# PUBLIC DISCLOSURE

## September 27, 2021

# COMMUNITY REINVESTMENT ACT
# PERFORMANCE EVALUATION

**Arvest Bank**
**RSSD #311845**

**75 North East Street**
**Fayetteville, Arkansas 72701**

**Federal Reserve Bank of St. Louis**

**P.O. Box 442**
**St. Louis, Missouri 63166-0442**

**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 the 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 RATING

The following table shows the performance level of Arvest Bank with respect to the Lending, Investment, and Service Tests.

| Arvest Bank | | | |
|---|---|---|---|
| **Performance Tests** | | | |
| **Performance Levels** | **Lending Test\*** | **Investment Test** | **Service Test** |
| Outstanding | | | |
| High Satisfactory | X | X | X |
| Low Satisfactory | | | |
| Needs to Improve | | | |
| Substantial Noncompliance | | | |
| **OVERALL RATING** | **SATISFACTORY** | | |

\*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors supporting the institution's rating include the following:

- The bank's lending levels reflect good responsiveness to the credit needs of its assessment areas.

- A high percentage of loans are made in the bank's assessment areas.

- The geographic distribution of loans reflects adequate penetration throughout the bank's assessment areas.

- The distribution of borrower's income/revenue reflects good penetration among customers of different income levels and businesses and farms of different sizes.

- The bank is a leader in making community development loans.

- The bank makes use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas.

- The bank makes a significant level of qualified community development investments and grants and is occasionally in a leadership position.

- Service delivery systems are reasonably accessible to the bank's assessment areas, and the bank's record of opening and closing branches has generally not adversely affected the accessibility of its service delivery systems.

- The bank is a leader in providing community development services.

# INSTITUTION

## DESCRIPTION OF INSTITUTION

Arvest Bank is a large, multistate retail bank headquartered in Fayetteville, Arkansas. The bank is a wholly owned, state-chartered subsidiary of Arvest Holdings, Inc., whose parent bank holding company is Arvest Bank Group, Inc. Arvest Bank has 11 direct subsidiaries that perform a variety of activities including mortgage banking, investments, insurance, title insurance, commercial leasing, consumer finance activities, and deposit investment products. One subsidiary, Arvest Central Mortgage Corporation, is credit granting; the subsidiary purchases mortgage servicing rights from third parties and brokers refinance loans for current customers to Arvest Bank's mortgage division. Additionally, the bank operated a separate subsidiary for issuing and servicing credit cards until early 2021, when the subsidiary was dissolved and incorporated into Arvest Bank.

Arvest Bank is a full-service financial institution offering an array of commercial and consumer loan and deposit products with an extensive branch network consisting of 241 offices across Arkansas, Kansas, Missouri, and Oklahoma. The bank's most significant presence remains in the state of Arkansas, in particular the Fayetteville-Springdale-Rogers Metropolitan Statistical Area (MSA), which includes the bank's main office and the largest share of the bank's branches, deposits, and loan volume of any of the bank's assessment areas. The bank also maintains significant operations in central and eastern Oklahoma in both nonMSA and MSA portions of the state. In total, the bank has designated 20 distinct assessment areas. However, separate nonMSA assessment areas within each state were combined for analysis given their proximity and similar economic and demographic characteristics.

Therefore, 16 assessment areas were included for analysis in this evaluation:

- Fayetteville-Springdale-Rogers, Arkansas MSA (Fayetteville MSA)
- Little Rock-North Little Rock-Conway, Arkansas MSA (Little Rock MSA)
- Hot Springs, Arkansas MSA (Hot Springs MSA)
- Jonesboro, Arkansas MSA (Jonesboro MSA)[1]
- Texarkana, Texas-Arkansas MSA (Texarkana MSA)[2]
- NonMSA Arkansas
- Oklahoma City, Oklahoma MSA (Oklahoma City MSA)
- Tulsa, Oklahoma MSA (Tulsa MSA)
- Lawton, Oklahoma MSA (Lawton MSA)
- NonMSA Oklahoma
- Joplin, Missouri MSA (Joplin MSA)
- Springfield, Missouri MSA (Springfield MSA)
- NonMSA Missouri
- Fort Smith, Arkansas-Oklahoma Multistate MSA (Fort Smith MSA)
- Kansas City, Missouri-Kansas Multistate MSA (Kansas City MSA)
- NonMSA Kansas

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[1] The Jonesboro and Texarkana MSAs are partial MSAs. All other MSA assessment areas include the full MSA.
[2] The bank operates only in the Arkansas portion of the multi-state MSA.

In addition to the 241 offices previously mentioned, the bank also operates six loan production offices (LPOs) and 97 stand-alone automated teller machines (ATMs), approximately half of which are also deposit accepting, throughout its assessment areas. The bank also offers online and mobile banking services, which increases its ability to provide banking services throughout its assessment areas. Since the previous evaluation, the bank has closed 72 branches and opened 13 branches. Descriptions of the bank's various delivery channels and branch activity are detailed in the *Service Test* section for each assessment area and rated area.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its assessment areas, and the bank is considered capable of meeting assessment area credit needs based on its available resources and financial products and services.

As of June 30, 2021, the bank reported total assets of $26.2 billion, an increase of 40.0 percent from the previous evaluation. As of the same date, loans and leases outstanding were $14.3 billion (54.6 percent of total assets), and deposits totaled $22.8 billion. The composition of the bank's loan portfolio by dollar amount and percentage are displayed in the following table.

| Distribution of Total Loans as of June 30, 2021 | | |
| --- | --- | --- |
| **Credit Category** | **Amount ($000s)** | **Percentage of Total Loans** |
| Construction and Development | $1,038,853 | 7.3% |
| Commercial Real Estate | $3,090,941 | 21.6% |
| Multifamily Residential | $438,650 | 3.1% |
| 1–4 Family Residential | $4,237,265 | 29.6% |
| Farmland | $601,533 | 4.2% |
| Farm Loans | $188,066 | 1.3% |
| Commercial and Industrial | $2,744,595 | 19.2% |
| Loans to Individuals | $1,722,831 | 12.0% |
| Total Other Loans | $263,868 | 1.8% |
| **TOTAL** | **$14,326,351** | **100%** |

As indicated in the table above, a significant portion of the bank's lending resources is directed to residential real estate, which includes 1–4 family residential and multifamily residential; commercial real estate; and commercial and industrial loans. The bank also originates and subsequently sells a significant volume of loans related to residential real estate. As these loans are sold on the secondary market shortly after origination, this activity would not be captured in the table. The bank originated and sold 8,776 loans totaling $1.5 billion and 11,016 loans totaling $2.1 billion in 2018 and 2019, respectively.

Additionally, as shown above, farmland and farm loans do not represent a significant concentration of the bank's lending by dollar volume. These products are nevertheless an important product line in many of the bank's assessment areas, particularly nonMSA areas, and are included for review where applicable.

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on July 30, 2018.

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## SCOPE OF EXAMINATION

The bank's CRA performance was reviewed using the Federal Financial Institutions Examination Council's (FFIEC's) Interagency Large Institution CRA Examination Procedures. The large bank performance standards consist of three tests: Lending, Investment, and Service. The bank maintains operations in four states and two multistate MSAs and received a rating for each of these areas, as well as an overall institution rating. The following table details the number of branch offices, breakdown of deposits, and the CRA review procedures applicable to each rated area completed as part of this evaluation. The rated areas are listed in order of significance toward the overall institution rating. Deposit information in the following table, as well as deposit information throughout this evaluation, is taken from the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2021.

| State/Multistate MSA | Offices | | Deposits as of June 30, 2021 | | Assessment Area Reviews | | |
|---|---|---|---|---|---|---|---|
| | # | % | $ (000s) | % | Full Scope | Limited Scope | TOTAL |
| Arkansas | 98 | 40.7% | $12,321,531 | 54.2% | 4 | 2 | **6** |
| Oklahoma | 80 | 33.2% | $6,761,591 | 29.7% | 3 | 1 | **4** |
| Missouri | 30 | 12.4% | $1,808,581 | 8.0% | 2 | 1 | **3** |
| Fort Smith MSA | 11 | 4.6% | $1,022,880 | 4.5% | 1 | 0 | **1** |
| Kansas City MSA | 19 | 7.9% | $698,764 | 3.1% | 1 | 0 | **1** |
| Kansas | 3 | 1.2% | $133,637 | 0.6% | 1 | 0 | **1** |
| **OVERALL** | **241** | **100%** | **$22,746,984** | **100%** | **12** | **4** | **16** |

The six rated areas in the table above are weighted based on the significance of the bank's operations in each area to determine the overall institution rating. Primary emphasis was placed on performance in Arkansas and Oklahoma given the bank's branch structure and loan and deposit activity. Taken together, these two rated areas represent 73.9 percent of the bank's total branches and 83.9 percent of total deposits.

## Lending Test

Under the Lending Test, the bank's performance is evaluated using the following criteria and time frames.

| Lending Test Performance Criterion | Products Selected for Review | Time Period |
|---|---|---|
| Level of Lending Activity | • Loans reported under the Home Mortgage Disclosure Act (HMDA)<br><br>• Small business and small farm loans reported under the CRA | January 1, 2018 – December 31, 2019 |
| Assessment Area Concentration | | |
| Geographic Distribution of Loans | | |
| Loan Distribution by Borrower's Profile | | |
| Community Development Lending Activities | | July 30, 2018 – June 30, 2021 |
| Product Innovation[3] | | |

Unless otherwise specified at the rated area or assessment area level, performance in the HMDA loan category carried greater significance toward the bank's overall performance conclusions than did either small business or small farm loans based on the total volume of HMDA lending and the bank's business strategy. In general, small farm lending received the least weight in determining overall performance conclusions, except in the bank's nonMSA assessment areas, where the demand for small farm loans and the bank's lending activity are greater. Lastly, equal emphasis is placed on performance in 2018 and 2019.

Under the Lending Test criteria previously noted, analyses often involve comparisons of bank performance to assessment area demographics and the performance of other lenders based on HMDA and CRA aggregate data. Unless otherwise noted, the following are the information sources referenced throughout the evaluation:

- Assessment area demographics are based on 2015 American Community Survey (ACS) data, and business demographics are based on 2018 and 2019 Dun & Bradstreet data.

- Median family incomes are based on the FFIEC's 2018 and 2019 annual estimates. The 2018 estimates were used to classify borrowers into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure for that area.

- Industry demographics are sourced from the 2020 U.S. Census Bureau Business Patterns data, according to the North American Industry Classification System.

- Unemployment data are sourced from the U.S. Department of Labor, Bureau of Labor Statistics and are not seasonally adjusted.

- In order to evaluate the bank's lending performance to borrowers of different income levels, borrowers are classified as low-, moderate-, middle-, or upper-income. In the evaluation of the bank's distribution of loans to borrowers of different income levels and businesses and farms of different revenue sizes, the demographic figure refers to the percentage of families

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[3] Unlike other large bank CRA performance criteria, a lack of innovative and/or flexible lending practices does not necessarily impact the bank's performance negatively. These activities are largely used to augment consideration given to an institution's performance under the quantitative criteria, resulting in a higher performance rating. This distinction also applies to the use of innovative or complex investments under the Investment Test.

in that assessment area who are classified as either low or moderate income or the percentage of businesses and farms with annual revenues of $1 million or less.

- In the evaluation of the bank's geographic distribution of loans, the demographic figure refers to the percentage of owner-occupied housing units in that assessment area that are located in either low- or moderate-income census tracts or the percentage of businesses and farms located in LMI census tracts.

When analyzing bank performance, greater emphasis is placed on annually updated aggregate lending data, which are expected to describe many factors impacting lenders and to predict more relevant comparisons.

### Investment Test

All community development investments, including grants and donations, made since the bank's previous CRA evaluation were reviewed. In addition, investments made prior to the date of the previous CRA evaluation, but still outstanding as of this review date, were also considered. Qualified investments and grants were evaluated to determine the bank's overall level of activity, use of innovative and/or complex investments, and responsiveness to the credit and community development needs of the bank's assessment areas.

### Service Test

The review period for retail and community development services includes activity from the date of the bank's previous CRA evaluation to the date of the current evaluation.

The Service Test considers the following criteria:

- Distribution and accessibility of bank branches and alternative delivery systems.
- Changes in branch locations.
- Reasonableness of business hours and retail services.
- Community development services.

### Review Procedures and Community Contacts

To augment this evaluation, interviews were conducted with 28 community contacts to ascertain specific credit needs, opportunities, and local market conditions within the bank's assessment areas, as well as provide context with which to evaluate the bank's responsiveness to these credit needs and opportunities. Key details from these community contact interviews are included in the *Description of Assessment Area* section applicable to the assessment area in which they were conducted.

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## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Arvest Bank's performance under the Lending Test is rated High Satisfactory. The rating reflects an aggregation of each rated area shown in the table below, with Arkansas and Oklahoma carrying the most weight toward the overall rating. The bank's performance under each of the criteria of the Lending Test is shown in the tables that follow.

| Rated Area | Lending Test Rating |
|---|---|
| Arkansas | High Satisfactory |
| Oklahoma | High Satisfactory |
| Missouri | Low Satisfactory |
| Fort Smith Multistate MSA | High Satisfactory |
| Kansas City Multistate MSA | High Satisfactory |
| Kansas | High Satisfactory |
| **OVERALL** | **HIGH SATISFACTORY** |

## Assessment Area Concentration

For the loan activity reviewed as part of this evaluation, the following table displays the number and dollar volume of loans inside and outside the bank's assessment areas for 2018 and 2019 combined.

| Lending Inside and Outside of Assessment Area January 1, 2018 through December 31, 2019 | | | | | | |
|---|---|---|---|---|---|---|
| Product | Inside Assessment Area | | Outside Assessment Area | | TOTAL | |
| HMDA | 32,048 | 86.8% | 4,861 | 13.2% | 36,909 | 100% |
| | 4,779,234 | 80.2% | 1,176,861 | 19.8% | 5,956,095 | 100% |
| Small Business | 13,807 | 92.1% | 1,181 | 7.9% | 14,988 | 100% |
| | 1,568,087 | 90.7% | 160,263 | 9.3% | 1,728,350 | 100% |
| Small Farm | 6,846 | 93.7% | 461 | 6.3% | 7,307 | 100% |
| | 400,677 | 91.8% | 35,805 | 8.2% | 436,482 | 100% |
| **TOTAL LOANS** | **52,701** | **89.0%** | **6,503** | **11.0%** | **59,204** | **100%** |
| | **6,747,998** | **83.1%** | **1,372,929** | **16.9%** | **8,120,927** | **100%** |

A high percentage of HMDA, small business, and small farm loans were made in the bank's assessment areas. As shown above, 89.0 percent of the total loans were made inside the assessment areas, accounting for 83.1 percent of the dollar volume of total loans.

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## Lending Activity

| Rated Area | Lending Activity |
|---|---|
| Arkansas | Good |
| Oklahoma | Excellent |
| Missouri | Good |
| Fort Smith Multistate MSA | Adequate |
| Kansas City Multistate MSA | Good |
| Kansas | Adequate |
| **OVERALL** | **GOOD** |

Overall lending levels reflect good responsiveness to the credit needs of the bank's assessment areas and did not vary greatly by rated area, as shown in the table above. The total number and dollar amount of loans were considered in arriving at lending activity conclusions, in addition to competitive factors and the bank's overall importance to the area. Additional details are discussed later for each assessment area reviewed under full-scope procedures.

## Geographic and Borrower Distribution

The overall geographic distribution of loans reflects adequate penetration throughout the assessment areas, as displayed below.

| Rated Area | Geographic Distribution of Loans |
|---|---|
| Arkansas | Good |
| Oklahoma | Adequate |
| Missouri | Poor |
| Fort Smith Multistate MSA | Good |
| Kansas City Multistate MSA | Good |
| Kansas | Excellent |
| **OVERALL** | **ADEQUATE** |

The bank's geographic distribution of loans varied somewhat between rated areas. While performance was considered good in three rated areas, including in Arkansas, performance in Oklahoma and Missouri was adequate and poor, respectively, resulting in an adequate overall conclusion.

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Overall, performance by borrower's income or revenue profile is good, as shown in the following table.

| Rated Area | Loan Distribution by Borrower's Profile |
|---|---|
| Arkansas | Good |
| Oklahoma | Good |
| Missouri | Good |
| Fort Smith Multistate MSA | Good |
| Kansas City Multistate MSA | Adequate |
| Kansas | Good |
| **OVERALL** | **GOOD** |

## Community Development Lending Activity

The bank is a leader in making community development loans, as shown in the table below.

| Rated Area | Community Development Lending Activity |
|---|---|
| Arkansas | Leader |
| Oklahoma | Leader |
| Missouri | Relatively high |
| Fort Smith Multistate MSA | Leader |
| Kansas City Multistate MSA | Relatively high |
| Kansas | Adequate |
| **OVERALL** | **LEADER** |

As shown above, the bank is a leader in making community development loans in Arkansas and Oklahoma, which drives the overall rating, with the level of community development lending in the bank's other rated areas varying slightly. The bank made 239 qualified community development loans totaling $902.3 million throughout its assessment areas; this level of community development lending more than doubles the 86 qualified loans totaling $376.3 million at the previous evaluation and is a significant increase even when considering the bank's growth in total assets during the review period.

In addition to these loans, the bank received community development lending credit for certain loans originated under the Small Business Administration's (SBA's) Paycheck Protection Program (PPP). These loans made to small businesses impacted by the COVID-19 pandemic (the pandemic) in 2020 helped to support and retain LMI jobs (see *Product Innovation* section that follows for more information). In total, the bank made 755 community development PPP loans totaling $409.0 million in its assessment areas.

While the bank was already in a leadership position in many of its assessment areas, particularly in Arkansas and Oklahoma, additional consideration was given for the number and dollar amount of PPP loans made in the bank's assessment areas, which bolster the overall conclusion that the bank is a leader in making community development loans. Taken together, the bank made 993 qualified community development loans totaling $1.3 billion during the review period.

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### Product Innovation

Arvest Bank makes use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas.

| Rated Area | Use of Product Innovation |
|---|---|
| Arkansas | Makes extensive use |
| Oklahoma | Makes use |
| Missouri | Makes use |
| Fort Smith Multistate MSA | Makes use |
| Kansas City Multistate MSA | Makes extensive use |
| Kansas | Makes limited use |
| **OVERALL** | **MAKES USE** |

As shown in the table above, the bank's use of innovative and/or flexible lending practices varied slightly by rated area. Following are descriptions of each of the innovative and/or flexible lending options offered by the bank during the review period, listed in order of impact.

### Activities in Response to the COVID-19 Pandemic

In response to the coronavirus, additional consideration was given to the bank's retail lending activities that were responsive to the needs of LMI individuals or small businesses and farms that were impacted by the pandemic. These activities were developed and implemented quickly and often despite resource and operational constraints that the bank faced due to disruptions caused by the pandemic. These activities are considered particularly responsive given their impact in alleviating some of the impact of the pandemic on LMI individuals and small businesses and farms, the speed and responsiveness with which they were developed, and the significant resources and planning required to implement these activities. A summary of each of the bank's retail lending activities taken in response to the pandemic follows.

- Small Business Administration (SBA) Paycheck Protection Program (PPP): PPP loans are available to businesses with fewer than 500 employees or businesses that meet SBA industry size standards. The program provides funds for payroll costs and other operational costs to businesses impacted by the pandemic in 2020 and are fully forgivable if employee retention criteria are met and the funds are used for eligible purposes. From March through August 2020, Arvest Bank originated 15,327 PPP loans totaling $1.2 billion. As previously discussed in the *Community Development Lending Activity* section, a portion of these loans also received credit as qualified community development loans.

- Arvest Assist Consumer Loan: From March through May 2020, the bank developed and implemented an unsecured consumer loan product tailored to meet the needs of consumers impacted by the pandemic. The Arvest Assist product featured lower interest rates than the bank's typical unsecured loan products, no fees, a 120-day deferral for the first payment, and flexible evaluation of income for underwriting purposes for borrowers whose income had been disrupted by the pandemic. While impactful for all borrowers, these loans are

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especially impactful for qualifying LMI borrowers given the flexible underwriting criteria and low cost. In total, the bank originated 570 Arvest Assist loans totaling $4.8 million throughout its assessment areas.

- Loan Forbearance and Modification Programs: Consideration was given to financial institutions offering payment accommodations, such as loan forbearance or payment modification plans, to consumer and commercial borrowers impacted by the pandemic. These activities had a significant impact in helping borrowers avoid delinquencies or negative credit bureau reporting caused by hardships from pandemic-related issues and eased cash flow pressures on businesses impacted by the pandemic. Arvest Bank offered payment extension or modification plans to 5,676 consumer loan accounts and 3,578 commercial loan accounts, as well as 10,057 loan forbearance plans for mortgage accounts.

**Consumer Real Estate**

- Down Payment Assistance Programs: Through partnerships with various state agencies in Arkansas, Kansas, and Missouri, the bank is an approved lender and offers down payment assistance grants to LMI borrowers that are forgivable if the borrower remains in the home for at least ten years. These grants increase homeownership rates, as a common barrier to homeownership for LMI borrowers is securing funds for a down payment. In total, the bank assisted 146 individuals with down payment assistance through the programs, totaling $773,741.

- HomeReady: This mortgage program is offered through Fannie Mae and is available to all LMI borrowers. The program features terms that are more flexible than traditional government-insured loans, such as a lower down payment, cancellable mortgage insurance, and flexible funding source options such as gifts and grants. During the review period, the bank made 1,076 of these loans totaling $139.9 million. The bank's utilization of this program increased significantly from the $24.1 million in loans issued at the previous evaluation.

- Federal Housing Agency (FHA)/U.S. Department of Veterans Affairs (VA) Insured Loan Programs: These government-insured loan programs offer flexible, long-term financing to eligible borrowers with low or no down payment requirements and are offered throughout all of the bank's assessment areas. During the review period, the bank originated 1,758 FHA loans totaling $220.6 million and 341 VA loans totaling $48.9 million.

U.S. Department of Agriculture Rural Development (RD) Loan Program: This loan program is designed to assist LMI borrowers in purchasing affordable housing in rural areas and features no down payment requirement. During the review period, the bank originated 761 of these loans totaling $83.2 million.

- U.S. Department of Housing and Urban Development (HUD), Section 184 Loan Program: This program provides access to mortgage financing to Native American and Alaska Native tribal members. With financing through this program, borrowers have a low down payment requirement and flexible underwriting. Eligible borrowers must be a member of a federally recognized tribe in an eligible state, four of which include Arkansas, Kansas,

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Missouri, and Oklahoma. During the review period, the bank originated 79 of these loans totaling $9.1 million.

- American Dream Down Payment Initiative (ADDI): This down payment assistance program is offered through partnership with the Arkansas Development Finance Authority (ADFA) and is only available in Arkansas. This program provides low-income borrowers with interest-free down payment loans up to $6,000, which are forgivable after five years. The bank assisted ten individuals in receiving down payment assistance through this program, totaling $58,331.

**Arkansas Grant Programs – Partnerships with the Federal Home Loan Bank (FHLB) of Dallas**

- Affordable Housing Program (AHP): Through this program, the FHLB provides funds to member banks seeking to purchase, construct, or rehabilitate housing for the benefit of LMI borrowers. The bank administered two grants through this program totaling $915,000.

- Special Needs Assistance Program (SNAP): This program provides grant funds for housing rehabilitation to LMI, special-needs individuals. During the review period, the bank administered 37 grants totaling $198,411.

- Housing Assistance for Veterans (HAVEN) Program: Through this program, the FHLB provides funds to LMI veterans and active-duty personnel who are disabled by active military service. The funds must be used for necessary home repairs and/or modifications. The bank administered 12 grants through this program totaling $114,292 during the review period.

- Partnership Grant Program (PGP): Through this program, the FHLB matches 3:1 contributions from member banks for grants for operational needs to community-based organizations and nonprofits involved in affordable housing and economic development or technical assistance for small businesses. During the review period, the bank awarded eight grants totaling $62,668 to different community groups and nonprofit organizations in its Arkansas assessment areas.

INVESTMENT TEST

Overall, the bank is rated High Satisfactory under the Investment Test. The bank makes a significant level of community development investments and grants throughout its assessment areas and is occasionally in a leadership position. These investments and grants demonstrated an adequate responsiveness to credit and community development needs throughout the bank's assessment areas. The following table provides details on the total dollar volume of qualified community development investments, grants, and donations and the overall Investment Test rating for each rated area.

| Multistate MSA/State | Investments ($) | Donations/Grants ($) | Investment Test Rating |
|---|---|---|---|
| Arkansas | $55.7 million | $353,874 | High Satisfactory |
| Oklahoma | $53.6 million | $370,568 | High Satisfactory |
| Missouri | $10.3 million | $417,228 | Low Satisfactory |
| Fort Smith Multistate MSA | $8.6 million | $114,275 | High Satisfactory |
| Kansas City Multistate MSA | $28.4 million | $87,130 | Outstanding |
| Kansas | $587,494 | $9,348 | Low Satisfactory |
| **TOTAL** | **$157.2 million** | **$1,352,423** | **HIGH SATISFACTORY** |

As shown in the table above, the bank made total investments of $157.2 million and total donations/grants of $1.4 million. The bank's investments included mortgage-backed securities (MBS), Low-Income Housing Tax Credits (LIHTCs), New Markets Tax Credits (NMTCs), municipal bonds, and private bonds. Included in the investment totals are investments made in a prior period but still outstanding as of the date of this evaluation ($66.9 million), as well as investments made to broader statewide areas that include more than one of the bank's assessment areas ($4.3 million). Investments benefitting more than one of the bank's assessment areas within a state are detailed in the respective statewide section. Additional details of the bank's investment and donation/grant activity are discussed later in the evaluation of each rated area and assessment area.

SERVICE TEST

The bank's performance under the Service Test is rated High Satisfactory. Of the four criteria assessed in the Service Test, greater emphasis is placed on the level of community development services provided by the bank. Service Test ratings by rated area are shown in the table below, with performance under each of the four Service Test criteria detailed in the tables that follow.

| Rated Area | Service Test Rating |
|---|---|
| Arkansas | High Satisfactory |
| Oklahoma | Outstanding |
| Missouri | Low Satisfactory |
| Fort Smith Multistate MSA | Outstanding |
| Kansas City Multistate MSA | Outstanding |
| Kansas | Low Satisfactory |
| **OVERALL** | **HIGH SATISFACTORY** |

While there is some variance in the bank's performance by rated area, the Service Test is rated at a High Satisfactory or higher level in four of the six rated areas, including Arkansas and Oklahoma. Therefore, overall performance is High Satisfactory.

