$1MM</b>	0	0	0.0	0.0	Not Reported		8.6
<b>Unknown</b>	0	0	0.0	0.0			5.5
Farm Revenue By Size	Small Farm Loans				Aggregate CRA Data		% of Farms by Revenue
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	0	0	0.0	0.0	63.9	91.7	98.0
<b>Over \$1MM</b>	0	0	0.0	0.0	Not Reported		2.0
<b>Unknown</b>	0	0	0.0	0.0			0.0

Source: 2019 FFIEC Census Data  
 2019 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.



## APPENDIX F

### GLOSSARY

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

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

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

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

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

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

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

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

their mortgage lending activity. The reports include such data as the race, gender and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

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

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

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

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

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

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

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

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

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

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

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

**Rated area:** A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

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

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

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