## Accessibility of Delivery Systems

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the bank's assessment areas. In addition to branch locations, consideration was given to the distribution of LPOs and stand-alone ATMs, which provide further ease of access to individuals in the bank's assessment areas. Lastly, the bank's website and mobile application offer full functionality and extend the bank's ability to offer its products and services beyond its physical branch presence.

| Rated Area | Accessibility of Delivery Systems |
| --- | --- |
| Arkansas | Reasonably accessible |
| Oklahoma | Accessible |
| Missouri | Reasonably accessible |
| Fort Smith Multistate MSA | Accessible |
| Kansas City Multistate MSA | Reasonably accessible |
| Kansas | Reasonably accessible |
| **OVERALL** | **REASONABLY ACCESSIBLE** |

As shown in the table above, the bank's delivery systems are reasonably accessible in four rated areas and are more accessible to LMI individuals and geographies in Oklahoma and Fort Smith. Overall, the bank's delivery systems are reasonably accessible.

## Changes in Branch Locations

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 individuals.

| Rated Area | Changes in Branch Locations |
| --- | --- |
| Arkansas | Generally not adversely affected |
| Oklahoma | Generally not adversely affected |
| Missouri | Not adversely affected |
| Fort Smith Multistate MSA | Not adversely affected |
| Kansas City Multistate MSA | Not adversely affected |
| Kansas | Not adversely affected |
| **OVERALL** | **GENERALLY NOT ADVERSELY AFFECTED** |

## Reasonableness of Businesses Hours and Services in Meeting Assessment Area Needs

The bank's business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly LMI geographies or individuals. Most branch locations operate within standard weekday hours (8:00 a.m. to 5:00 p.m.), with some branches offering extended hours until 6:00 or 7:00 p.m. In addition, more than half of the bank's branches operate Saturday lobby hours as well, generally from 9:00 a.m. to 1:00 p.m., and drive-through facilities are operated

at a vast majority of the bank's branches, many of which operate extended hours beyond standard lobby hours. While the bank's hours vary between branches and assessment areas, they do not vary in a way that adversely impacts LMI geographies or individuals. Moreover, the bank offers the same suite of products and services throughout its entire branch network.

| Rated Area | Reasonableness of Business Hours and Services |
|---|---|
| Arkansas | Do not vary in a way that inconveniences |
| Oklahoma | Do not vary in a way that inconveniences |
| Missouri | Do not vary in a way that inconveniences |
| Fort Smith Multistate MSA | Do not vary in a way that inconveniences |
| Kansas City Multistate MSA | Do not vary in a way that inconveniences |
| Kansas | Do not vary in a way that inconveniences |
| **OVERALL** | **DO NOT VARY IN A WAY THAT INCONVENIENCES** |

Additional consideration was given to the bank's retail banking activities that were implemented in response to the pandemic. These activities included those that reduce fees or increase the availability of the bank's services for borrowers, including LMI borrowers, as well as providing alternative service options considering limited access to branch locations. In response to the pandemic, Arvest Bank waived up to three overdraft fees for all customers during March and April 2020. In total, 154,037 such fees were waived for the bank's customers totaling $5.4 million. Additionally, the bank took proactive measures to contact customers with no access to alternative service delivery systems such as debit cards, online banking access, or electronic funds transfer service to make customers aware of these services and assist them in implementing alternative banking options. In total, the bank contacted 128,439 customers through these efforts.

## Community Development Services

Overall, the bank is a leader in providing community development services throughout its assessment areas, as displayed in the following table.

| Rated Area | Community Development Services |
|---|---|
| Arkansas | Leader |
| Oklahoma | Leader |
| Missouri | Adequate |
| Fort Smith Multistate MSA | Leader |
| Kansas City Multistate MSA | Leader |
| Kansas | Limited |
| **OVERALL** | **LEADER** |

As shown, the bank is a leader in providing community development services in four of the six rated areas, including Arkansas and Oklahoma. During the review period, 548 bank employees provided 7,676 hours of community service activities to 423 different organizations operating throughout its assessment areas. Overall, this level of community development services is in line with the bank's performance at the previous evaluation. However, consideration was given to the impact of the pandemic in 2020 on the bank's ability to provide community development service

activities. Many of the bank's typical community development service activities, such as financial literacy events, are performed at in-person meetings or in large gatherings, many of which were restricted in 2020 because of the pandemic. Consequently, declines in the level of community development service activities in certain assessment areas did not necessarily have a negative impact on the bank's performance if these declines were attributable to the impacts of the pandemic.

In addition to the community development service activities described above, the bank manages Individual Development Accounts (IDAs) and Representative Payee Accounts (RPAs) for LMI individuals throughout many of its assessment areas. An IDA is one tool designed to enable low-income families to save toward a targeted amount or goal, typically for the use of homeownership, post-secondary education, or small business ownership. An RPA is an account set up through cooperation with the Social Security Administration through which the bank administers social security benefits for LMI individuals. These accounts improve access to financial services for LMI individuals and are considered innovative and responsive service offerings. In total, the bank opened 105 IDAs and 2,152 RPAs for LMI individuals in its assessment areas during the review period.

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

This Reserve Bank does not have public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to Arvest Bank. In determining this institution's overall CRA rating, the Federal Reserve has considered information that was made available on a confidential basis during its consultations. The Federal Reserve has considered this information in conjunction with the factors in 12 CFR §228.28(c)(2) and has determined that an adjustment to the CRA Performance Evaluation rating is not warranted.

# ARKANSAS

**CRA RATING FOR ARKANSAS:**      **SATISFACTORY**
**The Lending Test is rated:**       **High Satisfactory**
**The Investment Test is rated:**      **High Satisfactory**
**The Service Test is rated:**       **High Satisfactory**

Major factors supporting the ratings for the state of Arkansas include:

- The bank's lending activity levels reflect good responsiveness to the credit needs of the Arkansas assessment areas.

- The geographic distribution of loans reflects good penetration throughout the Arkansas assessment areas.

- The distribution of loans in the Arkansas assessment areas reflects good penetration among individuals of different income levels (including LMI levels) and businesses and farms of different sizes.

- The bank is a leader in making community development loans throughout the Arkansas assessment areas.

- The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of the Arkansas assessment areas.

- The bank makes a significant level of qualified community development investments and grants and is occasionally in a leadership position.

- Delivery systems are reasonably accessible to geographies and individuals of different income levels in the Arkansas assessment areas. Changes in branch locations have generally not adversely affected the accessibility of the bank's delivery systems, and business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly in LMI geographies.

- The bank is a leader in providing community development services throughout Arkansas.

**SCOPE OF EXAMINATION**

Scoping considerations applicable to the review of Arkansas assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. Small farm lending was assessed in all assessment areas other than the Hot Springs MSA assessment area. In all assessment areas, HMDA lending received the greatest weight in the analysis. Small farm lending received the least weight in the MSA assessment areas but was weighted equally with small business lending in the nonMSA assessment area.

The bank operates seven assessment areas throughout Arkansas, located in five MSAs and two noncontiguous nonMSA portions of the state. Performance in the nonMSA assessment areas was combined for analysis, resulting in one set of performance conclusions for nonMSA Arkansas. Four of the bank's Arkansas assessment areas were reviewed under full-scope procedures. When considering branch structure and loan/deposit activity, CRA performance in the Fayetteville MSA assessment area carried the greatest weight when forming overall state conclusions.

To augment the evaluation of the full-scope review assessment areas in Arkansas, 12 community contact interviews were conducted. These interviews were used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from these interviews are included in the *Description of Institution's Operations* sections, as applicable to the assessment areas in which the community contacts were made.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN ARKANSAS

The bank operates 98 branches (40.7 percent of total branches) throughout the six CRA assessment areas in the state of Arkansas. The following table gives additional detail regarding the bank's operations within Arkansas.

| Assessment Area | Offices | | Deposits As of June 30, 2020 | | Review Procedures |
|---|---|---|---|---|---|
| | # | % | $ | % | |
| Fayetteville MSA | 46 | 46.9% | $7,166,202 | 58.2% | Full scope |
| Little Rock MSA | 20 | 20.4% | $3,012,338 | 24.4% | Full scope |
| Hot Springs MSA | 5 | 5.1% | $526,567 | 4.3% | Full scope |
| Jonesboro MSA | 3 | 3.1% | $147,824 | 1.2% | Limited scope |
| Texarkana MSA | 1 | 1.0% | $41,285 | 0.3% | Limited scope |
| NonMSA Arkansas | 23 | 23.5% | $1,427,315 | 11.6% | Full scope |
| **TOTAL** | **98** | **100%** | **$12,321,531** | **100%** | **4 – Full scope** |

As shown above, the bank's deposits in Arkansas total $12.3 billion, which represents 54.2 percent of total bank deposits. In addition to the branch locations shown in the table above, the bank also operates two LPO locations, both located in the Little Rock MSA assessment area, and 30 stand-alone ATMs, 19 of which are deposit accepting. The bank's operations in the state are heavily concentrated in the Fayetteville MSA, which carried the greatest weight toward determining statewide ratings. During the review period the bank closed 40 branches and opened six branches throughout Arkansas.

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

LENDING TEST

Arvest Bank's performance under the Lending Test in Arkansas is rated High Satisfactory. The test considers the following criteria.

**Lending Activity**

| Full-Scope Review Areas | Lending Activity |
|---|---|
| Fayetteville MSA | Excellent |
| Little Rock MSA | Adequate |
| Hot Springs MSA | Good |
| NonMSA Arkansas | Good |
| **OVERALL** | **GOOD** |

| Limited-Scope Review Areas | Lending Activity |
|---|---|
| Jonesboro MSA | Consistent |
| Texarkana MSA | Consistent |

The bank's overall level of lending reflects good responsiveness to the credit needs of the Arkansas assessment areas. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank's overall importance to each assessment area.

**Geographic and Borrower Distribution**

As displayed in the following tables, the bank's overall geographic distribution of loans reflects good penetration throughout Arkansas.

| Full-Scope Review Areas | Geographic Distribution of Loans |
|---|---|
| Fayetteville MSA | Good |
| Little Rock MSA | Good |
| Hot Springs MSA | Adequate |
| NonMSA Arkansas | Adequate |
| **OVERALL** | **GOOD** |

| Limited-Scope Review Areas | Geographic Distribution of Loans |
|---|---|
| Jonesboro MSA | Consistent |
| Texarkana MSA | Below |

The overall borrower distribution of loans is good, as shown in the following tables.

| Arvest Bank | | CRA Performance Evaluation |
|---|---|---|
| Fayetteville, Arkansas | Arkansas | September 27, 2021 |

| Full-Scope Review Areas | Loan Distribution by Borrower's Profile |
|---|---|
| Fayetteville MSA | Good |
| Little Rock MSA | Good |
| Hot Springs MSA | Adequate |
| NonMSA Arkansas | Good |
| **OVERALL** | **GOOD** |

| Limited-Scope Review Areas | Loan Distribution by Borrower's Profile |
|---|---|
| Jonesboro MSA | Consistent |
| Texarkana MSA | Consistent |

## Community Development Lending Activity

Arvest Bank is a leader in making community development loans in Arkansas, as displayed below.

| Full-Scope Review Areas | Community Development Lending Activities |
|---|---|
| Fayetteville MSA | Leader |
| Little Rock MSA | Leader |
| Hot Springs MSA | Adequate |
| NonMSA Arkansas | Leader |
| **OVERALL** | **LEADER** |

| Limited-Scope Review Areas | Community Development Lending Activities |
|---|---|
| Jonesboro MSA | Consistent |
| Texarkana MSA | Below |

During the review period, the bank made 91 community development loans in the state of Arkansas totaling $418.1 million. As the bank met the community development lending needs of its own assessment areas, additional consideration was given to community development loans made in the state of Arkansas outside of the bank's assessment areas. As a result, these figures include two loans totaling $5.2 million originated in Forrest City, Arkansas, outside of the bank's assessment areas. Both loans helped finance a multifamily affordable housing development that was partially financed through LIHTCs. Moreover, Arvest Bank was also in a leadership position in originating PPP loans to businesses impacted by the pandemic in Arkansas. In total, the bank received credit for 314 PPP loans originated in its Arkansas assessment areas totaling $153.4 million. The bank's PPP lending activity further supports the fact that the bank is a leader in providing community development loans in the state.

## Product Innovation

The bank makes extensive use of flexible lending practices in serving the credit needs of the Arkansas assessment areas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of

| Arvest Bank | | CRA Performance Evaluation |
|---|---|---|
| Fayetteville, Arkansas | Arkansas | September 27, 2021 |

this document. The bank's use of flexible and/or innovative lending products in Arkansas is described below:

- Through the ADFA and ADDI, the bank facilitated down payment assistance to 85 borrowers totaling $558,397. As noted by community contacts, down payment assistance was identified as a need in many of the bank's Arkansas assessment areas and is especially impactful in increasing homeownership for LMI residents.

- The bank originated 434 loans totaling $61.1 million through the HomeReady program. These loans provide flexible, long-term financing for LMI borrowers, which was noted by community contacts in several assessment areas as a credit need. This represents a substantial increase from the 12 loans totaling $1.1 million originated at the previous evaluation.

- Through various programs with the FHLB, the bank awarded 51 grants totaling $801,868. These grants were primarily made through the SNAP (33 grants) and HAVEN (12 grants) programs, which provide funds to eligible borrowers for home improvements. In addition, the bank awarded one grant totaling $475,000 through the AHP program, which financed the rehabilitation of an affordable housing structure for visually impaired LMI individuals, and five grants through the PGP program totaling $33,668.

- The bank also originated a significant volume of mortgage loans through government loan programs, including 787 FHA loans ($106.4 million), 398 RD loans ($46.7 million), and 141 VA loans ($21.1 million).

- Lastly, the bank awarded two grants totaling $334,358 through the HUD Section 184 Loan Program, which offers flexible mortgage loans to Native Americans in eligible states.

INVESTMENT TEST

Overall, the bank's performance in Arkansas is rated High Satisfactory under the Investment Test. The following tables display investment and grant activity performance in the Arkansas assessment areas.

| Full-Scope Review Areas | Investment and Grant Activity |
|---|---|
| Fayetteville MSA | Excellent |
| Little Rock MSA | Significant |
| Hot Springs MSA | Significant |
| NonMSA Arkansas | Adequate |
| **OVERALL** | **SIGNIFICANT** |

| Limited-Scope Review Areas | Investment and Grant Activity |
|---|---|
| Jonesboro MSA | Consistent |
| Texarkana MSA | Below |

As shown in the table below, the bank's total investment and grant activity included $40.6 million in qualified investments and grants and $353,874 in donations. These activities consisted primarily

| Arvest Bank | | CRA Performance Evaluation |
|---|---|---|
| Fayetteville, Arkansas | Arkansas | September 27, 2021 |

of investments in MBS supporting affordable housing throughout the Arkansas assessment areas, as well as municipal bonds supporting community service or revitalization efforts in LMI areas. Additional details regarding the composition of the bank's investments can be found in the *Investment Test* section for each of the respective assessment areas.

| Arkansas Assessment Area | Investments/Grants ($) | Donations ($) |
|---|---|---|
| Fayetteville MSA | $14.3 million | $29,410 |
| Little Rock MSA | $29.7 million | $196,251 |
| Hot Springs MSA | $2.2 million | $7,800 |
| Jonesboro MSA | $2.1 million | $62,537 |
| Texarkana MSA | – | $12,800 |
| NonMSA Arkansas | $5.2 million | $45,076 |
| **TOTAL** | **$53.5 million** | **$353,874** |

In addition to the totals in the table above, the bank had several investments benefitting the broader statewide area that included multiple Arkansas assessment areas. The bank made two new investments totaling $1.0 million in bonds that provided funds to the state of Arkansas' emergency notification system, which is considered essential communication infrastructure. The bank also had a $1.3 million investment in a small business investment company fund supporting small business needs in Arkansas.

SERVICE TEST

The bank is rated High Satisfactory under the Service Test in Arkansas based on the criteria in the following tables.

**Accessibility of Service Delivery Systems**

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in Arkansas, as shown in the following tables.

| Arvest Bank | | CRA Performance Evaluation |
|---|---|---|
| Fayetteville, Arkansas | Arkansas | September 27, 2021 |

| Full-Scope Review Areas | Accessibility of Delivery Systems |
|---|---|
| Fayetteville MSA | Accessible |
| Little Rock MSA | Reasonably accessible |
| Hot Springs MSA | Unreasonably inaccessible |
| NonMSA Arkansas | Reasonably accessible |
| **OVERALL** | **REASONABLY ACCESSIBLE** |

| Limited-Scope Review Areas | Accessibility of Delivery Systems |
|---|---|
| Jonesboro MSA | Consistent |
| Texarkana MSA | Consistent |

## Changes in Branch Locations

Changes in branch locations have generally not affected the accessibility of the bank's service delivery systems, particularly to LMI geographies and individuals, as noted in the tables below.

| Full-Scope Review Areas | Changes in Branch Locations |
|---|---|
| Fayetteville MSA | Generally not adversely affected |
| Little Rock MSA | Not adversely affected |
| Hot Springs MSA | Adversely affected |
| NonMSA Arkansas | Generally not adversely affected |
| **OVERALL** | **GENERALLY NOT ADVERSELY AFFECTED** |

| Limited-Scope Review Areas | Changes in Branch Locations |
|---|---|
| Jonesboro MSA | Consistent |
| Texarkana MSA | Consistent |

## Reasonableness of Business Hours and Services in Meeting Assessment Area Credit Needs

Business hours and services do not vary in a way that inconveniences certain portions of the Arkansas assessment areas, particularly LMI geographies and individuals. The bank's performance under this criterion is displayed by assessment area in the following tables.

| Full-Scope Review Areas | Reasonableness of Business Hours and Services |
|---|---|
| Fayetteville MSA | Do not vary in a way that inconveniences |
| Little Rock MSA | Do not vary in a way that inconveniences |
| Hot Springs MSA | Do not vary in a way that inconveniences |
| NonMSA Arkansas | Do not vary in a way that inconveniences |
| **OVERALL** | **DO NOT VARY IN A WAY THAT INCONVENIENCES** |

Arvest Bank
Fayetteville, Arkansas                    Arkansas

CRA Performance Evaluation
September 27, 2021

| Limited-Scope Review Areas | Reasonableness of Business Hours and Services |
|---|---|
| Jonesboro MSA | Consistent |
| Texarkana MSA | Consistent |

## Community Development Services

Arvest Bank is a leader in providing community development services throughout the Arkansas assessment areas. Performance under this criterion for each of the Arkansas assessment areas is displayed in the following tables.

| Full-Scope Review Areas | Community Development Services |
|---|---|
| Fayetteville MSA | Leader |
| Little Rock MSA | Leader |
| Hot Springs MSA | Relatively high level |
| NonMSA Arkansas | Relatively high level |
| **OVERALL** | **LEADER** |

| Limited-Scope Review Areas | Changes in Branch Locations |
|---|---|
| Jonesboro MSA | Consistent |
| Texarkana MSA | Consistent |

During the review period, 244 bank employees provided 2,701 hours of community development service activities to 142 organizations throughout the Arkansas assessment areas. Despite the challenges posed by the pandemic to providing routine community development services, the overall level of community development services provided by the bank in Arkansas represents an increase from the 130 organizations and 2,260 hours qualified at the previous evaluation and reaffirms the bank's role as a leader in providing community development services in its Arkansas assessment areas. Bank employees served in numerous capacities for nonprofit agencies and community service and economic development organizations. Details of the most impactful of these activities are included in the *Community Development Services* section for each full-scope assessment area.

# FAYETTEVILLE-SPRINGDALE-ROGERS, ARKANSAS MSA

*(Full-Scope Review)*

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FAYETTEVILLE MSA ASSESSMENT AREA

### Bank Structure

The bank operates 46 branches in the Fayetteville MSA assessment area, representing 19.1 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

| Branch Location by Census Tract Income Level | | | |
|---|---|---|---|
| Low-Income | Moderate-Income | Middle-Income | Upper-Income |
| 0 | 8 | 26 | 12 |

During the review period, the bank closed 11 branches and opened three new branches in the assessment area. In addition to operating ATMs at each branch location, the bank also operates 28 stand-alone ATMs in the assessment area, 14 of which are deposit accepting. Of these stand-alone ATMs, four are in moderate-income census tracts. Based on this branch network and other service delivery systems such as online and mobile banking, the bank is well positioned to deliver financial services to substantially all of the assessment area.

### General Demographics

The assessment area comprises the entirety of the Fayetteville MSA, which includes Benton, Madison, and Washington counties in the northwest portion of Arkansas. The majority of the 470,332 population in the assessment area is concentrated in Benton (238,198) and Washington (216,432) counties, while Madison County (15,702) contains a significantly smaller population. While Madison County is more rural, Benton and Washington counties are largely urban and have experienced significant population and economic growth in the last two decades due largely to the success of several key businesses headquartered in Benton County, such as Walmart, Tyson Foods, and JB Hunt, as well as the University of Arkansas, located in Washington County.

The Fayetteville MSA is a competitive banking market, with 36 FDIC-insured depository institutions operating 197 branches. By both branch presence and deposit market share (45.7 percent), Arvest Bank is the market leader in the assessment area, with the next highest institution holding only 8.0 percent of the total deposit dollars in the assessment area. Deposits held in the Fayetteville MSA represent 31.5 percent of total bank deposits, by far the most of any of the bank's assessment areas. While competition for HMDA and CRA loans is similarly high, the bank also is a market leader in both categories. An analysis of 2019 HMDA-reportable loans shows that of the 408 entities with loan activity in the assessment area, Arvest Bank ranked first, with 22.4 percent of total HMDA loan activity. Similarly, the bank ranked first out of 102 institutions with CRA loan activity in the assessment area in 2019, accounting for 24.7 percent of all CRA loan activity. The population of the assessment area is diverse and varied, thus creating a need for a blend of consumer, business, and agriculture loan products. Community contacts stressed the need for greater affordable housing development, the need for an affordable home improvement product,

| Arvest Bank | | CRA Performance Evaluation |
|---|---|---|
| Fayetteville, Arkansas | Fayetteville MSA | September 27, 2021 |

and outreach and financial literacy training for consumers and businesses. Furthermore, opportunities for community development involvement are ample through partnerships with various nonprofit agencies and government assistance entities, as well as two universities located in the cities of Fayetteville and Bentonville.

## Income and Wealth Demographics

The following table displays the distribution of assessment area census tracts by income level and the family population within those tracts.

| Assessment Area Demographics by Geography Income Level | | | | |
|---|---|---|---|---|
| | Census Tracts | | Family Population | |
| Low | 2 | 2.4% | 1,973 | 1.7% |
| Moderate | 18 | 21.2% | 25,064 | 21.0% |
| Middle | 40 | 47.1% | 52,270 | 43.9% |
| Upper | 25 | 29.4% | 39,767 | 33.4% |
| **TOTAL** | **85** | **100%** | **119,074** | **100%** |

As shown above, 23.6 percent of the assessment area census tracts are low or moderate income, while 22.7 percent of the assessment area family population resides within those tracts. The majority of these LMI census tracts are in Washington County, in and around the cities of Fayetteville and Springdale. The assessment area contains only two low-income census tracts which represent a small percentage of total census tracts and the assessment area family population; one of these census tracts is in northern Fayetteville while the other is in the city of Rogers.

According to 2015 ACS data, the median family income for the assessment area is $60,876, which exceeds the median family income for the state of Arkansas as a whole ($51,782). More recently, the FFIEC estimates the median family income for the Fayetteville MSA to be $64,500 in 2018 and $66,400 in 2019. The following table compares the distribution of assessment area families by income level to the state of Arkansas as a whole.

| Family Population by Income Level | | | | |
|---|---|---|---|---|
| | Assessment Area | | Arkansas | |
| Low | 24,295 | 20.4% | 164,346 | 21.6% |
| Moderate | 22,143 | 18.6% | 134,818 | 17.7% |
| Middle | 24,183 | 20.3% | 149,580 | 19.7% |
| Upper | 48,453 | 40.7% | 311,180 | 41.0% |
| **TOTAL** | **119,074** | **100%** | **759,924** | **100%** |

When compared to the previous table, the data in the table above shows that a higher percentage of families in the assessment area are LMI (39.0 percent) than reside in LMI geographies (22.7 percent). By comparison, the distribution of assessment area families by income level is closely aligned with that of Arkansas as a whole, as shown in the table above. Additionally, while not shown above, the percentage of assessment area families below the poverty level (11.2 percent) is lower than the statewide figure of 14.3 percent. Therefore, when considering income and poverty levels in the assessment area and statewide, the Fayetteville MSA is more affluent than the state of Arkansas as a whole.

**Housing Demographics**

The following table displays housing demographics for the assessment area and the state of Arkansas. The affordability ratio measures the extent to which a family earning the median household income for the assessment area can afford a median-priced home in the assessment area, while the housing cost burden shows the percentage of renters with housing costs that exceed 30.0 percent of their income.

| Housing Demographics | | | | |
|---|---|---|---|---|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) | Housing Cost Burden |
| Assessment Area | $149,333 | 33.4% | $743 | 39.8% |
| Arkansas | $111,400 | 37.1% | $677 | 42.7% |

Based on the data in the table above, homeownership is less affordable in the assessment area than in the state of Arkansas as a whole, even when accounting for higher income levels in the assessment area. Within the assessment area, homeownership is least affordable in Washington County based on an affordability ratio of 28.7 and housing cost burden of 44.8 percent, while Benton and Madison counties are comparatively more affordable. In addition, rents are much higher in the assessment area than the state as a whole, but fewer renters' housing costs exceed 30 percent of their income. These demographics indicate that homeownership or affordable rental options are likely a challenge for many LMI residents in the area, particularly those in Washington County. This was echoed by community contacts who noted that there has been little new affordable housing stock development, particularly for single family homes.

**Industry and Employment Demographics**

The assessment area economy is large and diverse and supports a strong small business sector in addition to several large, national businesses and a prominent public university. County business patterns data indicate that of the 240,743 paid employees in the assessment area, the largest job sectors are government (12.0 percent), manufacturing (11.7 percent), and health care and social assistance (11.1 percent). Additionally, construction is a significant sector of the assessment area economy, accounting for 9.9 percent of all business establishments. Of all businesses operating in the assessment area, 91.5 percent reported annual revenues of $1 million or less, indicating that small businesses play an important role in the area's economy.

The following table displays unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Arkansas.

| Unemployment Levels | | | |
|---|---|---|---|
| Dataset | Time Period (Annual Average) | | |
| | 2018 | 2019 | 2020 Year to Date (YTD) |
| Assessment Area | 2.8% | 2.5% | 5.2% |
| Arkansas | 3.6% | 3.6% | 7.0% |

As shown in the preceding table, unemployment levels in the assessment area remained lower than statewide figures throughout the review period, but they more than doubled in 2020. This increase

in both the assessment area and statewide unemployment level reflects a national trend of higher unemployment levels due to the impact of the pandemic.

## Community Contact Information

Two community contact interviews were conducted with individuals knowledgeable of the assessment area's economic conditions and credit needs. One of these individuals represents a small business development organization, and the other contact represents an affordable housing organization.

Both contacts identified similar economic characteristics for the assessment area. Notably, the economies of Washington and Benton counties continue to experience growth due largely to several anchor employers headquartered in the area such as Walmart, JB Hunt, Tyson Foods, and the University of Arkansas. The employment opportunities associated with these businesses continue to attract new residents to the area, which has contributed to rising population levels. Conversely, one contact noted that Madison County is more rural and dependent on agriculture and is generally less affluent than the other two counties in the assessment area; additionally, the contact noted that many Madison County residents commute to work in Benton or Washington counties, increasing the need for public transit. The contacts confirmed that the industries listed in the *Industry and Employment Demographics* section were key industries in the assessment area. While neither contact identified credit gaps in the assessment area, both contacts pointed to the utilization of alternative financial sources for both consumer and commercial customers. In particular, the contacts noted that many younger consumers in the area have turned to online banking accounts or other payment applications for the sake of convenience in place of maintaining traditional deposit accounts at banks. On the commercial side, some small businesses have utilized online financial technology companies to obtain funding, particularly small dollar loans.

When describing the credit needs of the assessment area, the housing contact stated that there is not enough affordable housing supply in the area to meet the demand. New housing developments are common, but the contact stated that less than 10 percent of new development is for affordable housing, and many that are designed to be affordable are no longer affordable when factoring in fees and parking costs. While multifamily affordable housing developments are more common, the need for single family affordable housing supply is the most pressing need in the assessment area, with rising housing prices and dwindling affordable housing supply representing the greatest barriers to homeownership for LMI residents.

The contact also pointed to the need for low-cost home improvement loans to maintain the existing affordable housing stock and allow LMI residents to remain in their homes. The contact went on to explain that financial institutions in the assessment area could be more impactful by increasing outreach efforts to make LMI borrowers aware of their affordable or flexible lending products, providing credit counseling, and partnering with local housing organizations to develop loan products designed for LMI borrowers.

With regard to business needs in the assessment area, the small business contact noted that business conditions are favorable overall in the assessment area due to the infrastructure and increasing labor supply. However, funding and resources such as counseling remain a barrier for many businesses, in particular minority-owned businesses. As such, the contact identified increased

outreach to minority-owned businesses, as well as small dollar loans such as micro loans, as credit needs for businesses in the area. Both community contacts identified Arvest Bank as being particularly active in the assessment area in meeting affordable housing and small business needs and working with local organizations to better serve the residents of the assessment area.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FAYETTEVILLE MSA ASSESSMENT AREA

LENDING TEST

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes. Finally, the bank is a leader in making community development loans in the Fayetteville MSA assessment area.

### Lending Activity

The following table displays the combined 2018 and 2019 lending volume by number and dollar amount in the assessment area.

| Summary of Lending Activity January 1, 2018 through December 31, 2019 | | | | |
|---|---|---|---|---|
| Loan Type | # | % | $(000s) | % |
| Home Improvement | 828 | 5. 5% | 51,576 | 2.5% |
| Home Purchase | 4,786 | 31.7% | 951,345 | 45.9% |
| Multifamily Housing | 49 | 0.3% | 91,974 | 4.4% |
| Refinancing | 3,023 | 20.0% | 402,486 | 19.4% |
| Other Purpose Line of Credit (LOC) | 614 | 4.1% | 38,585 | 1.9% |
| Other Purpose Closed/Exempt | 231 | 1.5% | 19,888 | 1.0% |
| Purpose Not Applicable | 2 | 0.0% | 245 | 0.0% |
| **Total HMDA** | **9,533** | **63.1%** | **1,556,099** | **75.2%** |
| Small Business | 3,794 | 25.1% | 421,071 | 20.3% |
| Small Farm | 1,770 | 11.7% | 93,456 | 4.5% |
| **TOTAL LOANS** | **15,097** | **100.00%** | **2,070,626** | **100.00%** |

The bank's lending activity in the Fayetteville MSA assessment area represents 27.7 percent of total 2018 and 2019 HMDA and CRA loans made in the bank's combined assessment areas. By comparison, the bank operates 19.1 percent of its total branches and holds 31.5 percent of total bank deposits in the assessment area. As previously discussed, the bank is a market leader in both deposit market share and lending activity; while the share of total bank deposits held in the assessment area is slightly higher than the share of total loans, this is reflective of the bank's dominant market presence rather than a lack of lending activity. In 2019, the bank ranked first out of 408 lenders in HMDA originations and first out of 102 lenders in CRA originations in the assessment area. Therefore, the bank's level of lending reflects excellent responsiveness to credit needs in the assessment area.

## Geographic Distribution of Loans

As previously shown, the Fayetteville MSA assessment area includes two low-income census tracts and 18 moderate-income census tracts; given this distribution, greater emphasis was placed on the bank's performance lending in moderate-income census tracts for all three loan products reviewed. Overall, the bank's geographic distribution of loans in the assessment area is good.

*Home Mortgage Disclosure Act (HMDA) Lending*

The geographic distribution of HMDA loans is good overall. The bank's performance lending in low-income census tracts in both 2018 (0.3 percent) and 2019 (0.7 percent) was closely aligned with peer lending performance (0.4 percent in 2018 and 0.7 percent in 2019) and demographic figures (0.4 percent in 2018 and 0.6 percent in 2019), reflecting adequate performance. The bank's HMDA lending in moderate-income census tracts compared more favorably to comparison data and is considered good overall. In 2018, the bank originated 12.8 percent of its HMDA loans in moderate-income census tracts, which was in line with the aggregate lending level (11.9 percent) and slightly below the demographic figure (15.7 percent), reflecting adequate performance. The bank's lending levels in moderate-income census tracts in 2019 (14.7 percent) exceeded that of peer institutions in the assessment area (12.3 percent) but was below the demographic figure of 18.1 percent, reflecting good performance.

Further consideration was given to the bank's performance in addressing credit needs noted by community contacts, who pointed to the need for affordable housing development, particularly home purchase loans for 1–4 family units. In 2018 and 2019, the bank originated 13.2 percent and 15.9 percent of its home purchase loans in low- and moderate-income census tracts, respectively; this level of lending exceeded aggregate lending levels of 11.8 percent in 2018 and 12.3 percent in 2019. When considering this context and the greater emphasis placed on lending performance in moderate-income census tracts, the bank's geographic distribution of HMDA loans is considered good.

*Small Business Lending*

The bank originated 1.0 percent of its small business loans in low-income census tracts in 2018 and 1.9 percent in 2019, which was in line with aggregate lending levels for both years (0.9 percent in 2018 and 1.5 percent in 2019) and the demographic figure (1.1 percent in 2018 and 1.9 percent in 2019), reflecting adequate performance in both years.

The bank's distribution of small business loans in moderate-income census tracts in 2018 (16.6 percent) exceeded that of peer institutions in the assessment area (15.2 percent) and was in line with the percentage of small businesses located in moderate-income census tracts (16.9 percent), reflecting good performance. The bank's performance in 2019 (19.8 percent) was even higher relative to the aggregate lending level (16.5 percent) and demographic figure (18.6 percent) and is considered excellent. As greater emphasis is placed on performance lending in moderate-income census tracts in the assessment area, the bank's overall geographic distribution of small business loans is good.

*Small Farm Lending*

The geographic distribution of small farm loans is excellent. According to demographic estimates, there was only one farm operating in low-income census tracts in 2018 and four in 2019, representing less than 1.0 percent of all farms operating in the assessment area. As a result, opportunities for lending to small farms in low-income census tracts are minimal. While the bank made no small farm loans in low-income census tracts in 2018 and 2019, this is considered adequate given the limited lending opportunities in those geographies. The bank's distribution of small farm loans in moderate-income census tracts reflects excellent performance in both 2018 and 2019. In both years, the bank's lending (21.4 percent in 2018 and 28.7 percent in 2019) exceeded both the aggregate lending level (20.5 percent in 2018 and 26.7 percent in 2019) and the demographic figure (17.0 percent in 2018 and 20.0 percent in 2019). Therefore, the overall geographic distribution of small farm loans is considered excellent.

Lastly, no conspicuous lending gaps were noted in LMI areas based on an analysis of the dispersion of all three lending products. The bank had loan activity in all census tracts in the assessment area in both 2018 and 2019, including all LMI census tracts.

## **Loan Distribution by Borrower's Profile**

Based on all three products reviewed, the overall borrower distribution of the bank's loans is considered good.

*Home Mortgage Disclosure Act (HMDA) Lending*

The distribution of HMDA loans is good overall. In 2018, the bank originated 7.5 percent of its HMDA loans to low-income borrowers, which exceeded aggregate lending levels (6.3 percent) but was below the percentage of assessment area families who are low income (20.0 percent). However, a significant portion of this demographic figure is unlikely to qualify for a home mortgage loan, as evidenced by the overall assessment area poverty level of 11.2 percent. Considering this context and when compared to peer lenders in the assessment area, the bank's performance lending to low-income borrowers in 2018 is good. Similarly, lending to low-income borrowers in 2019 (6.7 percent) outpaced peer institutions in the assessment area (5.7 percent) but was again below the demographic figure (20.4 percent), reflecting good performance.

In 2018, the bank originated 15.0 percent of its HMDA loans to moderate-income borrowers, which equaled the performance of peer institutions in the assessment area and was below the demographic figure of 18.3 percent, reflecting adequate performance. Similarly, lending in 2019 to moderate-income borrowers (16.3 percent) was in line with the aggregate lending level (15.6 percent) and is considered adequate. As previously noted, Arvest Bank ranked first in HMDA originations in both 2018 and 2019. When combined, Arvest Bank accounts for 24.2 percent of total HMDA loans made to LMI borrowers in the assessment area in 2018 and 2019. The bank's role in the market in meeting the needs of LMI borrowers further supports the conclusion that the borrower distribution of HMDA loans is good overall.

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*Small Business Lending*

Overall, the distribution of small business loans by business revenue profile is good. The bank originated 69.1 percent of its small business loans to businesses with annual revenues of $1 million or less in 2018 and 64.9 percent in 2019, which was well above the aggregate lending levels of 46.7 percent in 2018 and 43.5 percent in 2019. While below the demographic estimate of assessment area businesses with annual revenues of $1 million or less (91.0 percent in 2018 and 91.5 percent in 2019), this nevertheless reflects good performance when compared to aggregate lending levels. Moreover, across both years of data, 79.0 percent of the bank's loans to businesses with annual revenues of $1 million or less were in amounts of $100,000 or less, which are typically amounts that are more responsive to the needs of small businesses.

*Small Farm Lending*

The bank's record of lending to small farms is good overall. The bank originated 96.3 percent of its total small farm loans to farms with annual revenues of $1 million or less in 2018 and 81.0 percent in 2019. This exceeded aggregate lending levels for both years (89.6 percent in 2018 and 74.2 percent in 2019) but was below the demographic estimate of small farms with annual revenues of $1 million or less (97.5 percent in 2018 and 97.1 percent in 2019). In addition, across both years of data, 86.5 percent of the bank's loans to farms with annual revenues of $1 million or less was in amounts of $100,000 or less, which is considered more responsive to the needs of small farms. Therefore, the borrower distribution of small farm loans is considered good in both 2018 and 2019.

## Community Development Lending Activity

The bank is a leader in making community development loans in the Fayetteville MSA assessment area. As detailed in the table below, the bank made 33 community development (CD) loans totaling $207.6 million and 176 PPP loans totaling $90.4 million. The most impactful of these loans are discussed following the table below.

| Community Development Lending | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | Affordable Housing | | Community Services | | Revitalization/ Stabilization | | Economic Development | | Total | |
| | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) |
| CD Loans | 2 | 2,166 | 1 | 2,000 | 6 | 39,360 | 24 | 164,068 | 33 | 207,594 |
| PPP Loans | - | - | - | - | - | - | 176 | 90,392 | 176 | 90,392 |

- The bank originated two community development loans with a purpose of affordable housing, totaling $2.2 million. These loans provided funding for affordable multifamily housing developments. As noted by community contacts and assessment area housing demographics, the assessment area has need for affordable rental options for LMI borrowers.

- The bank financed several community development loans for various commercial and residential real estate construction projects that qualified as either revitalization/ stabilization of LMI geographies or economic development by supporting permanent LMI job creation for small businesses. One loan totaling $28.4 million financed the construction of a regional cancer treatment facility, while another loan for $33.8 million helped to revitalize/stabilize a moderate-income geography through the construction of a student housing complex. These loans are considered impactful given the size of the loan and the overall impact to the assessment area.

## INVESTMENT TEST

The bank makes an excellent level of qualified community development investments and grants in the assessment area and is often in a leadership position. In total, the bank made $14.3 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed below the table.

| Summary of Investments – Fayetteville MSA | | | |
|---|---|---|---|
| Investment Type | Current Period | Prior Period, Still Outstanding | Total |
| MBS | $4.0 million | $1.1 million | $5.2 million |
| LIHTCs | - | $2.2 million | $2.2 million |
| Municipal/private bonds | $3.5 million | $3.3 million | $6.9 million |
| Donations | $29,410 | - | $29,410 |
| TOTAL | $7.6 million | $6.6 million | $14.3 million |

- The bank continues to invest in one LIHTC project from a period that is still outstanding. The project funds the rehabilitation and preservation of a 51-unit facility providing subsidized affordable housing for elderly LMI individuals.

- The bank made $4.0 million in new MBS investments during the current review period. These investments support permanent financing for affordable housing loans for LMI individuals in the assessment area. The total dollar volume of the bank's current period investments is significant and helps address the need for affordable housing noted by community contacts.

- The bank made one donation totaling $4,200 to a recreation center in the city of Springdale that is in a moderate-income census tract and provides a variety of after-school programs and recreational activities that primarily benefit LMI individuals.

## SERVICE TEST

Arvest Bank's service delivery systems are accessible to geographies and individuals of different income levels throughout the Fayetteville MSA assessment area, and the bank's record of opening and closing branches has generally not adversely affected the accessibility of these service delivery systems, particularly to LMI geographies or individuals. Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies or individuals. Lastly, the bank is a leader in providing community development services in the Fayetteville MSA assessment area.

## Accessibility of Delivery Systems

The bank operates 46 branches and 28 stand-alone ATMs, 14 of which are deposit accepting, throughout the assessment area. The following table displays the location of the bank's branches and stand-alone ATMs by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|---|---|---|---|---|---|---|
| **Dataset** | **Geography Income Level** | | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | **Unknown** | |
| Branches | 0 | 8 | 26 | 12 | 0 | **46** |
| | 0.0% | 17.4% | 56.5% | 26.1% | 0.0% | **100%** |
| Stand-alone ATMs | 0 | 4 | 14 | 10 | 0 | **28** |
| | 0.0% | 14.3% | 50.0% | 35.7% | 0.0% | **100%** |
| Census tracts | 2.4% | 21.2% | 47.1% | 29.4% | 0.0% | **100%** |
| Household population | 1.7% | 21.0% | 43.9% | 33.4% | 0.0% | **100%** |

As shown in the table above, eight, or 17.4 percent, of the bank's branches in the assessment area are in LMI geographies. By comparison, 23.6 percent of geographies in the assessment area are LMI, and 22.7 percent of households reside in LMI geographies. The bank also operates four stand-alone ATMs in moderate-income geographies, two of which are also deposit accepting, and two of which are in moderate-income census tracts that the bank does not also operate a branch in. While the bank does not operate any branches directly in the assessment area's low-income census tracts, the bank operates two branches within one mile of both low-income census tracts that are accessible to residents of those tracts. As a result, service delivery systems are accessible to geographies and individuals of different income levels in the assessment area.

## Changes in Branch Locations

During the review period, the bank closed 11 branches and opened three branches. Of the closed branches, two were in moderate-income census tracts, four in middle-income census tracts, and five in upper-income census tracts. Meanwhile, one new branch location was opened in a middle-income census tract and two in upper-income census tracts. Generally, closed branches were selected given their proximity to nearby Arvest Bank branches that are easily accessible to residents impacted by the closed branches. For instance, the bank operates another branch within one mile of one of the branches it closed in a moderate-income census tract, resulting in a minimal impact to accessibility. While the net result of the bank's branch activity in the assessment area was a loss of eight branches, the resulting impact to branch accessibility was minimal given the presence of nearby Arvest Bank branches to closed branch locations. As a result, changes in branch locations have generally not adversely affected the accessibility of the bank's service delivery systems, particularly to LMI geographies or individuals.

## Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Most branches in the assessment

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area operate standard lobby hours from 8:00 a.m. to 5:00 p.m. on weekdays, with many branches operating extended lobby hours until 6:00 p.m. on Fridays. Of the bank's 46 branches in the assessment area, 23 operate Saturday lobby hours, including three in moderate-income census tracts. Furthermore, most branches in the assessment area operate drive-through facilities, many of which operate extended weekday hours and Saturday hours, including in LMI geographies. Lastly, lenders are equally dispersed throughout the bank's branches.

**Community Development Services**

Arvest Bank is a leader in providing community development services in the Fayetteville MSA. During the review period, 101 bank employees provided 805 hours of community development service activities to 50 different organizations. Most of these efforts consisted of providing financial or technical expertise to various community service and nonprofit organizations, as well as financial literacy training offered in various schools in LMI areas throughout the assessment area. The most impactful of these services are described below.

- One bank employee serves as the president of a downtown redevelopment organization that seeks to attract and retain new businesses to the city of Springdale. These efforts are part of a formal municipal development plan to help revitalize/stabilize the downtown Springdale area, which includes several LMI geographies.

- One bank employee provided financial expertise to an organization providing small business mentoring services throughout the assessment area. As noted by community contacts, the assessment area has great need for small business counseling services, particularly for minority-owned businesses and in LMI areas.

- Seven bank employees served in various capacities for the local chapter of an affordable housing organization that is active in new affordable housing development in the assessment area. Bank employees served as board members and provided expertise to various committees for the organization. These activities are responsive to the need for affordable housing development in the assessment area identified by community contacts.

- Ten bank employees are involved in committees for, and teach classes on behalf of, three local credit counseling and financial literacy organizations. The organizations specialize in improving credit histories and providing homeowners and financial literacy education to LMI individuals, which were services identified as being impactful in the assessment area by community contacts.

Lastly, Arvest Bank opened and managed 47 IDAs and 235 RPAs for LMI individuals in the assessment area during the review period.

# LITTLE ROCK-NORTH LITTLE ROCK-CONWAY, ARKANSAS MSA

*(Full-Scope Review)*

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LITTLE ROCK MSA ASSESSMENT AREA

### Bank Structure

The bank operates 20 branches in the Little Rock MSA assessment area, representing 8.3 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

| Branch Location by Census Tract Income Level | | | |
|---|---|---|---|
| **Low-Income** | **Moderate-Income** | **Middle-Income** | **Upper-Income** |
| 0 | 5 | 7 | 8 |

During the review period, the bank closed five branch locations and converted an LPO location to a full-service branch that was subsequently closed. In addition to this branch network, other service delivery systems in the assessment area include two LPO locations, one of which is in a moderate-income census tract. Based on this branch network and other service delivery systems such as online and mobile banking, the bank is well positioned to deliver financial services to nearly all of the assessment area. While the bank's online and mobile banking capabilities offer some access to its financial services to residents anywhere in the assessment area, the bank does not operate any branch locations in Grant County, which may impede its ability to fully serve that portion of the assessment area.

### General Demographics

The assessment area comprises the entirety of the Little Rock MSA, including Faulkner, Grant, Lonoke, Perry, Pulaski, and Saline counties in central Arkansas. The assessment area has a total population of 722,684, most heavily concentrated in Pulaski County (390,463), which contains the city of Little Rock, and Faulkner County (119,343). While the assessment area is largely urban, Perry and Grant counties are more rural, with populations of 10,300 and 18,054, respectively.

The banking market in the Little Rock MSA is highly competitive, with 39 FDIC-insured depository institutions operating 295 branches. Arvest Bank ranks third out of these institutions, with 9.8 percent of total deposits held in the assessment area and 6.8 percent of assessment area branches. Of the bank's total deposits, 13.2 percent are held in the Little Rock MSA assessment area. Competition for HMDA and CRA loans is similarly high. An analysis of 2019 HMDA- and CRA-reportable loans shows that 374 entities reported HMDA loan activity and 106 reported CRA loan activity in the assessment area. Of these institutions, Arvest Bank ranked second in total HMDA lending activity (first in HMDA originations) and ninth in CRA lending activity.

The assessment area covers a wide, diverse metropolitan area. Consequently, credit needs are varied and include a blend of consumer, commercial, and agricultural loan products. Other credit needs identified by community contacts include affordable home purchase and home improvement

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|---|---|---|
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loans, financial literacy training for LMI individuals, and more flexible lending products designed to meet the needs of small businesses. In addition, community contacts noted that the Little Rock MSA is a market with great need and opportunity for community development involvement including partnerships through various nonprofit agencies and government assistance entities, as well as several major universities and other public institutions.

## **Income and Wealth Demographics**

The following table displays the distribution of assessment area census tracts by income level and the family population within those tracts.

| Assessment Area Demographics by Geography Income Level | | | | |
|---|---|---|---|---|
| | **Census Tracts** | | **Family Population** | |
| Low | 11 | 6.7% | 6,383 | 3.6% |
| Moderate | 39 | 23.8% | 33,362 | 18.6% |
| Middle | 64 | 39.0% | 77,012 | 43.0% |
| Upper | 48 | 29.3% | 61,640 | 34.4% |
| Unknown | 2 | 1.2% | 698 | 0.4% |
| **TOTAL** | **164** | **100%** | **179,095** | **100%** |

LMI census tracts comprise 30.5 percent of all assessment area census tracts, while 22.2 percent of families in the assessment area reside in LMI census tracts. These LMI geographies are primarily concentrated in the area south of Interstate 630 in the city of Little Rock, which represents 18 of the 50 LMI census tracts in the assessment area. In addition to this area, the downtown Little Rock and North Little Rock areas also host high concentrations of LMI geographies relative to the rest of the assessment area.

Based on 2015 ACS data, the median family income for the assessment area ($61,236) exceeds the median family income for the state of Arkansas as a whole ($51,782). More recently, the FFIEC estimated the median family income for the Little Rock MSA to be $65,900 in 2018 and $69,800 in 2019. The following table compares the population of assessment area families by income level to the state of Arkansas.

| Family Population by Income Level | | | | |
|---|---|---|---|---|
| | **Assessment Area** | | **Arkansas** | |
| Low | 38,206 | 21.3% | 164,346 | 21.6% |
| Moderate | 31,447 | 17.6% | 134,818 | 17.7% |
| Middle | 35,717 | 19.9% | 149,580 | 19.7% |
| Upper | 73,725 | 41.2% | 311,180 | 41.0% |
| **TOTAL** | **179,095** | **100%** | **759,924** | **100%** |

When compared with the data in the previous table, the information in the table above illustrates that a much higher percentage of assessment area families are LMI (38.9 percent) than reside in LMI geographies (22.2 percent). The distribution of assessment area families by income level is closely aligned with statewide figures. However, the poverty level in the assessment area (10.4 percent) is below the statewide figure (14.3 percent), though poverty levels vary somewhat by county in the assessment area. Poverty figures are highest in Pulaski County (12.3 percent) and

lowest in Saline County (5.9 percent). Taken together, these income and demographic figures indicate that the Little Rock MSA is more affluent than the state of Arkansas as a whole.

## Housing Demographics

The following table displays housing demographics for the Little Rock MSA assessment area and the state of Arkansas.

| Housing Demographics | | | | |
|---|---|---|---|---|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) | Housing Cost Burden |
| Assessment Area | $138,983 | 35.4% | $766 | 43.8% |
| Arkansas | $111,400 | 37.1% | $677 | 42.7% |

Based on these demographics, housing affordability in the assessment area is comparable to statewide figures. While median housing values are higher in the assessment area than statewide, median income figures are also higher, making housing affordability in line with statewide levels. Similarly, median rental values are higher in the assessment area than statewide but are comparable when adjusting for income levels.

The figures shown above are characteristic of the assessment area overall, though housing affordability varied widely by county. Housing was most affordable in Perry County (50.3 percent) but much less affordable in Faulkner County (35.1 percent) and Pulaski County (32.4 percent). The majority of LMI families in the assessment area are concentrated in Faulkner and Pulaski counties, indicating that homeownership is likely a challenge for LMI residents in those counties. Indeed, community contacts familiar with affordable housing needs in the assessment area noted that there is not currently enough affordable housing stock or new development to meet demand, particularly in Pulaski County. The problem is exacerbated by an aging housing stock, demonstrated by a median housing stock age of 36 years in Pulaski County, which renders otherwise affordable housing as unaffordable for many LMI borrowers due to the high cost of needed repairs.

## Industry and Employment Demographics

The assessment area economy is large and diverse, supporting 20,859 business establishments, with small businesses playing a key role, as evidenced by the fact that 90.4 percent of businesses in the assessment area reported annual revenues of $1 million or less in 2019. In addition to this strong small business sector, the assessment area hosts several universities, large health care and research facilities, and national companies, which serve as anchor businesses for the area's economy. According to county business patterns data, there are 316,417 paid employees in the assessment area; by number of paid employees, the largest sectors of the assessment area economy are government (19.3 percent), health care and social assistance (15.5 percent), and retail trade (11.6 percent).

Displayed in the following table is unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Arkansas.

| Unemployment Levels | | | |
|---|---|---|---|
| **Dataset** | **Time Period (Annual Average)** | | |
| | **2018** | **2019** | **YTD 2020** |
| Assessment Area | 3.3% | 3.2% | 6.9% |
| Arkansas | 3.7% | 3.5% | 6.6% |

As shown in the table above, unemployment levels in both the assessment area and statewide increased precipitously in 2020 YTD. These increases reflect a national trend of rising unemployment due to the impact of the pandemic. Unemployment levels in the assessment area were lower than statewide averages in 2018 and 2019 but surpassed the statewide figure for year to date (YTD), suggesting that the impact of the pandemic on unemployment levels in the assessment area was greater than in Arkansas as a whole. This was supported by community contacts, who described that unemployment and job loss were most significant in the Little Rock metro area and that the subsequent recovery has been slower there than elsewhere in the state. Of all counties in the assessment area, Pulaski County, which includes the city of Little Rock, saw the highest unemployment levels of any county in the assessment area, reaching a high of 11.5 percent in April 2020.

## Community Contact Information

Information from four community contact interviews was leveraged to gain a better understanding of the assessment area's economic conditions, credit needs, and community development opportunities. Of these individuals, one represents an affordable housing organization, two represent economic and community development organizations, and one represents a small business development organization.

All four contacts noted that the Little Rock MSA has experienced continued population growth over the past five years, though the growth has not been distributed equally. Overall, the populations of the more urban counties in the assessment area, such as Faulkner, Pulaski, and Saline counties, have increased as individuals from surrounding rural areas have relocated in search of better job opportunities. As such, the population growth has been skewed toward younger residents moving into the area. Meanwhile, the populations of the more rural counties in the assessment area, such as Grant and Perry counties, have declined or remained stagnant. Thus, employment opportunities have increased in the counties that have experienced population growth while the more rural counties have not experienced the same economic growth. The contacts described economic conditions in the assessment area as generally favorable but described how effects from the pandemic remain, particularly in urban areas of the market such as Pulaski County, which experienced more business closures and permanent job losses. According to community contacts, access to banking services is widespread throughout the assessment area, including LMI areas, though there are fewer institutions operating in Grant County as compared to the rest of the assessment area.

Both housing contacts identified a need for more affordable home purchase loans and home improvement loans. The contacts noted that there is little new affordable housing development in the assessment area, and much of the existing affordable housing stock needs repairs, which often increases the cost of homeownership to the point that it is no longer affordable for many LMI residents. The area to the south of Interstates 630 and 30 and Little Rock has the greatest

concentration of available affordable housing stock per community contacts, though the need for home improvement loans is increasing due to the increasing age of homes in this area. Lastly, these contacts pointed to the need for increased financial literacy training for homebuyers and consumers to increase the utilization of available resources and affordable lending products and help improve credit scores, both of which are barriers to homeownership for many LMI borrowers in the assessment area.

The small business/economic development community contacts noted that overall economic conditions are favorable in the assessment area due to improved tax and development incentives for businesses and a low cost of living. However, both contacts pointed to access to capital as a barrier for small business growth and development and identified a need for flexible lending products and underwriting standards for small businesses. Additionally, the contacts stated that local financial institutions could improve their economic development efforts by partnering with local small businesses and economic development organizations for activities such as small business counseling, loan funds, and economic development projects.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LITTLE ROCK MSA ASSESSMENT AREA**

LENDING TEST

Lending activity levels reflect adequate responsiveness to the credit needs of the Little Rock MSA assessment area. The geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes. Finally, the bank is a leader in making community development loans in the Fayetteville MSA assessment area.

**Lending Activity**

The following table displays the combined 2018 and 2019 lending volume by number and dollar amount in the assessment area.

| Summary of Lending Activity January 1, 2018 through December 31, 2019 | | | | |
|---|---|---|---|---|
| **Loan Type** | **#** | **%** | **$(000s)** | **%** |
| Home Improvement | 240 | 5.9% | 12,977 | 2.4% |
| Home Purchase | 1,443 | 35.6% | 242,255 | 45.1% |
| Multifamily Housing | 30 | 0.7% | 28,224 | 5.2% |
| Refinancing | 868 | 21.4% | 100,518 | 18.7% |
| Other Purpose LOC | 139 | 3.4% | 6,245 | 1.2% |
| Other Purpose Closed/Exempt | 59 | 1.5% | 5,085 | 0.9% |
| Purpose Not Applicable | 1 | 0.0% | 115 | 0.0% |
| **Total HMDA** | **2,780** | **68.6%** | **395,419** | **73.5%** |
| Small Business | 1,222 | 30.2% | 139,492 | 25.9% |
| Small Farm | 48 | 1.2% | 2,747 | 0.5% |
| **TOTAL LOANS** | **4,050** | **100.00%** | **537,658** | **100.00%** |

The bank's lending activity in the Little Rock MSA assessment area represents 7.4 percent of total 2018 and 2019 HMDA and CRA loans made in the bank's combined assessment areas. This figure is in line with the share of total bank branches in the assessment area (8.3 percent) but below the share of total bank deposits held in the Little Rock MSA (13.2 percent). However, as previously noted, the bank ranks second out of 374 lenders with HMDA lending activity in the assessment area in 2019 and ninth out of 106 lenders in CRA lending activity. This demonstrates the bank's importance in helping to meet the credit needs of the assessment area. As such, lending activity levels reflect adequate responsiveness to credit needs in the assessment area.

## Geographic Distribution of Loans

Overall, the geographic distribution of loans in the assessment area is good based on all three products reviewed. Small farm lending received less weight toward the overall conclusion given the bank's emphasis on HMDA and small business lending and limited opportunities for agricultural loans.

*Home Mortgage Disclosure Act (HMDA) Lending*

The distribution of HMDA loans reflects good penetration of LMI geographies overall, especially in light of performance context. In 2018, the bank originated 1.7 percent of its HMDA loans in low-income census tracts as compared to the aggregate lending level of 1.4 percent and the percentage of owner-occupied housing located in low-income census tracts (2.4 percent), reflecting adequate performance. Similarly, the bank's performance lending in low-income geographies in 2019 (1.6 percent) was in line with aggregate lending (1.3 percent) and the demographic figure (2.4 percent) and is also considered adequate. The bank originated 12.8 percent of its HMDA loans in moderate-income geographies in 2018 and 10.0 percent in 2019, slightly higher than the aggregate figure for 2018 (11.9 percent) and slightly below the aggregate figure for 2019 (11.0 percent) but below the demographic figure (17.1 percent in 2018 and 2019). Therefore, the bank's lending performance in moderate-income geographies is likewise considered adequate for both years.

In general, the bank's lending was closely aligned with the performance of peer institutions in the assessment area; however, additional context was considered in reaching an overall conclusion. As pointed out by community contacts, the portion of the assessment area with the greatest need for affordable housing lending is the area south of Interstates 630 and 30 in the city of Little Rock; this area consists of five low-, ten moderate-, and three middle-income census tracts. Across both years of data reviewed, the bank originated 146 HMDA loans in these census tracts, which represents 40.3 percent of its total HMDA loans in LMI geographies in the assessment area Most of these loans were home purchase loans but included a mix of home improvement and multifamily loans as well, all of which are responsive to the needs identified by community contacts. Therefore, when considering this context, the overall geographic distribution of HMDA loans is good.

*Small Business Lending*

The overall distribution of small business loans by geography income level is good. In 2018, the percentage of the bank's small business loans in low-income census tracts (3.6 percent) was in line with aggregate lending levels (4.6 percent) and the demographic figure (4.7 percent), reflecting adequate performance. Similarly, the bank originated 4.5 percent of its small business loans in low-income census tracts in 2019, which was closely aligned with peer lending levels (4.9 percent) and the demographic figure (4.7 percent), also reflecting adequate performance. The bank's lending in moderate-income census tracts in both 2018 (22.0 percent) and 2019 (20.4 percent) exceeded aggregate lending levels (18.6 percent in 2018 and 18.0 percent in 2019) and was in line with the demographic figure (20.7 percent in 2018 and 20.5 in 2019), reflecting good performance in both years.

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*Small Farm Lending*

The geographic distribution of small farm loans is poor overall. According to demographic estimates, there were only nine farms operating in low-income census tracts in 2018 and seven in 2019, representing approximately 1.0 percent of all farms operating in the assessment area. As a result, opportunities for lending to small farms in low-income census tracts are minimal. While the bank made no small farm loans in low-income census tracts in 2018 and 2019, this is considered adequate given the limited lending opportunities in those geographies. However, the bank's distribution of small farm loans in moderate-income census tracts reflects poor performance in both 2018 and 2019. In both years, the bank's lending (7.7 percent in 2018 and 4.5 percent in 2019) was below both the aggregate lending level (8.6 percent in 2018 and 9.2 percent in 2019) and the demographic figure (17.0 percent in 2018 and 2019). Therefore, the overall geographic distribution of small farm loans is considered poor.

No conspicuous lending gaps were identified based on an analysis of the dispersion of all three loan products reviewed. The bank had loan activity in 97.6 percent of all assessment area census tracts in 2018 and in 94.0 percent of LMI census tracts. Similarly, the bank originated loans in 97.0 percent of all census tracts in the assessment area in 2019 and 94.0 percent of LMI geographies.

## **Loan Distribution by Borrower's Profile**

The bank's overall loan distribution by borrower's profile is good. As previously discussed, small farm lending received less weight toward the overall conclusion than did HMDA and small business lending.

*Home Mortgage Disclosure Act (HMDA) Lending*

The bank's performance in making home mortgage loans to individuals of different income levels is good overall. The bank originated 5.5 percent of its HMDA loans to low-income borrowers in 2018, which was in line with the performance of peer institutions in the assessment area (5.7 percent) but below the percentage of assessment area families who are low income (21.3 percent). While the gap between the bank's performance and the demographic figure is large, a significant portion of borrowers in this demographic is unlikely to qualify for a home mortgage loan given the overall poverty level of 10.4 percent in the assessment area. Community contacts described that this population is more likely to have derogatory credit history that could prevent them from qualifying from a traditional mortgage, and that down payment costs often price LMI borrowers out of the housing market in the assessment area. Therefore, the bank's performance is considered adequate. In 2019, the bank originated 7.4 percent of its HMDA loans to low-income borrowers, which compared favorably to aggregate lending levels (6.2 percent) but was also below the demographic figure (21.3 percent), reflecting good performance.

In 2018, the bank originated 17.9 percent of its HMDA loans to moderate-income borrowers, which was closely aligned with the aggregate lending level (17.1 percent) and the demographic figure (17.6 percent) and is considered adequate. In 2019, the bank made 19.5 percent of its HMDA loans to moderate-income borrowers as compared to 17.3 percent for other lenders in the assessment area and the demographic figure (17.6 percent), reflecting excellent performance. When determining the overall conclusion, additional consideration was given to the distribution

of HMDA loans by loan purpose. Across both years of data, 63.9 percent of the bank's HMDA loans to LMI borrowers were home purchase loans. These are considered particularly impactful given the information provided by community contacts, which stressed the need for affordable home purchase loans in the assessment area to improve access to affordable housing for LMI individuals.

*Small Business Lending*

In both 2018 and 2019, the bank's distribution of small business loans by business revenue size reflects good performance. In both years, the percentage of the bank's small business loans to businesses with annual revenues of $1 million or less (65.8 percent in 2018 and 59.7 percent in 2019) was well above the aggregate lending level of 43.4 percent in 2018 and 41.8 percent in 2018. While below the demographic estimate of businesses in the assessment area with annual revenues of $1 million or less (89.8 percent in 2018 and 90.4 percent in 2019), the bank's performance is nevertheless considered good in comparison to aggregate lending levels. Moreover, across both years of data, 82.1 percent of the bank's loans to businesses with annual revenues of $1 million or less were in amounts of $100,000 or less. As noted by community contacts, smaller dollar loans such as these are typically more responsive to the needs of small businesses and demonstrate the bank's willingness to meet those needs.

*Small Farm Lending*

The borrower distribution of small farm loans is good overall. In 2018, the bank originated 96.2 percent of its small farm loans to farms with annual revenues of $1 million or less. This exceeded the performance of other lenders in the assessment area (61.6 percent) by a wide margin and was in line with the demographic figure of 97.8 percent, reflecting excellent performance. Performance in 2019 is considered adequate, as the percentage of the bank's small farm loans to businesses with annual revenues of $1 million or less (63.6 percent) was in line with aggregate lending performance (60.1 percent) but below the demographic figure (97.8 percent). When balancing performance across both years, the overall borrower distribution of small farm loans is considered good.

## Community Development Lending Activity

The bank is a leader in making community development loans in the Little Rock MSA assessment area. As shown in the table below, the bank made 25 community development loans totaling $88.9 million and 67 PPP loans totaling $36.3 million. The most impactful of these loans are discussed after the following table.

| Community Development Lending | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Affordable Housing | | Community Services | | Revitalization/ Stabilization | | Economic Development | | Total | |
| | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) |
| CD Loans | 4 | 2,147 | - | - | 9 | 19,724 | 12 | 67,031 | 25 | 88,903 |
| PPP Loans | - | - | - | - | - | - | 67 | 36,286 | 67 | 36,286 |

- Three loans totaling $1.3 million provided financing for the construction or purchase of affordable multifamily housing units. These loans are responsive to the need for greater affordable rental options, as noted by community contacts.

- Three economic development loans totaling $46.8 million were considered impactful given the size of the loan and their impact to the assessment area. One of these loans totaling $26.0 million financed rehabilitations and improvements to a medical facility located in a moderate-income census tract and supported permanent job retention for LMI individuals. The remaining two loans totaling $20.8 million provided funds for the construction of two different hotels, both of which create jobs in the assessment area including for LMI individuals.

- Two loans totaling $9.0 million qualified for a purpose of revitalizing/stabilizing a moderate-income census tract in the city of Conway. The loans were made to an economic development organization for the purpose of purchasing and developing commercial real estate, which helps to attract new businesses to the assessment area.

INVESTMENT TEST

The bank makes a significant level of qualified community development investments and grants in the assessment area and is occasionally in a leadership position. In total, the bank made $29.9 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed below the table that follows.

| Summary of Investments – Little Rock MSA | | | |
|---|---|---|---|
| Investment Type | Current Period | Prior Period, Still Outstanding | Total |
| MBS | $15.7 million | $2.4 million | $18.1 million |
| Municipal/private bonds | $11.6 million | - | $11.6 million |
| Donations | $196,251 | - | $196,251 |
| **TOTAL** | **$27.5 million** | **$2.4 million** | **$29.9 million** |

- The bank made $15.7 million in new MBS investments during the review period. These consisted of pools of individual loans to LMI individuals, as well as large multifamily housing developments that are primarily occupied by LMI individuals. The bank's multifamily MBS investments included funding for at least four multifamily developments in the assessment area, which are considered particularly impactful considering the significant number of affordable housing units they support.

- The bank made four donations totaling $40,750 to a large school district in the assessment area with a majority of students receiving free or reduced lunch, a proxy for family income indicating that students in the district come primarily from LMI families. These donations supported the purchase of new equipment and supplies for the school.

- The bank made one donation for $5,000 to an economic development organization that specializes in providing office space and resources for new businesses. As noted by community contacts, the assessment area has need for partnerships between local financial institutions and economic development organizations that help facilitate small business development.

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SERVICE TEST

The bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the Little Rock MSA assessment area, and the bank's record of opening and closing branches has not adversely affected the accessibility of these service delivery systems, particularly to LMI geographies or individuals. Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies or individuals. Lastly, the bank is a leader in providing community development services in the Little Rock MSA assessment area.

## **Accessibility of Delivery Systems**

The following table displays the location of the bank's branches 20 branches in the assessment area by geography income level compared to the distribution of assessment area census tracts and households by geography income level. In addition to these full-service branch locations, the bank also operates two mortgage LPO locations in the assessment area, one of which is in a moderate-income census tract.

| **Branch Distribution by Geography Income Level** | | | | | | |
|---|---|---|---|---|---|---|
| **Dataset** | **Geography Income Level** | | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | **Unknown** | |
| Branches | 0 | 5 | 7 | 8 | 0 | **20** |
| | 0.0% | 25.0% | 35.0% | 40.0% | 0.0% | **100%** |
| Census Tracts | 6.7% | 23.8% | 39.0% | 29.3% | 1.2% | **100%** |
| Household Population | 3.6% | 18.6% | 43.0% | 34.4% | 0.4% | **100%** |

As shown above, the bank operates five branches in moderate-income census tracts and none in low-income census tracts, representing 25.0 percent of total branches in the assessment area. This distribution is slightly below the percentage of assessment area census tracts that are LMI (30.5 percent) but exceeds the household population in LMI geographies (22.2 percent). While not located in an LMI census tract, four of the bank's branches in middle- and upper-income census tracts are within one mile of an adjacent LMI geography and are accessible to residents of those tracts, further increasing accessibility to LMI geographies. Taken together, these service delivery systems are reasonably accessible to individuals and geographies of different income levels in the assessment area.

## **Changes in Branch Locations**

During the review period, the bank closed five branch locations: one in a moderate-income census tract, two in middle-income census tracts, and two in upper-income census tracts. One of these branch closures was previously an LPO location that was converted to a full-service branch during the review period but subsequently closed. The bank closed one branch in a moderate-income census tract in the city of Lonoke. As this was the only LMI geography impacted by the branch closure, the resulting impact to branch accessibility is minimal. As none of the other closed branch locations were in LMI geographies or located near LMI areas, changes in branch locations did not adversely affect the accessibility of the bank's service delivery systems.

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**Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

Business hours are relatively consistent across the assessment area. Five branches operate standard weekday lobby hours from 8:30 a.m. to 5:00 p.m., while 13 branches offer extended hours beyond 5:00 p.m. on weekdays, including four branches in moderate-income census tracts. Overall, 15 branches operate Saturday lobby hours from 9:00 a.m. to 12:00 p.m., including four branches in moderate-income census tracts. All but two of the bank's branches operate drive-through facilities, most of which also offer Saturday drive-through hours. Finally, lenders are equally dispersed throughout branches in the assessment area. Therefore, business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies.

**Community Development Services**

Arvest Bank is a leader in providing community development services in the Little Rock MSA assessment area. During the review period, 61 bank employees provided 1,124 hours of community development services to 45 different organizations. This represents a substantial increase from the 328 hours and 15 organizations qualified at the previous evaluation. Bank employees provided financial literacy training at schools and for organizations throughout the assessment area and served as board members or provided financial/technical expertise to various community service, affordable housing, and economic development organizations. Noteworthy community service activities include the following:

- Six bank employees served as board members or provided expertise serving on various committees for an affordable housing agency the develops homeownership programs and provides down payment assistance for LMI individuals in the state of Arkansas. These activities increase homeownership rates for LMI individuals in the assessment area and are responsive to the need for affordable housing programs.

- Four bank employees provided services to a nonprofit education organization that develops and administers financial literacy training for students. As noted by community contacts, the assessment area has need of increased financial literacy efforts that help to increase awareness and utilization of financial services and address pervasive issues that contribute to low credit scores. In total, the bank provided 293 hours of financial literacy training to 22 organizations assisting both consumers and businesses, representing a significant portion of the bank's overall community development service hours in this assessment area.

- One bank employee serves on the board of directors for an economic development organization that pursues and promotes economic development efforts in an area of downtown Little Rock that contains several LMI geographies. The organization partners with local businesses to provide resources and attempts to attract new businesses to the area, helping to revitalize and stabilize an LMI area.

- One bank employee provided expertise and assisted with various committees as a board member for an economic development organization that supports affordable housing initiatives, infrastructure investment, and attracting and retaining new businesses to portions of the city of Little Rock.

# HOT SPRINGS, ARKANSAS MSA

*(Full-Scope Review)*

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HOT SPRINGS MSA ASSESSMENT AREA

### Bank Structure

The bank operates five branches in the Hot Springs MSA, representing 2.1 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

| Branch Location by Census Tract Income Level | | | |
|---|---|---|---|
| **Low-Income** | **Moderate-Income** | **Middle-Income** | **Upper-Income** |
| 0 | 0 | 3 | 2 |

During the review period, the bank did not open any new branches and closed five branches in the Hot Springs MSA: two in moderate-income census tracts, two in middle-income census tracts, and one in an upper-income census tract. Throughout most of the review period, the bank's branch network and other service delivery systems, such as online and mobile banking, positioned the bank well to deliver financial services to substantially all of the assessment area. However, several of the bank's closed branch locations were located within the core of the city of Hot Springs. As of the examination date, the bank does not operate any branch locations within this portion of the assessment area, which includes a number of LMI census tracts, and may have difficulty in fully serving this area going forward.

### General Demographics

The bank has designated Garland County as an assessment area, which comprises the entirety of the Hot Springs MSA. Garland County has a total population of 96,954, most of which is concentrated in the city of Hot Springs. While the assessment area's population is relatively small, it includes a national park and hosts significant tourism and recreation sectors which draw in significant numbers of outside visitors annually. While a relatively small market, the assessment area hosts 14 FDIC-insured depository institutions, which operate 48 total branches. Of these institutions, Arvest Bank ranks second, with 20.3 percent of the total deposit market share. Deposits held in the Hot Springs MSA represent 2.3 percent of total bank deposits.

While only 14 institutions operate a branch in the assessment area, an analysis of 2019 HMDA and CRA lending activity shows that 215 entities reported HMDA loan activity and 59 reported CRA loan activity in the assessment area, indicating relatively high levels of lending competition. Of these institutions, Arvest Bank ranked first in HMDA and fourth in CRA lending activity.

Credit needs in the assessment area include a blend of consumer, commercial, and agricultural loan products. Other needs noted by community contacts include small dollar commercial and home improvement loans, as well as greater outreach efforts on behalf of banks to inform businesses and consumers of available financing options. Moreover, community contacts indicated that there are opportunities for local financial institutions to participate in community development initiatives through partnerships with local organizations and enhanced outreach efforts.

## Income and Wealth Demographics

The following table displays the distribution of assessment area census tracts by income level and the family population within those tracts.

| Assessment Area Demographics by Geography Income Level | | | | |
|---|---|---|---|---|
| | Census Tracts | | Family Population | |
| Low | 2 | 10.0% | 1,111 | 4.3% |
| Moderate | 4 | 20.0% | 3,355 | 12.9% |
| Middle | 9 | 45.0% | 12,371 | 47.7% |
| Upper | 5 | 25.0% | 9,114 | 35.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% |
| **TOTAL** | **20** | **100%** | **25,951** | **100%** |

As shown above, the assessment area includes two low- and four moderate-income census tracts, which represent 30.0 percent of the total census tracts in the assessment area. However, the percentage of assessment area families who reside in those census tracts, 17.2 percent, is much lower. These LMI geographies are concentrated in or around the city of Hot Springs.

According to 2015 ACS data, the median family income for the assessment area was $49,645, slightly lower than the statewide median family income of $51,782. However, more recent estimates from the FFIEC reflect a median family income of $52,700 in 2018 and $60,000 in 2019 for the Hot Springs MSA, reflecting a trend of increasing income throughout the review period. The table below displays the distribution of assessment area families by income level compared to Arkansas as a whole.

| Family Population by Income Level | | | | |
|---|---|---|---|---|
| | Assessment Area | | Arkansas | |
| Low | 6,024 | 23.2% | 164,346 | 21.6% |
| Moderate | 4,346 | 16.8% | 134,818 | 17.7% |
| Middle | 5,091 | 19.6% | 149,580 | 19.7% |
| Upper | 10,490 | 40.4% | 311,180 | 41.0% |
| **TOTAL** | **25,951** | **100%** | **759,924** | **100%** |

When compared with the data in the first table in this section, the table above illustrates that a significantly higher percentage of families in the assessment area are LMI (40.0 percent) than reside in LMI geographies (17.2 percent). While the assessment area has a slightly higher portion of families who are low income compared to the state as a whole, the overall distribution of families by income level is closely aligned with statewide figures. Similarly, poverty levels in the assessment area and state of Arkansas as a whole (14.3 percent) are equivalent. Based on these factors, the assessment area is similarly affluent to Arkansas as a whole.

## Housing Demographics

The following table displays housing demographics for the Hot Springs MSA assessment area and the state of Arkansas.

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| Housing Demographics | | | | |
|---|---|---|---|---|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) | Housing Cost Burden |
| Assessment Area | $130,716 | 29.7% | $712 | 50.4% |
| Arkansas | $111,400 | 37.1% | $677 | 42.7% |

As shown in the table above, housing in the assessment area is less affordable than in Arkansas as a whole. While income levels for the assessment area and state are comparable, the median housing value for the assessment area exceeds the statewide figure, resulting in a lower affordability ratio. Similarly, median rental costs in the assessment area are higher than statewide levels, resulting in more than 50.0 percent of renters in the assessment area with rental costs exceeding 30.0 percent of their income. As such, LMI individuals in the assessment area likely struggle with homeownership and finding affordable rental options. This is especially true in LMI geographies in the assessment area. Of note, only 31.4 percent of available housing units are owner occupied in the assessment area's low-income census tracts and 40.5 percent in moderate-income census tracts, both of which are much lower than the assessment area average of 53.7 percent. Moreover, the median age of housing stock is 61 years in low-income census tracts in the assessment area and 50 years in moderate-income census tracts as compared to 39 years for the assessment area as a whole. These figures indicate that few affordable housing options are available to residents in LMI geographies and point to a need for affordable home improvement loans to address the issue of an aging housing stock. These credit needs were confirmed by community contacts who described the impact of deteriorating housing stock on the availability of affordable housing in the assessment area.

## Industry and Employment Demographics

The assessment area economy is characterized by a strong small business sector as evidenced by the fact that 92.4 percent of businesses reported annual revenues of $1 million or less. In addition, tourism plays a significant role in the area's economy, which supports strong retail trade and accommodation and food services sectors. Of the 37,909 paid employees in the assessment area, 20.9 percent work in health care and social assistance, 15.7 percent in retail trade, and 14.8 percent in accommodation and food services.

Displayed in the following table is unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Arkansas.

| Unemployment Levels | | | |
|---|---|---|---|
| Dataset | Time Period (Annual Average) | | |
| | 2018 | 2019 | YTD 2020 |
| Assessment Area | 4.0% | 3.7% | 9.1% |
| Arkansas | 3.6% | 3.6% | 7.0% |

As shown in the table above, unemployment levels in the assessment area remained higher than statewide levels throughout the review period, with the gap between the two widening in 2020. As much of the increase in unemployment levels in 2020 is attributed to the impact of the pandemic, this suggests that the pandemic had a greater impact on economic conditions in the assessment area than the state as a whole.

## Community Contact Information

Information from four community contact interviews was utilized to gain a better understanding of the assessment area's economic conditions, credit needs, and community development opportunities. Of these individuals, one represents an affordable housing organization, and one represents a small business development organization.

Both community contacts described the assessment area's economy as strong in recent years due mainly to a successful tourism industry. In particular, the local economy fared better than the rest of the state during the peak of the pandemic due to the many outdoor attractions offered in the area. While the economy of Garland County has grown overall, both contacts pointed to disparities in income within the county; in general, the northern portion of the county is more affluent, while portions of the city of Hot Springs are composed mainly of low- or moderate-income individuals. Demographically, the contacts noted that the population of Garland County has increased in recent years, particularly in the private retirement community of Hot Springs Village in the northern part of the county. With regard to banking services, both contacts described the assessment area as well banked with no banking deserts.

The assessment area has great need for affordable housing development and affordable home loans, according to the housing contact. The contact stated that the current affordable housing stock does not meet the demand for affordable homes, an issue that has been compounded by rising home costs and investors buying previously affordable properties and renovating them to a point that they are no longer affordable for LMI residents in the assessment area. Additionally, the condition of existing affordable housing stock in the assessment area is poor overall, and many LMI residents are unable to afford the necessary repairs to maintain their homes according to the same contact. As a result, the assessment area needs affordable home improvement loans, particularly in LMI areas and to LMI borrowers. The contact went on to list lack of down payment funds and poor credit as other barriers to homeownership for many residents in the assessment area and stressed the need for banks operating in the area to increase their outreach efforts and meet the need for small dollar home improvement and home purchase loans.

The small business contact noted that business conditions are favorable overall due to low operating costs and a strong tourism sector. However, the contact explained that some banks are hesitant to lend to newer startup businesses. According to the contact, banks were responsive in processing PPP loans in the assessment area during the onset of the pandemic, but this mainly benefitted businesses with existing relationships with banks while newer businesses struggled to get access to capital during the pandemic. Overall, the contact pointed to smaller dollar loans for small businesses as the greatest need in the assessment area and indicated that there are ample opportunities for community development involvement from local financial institutions such as through participation in collaborative small business loan funds and greater outreach to area businesses.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HOT SPRINGS MSA ASSESSMENT AREA

LENDING TEST

Lending activity levels reflect good responsiveness to the credit needs of the Hot Springs MSA assessment area. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes. Finally, the bank provides an adequate level of community development loans in the Hot Springs MSA assessment area. As previously noted in the *Scope of Examination* section for Arkansas, small farm lending is not assessed in the Hot Springs MSA.

### Lending Activity

The following table displays the combined 2018 and 2019 lending volume by number and dollar amount in the assessment area.

| Summary of Lending Activity<br>January 1, 2018 through December 31, 2019 | | | | |
|---|---|---|---|---|
| Loan Type | # | % | $(000s) | % |
| Home Improvement | 53 | 5.9% | 2,648 | 2.5% |
| Home Purchase | 274 | 30.4% | 42,672 | 40.0% |
| Multifamily Housing | 8 | 0.9% | 5,515 | 5.2% |
| Refinancing | 186 | 20.6% | 21,007 | 19.7% |
| Other Purpose LOC | 27 | 3.0% | 1,304 | 1.2% |
| Other Purpose Closed/Exempt | 15 | 1.7% | 1,455 | 1.4% |
| Purpose Not Applicable | 0 | 0.0% | 0 | 0.0% |
| **Total HMDA** | **563** | **62.5%** | **74,601** | **69.9%** |
| Small Business | 320 | 35.5% | 31,171 | 29.2% |
| Small Farm | 18 | 2.0% | 901 | 0.8% |
| **TOTAL LOANS** | **901** | **100.0%** | **106,673** | **100.0%** |

Lending activity in this assessment area represents 1.7 percent of total HMDA and CRA loans made within the bank's combined assessment areas. This lending activity is in line with the share of total bank branches in the assessment area (2.1 percent) and the percentage of total bank deposits held in the assessment area (2.3 percent). Additionally, the bank plays an important role in meeting the credit needs of the assessment area, as demonstrated by the fact that it ranks first in HMDA lending activity and fourth in CRA lending activity in the Hot Springs MSA. Considering these factors, the bank's lending activity in the assessment area reflects good responsiveness to assessment area credit needs.

## Geographic Distribution of Loans

Based on loan demand and the bank's lending activity levels, primary emphasis was placed on performance in HMDA lending. Overall, the bank's geographic distribution in the Hot Springs MSA assessment area is adequate.

*Home Mortgage Disclosure Act (HMDA) Lending*

Overall, the geographic distribution of HMDA loans reflects an adequate penetration of geographies of different income levels in the assessment area. In 2018, the bank originated 1.4 percent of its HMDA loans in low-income census tracts in the assessment area, below the performance of peer institutions (3.5 percent) and the percentage of owner-occupied housing located in these census tracts (3.4 percent). As previously noted, opportunities for making mortgage loans in the assessment area's low-income census tracts are limited based on certain housing demographics. Nevertheless, the bank's performance is considered poor when compared to aggregate lending levels. However, the bank's lending levels in low-income geographies improved in 2019 to 3.3 percent, which was closely aligned with aggregate lending levels (3.5 percent) and the demographic figure (3.4 percent), reflecting adequate performance.

Lending in moderate-income census tracts represented 9.6 percent of the bank's HMDA loans in 2018 and 10.4 percent in 2019. This performance was in line with that of peer institutions in the assessment area (9.2 percent in 2018 and 9.9 percent in 2019) but slightly below the demographic figure (11.8 percent). This represents adequate performance for both years of data.

*Small Business Lending*

Small business lending in LMI geographies in the assessment area is considered good overall. In 2018, the bank made 6.5 percent of its small business loans in low-income census tracts and 19.5 percent in moderate-income census tracts. This closely mirrored both the performance of peer institutions in the assessment area (6.8 percent in low-income tracts and 20.1 percent in moderate-income tracts) and the demographic figures (6.9 percent of assessment area businesses located in low-income census tracts and 19.1 percent in moderate-income census tracts), reflecting adequate performance.

The bank's performance improved in 2019, with 6.0 percent of small business loans in low-income census tracts and 22.9 percent in moderate-income census tracts. By comparison, aggregate lending levels were at 4.9 percent in low-income census tracts and 20.8 percent in moderate-income census tracts, while the demographic figures mirror those in 2018. As the bank's lending levels compare favorably to comparison data, small business lending in both low- and moderate-income census tracts is considered good in 2019.

Lastly, no conspicuous lending gaps were noted in LMI areas based on an analysis of the dispersion of both lending products. The bank had loan activity in all census tracts in the assessment area in both 2018 and 2019, including all LMI census tracts.

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## Loan Distribution by Borrower's Profile

Overall, the distribution of HMDA and small business loans by borrower's income level and business revenue size is considered adequate.

### *Home Mortgage Disclosure Act (HMDA) Lending*

The borrower distribution of HMDA loans is adequate overall. The bank originated 5.1 percent of its HMDA loans to low-income borrowers in 2018, which was in line with peer lending performance (6.0 percent) but below the percentage of assessment area families who are low income (23.2 percent). While the bank's performance is well below the demographic figure, a significant portion of this population is unlikely to qualify for a mortgage loan based on the poverty level in the assessment area (14.3 percent). Therefore, this performance is considered adequate, especially in comparison to the aggregate lending level. In 2019, the percentage of bank loans to low-income borrowers (12.2 percent) was well above aggregate lending levels (7.0 percent) but below the demographic figure (23.2 percent) and is considered excellent.

Lending to moderate-income borrowers is considered adequate in both 2018 and 2019. In both years, the bank's lending levels (12.3 percent in 2018 and 14.4 percent in 2019) were in line with aggregate lending performance (13.6 percent in 2018 and 15.3 percent in 2019) but slightly below the demographic figure of 16.7 percent.

### *Small Business Lending*

The distribution of small business loans by business revenue size is good overall. In 2018, the bank made 62.3 percent of its small business loans to businesses with annual revenues of $1 million or less. This was well above the aggregate lending level (40.8 percent) but below the demographic estimate of assessment area businesses with annual revenues of $1 million or less (92.2 percent), reflecting good performance. Similarly, the bank's performance in 2019 (64.5 percent) exceeded that of peer institutions in the assessment area (39.3 percent) but was below the demographic figure (92.4 percent), again reflecting good performance. In addition, for both years combined, 77.3 percent of the bank's loans to businesses with annual revenues of $1 million or less were in amounts of $100,000 or less, which further demonstrates the bank's willingness to meet the credit needs of small businesses in the assessment area.

## Community Development Lending Activity

The bank makes an adequate level of community development loans in the Hot Springs MSA. During the review period, the bank made four community development loans totaling $5.4 million and received community development lending credit for an additional 23 PPP loans totaling $12.4 million, as shown in the following table.

| Community Development Lending | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | Affordable Housing | | Community Services | | Revitalization / Stabilization | | Economic Development | | Total | |
| | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) |
| CD Loans | 1 | 934 | - | - | 2 | 3,100 | 1 | 1,397 | 4 | 5,430 |
| PPP Loans | - | - | - | - | - | - | 23 | 12,363 | 23 | 12,363 |

- The bank made one loan totaling $3.0 million that helped to revitalize/stabilize a moderate-income census tract. The loan funded improvements to a restaurant that employs LMI individuals and helps to retain businesses in residents in the area.

INVESTMENT TEST

The bank makes a significant level of qualified community development investments and grants in the assessment area and is occasionally in a leadership position. In total, the bank made $2.2 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed below the table.

| Summary of Investments – Hot Springs MSA | | | |
|---|---|---|---|
| Investment Type | Current Period | Prior Period, Still Outstanding | Total |
| MBS | $289,071 | $27,367 | $316,438 |
| LIHTCs | - | $1.6 million | $1.6 million |
| Municipal/private bonds | $250,000 | - | $250,000 |
| Donations | $7,800 | - | $7,800 |
| TOTAL | $546,871 | $1.7 million | $2.2 million |

- The bank continues to invest in one LIHTC project from a prior examination period totaling $1.6 million. The investment helps to restore a historic hotel building in downtown Hot Springs as part of the city's formal redevelopment plan for the area.

SERVICE TEST

Arvest Bank's service delivery systems are unreasonably inaccessible to individuals and geographies of different income levels in the Hot Springs MSA. The bank's record of opening and closing branches has adversely affected the accessibility of its service delivery systems, and business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies or individuals. Lastly, the bank provides a relatively high level of community development services in the assessment area.

**Accessibility of Delivery Systems**

As shown below, the bank operates five branches in the Hot Springs MSA. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|---|---|---|---|---|---|---|
| **Dataset** | **Geography Income Level** | | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | **Unknown** | |
| Branches | 0 | 0 | 3 | 2 | 0 | **5** |
| | 0.0% | 0.0% | 60.0% | 40.0% | 0.0% | **100%** |
| Census tracts | 10.0% | 20.0% | 45.0% | 25.0% | 0.0% | **100%** |
| Household population | 4.3% | 12.9% | 47.7% | 35.1% | 0.0% | **100%** |

As of the date of this evaluation, the bank does not operate any branches in LMI geographies in the assessment area. While the bank previously operated two branch locations in moderate-income census tracts and one branch in a middle-income census tract that was adjacent to several LMI geographies, these locations were closed at various points throughout the review period. During that time, the branch distribution by geography income level was in line with the percentage of households in the assessment area located in LMI census tracts (17.2 percent) but below the percentage of assessment area census tracts that are LMI (30.0 percent). Nevertheless, the bank's current branching structure as of the date of this evaluation is unreasonably inaccessible to individuals and geographies of different income levels in the Hot Springs MSA, particularly LMI geographies.

## Changes in Branch Locations

During the review period, the bank closed five branch locations: two in moderate-income census tracts, two in middle-income census tracts, and one in an upper-income census tract. The closed branch locations in moderate-income census tracts represented the bank's only branches in LMI geographies in the assessment area, while one of the closed branch locations in a middle-income census tract bordered several LMI geographies and was the bank's only other branch location in downtown Hot Springs. Therefore, the bank's record of opening and closing branch locations has adversely affected the accessibility of its service delivery systems in the assessment area, particularly for LMI individuals and geographies.

## Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours vary slightly across the assessment area but do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Four of the five branches in the assessment area operate weekday lobby hours from 8:00 a.m. to 5:00 p.m. or 6:00 p.m., with the remaining branch (located in a middle-income census tract) operating from 8:30 a.m. to 4:30 p.m. In addition, extended drive-through hours on weekdays are offered at several branch locations. Three locations operate Saturday lobby hours, while all five locations operate Saturday drive-through hours. Lastly, lenders are equally dispersed throughout the assessment area.

**Community Development Services**

The bank provides a relatively high level of community development services in the Hot Springs MSA. During the review period, 12 bank employees provided 131 hours of community development service activities to eight different organizations throughout the assessment area. Additionally, the bank opened and operated 88 RPA accounts for LMI individuals during the review period. The most impactful of these community development services are discussed below.

- One employee served as a board member for an affordable housing organization that is involved with new affordable housing development in the assessment area. As noted by community contacts, the assessment area has great need for new affordable housing development, and these activities are responsive to that need.

- One employee served as a board member for a local workforce development organization that supports various financial literacy programs and grants in the assessment area. These activities qualify for a purpose of revitalization/stabilization by helping to attract and retain new businesses through workforce development.

# JONESBORO, ARKANSAS MSA

*(Limited-Scope Review)*

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JONESBORO MSA ASSESSMENT AREA

This assessment area includes the entirety of Craighead County, one of the two counties that make up the Jonesboro, Arkansas MSA. The bank operates three branches in this assessment area and did not open any branches but closed two branches during the review period. The tables below detail key demographics relating to this assessment area.

| Assessment Area Demographics by Population Income Level | | | | | |
|---|---|---|---|---|---|
| **Demographic Type** | **Population Income Level** | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | |
| Family population | 5,135 | 4,348 | 5,002 | 11,317 | **25,802** |
| | 19.9% | 16.9% | 19.4% | 43.9% | **100%** |
| Household population | 9,061 | 6,071 | 6,565 | 17,027 | **38,724** |
| | 23.4% | 15.7% | 17.0% | 44.0% | **100%** |

| Assessment Area Demographics by Geography Income Level | | | | | | |
|---|---|---|---|---|---|---|
| **Dataset** | **Geography Income Level** | | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | **Unknown-** | |
| Census tracts | 2 | 2 | 10 | 3 | 0 | **17** |
| | 11.8% | 11.8% | 58.8% | 17.7% | 0.0% | **100%** |
| Family population | 1,568 | 2,978 | 14,953 | 6.303 | 0 | **25,802** |
| | 6.1% | 11.5% | 58.0% | 24.4% | 0.0% | **100%** |
| Household population | 3,518 | 5,768 | 21,404 | 8,034 | 0 | **38,724** |
| | 9.1% | 14.9% | 55.3% | 20.8% | 0.0% | **100%** |
| Business institutions | 469 | 708 | 1,981 | 803 | 0 | **3,961** |
| | 11.8% | 17.9% | 50.0% | 20.3% | 0.0% | **100%** |

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JONESBORO MSA ASSESSMENT AREA

LENDING TEST

The bank's Lending Test performance in this assessment area is consistent with the bank's Lending Test performance in the full-scope MSA assessment areas, as detailed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in *Appendix C*.

| Lending Test Criteria | Performance |
|---|---|
| Lending Activity | Consistent |
| Geographic Distribution of Loans | Consistent |
| Loan Distribution by Borrower's Profile | Consistent |
| Community Development Lending Activity | Consistent |
| **OVERALL** | **Consistent** |

During the review period, the bank made eight community development loans totaling $63.0 million. These loans qualified for a community development purpose of revitalization/ stabilization of LMI geographies (five), affordable housing (two), and community services (one). One noteworthy loan totaling $42.4 million financed the construction of a new hotel in a low-income census tract, which will create numerous permanent LMI jobs. In addition to these loans, the bank also received credit for four PPP loans totaling $2.6 million.

INVESTMENT TEST

The bank's Investment Test performance in the Jonesboro MSA assessment area is consistent with the investment performance in the full-scope MSA assessment areas. The bank made total qualified investments of $2.2 million, as shown in the table below.

| Summary of Investments – Jonesboro MSA | | | |
|---|---|---|---|
| Investment Type | Current Period | Prior Period, Still Outstanding | Total |
| MBS | $83,705 | - | $83,705 |
| Municipal/Private Bonds | $1.5 million | $595,000 | $2.1 million |
| Donations | $62,537 | - | $62,537 |
| **TOTAL** | **$1.6 million** | **$595,000** | **$2.2 million** |

| Arvest Bank | | CRA Performance Evaluation |
|---|---|---|
| Fayetteville, Arkansas | Jonesboro MSA | September 27, 2021 |

SERVICE TEST

The bank's service test performance in this assessment area is consistent with the service performance in the full-scope MSA assessment areas, as shown below.

| Service Test Criteria | Performance |
|---|---|
| Accessibility of Delivery Systems | Consistent |
| Changes in Branch Locations | Consistent |
| Reasonableness of Business Hours and Services | Consistent |
| Community Development Services | Consistent |
| **OVERALL** | **Consistent** |

During the review period, 10 bank employees provided 392 hours of community development service activities to eight different organizations in the assessment area. These activities included bank employees serving as board members or providing financial assistance/technical assistance to various community service organizations such as youth organizations, food banks, and nonprofit agencies that support various community service efforts throughout the assessment area. Lastly, Arvest Bank opened and maintained 12 RPA accounts for LMI individuals in the assessment area during the review period.

# TEXARKANA, TEXAS-ARKANSAS MSA

*(Limited-Scope Review)*

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE TEXARKANA MSA ASSESSMENT AREA

This assessment area includes the entireties of Little River and Miller counties, both counties that make up the Texarkana, Arkansas MSA. The bank relocated its single branch in the assessment area during the review period in the city of Ashdown. The tables below detail key demographics relating to this assessment area.

| Assessment Area Demographics by Population Income Level | | | | | |
|---|---|---|---|---|---|
| **Demographic Type** | **Population Income Level** | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | |
| Family population | 3,424 | 2,298 | 2,988 | 5,687 | **14,397** |
| | 23.8% | 16.0% | 20.8% | 39.5% | **100%** |
| Household population | 6,009 | 3,520 | 3,823 | 8,859 | **22,211** |
| | 27.1% | 15.9% | 17.2% | 39.9% | **100%** |

| Assessment Area Demographics by Geography Income Level | | | | | | |
|---|---|---|---|---|---|---|
| **Dataset** | **Geography Income Level** | | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | **Unknown-** | |
| Census tracts | 1 | 4 | 8 | 2 | 1 | **16** |
| | 6.3% | 25.0% | 50.0% | 12.5% | 6.3% | **100%** |
| Family population | 474 | 2,714 | 8,082 | 3,114 | 13 | **14,397** |
| | 3.3% | 18.9% | 56.1% | 21.6% | 0.1% | **100%** |
| Household population | 851 | 4,584 | 12,267 | 4,496 | 13 | **22,211** |
| | 3.8% | 20.6% | 55.2% | 20.2% | 0.1% | **100%** |
| Business institutions | 34 | 519 | 826 | 334 | 6 | **1,719** |
| | 2.0% | 30.2% | 48.1% | 19.4% | 0.3% | **100%** |

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TEXARKANA MSA ASSESSMENT AREA**

LENDING TEST

The bank's Lending Test performance in this assessment area is below the Lending Test performance in the full-scope MSA assessment areas, as detailed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in *Appendix C*.

| Lending Test Criteria | Performance |
|---|---|
| Lending Activity | Consistent |
| Geographic Distribution of Loans | Below |
| Distribution of Loans by Borrower's Profile | Consistent |
| Community Development Lending Activity | Below |
| **OVERALL** | **Below** |

During the review period, the bank made two community development loans totaling $3.5 million, both of which qualified for a purpose of economic development. In addition, the bank received credit for five PPP loans totaling $1.4 million.

INVESTMENT TEST

The bank's Investment Test performance in this assessment area is below the investment performance in the full-scope MSA assessment areas. The bank's only investments in the Texarkana MSA assessment area were 12 donations totaling $12,800.

SERVICE TEST

The bank's performance under the Service Test in this assessment area is consistent with performance in the full-scope MSA assessment areas, as shown in the table below.

| Service Test Criteria | Performance |
|---|---|
| Accessibility of Delivery Systems | Consistent |
| Changes in Branch Locations | Consistent |
| Reasonableness of Business Hours and Services | Consistent |
| Community Development Services | Consistent |
| **OVERALL** | **Consistent** |

During the review period, four bank employees provided ten community development service hours to four different organizations. In addition, the bank opened and maintained eight RPA accounts for LMI individuals in the assessment area during the review period.

# NONMSA ARKANSAS
*(Full-Scope Review)*

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMSA ARKANSAS

### Bank Structure

The bank operates 23 of its 241 branches (9.5 percent) in the nonMSA Arkansas assessment area, which are distributed as follows.

| Branch Location by Census Tract Income Level | | | |
|---|---|---|---|
| **Low-Income** | **Moderate-Income** | **Middle-Income** | **Upper-Income** |
| 0 | 3 | 20 | 0 |

During the review period, the bank closed 15 branches in the assessment area and opened one new branch located in a moderate-income census tract. In addition to these branch locations, the bank also operates one stand-alone, deposit-accepting ATM in the city of Berryville, located in a middle-income census tract. Based on these branch locations, the bank is well positioned to deliver financial services to most of the assessment area. However, the bank does not operate any branch locations in adjacent Newton and Searcy counties in the north-central portion of the state, nor in Yell County further to the south. While online and mobile banking offer some means to deliver financial services to these areas, the bank likely struggles to fully service these portions of the assessment area.

### General Demographics

The nonMSA Arkansas assessment area is composed of two noncontiguous assessment areas. The first includes 17 contiguous counties in central and northern Arkansas, while the second assessment area includes Mississippi County in far eastern Arkansas. Given their similar demographic characteristics, economic conditions, and credit needs, these two assessment areas are combined for analysis as a single nonMSA Arkansas assessment area. The combined assessment area includes 18 counties, which are listed in the table below:

| Counties Making up the NonMSA Arkansas Assessment Area | | | |
|---|---|---|---|
| Baxter | Johnson | Newton | Searcy |
| Boone | Logan | Pike | Sevier |
| Carroll | Marion | Polk | Yell |
| Conway | Mississippi | Pope | |
| Howard | Montgomery | Scott | |

The assessment area has a total population of 419,288; Pope and Mississippi counties are the most populous counties in the assessment area, with populations of 62,830 and 44,864, respectively. While most of the assessment area is rural, certain cities such as Russellville in Pope County and Harrison in Boone County serve as regional hubs for commercial and banking activity in the surrounding counties. The demographic makeup of the assessment area is relatively homogeneous.

While rural, the assessment area is vast and hosts many financial institutions. In total, 37 FDIC-insured depository institutions operate 185 branches throughout the assessment area. Arvest Bank

| Arvest Bank | | CRA Performance Evaluation |
|---|---|---|
| Fayetteville, Arkansas | NonMSA Arkansas | September 27, 2021 |

is the market leader in the assessment area by deposit market share (15.3 percent) and total branches. Deposits held in nonMSA Arkansas represent 6.3 percent of total bank deposits.

In line with its extensive branch presence, the bank also plays an important role in meeting the credit needs of the assessment area. An analysis of 2019 HMDA-reportable loans shows that there were 311 entities with lending activity in the assessment area, of which Arvest Bank ranked first with 14.4 percent of all HMDA lending activity. Similarly, the bank ranked first out of 97 institutions with CRA lending activity in the assessment area with 17.0 percent of all CRA lending activity.

The assessment area credit needs include a blend of consumer, commercial, and agricultural loan products. Additionally, community contacts familiar with the assessment area pointed to a need for affordable home improvement loans and workforce development and financial literacy training initiatives. While the availability of community development intermediaries, such as nonprofit agencies and government assistance entities, is somewhat limited relative to more urban portions of the state, community contacts noted that community development opportunities are available for financial institutions.

## Income and Wealth Demographics

The following table reflects the number of census tracts by income level and the family population within those tracts.

| Assessment Area Demographics by Geography Income Level | | | | |
|---|---|---|---|---|
| | Census Tracts | | Family Population | |
| Low | 0 | 0.0% | 0 | 0.0% |
| Moderate | 10 | 10.1% | 8,079 | 7.3% |
| Middle | 80 | 80.8% | 90,122 | 80.9% |
| Upper | 9 | 9.1% | 13,191 | 11.8% |
| TOTAL | 99 | 100% | 111,392 | 100% |

As shown above, the assessment area includes no low-income and ten moderate-income census tracts, representing 10.1 percent of the total census tracts in the assessment area. Meanwhile, only 7.3 percent of families in the assessment area reside in moderate-income census tracts. Most of the assessment area census tracts and family population are middle-income. Despite being middle-income geographies, many of these census tracts were designated as distressed, underserved, or both during the review period, as detailed below.

- There are 32 census tracts designated as distressed due to poverty in Logan, Marion, Mississippi, Montgomery, Polk, Scott, Searcy, and Sevier counties.

- Eight census tracts are designated as distressed due to population loss in Mississippi County.

- There are 16 census tracts designated as underserved due to their remote rural location in Marion, Montgomery, Pike, Polk, and Searcy counties.

According to 2015 ACS data, the median family income for the assessment area ($44,702) was comparable to the median family income for all of nonMSA Arkansas ($45,047). More recently, the FFIEC estimated the median family income for nonMSA Arkansas to be $48,200 in 2018 and $49,100 in 2019. The following table displays the distribution of assessment area families by income level compared to nonMSA Arkansas as a whole.

| Family Population by Income Level | | | | |
|---|---|---|---|---|
| | Assessment Area | | NonMSA Arkansas | |
| Low | 21,942 | 19.7% | 63,831 | 21.4% |
| Moderate | 21,299 | 19.1% | 53,700 | 18.0% |
| Middle | 23,130 | 20.8% | 58,267 | 19.5% |
| Upper | 45,021 | 40.4% | 123,066 | 41.2% |
| TOTAL | 111,392 | 100% | 298,864 | 100% |

As shown above, 38.8 percent of families in the assessment area are LMI, significantly higher than the percentage of families who live in moderate-income census tracts (7.3 percent). This figure is comparable to nonMSA Arkansas as a whole, though the distribution between low- and moderate-income families varies slightly. Poverty levels, however, are slightly lower in the assessment area (15.3 percent) than in nonMSA Arkansas as a whole (16.6 percent). Poverty levels range by county from a low of 15.2 percent in Baxter County to a high of 25.3 percent in Searcy County. When considering these factors and income levels, the assessment area is similarly affluent to all of nonMSA Arkansas combined.

## Housing Demographics

The following table displays housing demographics for the assessment area and nonMSA Arkansas as a whole.

| Housing Demographics | | | | |
|---|---|---|---|---|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) | Housing Cost Burden |
| Assessment Area | $96,500 | 37.5% | $589 | 40.0% |
| NonMSA Arkansas | $85,869 | 41.0% | $588 | 41.1% |

Homeownership in the assessment area is less affordable than in nonMSA Arkansas as a whole, as evidenced by a lower affordability ratio for the assessment area. Affordability varied by county, with housing being most affordable in Sevier County (53.6 percent) and least affordable in Baxter County (29.4 percent). Additionally, the median age of housing stock in the assessment area is 39 years. As the average age of available housing stock increases, home improvements are often needed to maintain the condition of the home; this increases the associated costs of homeownership outside of what is reflected by the median housing value. Community contacts identified this as being a barrier to homeownership for many LMI residents in the assessment area, as the costs for home improvements often render otherwise affordable housing too expensive. While owner-occupied housing costs are higher in the assessment area relative to nonMSA Arkansas as a whole, rental costs are similar between the two, as demonstrated by the median gross rental and housing cost burden figures in the table above.

| Arvest Bank | | CRA Performance Evaluation |
|---|---|---|
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## Industry and Employment Demographics

The assessment area economy is driven by its small business and small farm sectors; in 2019, 90.5 percent of businesses and 96.4 percent of farms reported annual revenues of $1 million or less. Of the 139,037 paid employees in the assessment area, 23.8 percent work in manufacturing, 17.4 percent in government, and 11.7 percent in retail trade. Additionally, while not captured in county business patterns data, agriculture plays a key role in the assessment area economy, particularly cattle production. According to 2019 Dunn & Bradstreet data, there were a total of 970 farms operating throughout the assessment area.

Displayed in the following table is unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Arkansas.

| Unemployment Levels | | | |
|---|---|---|---|
| Dataset | Time Period (Annual Average) | | |
| | 2018 | 2019 | YTD 2020 |
| Assessment Area | 4.2% | 4.1% | 7.2% |
| Arkansas | 3.6% | 3.6% | 7.0% |

As shown above, unemployment levels in the assessment area remained higher than in Arkansas as a whole during the review period, though only slightly so. While the impact of the pandemic contributed to rising unemployment levels across the nation, community contacts described that the impact to the assessment area was more pronounced in some cases due to the high concentration of manufacturing jobs in the assessment area, many of which closed permanently or laid off large numbers of workers during the pandemic.

## Community Contact Information

For the nonMSA Arkansas assessment area, four community contact interviews were conducted. Given that the assessment area encompasses broad portions of the state, these community contacts represent organizations that serve larger regional areas, thereby ensuring that the economic conditions and credit needs of the entire assessment area are captured. Two of these individuals represent small business development centers, while the remaining two contacts represent affordable housing organizations.

According to community contacts, the economic conditions of the assessment area vary by county. For instance, some counties such as Polk and Pike have experienced growth recently due to a strong tourism sector, though overall the assessment area is largely rural and lacks major investment in new housing or small business development. Several contacts noted that many residents commute to larger regional cities for work, with many of the smaller and less populous counties in the assessment area having few job opportunities. Moreover, two of the community contacts identified a lack of educational attainment as a pervasive issue in the assessment area, indicating a need for workforce development initiatives. With regard to the pandemic, many low-income, frontline workers saw a boost in income during the pandemic, while other sectors such as manufacturing were harder hit and have been slower to recover. Demographically, all contacts stated that the population of the assessment area has either remained stagnant or decreased depending on the county. Assessment area demographics support these statements, with 13 of the 18 counties in the assessment area recording a decline in population from 2010 to 2015. Lastly,

both contacts described banking services as being accessible throughout the assessment area, though one contact noted that many minority business owners have struggled to obtain financing from banks in the area.

The housing contacts explained that while there are available affordable housing options, the age of housing stock is high and has created a significant need for affordable home improvement loans. The issue extends to rental housing as well, with many residents struggling to obtain quality affordable rental units due to the condition of the properties. The contacts went on to explain that another significant barrier to homeownership is the large number of residents in the assessment area who are low income and are unable to save enough money for a down payment or to be able to afford other costs of homeownership. Consequently, down payment assistance initiatives are particularly impactful in the assessment area.

The small business contacts identified the lack of a skilled workforce and poor credit history as the largest barriers that business owners face in the assessment area. The contacts identified a need for financial literacy training for both consumers and businesses in the assessment area. Both contacts also noted that while banks in the area have been willing to extend small dollar loans to qualified businesses, banks could be more proactive in developing products that better suit the needs of small business owners in the assessment area, including more flexible underwriting criteria for newer businesses. One of these contacts identified that Arvest Bank is particularly active in small business lending in the assessment area through SBA lending programs and is one of the few financial institutions in the assessment area with Spanish-speaking staff members.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NONMSA ARKANSAS ASSESSMENT AREA

LENDING TEST

Lending activity levels reflect good responsiveness to the credit needs in nonMSA Arkansas. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes. Finally, the bank is a leader in providing community development loans in nonMSA Arkansas.

### Lending Activity

The following table displays the combined 2018 and 2019 lending volume by number and dollar amount in the assessment area.

| Summary of Lending Activity<br>January 1, 2018 through December 31, 2019 | | | | |
|---|---|---|---|---|
| Loan Type | # | % | $(000s) | % |
| Home Improvement | 232 | 4.3% | 10,498 | 2.3% |
| Home Purchase | 1,243 | 23.3% | 156,344 | 33.7% |
| Multifamily Housing | 35 | 0.7% | 18,770 | 4.0% |
| Refinancing | 911 | 17.0% | 83,505 | 18.0% |
| Other Purpose LOC | 94 | 1.8% | 3,846 | 0.8% |
| Other Purpose Closed/Exempt | 66 | 1.2% | 3,883 | 0.8% |
| Purpose Not Applicable | 0 | 0.0% | 0 | 0.0% |
| **Total HMDA** | **2,581** | **48.3%** | **276,846** | **59.7%** |
| Small Business | 1,692 | 31.7% | 137,497 | 29.6% |
| Small Farm | 1,072 | 20.1% | 49,457 | 10.7% |
| **TOTAL LOANS** | **5,345** | **100.0%** | **463,800** | **100.0%** |

Lending activity in nonMSA Arkansas represents 9.8 percent of the total HMDA and CRA loans made within the bank's combined assessment areas in 2018 and 2019. This level of lending exceeds the percentage of total bank deposits held in the assessment area (6.3 percent) and is in line with the share of total bank branches in this assessment area (9.5 percent). Additionally, Arvest Bank ranks first in HMDA and CRA lending activity in the assessment area and accounts for a significant portion of the total lending activity. In particular, the bank plays a significant role in meeting the credit needs of small farms in the assessment area, accounting for 36.8 percent of all small farm loans made in the assessment area in 2019. These factors demonstrate the bank's impact in the assessment area and its commitment to meeting the credit needs of nonMSA Arkansas. Therefore, lending activity levels reflect good responsiveness to the credit needs of the assessment area.

## Geographic Distribution of Loans

The overall geographic distribution of loans in nonMSA Arkansas is adequate when considering performance from all three products reviewed. While HMDA lending still received primary consideration toward the overall conclusion, small farm lending is weighted more heavily in this assessment area than in other metropolitan areas of the state based on loan demand and the bank's lending activity levels. Lastly, performance in this assessment area is primarily based on the bank's lending in moderate-income census tracts, as the assessment area does not include any low-income census tracts.

*Home Mortgage Disclosure Act (HMDA) Lending*

Overall, the distribution of the bank's HMDA loans by geography income level is considered adequate. In 2018, the bank originated 4.7 percent of its HMDA loans in moderate-income geographies, which was closely aligned with the performance of peer institutions in the assessment area (5.1 percent) and the demographic figure (5.7 percent). Similarly, the bank's performance in 2019 (5.3 percent), while slightly higher than the previous year, was in line with aggregate lending performance (4.4 percent) and the demographic figure (5.7 percent). Therefore, performance in both years is considered adequate. As discussed in the *Income and Wealth Demographics* section for this assessment area, most of the assessment area is composed of middle-income geographies, many of which were designated as distressed or underserved during the review period. Across both years of data, the bank originated 30.7 percent of its total HMDA loans in these distressed or underserved geographies, which further reflects an adequate geographic distribution of HMDA loans.

*Small Business Lending*

Across both years of data, the geographic distribution of small business loans is considered adequate. In both 2018 and 2019, the percentage of the bank's small business loans in moderate-income census tracts (5.9 percent in 2018 and 5.7 percent in 2019) was in line with aggregate lending performance (6.4 percent in 2018 and 2019) but slightly below the demographic figure (8.1 percent in 2018 and 8.2 percent in 2019). Additionally, 35.5 percent of the bank's total small business loans were made in distressed or underserved middle-income geographies.

*Small Farm Lending*

Overall, the distribution of small farm loans to geographies of different income levels is good. In 2018, the bank originated 8.1 percent of its small farm loans in moderate-income geographies. While above the percentage of small farms located in moderate-income geographies (4.4 percent), the bank's performance was in line with aggregate lending levels (7.2 percent), reflecting adequate performance. The percentage of the bank's small farm loans in moderate-income geographies in 2019 (7.5 percent) was in line with aggregate lending levels (7.4 percent) but exceeded the demographic figure (4.8 percent), reflecting adequate performance. As previously discussed, the bank accounts for a significant portion of the total small farm lending activity in the assessment area. Thus, when adjusting aggregate lending levels to remove Arvest Bank loans, the bank compares more favorably to aggregate performance. When considering this context and the bank's performance across both years of data, the geographic distribution of small farm loans is considered good.

Lastly, an analysis of the dispersion of all three lending products reviewed did not reveal evidence of any conspicuous lending gaps. The bank had loan activity in 92.9 percent of all assessment area census tracts in 2018 and in 70.0 percent of LMI census tracts. Similarly, the bank originated loans in 90.9 percent of all census tracts in the assessment area in 2019 and 60.0 percent of LMI geographies. The dispersion of the bank's loans was consistent with its branch structure and supports the conclusion that the geographic distribution of loans is adequate overall.

## **Loan Distribution by Borrower's Profile**

The distribution of loans by borrower's income level or business/farm revenue size is good overall.

*Home Mortgage Disclosure Act (HMDA) Lending*

The bank's HMDA lending reflects an adequate distribution to individuals of different income levels in the assessment area. In 2018, the bank originated 6.9 percent of its HMDA loans to low-income borrowers and 15.9 percent to moderate-income borrowers. For low-income borrowers, this exceeded the aggregate lending level of 6.0 percent but was below the percentage of assessment area families who are low income (19.7 percent). While the bank's performance falls below the demographic figure, information gleaned from community contacts indicate that a large percentage of this demographic population are unlikely to qualify for a conventional home mortgage loan due to rising material costs increasing the cost for new affordable housing development, derogatory credit history, or difficulty in obtaining down payment funds. When compared with the lending levels of peer institutions in the assessment area, however, the bank's performance is considered good. The bank's lending to moderate-income borrowers was in line with peer performance (15.4 percent) and below the 19.1 percent of assessment area families who are moderate income, reflecting adequate performance.

In 2019, 5.4 percent of the bank's HMDA loans were made to low-income borrowers, as compared to peer lending levels of 5.1 percent and the demographic figure of 19.7 percent; this reflects adequate performance. Meanwhile, the bank's lending to moderate-income borrowers (17.3 percent) compared favorably to the performance of aggregate lenders in the assessment area (15.4 percent) and was slightly below the demographic figure of 19.1 percent, reflecting good performance.

*Small Business Lending*

Overall, the distribution of small business loans to businesses of different sizes is good. The bank originated 75.7 percent of its small business loans to businesses with annual revenues of $1 million or less in 2018 and 70.2 percent in 2019. In both years, the bank's performance was well above that of peer institutions in the assessment area (45.3 percent in 2018 and 45.4 percent in 2019), but below the demographic figure (90.3 percent in 2018 and 90.5 percent in 2019). Furthermore, a combined 83.0 percent of the bank's loans to businesses with annual revenues of $1 million or less were in amounts of $100,000 or less, which are typically more responsive to the needs of small businesses. Given these factors, the bank's performance is considered good in both 2018 and 2019.

*Small Farm Lending*

The bank's lending levels reflect a good distribution to farms of different sizes. In 2018, the bank originated 90.0 percent of its small farm loans to farms with annual revenues of $1 million or less. This was well above the aggregate lending level (72.1 percent) but below the demographic estimate of assessment area farms with annual revenues of $1 million or less (96.1 percent). Similarly, the bank's performance in 2019 (82.8 percent) exceeded aggregate lending levels (73.5 percent) but was below the demographic figure (96.4 percent). Of the bank's total loans to farms with annual revenues of $1 million or less in 2018 and 2019, a combined 88.6 percent were made in amounts of $100,000 or less, which further demonstrates the bank's willingness to meet the needs of small farms in the assessment area.

## Community Development Lending Activity

The bank is a leader in making community development loans in nonMSA Arkansas. As shown in the table below, the bank made 19 community development loans totaling $49.7 million and 36 PPP loans totaling $10.4 million. The most impactful of these loans are discussed below the following table.

| Community Development Lending | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | Affordable Housing | | Community Services | | Revitalization/ Stabilization | | Economic Development | | Total | |
| | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) |
| CD Loans | 6 | 5,394 | 2 | 122 | 9 | 40,369 | 2 | 3,789 | 19 | 49,674 |
| PPP Loans | - | - | - | - | - | - | 36 | 10,400 | 36 | 10,400 |

- Two loans totaling $3.7 million financed impactful affordable housing developments. One of these loans funded the purchase of a multifamily affordable housing development located in a moderate-income census tract. This loan was partially funded through a LIHTC grant, meaning that all tenants must be LMI and that rental values are tailored to be affordable to LMI borrowers. The second loan funded the construction of a 24-unit multifamily housing development that will primarily benefit LMI tenants. As noted by community contacts, new affordable housing development is scarce in the assessment area, and the condition of much of the affordable rental housing stock is deteriorating. Both loans help address this need by financing new affordable housing developments that will primarily benefit LMI residents.

- The bank was the lead participant in funding two loans to construct an ambulatory center for a rural hospital. The bank's contributions of $18.0 million are impactful given that the hospital services several moderate-income and distressed or underserved middle-income geographies in portions of the assessment area that lack health care services. These loans help to revitalize/stabilize these areas by providing essential health care services.

INVESTMENT TEST

The bank provides an adequate level of community development investments and grants and is rarely in a leadership position. As shown below, most the bank's qualified investments in nonMSA

Arkansas were in municipal bonds, with all investment and grant activity in the assessment area totaling $5.2 million.

| Summary of Investments – NonMSA Arkansas | | | |
|---|---|---|---|
| **Investment Type** | **Current Period** | **Prior Period, Still Outstanding** | **Total** |
| MBS | $1.0 million | $307,333 | $1.3 million |
| Municipal/private bonds | $3.6 million | $220,000 | $3.9 million |
| Donations | $45,076 | - | $45,076 |
| **TOTAL** | **$4.6 million** | **$527,333** | **$5.2 million** |

- The bank's investment activity included $1.3 million in MBS, of which $1.0 million was made in the current review period. These investments support affordable home loans in the assessment area, which is responsive to needs identified by community contacts given the lack of new affordable housing development.

- The bank's municipal bond activity consisted of one prior and three current period bonds to school districts and one community college throughout the assessment area. As noted by community contacts, the assessment area has need for greater investment in education, and these investments are responsive to that need by providing funds for improvements and maintenance of various school buildings and projects. Many of these investments were made in distressed or underserved geographies, and all benefitted schools with a majority of students receiving free or reduced lunch services or federal tuition assistance, which are proxies for income.

SERVICE TEST

The bank's service delivery systems are reasonably accessible to individuals and geographies of different income levels in nonMSA Arkansas. The bank's record of opening and closing branches has generally not adversely affected the accessibility of its service delivery systems, and business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies or individuals. Lastly, the bank provides a relatively high level of community development services in the assessment area.

**Accessibility of Delivery Systems**

The bank operates 23 branches throughout nonMSA Arkansas, which are displayed in the table that follows along with the distribution of assessment area census tracts and household population by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|---|---|---|---|---|---|---|
| **Dataset** | **Geography Income Level** | | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | **Unknown** | |
| Branches | 0 | 3 | 20 | 0 | 0 | **23** |
| | 0.0% | 13.0% | 87.0% | 0.0% | 0.0% | **100%** |
| Census Tracts | 0.0% | 10.1% | 80.8% | 9.1% | 0.0% | **100%** |
| Household Population | 0.0% | 7.3% | 80.9% | 11.8% | 0.0% | **100%** |

As illustrated in the table, the bank's branches in moderate-income census tracts represent 13.0 percent of branches in the assessment area. This exceeds the household population in moderate-income census tracts (7.3 percent) and is slightly higher than the percentage of assessment area census tracts that are moderate income (10.1 percent). In addition to these branch locations, the bank also operates one stand-alone, deposit-accepting ATM in the assessment area in a middle-income census tract. The vast majority of the bank's branches in the assessment area are in middle-income census tracts, which aligns with the overall makeup of the assessment area. Overall, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area.

## Changes in Branch Locations

The following table displays the bank's branch activity during the review period.

| | Branch Activity by Geography Income Level | | | | | |
|---|---|---|---|---|---|---|
| **Dataset** | **Geography Income Level** | | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | **Unknown** | |
| Branches opened | 0 | 1 | 0 | 0 | 0 | 1 |
| Branches closed | 0 | 3 | 11 | 1 | 0 | 15 |

As shown above, the bank closed 15 total branches during the review period, three of which were in moderate-income census tracts and opened one new branch in a moderate-income census tract. In most cases, these closures reflected branch consolidation in areas with overlapping branch locations following an acquisition that the bank completed just prior to this review period. For example, three of the bank's closed branch locations were acquired branches in the city of Harrison, where the bank still operates three additional branches that are near the closed locations. Two closed locations were in moderate-income census tracts in the city of Russellville, where the bank opened a new branch location in the same moderate-income census tract, resulting in no impact to branch accessibility. In general, these branch closures did not have a significant impact on accessibility, especially to LMI geographies. However, some of these locations were closed in cities or areas that the bank does not operate other branches in, which does have some impact on accessibility. Overall, the bank's record of opening and closing branches has generally not adversely affected the accessibility of its service delivery systems, particularly to LMI geographies or individuals.

## Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies or individuals. Most locations operate standard weekday lobby hours from 8:00 or 8:30 a.m. to 5:00 or 5:30 p.m., with a handful of locations offering extended lobby hours to 6:00 p.m. Saturday lobby hours are only offered at three locations, all of which are in middle-income census tracts. All branch locations in the assessment area operate drive-through facilities, 18 of which also operate drive-through hours on Saturdays, including two branches in moderate-income census tracts. Lastly, lenders are equally dispersed throughout the assessment area's branches.

**Community Development Services**

Arvest Bank provides a relatively high level of community development services in the assessment area. During the review period, 56 bank employees provided 238 hours of community development service activities to 27 different organizations. In addition, the bank opened and operated 213 RPAs for LMI borrowers during the review period. Most of these efforts consisted of various financial literacy events at schools or various community service organizations throughout the assessment area, while other bank employees served as board members or provided financial/technical expertise to a variety of community service or economic development organizations. Of note, two bank employees serve as board members for a nonprofit affordable housing agency operating in Baxter County. The organization supports affordable housing initiatives in the area, including new affordable housing development, which was identified by community contacts as a credit need in the assessment area.

# OKLAHOMA

**CRA RATING FOR OKLAHOMA:**     **SATISFACTORY**
**The Lending Test is rated:**      **High Satisfactory**
**The Investment Test is rated:**     **High Satisfactory**
**The Service Test is rated:**      **Outstanding**

Major factors supporting the institution's rating in the state of Oklahoma include the following.

- The bank's lending activity levels reflect excellent responsiveness to the credit needs of the Oklahoma assessment areas.

- The geographic distribution of loans reflects an adequate penetration throughout the Oklahoma assessment areas.

- The distribution of loans in the Oklahoma assessment areas reflects good penetration among individuals of different income levels (including LMI levels) and businesses and farms of different sizes.

- The bank is a leader in making community development loans throughout the Oklahoma assessment areas.

- The bank makes use of innovative and/or flexible lending practices in serving the credit needs of the Oklahoma assessment areas.

- The bank makes a significant level of qualified community development investments and grants and is occasionally in a leadership position.

- Delivery systems are accessible to geographies and individuals of different income levels in the Oklahoma assessment areas. Changes in branch locations have generally not adversely affected the accessibility of the bank's delivery systems, and business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly in LMI geographies.

- The bank is a leader in providing community development services throughout the Oklahoma assessment areas.

## SCOPE OF EXAMINATION

Scoping considerations applicable to the review of Oklahoma assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. In all assessment areas, HMDA lending received the greatest weight in the analysis. Small farm lending received the least weight in the MSA assessment areas but was weighted equally with small business lending in the nonMSA assessment area.

The bank operates six assessment areas throughout Oklahoma located in three MSAs and three noncontiguous nonMSA portions of the state. Performance in the nonMSA assessment areas was combined for analysis, resulting in one set of performance conclusions for all of nonMSA Oklahoma. Three of the bank's Oklahoma assessment areas were reviewed under full-scope procedures. When considering branch structure and loan/deposit activity, CRA performance in nonMSA Oklahoma and the Tulsa MSA carried the greatest weight when forming overall state conclusions.

To augment the evaluation of the full-scope review assessment areas in Oklahoma, six community contact interviews were conducted. These interviews were used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from these interviews are included in the *Description of Institution's Operations* sections, as applicable to the assessment areas in which the community contacts were made.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN OKLAHOMA

The bank operates 80, or 33.2 percent, of its branches throughout the four CRA assessment areas in Oklahoma. The following table gives additional detail regarding the bank's operations within Oklahoma.

| Assessment Area | Offices | | Deposits As of June 30, 2020 | | Review Procedures |
|---|---|---|---|---|---|
| | # | % | $ | % | |
| NonMSA Oklahoma | 32 | 40.0% | $2,274,534 | 33.6% | Full scope |
| Tulsa MSA | 23 | 28.8% | $2,584,392 | 38.2% | Full scope |
| Oklahoma City MSA | 20 | 25.0% | $1,558,387 | 23.0% | Full scope |
| Lawton MSA | 5 | 6.3% | $344,278 | 5.1% | Limited scope |
| **TOTAL** | **80** | **100%** | **$6,761,591** | **100%** | **3 – Full scope** |

As shown above, the bank's deposits in Oklahoma total $6.8 billion, which represents 29.7 percent of total bank deposits. In addition to the branch locations shown in the table above, the bank also operates three LPO locations, two in the Tulsa MSA and one in Oklahoma City, and 40 stand-alone ATMs, 21 of which are deposit accepting. While the bank maintains significant operations in each of the three assessment areas reviewed under full-scope procedures, performance in nonMSA Oklahoma and the Tulsa MSA assessment areas carried the greatest weight toward overall state ratings, with the Oklahoma City MSA assessment area carrying slightly less weight. During the review period, the bank closed 18 branches, opened four branches, and relocated one branch throughout Oklahoma.

| Arvest Bank | | CRA Performance Evaluation |
|---|---|---|
| Fayetteville, Arkansas | Oklahoma | September 27, 2021 |

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

The bank's performance under the Lending Test in Oklahoma is rated High Satisfactory. The test considers the following criteria.

### Lending Activity

| Full-Scope Review Areas | Lending Activity |
|---|---|
| Oklahoma City MSA | Adequate |
| Tulsa MSA | Excellent |
| NonMSA Oklahoma | Excellent |
| **OVERALL** | **EXCELLENT** |

| Limited-Scope Review Areas | Lending Activity |
|---|---|
| Lawton MSA | Consistent |

The bank's overall level of lending reflects excellent responsiveness to the credit needs of the Oklahoma assessment areas. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank's overall importance to each assessment area.

### Geographic and Borrower Distribution

As displayed in the following tables, the bank's overall geographic distribution of loans reflects adequate penetration throughout Oklahoma.

| Full-Scope Review Areas | Geographic Distribution of Loans |
|---|---|
| Oklahoma City MSA | Adequate |
| Tulsa MSA | Adequate |
| NonMSA Oklahoma | Excellent |
| **OVERALL** | **ADEQUATE** |

| Limited-Scope Review Areas | Geographic Distribution of Loans |
|---|---|
| Lawton MSA | Exceeds |

Overall, the bank's performance by borrower's income and revenue profile is good in Oklahoma, as is displayed in the following tables.

| Full-Scope Review Areas | Distribution of Loans by Borrower's Profile |
|---|---|
| Oklahoma City MSA | Adequate |
| Tulsa MSA | Good |
| NonMSA Oklahoma | Good |
| **OVERALL** | **GOOD** |

| Limited-Scope Review Areas | Distribution of Loans by Borrower's Profile |
|---|---|
| Lawton MSA | Consistent |

## Community Development Lending Activities

| Full-Scope Review Areas | Community Development Lending Activities |
|---|---|
| Oklahoma City MSA | Leader |
| Tulsa MSA | Leader |
| NonMSA Oklahoma | Leader |
| **OVERALL** | **LEADER** |

| Limited-Scope Review Areas | Community Development Lending Activities |
|---|---|
| Lawton MSA | Consistent |

During the review period, the bank made 86 community development loans totaling $262.3 million throughout its Oklahoma assessment areas. As the bank met the community development lending needs of its assessment areas in the state, additional consideration was given to community development loans made in Oklahoma outside of the bank's assessment areas. The bank made two such loans totaling $11.2 million; one loan totaling $5.6 million helped fund the expansion of a large employer in a distressed middle-income geography that provides LMI jobs, while the second loan qualified for a purpose of economic development and supported a business that employs 13 LMI individuals. In addition, Arvest Bank was a leader in providing PPP loans to businesses impacted by the pandemic throughout its Oklahoma assessment areas. In total, the bank made 289 PPP loans that qualified for a purpose of economic development totaling $162.9 million (and an additional 2 PPP loans totaling $11.2 million in the broader, statewide Oklahoma area). This level of PPP lending activity further demonstrates the bank's leadership position in community development lending in the state. Lastly, many of the bank's community development loans were deemed responsive to assessment area credit needs or were noted as particularly impactful. Additional details on these loans can be found under the *Community Development Lending Activities* section for each full-scope assessment area.

## Product Innovation

The bank makes use of flexible lending practices in serving the credit needs of the Oklahoma assessment areas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document. The bank's use of flexible and/or innovative lending products in Oklahoma is described as follows:

- The bank originated 331 loans totaling $39.6 million through the HomeReady program. These loans provide flexible, long-term financing for LMI borrowers, which was noted by community contacts in several assessment areas as a credit need. This represents a substantial increase from the 99 loans totaling $11.9 million originated at the previous evaluation.

- The bank originated 74 loans totaling $8.5 million through the HUD Section 184 Loan Program, which offers flexible mortgage loans to Native Americans in eligible states.

- The bank also originated a significant volume of mortgage loans through government loan programs, including 548 FHA loans ($63.5 million), 189 RD loans ($18.4 million), and 92 VA loans ($12.9 million).

INVESTMENT TEST

The bank's Investment Test performance in Oklahoma is rated High Satisfactory. The following table displays investment and grant activity performance in the Oklahoma assessment areas.

| Full-Scope Review Areas | Investment and Grant Activity |
|---|---|
| Oklahoma City MSA | Adequate |
| Tulsa MSA | Significant |
| NonMSA Oklahoma | Excellent |
| **OVERALL** | **SIGNIFICANT** |

| Limited-Scope Review Areas | Investment and Grant Activity |
|---|---|
| Lawton MSA | Below |

As shown above, the level of investment and grant activity varied by rated area in Oklahoma. The following table displays that the bank's total investment and grant activity included $66.3 million in qualified investments and grants and $3 in donations. The bank's donation totals include 11 donations totaling $12,733 that were made to an organization providing community service activities throughout Oklahoma, which are counted at the statewide level rather than any individual assessment area. The bank's investment activities included municipal and private bonds, MBS supporting affordable housing loans for LMI individuals, and investments in LIHTC projects. Most of this investment activity was concentrated in nonMSA Oklahoma, reflecting an excellent level of investment and grant activity, while investment activity in the Oklahoma City and Tulsa MSAs was lower and reflected adequate and significant levels of activity, respectively. Additional details regarding the composition of the bank's investments can be found in the *Investment Test* section for each of the respective assessment areas.

| Oklahoma Assessment Area | Investments/Grants ($) | Donations ($) |
|---|---|---|
| Oklahoma City MSA | $10.3 million | $49,135 |
| Tulsa MSA | $8.4 million | $212,640 |
| NonMSA Oklahoma | $34.4 million | $77,298 |
| Lawton MSA | $518,003 | $18,762 |
| Statewide Oklahoma | - | $12,733 |
| **TOTAL** | **$53.6 million** | **$370,568** |

SERVICE TEST

The bank is rated Outstanding under the Service Test in Oklahoma, which considers the following criteria.

## Accessibility of Service Delivery Systems

Service delivery systems are accessible to geographies and individuals of different income levels in Oklahoma, as shown below.

| Full-Scope Review Areas | Accessibility of Delivery Systems |
|---|---|
| Oklahoma City MSA | Reasonably accessible |
| Tulsa MSA | Accessible |
| NonMSA Oklahoma | Readily accessible |
| **OVERALL** | **ACCESSIBLE** |

| Limited-Scope Review Areas | Accessibility of Delivery Systems |
|---|---|
| Lawton MSA | Consistent |

## Changes in Branch Locations

The bank's record of opening and closing branches has generally not adversely affected the accessibility of its service delivery systems, particularly to LMI geographies and individuals. The tables below display the bank's performance under this criterion.

| Full-Scope Review Areas | Changes in Branch Locations |
|---|---|
| Oklahoma City MSA | Not adversely affected |
| Tulsa MSA | Generally not adversely affected |
| NonMSA Oklahoma | Generally not adversely affected |
| **OVERALL** | **GENERALLY NOT ADVERSELY AFFECTED** |

| Limited-Scope Review Areas | Changes in Branch Locations |
|---|---|
| Lawton MSA | Consistent |

| Arvest Bank | | CRA Performance Evaluation |
|---|---|---|
| Fayetteville, Arkansas | Oklahoma | September 27, 2021 |

As shown in the preceding tables, changes in branch locations had varying impacts on the accessibility of the bank's delivery systems in each of the full-scope assessment areas. While accessibility was not impacted in the Oklahoma City MSA, changes in branch locations in the Tulsa MSA and nonMSA Oklahoma assessment areas had some isolated impact to certain LMI geographies, though the accessibility of the bank's service delivery systems overall was generally not adversely affected in those areas. Overall, the net result of branch openings and closures in Oklahoma has generally not adversely affected the accessibility of the bank's service delivery systems.

## Reasonableness of Business Hours and Services in Meeting Assessment Area Credit Needs

The bank's business hours and banking services do not vary in a way that inconveniences certain portions of the Oklahoma assessment areas, as shown in the following tables.

| Full-Scope Review Areas | Reasonableness of Business Hours and Services |
|---|---|
| Oklahoma City MSA | Do not vary in a way that inconveniences |
| Tulsa MSA | Do Not vary in a way that inconveniences |
| NonMSA Oklahoma | Do Not vary in a way that inconveniences |
| **OVERALL** | **DO NOT VARY IN A WAY THAT INCONVENIENCES** |

| Limited-Scope Review Areas | Reasonableness of Business Hours and Services |
|---|---|
| Lawton MSA | Consistent |

## Community Development Services

Arvest Bank is a leader in providing community development services in Oklahoma, as displayed in the following tables.

| Full-Scope Review Areas | Community Development Services |
|---|---|
| Oklahoma City MSA | Leader |
| Tulsa MSA | Leader |
| NonMSA Oklahoma | Leader |
| **OVERALL** | **LEADER** |

| Limited-Scope Review Areas | Community Development Services |
|---|---|
| Lawton MSA | Consistent |

During the review period, 166 bank employees provided 2,856 hours of community development service activities to 136 organizations throughout the bank's Oklahoma assessment areas. Bank employees served in numerous capacities for nonprofit agencies and community service and economic development organizations. Details of the most impactful of these activities are included in the *Community Development Services* section for each full-scope assessment area.

# OKLAHOMA CITY, OKLAHOMA MSA

*(Full-Scope Review)*

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE OKLAHOMA CITY MSA ASSESSMENT AREA

### Bank Structure

The bank operates 20 branches, representing 8.3 percent of total bank branches, in the Oklahoma City MSA assessment area. The locations of these branches by geography income level are displayed in the table below.

| Branch Location by Census Tract Income Level | | | | |
|---|---|---|---|---|
| Low-Income | Moderate-Income | Middle-Income | Upper-Income | Unknown-Income |
| 0 | 7 | 7 | 5 | 1 |

During the review period, the bank opened three branches in the assessment area—two in moderate-income census tracts and one in a unknown-income census tract—and closed six branches. In addition to these branch locations, the bank also operates four stand-alone ATMs, two of which are deposit accepting and two of which are in LMI census tracts, throughout the assessment area. While these service delivery systems are well dispersed throughout the Oklahoma City MSA, the bank does not operate any branches in Lincoln or Logan counties and may have some difficulty in fully serving these areas relative to the rest of the assessment area. However, these counties represent a relatively small portion of the assessment area's total population. As a whole the bank is well positioned to deliver financial services to the vast majority of the assessment area.

### General Demographics

The bank's assessment area includes the entirety of the Oklahoma City MSA, which includes Canadian, Cleveland, Grady, Lincoln, Logan, McClain, and Oklahoma counties. The assessment area has a total population of 1,318,408, most of which is concentrated in Oklahoma County (754,480) and Cleveland County (268,614). Most of the Oklahoma City metro area is ensconced in these two counties, with the surrounding counties being generally less populous and relatively more rural.

The assessment area is diverse both demographically and economically, with the energy sector playing a key role in the area's economic growth. Much of the industry in the assessment area is concentrated in Oklahoma County, which contains the core of the Oklahoma City metro area, while adjacent Cleveland County includes the University of Oklahoma and Tinker Air Force Base, both of which are major employers in the assessment area. Reflective of the diverse economy, credit needs in the assessment area are varied and include a mix of consumer and commercial loan and deposit products. Other credit needs or community development opportunities specifically noted by community contacts include an emphasis on affordable home purchase and home improvement loans, financial literacy efforts and homeownership counseling, and more responsive small business lending programs such as micro loans. Community contacts went on to note that opportunities for community development involvement are widespread, as the assessment area contains a variety of community development, nonprofit, and government assistance entities.

The Oklahoma City MSA also contains a competitive banking market, with 71 FDIC-insured depository institutions operating 397 branches throughout the assessment area. Arvest Bank is a key player among these institutions, ranking sixth in terms of deposit market share and third in terms of total branches. Deposits held in this assessment area represent 6.9 percent of total bank deposits. Competition for HMDA and CRA loans is similarly high, with 516 entities reporting HMDA lending activity and 139 entities reporting CRA lending activity in 2019. Of these, Arvest Bank ranked fourteenth in HMDA lending activity and ninth in CRA lending activity.

## Income and Wealth Demographics

The following table displays the distribution of assessment area census tracts and the family population within those tracts by geography income level.

| Assessment Area Demographics by Geography Income Level | | | | |
|---|---|---|---|---|
| | **Census Tracts** | | **Family Population** | |
| Low | 29 | 8.0% | 17,305 | 5.3% |
| Moderate | 106 | 29.2% | 70,397 | 21.7% |
| Middle | 136 | 37.5% | 135,181 | 41.8% |
| Upper | 83 | 22.9% | 100,538 | 31.1% |
| Unknown | 9 | 2.5% | 340 | 0.1% |
| **TOTAL** | **363** | **100%** | **323,761** | **100%** |

As displayed above, 37.2 percent of census tracts in the assessment area are designated as LMI, while 27.0 percent of assessment area families reside within those tracts. These LMI census tracts are primarily concentrated in Oklahoma County in the area surrounding downtown Oklahoma City.

According to 2015 ACS data, the median family income for the assessment area ($63,816) exceeds the median family income for the state of Oklahoma ($58,029). More recently, the FFIEC estimates the median family income for the Oklahoma City MSA to be $69,300 in 2018 and $73,100 in 2019. The data in the next table shows the distribution of assessment area families by income level compared to all Oklahoma families.

| Family Population by Income Level | | | | |
|---|---|---|---|---|
| | **Assessment Area** | | **Oklahoma** | |
| Low | 68,992 | 21.3% | 208,222 | 21.6% |
| Moderate | 56,617 | 17.5% | 170,327 | 17.6% |
| Middle | 66,502 | 20.5% | 195,424 | 20.2% |
| Upper | 131,650 | 40.7% | 392,036 | 40.6% |
| **TOTAL** | **323,761** | **100%** | **966,009** | **100%** |

As shown above, 38.8 percent of families in the assessment area are LMI, a far greater percentage than families who reside in LMI geographies (27.0 percent). Meanwhile, this distribution of families by income level in the assessment area is closely aligned with the state of Oklahoma as a whole. While this points to a similar affluence between the two data sets, poverty levels in the assessment area (11.2 percent) are lower than statewide levels (12.4 percent). Taken together with

the disparity in median family income levels, these factors indicate that the assessment area is slightly more affluent than the state of Oklahoma as a whole.

## Housing Demographics

The following table displays housing demographics for the assessment area and Oklahoma as a whole.

| Housing Demographics | | | | |
|---|---|---|---|---|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) | Housing Cost Burden |
| Assessment Area | $137,249 | 37.6% | $785 | 44.3% |
| Oklahoma | $117,900 | 39.7% | $727 | 41.1% |

Homeownership in the assessment area is less affordable than in the state of Oklahoma overall even when accounting for higher income levels, as demonstrated by a lower affordability ratio. Homeownership is least affordable in Oklahoma County (35.6 percent) and most affordable in Grady County (47.0 percent). As the majority of LMI geographies and individuals in the assessment area live in Oklahoma County, a low affordability ratio likely indicates that homeownership may be out of reach for many LMI residents in the area. The age of available affordable housing stock often compounds this issue, as older homes in the assessment area often require costly home improvements that further hinder LMI borrowers from homeownership according to community contacts. Housing demographics for the assessment area indicate that the average age of housing stock is 43 years, while the same figure for Oklahoma as a whole is 38 years, pointing to a need for affordable home improvement loans in the assessment area.

Similarly, rental costs in the assessment area are higher than statewide levels, even when accounting for income. These figures are driven by the housing cost burden in Oklahoma (45.9 percent) and Cleveland (45.7 percent) counties, with no other county in the assessment area having a housing cost burden over 36.2 percent. Lastly, assessment area demographics indicate that just 3.4 percent and 18.4 percent of all owner-occupied housing units in the assessment area are in low- and moderate-income census tracts, respectively.

## Industry and Employment Demographics

The economy of the Oklahoma City MSA is well diversified and supports several large employers, such as Chesapeake Energy and the University of Oklahoma, as well as a strong small business sector. Of the 618,123 paid employees in the assessment area, 24.0 percent are employed in government, 12.4 percent are employed in health care and social assistance, 10.7 percent in retail trade, and 10.4 percent in accommodation and food services. As previously noted, the energy sector plays a prominent role in the assessment area economy, as evidenced by the number of professional and technical services organizations operating in the assessment area. Though only representing 5.8 percent of paid employees, these organizations make up 13.9 percent of all business establishments in the assessment area, the largest of any sector. While the largest employers in the assessment area are large medical, educational, and energy institutions, Most of the businesses in the assessment area (91.4 percent) have annual revenues of $1 million or less, reflective of the assessment area's strong small business sector.

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Oklahoma.

| Unemployment Levels | | | |
|---|---|---|---|
| **Dataset** | **Time Period (Annual Average)** | | |
| | **2018** | **2019** | **YTD 2020** |
| Assessment Area | 3.2% | 3.0% | 6.9% |
| Oklahoma | 3.4% | 3.3% | 6.9% |

As shown above, unemployment levels in the assessment area were in line with statewide levels during the review period. Unemployment varied slightly between the counties in the assessment area, though not to a significant degree. Community contacts also described the impact of the pandemic on employment in 2020, noting that there were widespread temporary layoffs in certain industries such as manufacturing that increased unemployment levels in the assessment area. Additionally, community contacts noted that many small businesses in the assessment area were particularly impacted and were unable to retain some of their workforces.

**Community Contact Information**

Information from two community contact interviews was leveraged to gain a better understanding of the assessment area's economic conditions, credit needs, and community development opportunities. One of these individuals represents an affordable housing organization, while the second represents a small business development organization.

The assessment area economy is strong and has experienced continued growth over previous years leading up to the pandemic, according to both community contacts. The contacts indicated that the assessment area's economy has continued to diversify away from its historical dependency on the oil and gas sector, which has supported the economy's growth in recent years. Specifically, the warehousing, transportation, and health care sectors have experienced significant growth in the Oklahoma City area. While the local economy has experienced growth overall, the southern and eastern portions of Oklahoma City have higher concentrations of LMI residents and are in greater need of community and economic development initiatives. One contact went on to explain that revitalization efforts in the area have been concentrated in the eastern portion of Oklahoma City and in Cleveland County in particular. Both community contacts characterized banking services in the assessment area as widely available overall, though one contact noted that eastern Oklahoma City has far fewer financial institutions operating than other portions of the assessment area.

The housing contact pointed to home improvement and purchase loans as the greatest credit needs, particularly for LMI residents. The contact explained that new affordable housing development is sporadic and that many LMI residents struggle to obtain sufficient down payment funds to obtain a home loan. Similarly, many LMI residents are unable to afford costly home improvements to maintain the quality of existing affordable housing stock, which has increased the need for affordable home improvement loans in the assessment area. The contact indicated that financial institutions in the assessment area could help meet these needs through partnerships with local nonprofit and community development organizations, financial literacy training in schools, homeownership programs, and development of flexible loan products designed for LMI borrowers.

Additionally, the contact pointed to a high demand for small dollar consumer loans for LMI borrowers, as many residents have turned to alternative lending sources such as payday lenders due to difficulty obtaining these loans from traditional financial institutions.

The small business contact listed participation in micro loan funds and investments in enterprise and opportunity zones as ways for financial institutions to enhance community development efforts in the assessment area. The contact also encouraged development of more flexible small business loan products, such as those with incremental financing.

When describing the performance of financial institutions operating in the assessment area, one contact identified Arvest Bank as being particularly responsive to affordable housing needs in the Oklahoma City MSA.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE OKLAHOMA CITY MSA ASSESSMENT AREA

LENDING TEST

The bank's lending activity levels reflect adequate responsiveness to the credit needs of the Oklahoma City MSA assessment area. The geographic distribution of loans reflects adequate penetration throughout the assessment area, while the overall distribution of loans by borrower's income/revenue profile reflects adequate penetration among borrowers of different income levels and businesses and farms of different sizes. Lastly, the bank is a leader in making community development loans in the assessment area.

### Lending Activity

The following table displays the combined 2018 and 2019 lending volume by number and dollar amount in the assessment area.

| Summary of Lending Activity January 1, 2018 through December 31, 2019 | | | | |
|---|---|---|---|---|
| **Loan Type** | **#** | **%** | **$(000s)** | **%** |
| Home Improvement | 213 | 7.0% | 14,601 | 3.6% |
| Home Purchase | 944 | 31.0% | 193,015 | 47.0% |
| Multifamily Housing | 6 | 0.2% | 5,992 | 1.5% |
| Refinancing | 533 | 17.5% | 71,209 | 17.4% |
| Other Purpose LOC | 89 | 2.9% | 4,892 | 1.2% |
| Other Purpose Closed/Exempt | 62 | 2.0% | 4,053 | 1.0% |
| Purpose Not Applicable | 0 | 0.0% | 0 | 0.0% |
| **Total HMDA** | **1,847** | **60.7%** | **293,762** | **71.6%** |
| Small Business | 1,036 | 34.1% | 109,459 | 26.7% |
| Small Farm | 158 | 5.2% | 7,178 | 1.7% |
| **TOTAL LOANS** | **3,041** | **100.0%** | **410,399** | **100.0%** |

The bank originated 5.6 percent of its total HMDA and CRA loans in the Oklahoma City MSA assessment area in 2018 and 2019. By comparison, 6.9 percent of the bank's total deposits are held in the assessment area, and 8.3 percent of all bank branches are in the assessment area. While slightly below comparison data, the bank's lending activity nevertheless reflects adequate responsiveness to assessment area credit needs when considering its lending activity relative to other lenders in the assessment area. As previously noted, the bank ranks fourteenth out of 516 financial institutions with HMDA lending activity and ninth out of 139 institutions in CRA lending activity. Therefore, the bank's lending activity represents adequate responsiveness to the credit needs of the assessment area.

**Geographic Distribution of Loans**

The overall geographic distribution of loans in the assessment area is considered adequate based on all three products reviewed. As in other MSA assessment areas, the bank's HMDA lending performance carried the most weight toward the overall conclusion, followed by small business lending and, to a lesser extent, small farm lending.

*Home Mortgage Disclosure Act (HMDA) Lending*

The overall distribution of HMDA loans by geography income level is adequate. Greater emphasis is placed on the bank's lending in moderate-income census tracts considering housing demographic information that points to limited opportunities for making home loans in low-income census tracts; of all housing units in low-income census tracts, only 31.3 percent are owner occupied, which diminishes the opportunities for HMDA loans in these geographies.

In 2018, the bank made 0.7 percent of its HMDA loans in low-income census tracts, which is considered poor in comparison to aggregate lending levels (1.8 percent) and the demographic figure (3.4 percent). The bank's performance lending in low-income census tracts improved slightly in 2019 to 1.4 percent, however, which was in line with the aggregate lending level of 1.9 percent and while continuing to trail demographic (3.4 percent) is considered adequate.

The bank originated 12.1 percent of HMDA loans in moderate-income tracts in 2018 and 11.8 percent in 2019. This performance was comparable to peer institutions in the assessment area (14.5 percent in 2018 and 13.3 percent in 2019) but below the demographic figure (18.4 percent for both years), reflecting adequate performance for both years.

*Small Business Lending*

When considering performance in both 2018 and 2019, the geographic distribution of small business loans is considered good. The bank originated 4.7 percent of its small business loans in low-income census tracts in 2018, which aligned closely with the performance of peer institutions in the assessment area (4.5 percent) and the percent of assessment area businesses located in low-income census tracts (4.4 percent); this reflects adequate performance. The bank's performance in moderate-income census tracts (23.7 percent), however, exceeded the 19.6 percent of small business loans originated in those census tracts by peer lenders in the assessment area and was in line with the demographic figure (22.2 percent), reflecting good performance.

The bank's performance in 2019 was similar. Of the bank's small business loans made in the assessment area, 5.0 percent were made in low-income census tracts and 21.2 percent in moderate-income census tracts. These figures exceeded both the performance of peers in low-income census tracts (4.1 percent) and in moderate-income census tracts (18.4 percent). For both low- and moderate-income census tracts, bank lending was generally in line with demographic figures of 4.4 percent and 22.3 percent, respectively. Thus, performance in both low- and moderate-income census tracts in 2019 is considered good.

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*Small Farm Lending*

The geographic distribution of small farm loans is considered poor overall. Primary emphasis is placed on the bank's performance lending in moderate-income census tracts, as only 19 farming institutions, or 1.6 percent of all farms in the assessment area, are in low-income census tracts as of 2019. Despite the limited opportunities available to lend to farms in low-income census tracts, the bank's level of lending in 2018 (2.4 percent) and 2019 (1.3 percent) exceeded peer performance in both years (0.8 percent in 2018 and 0.1 percent in 2019), reflecting good performance in both years. On the other hand, the bank made 4.9 percent of its small farm loans in moderate-income census tracts in 2018 and 6.6 percent in 2019. This performance was below both the performance of peer institutions in the assessment area (9.7 percent in 2018 and 11.0 percent in 2019) and the percentage of assessment area farms located in moderate-income census tracts (10.9 percent in 2018 and 11.7 percent in 2019); this reflects poor performance in both 2018 and 2019. As greater emphasis is placed on lending performance in moderate-income census tracts, the overall geographic distribution of the bank's small farm loans in the assessment area is poor.

An analysis of the dispersion of all three loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2018, bank had loan activity in 82.1 percent of all assessment area census tracts and 70.4 percent of all LMI geographies. In 2019, the bank had lending activity in 78.2 percent of census tracts in the assessment area and 62.2 percent of LMI geographies in the assessment area. This dispersion supports the conclusion that the geographic distribution of loans is adequate overall.

## **Loan Distribution by Borrower's Profile**

The bank's borrower distribution of loans in the assessment area is adequate overall. Primary emphasis was placed on HMDA lending performance followed by small business lending and, to a lesser extent, small farm lending.

*Home Mortgage Disclosure Act (HMDA) Lending*

Overall, the distribution of HMDA loans by borrower's income level is adequate. In 2018, the bank originated 4.2 percent of its HMDA loans to low-income borrowers, which is considered poor in comparison to the aggregate lending level of 6.2 percent and the percentage of assessment area families who are low income (21.3 percent). Lending to moderate-income borrowers, however, is considered good. The bank's performance (19.8 percent) was higher than that of peer institutions in the assessment area (17.1 percent) and the demographic figure (17.5 percent).

In 2019, the percentage of the bank's HMDA loans originated to low-income borrowers (6.6 percent) was closely aligned with the aggregate lending level (6.3 percent) but below the demographic figure of 21.3 percent. However, a significant portion of this demographic is likely unable to qualify for a traditional mortgage loan, as evidenced by the overall assessment area poverty level of 11.2 percent. This performance is thus considered adequate when considering this context and the bank's performance relative to other lenders in the assessment area. Similarly, the bank's lending to moderate-income borrowers (16.8 percent) was in line with peer institutions in the assessment area (17.2 percent) and the demographic figure (17.5 percent), reflecting adequate performance.

*Small Business Lending*

The overall distribution of small business loans to businesses of different sizes is adequate. In 2018, 61.2 percent of the bank's small business loans were made to businesses with annual revenues of $1 million or less. While below the demographic figure of 91.0 percent, this performance was well above that of peer institutions in the assessment area (46.4 percent), reflecting good performance. The bank's performance in 2019 (58.4 percent) was slightly lower relative to aggregate lending levels (45.5 percent) and still below the 91.4 percent demographic figure, reflecting adequate performance. Overall, these lending levels reflect an adequate distribution of small business loans by business revenue profile.

*Small Farm Lending*

The bank's distribution of small farm loans by farm revenue profile is excellent in both 2018 and 2019. In both years, the percentage of the bank's small farm loans to farms with annual revenues of $1 million or less (95.1 percent in 2018 and 90.8 percent in 2019) was well above aggregate lending performance (77.7 percent in 2016 and 76.4 percent in 2019) and only slightly below the demographic figure of 97.9 percent. Across both years of data, 91.8 percent of the bank's small farm loans to businesses with annual revenues of $1 million or less were in amounts of $100,000 or less. This demonstrates the bank's willingness to meet the credit needs of small farms in the assessment area and further reflects excellent performance.

## **Community Development Lending Activity**

The bank is a leader in making community development loans in the Oklahoma City MSA assessment area. As shown in the table below, the bank made 28 community development loans totaling $101.3 million and 70 PPP loans totaling $45.4 million. The most impactful of these loans are discussed below the following table.

| Community Development Lending | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | Affordable Housing | | Community Services | | Revitalization/ Stabilization | | Economic Development | | Total | |
| | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) |
| CD Loans | 1 | 13,474 | 4 | 4,200 | 4 | 12475 | 19 | 71,194 | 28 | 101,343 |
| PPP Loans | - | - | - | - | - | - | 70 | 45,419 | 70 | 45,419 |

- The bank made one community development loan totaling $13.5 million, which financed the redevelopment of a 128-unit affordable multifamily housing complex. All tenants will be LMI, and the project qualified for financing assistance through LIHTCs. Additionally, the project is consistent with the Oklahoma City Urban Renewal Authority redevelopment agreement and thus helps to revitalize/stabilize an LMI area.

- One loan totaling $15.0 million qualified for a purpose of economic development by helping to create/retain LMI jobs for a small business. The loan financed the acquisition of a cancer treatment center that employs as many as 13 LMI individuals. This loan is considered responsive given the number of LMI jobs that are impacted.

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INVESTMENT TEST

In the Oklahoma City MSA assessment area, the bank provides an adequate level of community development investments and grants and is rarely in a leadership position. During the review period, the bank made total investments of $10.3 million through a combination of MBS and municipal bonds, as shown in the table below.

| Summary of Investments – Oklahoma City MSA | | | |
|---|---|---|---|
| Investment Type | Current Period | Prior Period, Still Outstanding | Total |
| MBS | $1.9 million | $5.4 million | $7.3 million |
| Municipal/private bonds | $3.0 million | - | $3.0 million |
| Donations | $49,135 | - | $49,135 |
| **TOTAL** | **$4.9 million** | **$5.4 million** | **$10.3 million** |

- The bank made one investment totaling $3.0 million in a municipal bond for Oklahoma City with a focus on civic projects directly or indirectly benefitting the downtown area, which has a majority of LMI census tracts. These enhancements included upgrades and maintenance for various roads, bridges, traffic control, parks, and recreation, as well as economic development incentives.

- The bank's investment activity also included 50 donations totaling $49,135. These donations benefitted a variety of community service organizations and school districts or other educational organizations throughout the assessment area. Of note, the bank made two contributions totaling $14,000 to a well-known national charity organization that distributes funds to various projects and organizations in the assessment area that primarily impact or benefit LMI individuals.

SERVICE TEST

Arvest Bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area, and the bank's record of opening and closing branches has not adversely affected the accessibility of those delivery systems. Business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI individuals or geographies. Lastly, the bank is a leader in providing community development services in the Oklahoma City MSA assessment area.

**Accessibility of Delivery Systems**

The bank operates 25, or 9.3 percent, of its 270 branches in the Oklahoma City MSA assessment area. The following table displays the location of the bank's branches and stand-alone ATMs by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|---|---|---|---|---|---|---|
| **Dataset** | **Geography Income Level** | | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | **Unknown** | |
| Branches | 0 | 7 | 7 | 5 | 1 | **20** |
| | 0.0% | 35.0% | 35.0% | 25.0% | 5.0% | **100%** |
| Stand-alone ATMs | 1 | 1 | 2 | 0 | 0 | **4** |
| | 25.0% | 25.0% | 50.0% | 0.0% | 0.0% | **100%** |
| Census Tracts | 8.0% | 29.2% | 37.5% | 22.9% | 2.5% | **100%** |
| Household Population | 5.7% | 24.9% | 41.2% | 27.9% | 0.3% | **100%** |

As shown above, the bank operates seven branches in moderate-income census tracts (35.0 percent of total bank branches in the assessment area) and none in low-income census tracts. Additionally, the bank operates four stand-alone ATMs in the assessment area, two of which are in LMI geographies and two of which are deposit accepting. While the bank does not operate any branches in low-income census tracts, nine of the bank's branches in the assessment area are in Oklahoma County, where a majority of the assessment area low-income census tracts are concentrated, and several of these branches are in proximity to low-income geographies. Overall, this delivery channel distribution is higher than the percentage of assessment area families who reside in LMI geographies (30.6 percent) and in line with the percentage of assessment area census tracts that are LMI (37.2 percent). Based on these factors, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area.

## Changes in Branch Locations

During the review period, the bank opened two branches in the assessment area: two in moderate-income census tracts and one in a middle-income census tract. The new branch in a moderate-income census tract is in the southern Oklahoma City metro area and borders several adjacent LMI geographies, while the newly opened middle-income branch likewise borders a moderate-income census tract. The bank also closed six branches in the assessment area during the review period: one in a moderate-income census tract, one in a middle-income census tract, one in a census track with an unknown income level, and three branches in upper-income census tracts. The closed branch location in a moderate-income census tract was outside of the urban core of Oklahoma City and does not impact a significant portion of the assessment area's LMI residents. Of the remaining five branch closures, one was in a middle-income census tract adjacent to several LMI geographies with no other Arvest branches in the nearby vicinity, thereby having an impact to accessibility for residents in that area. Overall, when considering both the bank's record of opening and closing branches in the assessment area, the accessibility of the banks' service delivery systems was not adversely affected.

## Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services are relatively consistent across the assessment area. Most of the bank's branches operate weekday lobby hours from 9:00 a.m. to 5:00 p.m., with many locations offering extended lobby hours on Fridays. In addition, 17 of the bank's branches operate Saturday lobby hours from 9:00 a.m. to 1:00 p.m. or 10:00 a.m. to 4:00 p.m., including all but two moderate-income branch locations. Drive-through facilities are operated at 19 of the branches in the assessment area, all of which offer extended weekday hours beyond standard lobby hours, as well as Saturday drive-through hours. Lastly, lenders are equally dispersed throughout the assessment

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area's branches. Therefore, business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals.

## **Community Development Services**

Arvest Bank is a leader in providing community development services in the assessment area. During the review period, 32 bank employees provided 1,078 hours of community development service activities to 30 different organizations. Bank employees conducted financial literacy events at schools and community service organizations, served as board members for organizations with a community development purpose, and provided financial/technical expertise to various nonprofit or community service organizations throughout the assessment area.

Noteworthy service activities are as follows.

- Two bank employees provided 31.5 hours of community development services to a workforce development organization that promotes workforce development initiatives and hosts financial literacy seminars in the assessment area. The bank's employees offered expertise in planning events for the organization and participated in financial literacy training events. These activities are responsive to a need identified by community contacts for financial literacy training for consumers.

- Three bank employees provided 46.5 hours of community development services to an organization that specializes in providing homebuyer education, credit counseling, and other mortgage-related educational services for LMI residents in the assessment area. These service activities are also responsive to the need identified by community contacts for greater financial literacy training for consumers in the assessment area.

- As part of a formal partnership with the organization, one bank employee led the annual fundraising campaign for the local chapter of a national community service organization. Over the course of the three-month fundraising period, the bank employee devoted 100 percent of her time to planning and coordinated the fundraising effort. Given the time commitment and the impact of the fundraising efforts, this service activity is considered particularly impactful. In addition to her contributions, two other bank employees provided 88 hours of community development service activities to the same organization as board members, providing expertise as members of the finance and planning committees.

Lastly, Arvest Bank opened and maintained 205 RPAs for LMI individuals in the assessment area during the review period.

# TULSA, OKLAHOMA MSA

*(Full-Scope Review)*

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE TULSA MSA ASSESSMENT AREA

### Bank Structure

The bank operates 23 branches in the Tulsa MSA assessment area, representing 9.5 percent of the bank's total branches. The locations of these branches by geography income level are displayed in the table below.

| Branch Location by Census Tract Income Level | | | | |
|---|---|---|---|---|
| Low-Income | Moderate-Income | Middle-Income | Upper-Income | Unknown-Income |
| 1 | 7 | 10 | 5 | 0 |

During the review period, the bank opened one branch and closed six branches. The bank also operates six stand-alone ATMs in the assessment area, four of which are deposit accepting and one of which is in a moderate-income census tract. The bank's service delivery systems in the assessment area are primarily concentrated in the city of Tulsa and in Creek, Okmulgee, Wagoner, and Tulsa counties. The bank does not operate any branches in the northern portion of the assessment area, which includes Pawnee and Osage counties and the northern portion of Rogers County. While the bank's alternative service delivery systems, such as online and mobile banking, offer some access to the bank's services without a physical branch presence, the bank may have some difficulty in fully serving this portion of the assessment area. However, as most of the assessment area's population is also concentrated in the area where the bank's branches are located, the bank is well positioned to deliver financial services to the majority of the assessment area overall.

### General Demographics

The assessment area comprises the entirety of the Tulsa MSA, including Creek, Okmulgee, Osage, Pawnee, Rogers, Tulsa, and Wagoner counties. Most of the assessment area's 962,676 residents live in Tulsa County (633,335), while the other counties in the assessment area range in population from 16,499 to 89,190. The assessment area also includes an American Indian reservation located in Osage County.

The assessment area hosts many financial institutions, with 59 FDIC-insured depository institutions operating 273 branches throughout the assessment area. Arvest Bank ranks second out of these institutions, with 6.9 percent of the total deposit market share, and first in terms of total branches in the assessment area. Deposits held in the Tulsa MSA represent 11.4 percent of the bank's total deposits. While 59 financial institutions operate a branch location in the assessment area, far more reported lending activity within the Tulsa MSA. An analysis of 2019 HMDA and CRA lending activity shows that 435 entities reported HMDA lending activity and 127 reported CRA lending activity in the assessment area. Arvest Bank ranked second out of these institutions with HMDA lending activity and ninth out of those with CRA lending activity.

The assessment area is diverse, and credit needs are varied. These needs include a standard blend of consumer, commercial, and agricultural loan products, though community contacts also pointed to a particular need for investment in affordable housing initiatives, home improvement loans, and small dollar business loans. Community contacts went on to note that the assessment area has great need and opportunity for community development initiatives, with a particular emphasis on financial literacy training for both consumers and businesses.

## Income and Wealth Demographics

The following table displays the distribution of assessment area census tracts by income level alongside the family population that resides in those census tracts.

| Assessment Area Demographics by Geography Income Level | | | | |
|---|---|---|---|---|
| | **Census Tracts** | | **Family Population** | |
| Low | 17 | 6.3% | 10,765 | 4.3% |
| Moderate | 76 | 27.9% | 57,255 | 23.1% |
| Middle | 111 | 40.8% | 106,931 | 43.1% |
| Upper | 68 | 25.0% | 73,083 | 29.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% |
| **TOTAL** | **272** | **100%** | **248,034** | **100%** |

As shown above, 34.2 percent of census tracts in the assessment area are designated as LMI, and 27.4 percent of families in the assessment area reside in LMI census tracts. Of the 93 LMI census tracts in the assessment area, 74 (79.6 percent) are in Tulsa County, which contains the city of Tulsa.

According to 2015 ACS data, the median family income for the assessment area ($61,145) was higher than the median family income for the state of Oklahoma ($58,029). More recently, the FFIEC estimates the median family income for the Tulsa MSA to be $65,800 in 2018 and $68,800 in 2019, indicating an overall increasing trend in income. The following table displays the income levels of families in the assessment area compared to the state of Oklahoma.

| Family Population by Income Level | | | | |
|---|---|---|---|---|
| | **Assessment Area** | | **Oklahoma** | |
| Low | 53,262 | 21.5% | 208,222 | 21.6% |
| Moderate | 43,878 | 17.7% | 170,327 | 17.6% |
| Middle | 50,431 | 20.3% | 195,424 | 20.2% |
| Upper | 100,463 | 40.5% | 392,036 | 40.6% |
| **TOTAL** | **248,034** | **100%** | **966,009** | **100%** |

Income characteristics for families in the assessment area are similar to the state of Oklahoma as a whole, as shown in the table above. When compared with the data in the previous table in this section, a higher percentage of families in the assessment area are LMI (39.2 percent) than reside in LMI geographies (27.4 percent). While the percentage of families in the assessment area that are LMI is in line with the state of Oklahoma, poverty levels in the assessment area (11.4 percent)

are lower than statewide figures (12.4 percent). These factors suggest that the assessment area is more affluent than the state of Oklahoma overall.

## Housing Demographics

The following table displays housing demographics for the assessment area and Oklahoma as a whole.

| Housing Demographics | | | | |
|---|---|---|---|---|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) | Housing Cost Burden |
| Assessment Area | $131,393 | 38.1% | $759 | 41.4% |
| Oklahoma | $117,900 | 39.8% | $727 | 41.1% |

As shown in the table above, homeownership in the assessment area is slightly less affordable than statewide levels based on a lower affordability ratio. This is driven by housing costs in Tulsa County (35.9 percent affordability ratio), which are significantly higher than in any other county in the assessment area. As much of the LMI population and geographies in the assessment area are in Tulsa County, homeownership is likely out of reach for many LMI residents there relative to other portions of the assessment area. Community contacts supported this conclusion, pointing to a shortfall of quality affordable housing stock in LMI areas due to a lack of new housing development and an aging housing stock. While the median age of housing stock for the assessment area overall is 44 years, the average age of housing stock in low- and moderate-income census tracts is 61 years and 52 years, respectively. Without newer affordable housing development, much of the existing affordable housing stock in LMI geographies needs significant repairs, which many LMI residents are unable to afford. Lastly, rental costs for the assessment area and Oklahoma as a whole are closely aligned though community contacts noted that rental costs in the assessment area have increased in recent years.

## Industry and Employment Demographics

The assessment area economy is large and diverse and has historically been buoyed by a strong oil and gas sector. County business patterns data indicate that there are 434,613 paid employees in the assessment area, with the largest job sectors in terms of paid employees being health care and social assistance (13.5 percent), government (12.6 percent), and manufacturing (12.5 percent). While larger oil and gas and manufacturing companies play a large role in the local economy, the assessment area also includes a strong small business sector, with 90.9 percent of businesses reporting annual revenues of $1 million or less.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Oklahoma.

| Unemployment Levels | | | |
|---|---|---|---|
| Dataset | Time Period (Annual Average) | | |
| | 2018 | 2019 | YTD 2020 |
| Assessment Area | 3.5% | 3.3% | 7.2% |
| Oklahoma | 3.4% | 3.3% | 6.9% |

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As shown in the preceding table, unemployment levels in the assessment area were generally higher than statewide levels during the review period. Additionally, the gap between the unemployment levels in the assessment area and state of Oklahoma widened in 2020, indicating that the pandemic likely impacted the assessment area to a greater degree than the rest of the state.

## **Community Contact Information**

Two community contact interviews were conducted with individuals to obtain information regarding the economic and demographic conditions, as well as credit and community development needs in the assessment area. One of these individuals represents an affordable housing organization, while the second contact represents an economic development organization in the assessment area.

Both community contacts described the overall economy of the Tulsa MSA as growing. The contacts pointed to ample funding for small businesses as helping to diversify the area's economy away from its historical dependency on the energy sector and drive new growth in the assessment area. This growth has magnified the need for new housing development for the rising population, as well as increased workforce development programs and, critically, transportation infrastructure. According to the contacts, the pandemic has hampered economic growth to some degree, though not as harshly as in other areas of the state. Additionally, both contacts noted that while the economy has grown overall in recent years, concentrated areas of LMI residents remain in the northern, midtown, and downtown Tulsa portions of the assessment area. Both contacts described the banking market as competitive but indicated that some portions of the assessment area lack broad access to banking services. Both community contacts pointed to the need for financial literacy training for businesses and consumers to enhance access and utilization of banking services in the assessment area, with one contact also pointing to the need for low-cost deposit accounts, individual development accounts, and small dollar consumer loans with minimal fees for consumers in the assessment area.

According to the housing contact, home improvement loans represent the greatest need in the assessment area. The contact described that there is little development of new affordable housing stock, while existing housing stock is aging and in need of expensive repairs that many LMI residents struggle to afford. Moreover, home and rental prices have increased in recent years, which has increased further the housing cost burden on many LMI residents. Other credit barriers that many LMI residents face include high debt-to-income ratios and poor credit, thus increasing the need for financial literacy training for consumers to assist with repairing or building credit histories. Lastly, the contact identified several nonprofit or community development organizations in the assessment area that local financial institutions could partner with to address housing needs and enhance community development efforts.

The economic development contact reiterated the continued diversification and growth of the Tulsa MSA's economy, in particular along the Interstate 71 corridor and downtown Tulsa area. The contact went on to identify small dollar business loans as the greatest need in the assessment area, particularly those in amounts of $100,000 or less, and pointed to partnerships with local community development organizations or participation in micro loan funds as potential opportunities for local financial institutions to enhance community development efforts.

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## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TULSA MSA ASSESSMENT AREA

LENDING TEST

Lending activity levels reflect excellent responsiveness to credit needs in the assessment area. The bank's overall geographic distribution of loans reflects adequate penetration throughout the assessment area. Furthermore, the overall distribution of loans by borrower's income/revenue profile reflects good penetration among borrowers of different income levels and businesses and farms of different revenue sizes. Lastly, the bank is a leader in providing community development loans in the Tulsa MSA.

## Lending Activity

The following table displays the combined 2018 and 2019 lending volume by number and dollar amount in the assessment area.

| Summary of Lending Activity January 1, 2018 through December 31, 2019 | | | | |
|---|---|---|---|---|
| **Loan Type** | **#** | **%** | **$(000s)** | **%** |
| Home Improvement | 388 | 6.9% | 24,615 | 3.0% |
| Home Purchase | 1,950 | 34.6% | 361,433 | 44.7% |
| Multifamily Housing | 12 | 0.2% | 25,118 | 3.1% |
| Refinancing | 1,124 | 20.0% | 172,862 | 21.4% |
| Other Purpose LOC | 159 | 2.8% | 10,237 | 1.3% |
| Other Purpose Closed/Exempt | 81 | 1.4% | 8,170 | 1.0% |
| Purpose Not Applicable | 3 | 0.1% | 472 | 0.1% |
| **Total HMDA** | **3,717** | **66.0%** | **602,907** | **74.6%** |
| Small Business | 1,711 | 30.4% | 188,627 | 23.3% |
| Small Farm | 201 | 3.6% | 16,571 | 2.1% |
| **TOTAL LOANS** | **5,629** | **100.0%** | **808,105** | **100.0%** |

The bank's combined HMDA and CRA lending activity in the Tulsa MSA represents 10.3 percent of its total loan activity across all assessment areas. These lending levels align with the percentage of total bank branches in the assessment area (9.5 percent) and the percentage of total bank deposits held in the assessment area (11.4 percent). Additional consideration was given to competitive factors and the bank's overall role in meeting the HMDA and CRA credit needs of the assessment area. As previously mentioned, Arvest Bank ranks second out of 435 lenders with HMDA lending activity in the assessment area and ninth out of 127 with CRA lending activity. Of note, the only lender with more HMDA lending activity than Arvest Bank in the assessment area has nearly five times the deposit market share, and four of the institutions with more CRA lending activity only offer online small business loans and do not operate any branches in the assessment area.

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These factors demonstrate that the bank plays an important role in meeting the credit needs of the assessment area despite significant competition. Therefore, the bank's lending activity in the assessment area is considered excellent.

## Geographic Distribution of Loans

The overall geographic distribution of loans in the Tulsa MSA is adequate, with HMDA lending receiving primary consideration toward the overall conclusion.

*Home Mortgage Disclosure Act (HMDA) Lending*

The bank's HMDA lending reflects a good penetration of geographies of different income levels overall. The bank originated 1.5 percent and 1.0 percent of its HMDA loans in low-income census tracts in 2018 and 2019, respectively. In both years, this performance was in line with peer lenders in the assessment area (1.0 percent in 2018 and 0.8 percent in 2019) and only slightly below the demographic figure of 2.7 percent. This reflects adequate performance lending in low-income census tracts in both 2018 and 2019.

The bank originated 16.2 percent of its HMDA loans in moderate-income census tracts in 2018, exceeding aggregate lending levels (14.7 percent) but falling short of the demographic figure (19.4 percent). Similarly, the bank's performance lending in moderate-income census tracts in 2019 (16.1 percent) was higher than peer institutions in the assessment area (14.4 percent) but below the demographic figure (19.4 percent). Given the bank's performance relative to other lenders in the assessment area, this reflects good performance across both years of data. The bank's distribution of loans by loan type lends further support to the conclusion that the geographic distribution of HMDA loans is good overall. As noted by community contacts, affordable purchase and home improvement loans are in high demand in LMI geographies in the assessment area. As a share of total home purchase loans made in all census tracts, the percentage of the bank's home purchase loans made in LMI census tracts (19.0 percent in 2018 and 18.3 percent in 2019) exceeded peer lending levels (15.1 percent in 2018 and 15.5 percent in 2019), demonstrating its responsiveness to this credit need.

*Small Business Lending*

The geographic distribution of small business loans is adequate overall. In 2018, the bank originated 2.8 percent of its small business loans in low-income census tracts, which was closely aligned with the performance of peer institutions in the assessment area (2.6 percent) and the demographic figure (3.1 percent), reflecting adequate performance. The bank's lending in moderate-income census tracts (19.7 percent) is also in line with peer performance (20.3 percent) but slightly below the percentage of assessment area businesses located in moderate-income census tracts (22.7 percent). This also reflects adequate performance.

Small business lending in low-income census tracts improved in 2019 to 3.9 percent, which exceeded the aggregate lending level (2.5 percent) and was slightly higher than the demographic figure (3.1 percent), reflecting good performance. The bank's lending in moderate-income census tracts in 2019 is also considered good, as the bank's performance increased to 21.7 percent, exceeding peer performance levels (19.8 percent) and aligning closely with the demographic figure (22.6 percent).

*Small Farm Lending*

Overall, the geographic distribution of small farm loans is adequate. According to assessment area demographics, there are only three farms operating within low-income census tracts in the assessment area as of 2019. As such, opportunities for lending in these geographies are extremely limited, and greater emphasis is placed on the bank's performance lending to farms in moderate-income census tracts. While the bank made no small farm loans in low-income census tracts in 2018 or 2019, this is considered adequate considering the limited opportunities available for lending to farms in low-income census tracts.

Of the bank's total small farm loans in 2018, 10.0 percent were made in moderate-income census tracts. This performance was higher than the aggregate lending level in moderate-income census tracts (8.7 percent) and slightly below the demographic figure of 12.0 percent, reflecting good performance. In 2019, the bank's performance (9.9 percent) and the aggregate lending level (10.5 percent) in moderate-income census tracts were closely aligned and were slightly below the demographic (12.1 percent), reflecting adequate performance.

## **Loan Distribution by Borrower's Profile**

Based on all three loan products reviewed, the bank's distribution of loans by borrower's income/revenue profile in the Tulsa MSA is considered good. Primary consideration was given to HMDA lending performance when determining the overall conclusion.

*Home Mortgage Disclosure Act (HMDA) Lending*

The bank's record of making HMDA loans to borrowers of different income levels is considered good overall. The bank originated 8.9 percent of its total HMDA loans to low-income borrowers in 2018. This outperformed peer lenders in the assessment area (6.2 percent) but was below the percentage of assessment area families who are low income (21.5 percent). Loans to moderate-income borrowers represented 18.7 percent of the bank's total HMDA lending in the assessment area in 2018, which was slightly higher than both the aggregate lending level (17.1 percent) and the demographic figure (17.7 percent) and is also considered good.

In 2019, the bank made 7.7 percent of its HMDA loans to low-income borrowers and 18.5 percent to moderate-income borrowers. The bank's performance to low-income borrowers was similar to peer performance (6.7 percent) but trailed the demographic figure (21.5 percent), while performance to moderate-income borrowers was similar to peer performance and the demographic figure (17.7 percent). When considering additional performance context regarding the need for affordable home purchase loans identified by community contacts, however, the bank's distribution of HMDA loans by product type compares more favorably to peers. In 2019, the bank made a much higher percentage of its home purchase loans to LMI borrowers (36.7 percent) than did peer institutions (26.7 percent), demonstrating the bank's responsiveness to the credit needs of LMI borrowers in the assessment area. Given this context, the distribution of the bank's HMDA loans to LMI borrowers in 2019 is considered good for both income categories.

*Small Business Lending*

The distribution of small business loans by business revenue profile is adequate overall. The percentage of the bank's small business loans to businesses with annual revenues of $1 million or less in 2018 (53.2 percent) and 2019 (53.0 percent) was higher than aggregate lending performance (42.4 percent in 2018 and 45.4 percent in 2019) but well below the demographic estimate of assessment area businesses with annual revenues of $1 million or less (90.6 percent in 2018 and 90.9 percent in 2019). Therefore, the bank's performance is considered adequate for both years of data reviewed. Of note, over the two-year period, 82.8 percent of the bank's small business loans to businesses with annual revenues of $1 million or less were in amounts of $100,000 or less, which are typically considered more responsive to the needs of small businesses. Small dollar commercial loans were noted as the greatest need for businesses in the assessment area by community contacts, and the bank's distribution of small business loans by loan amount further demonstrates the bank's willingness to make credit available to small businesses.

*Small Farm Lending*

The borrower distribution of small farm loans is good overall. The bank originated 92.2 percent of its small farm loans to farms with annual revenues of $1 million or less in 2018. This performance was well above that of peer institutions in the assessment area (68.5 percent) and only slightly below the demographic figure of 98.4 percent, reflecting good performance. Similarly, the bank's performance in 2019 (88.3 percent) exceeded aggregate lending levels (77.4 percent) by a wide margin while still slightly trailing the demographic (98.6 percent) and is also considered good. Moreover, 75.1 percent of the bank's small farm loans to farms with annual revenues of $1 million or less were in amounts of $100,000 or less, which are typically more responsive to the needs of small farms.

## Community Development Lending Activity

The bank is a leader in making community development loans in the Tulsa MSA assessment area. As shown in the table below, the bank made 26 community development loans totaling $92.3 million and 83 PPP loans totaling $71.1 million. The most impactful of these loans are discussed below the following table.

| Community Development Lending | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | Affordable Housing | | Community Services | | Revitalization/ Stabilization | | Economic Development | | Total | |
| | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) |
| CD Loans | 4 | 20,858 | 3 | 435 | 2 | 6,103 | 17 | 64,892 | 26 | 92,289 |
| PPP Loans | - | - | - | - | - | - | 83 | 71,059 | 83 | 71,059 |

- The bank originated four community development loans totaling $20.9 million that supported affordable housing development in the assessment area. These loans provided financing to three different multifamily housing units with below market-value rental rates that are primarily occupied by LMI individuals. Housing demographics for the assessment area indicate that the housing cost burden in Tulsa County is 43.2 percent, the highest of

any county in the assessment area. These loans are responsive to the need for affordable rental housing in the assessment area.

- Two loans totaling $18.5 million were made to help finance the construction of a mixed use residential and retail space in the downtown Tulsa area. These loans qualified for a purpose of economic development by supporting permanent LMI job creation for up to 25 individuals for a small business and are considered impactful given the overall number of jobs created.

INVESTMENT TEST

Arvest Bank makes a significant level of community development investments and grants in the Tulsa MSA and is occasionally in a leadership position. During the review period, the bank made $8.4 million in qualified community development investments, all of which were in MBS supporting affordable housing loans for LMI individuals in the assessment area. Of this total, $5.5 million were made in the current review period, while the bank also received credit for $2.9 million in prior period MBS investments with outstanding balances. These MBS investments offer permanent financing for home loans to LMI individuals, which is a need in the assessment area as noted by community contacts. In addition to this investment activity, the bank also made 63 donations totaling $212,640 in support of various community development initiatives. These donations supported community service and outreach organizations, food pantries, homeless shelters, and schools with large LMI populations throughout the assessment area. Of note, six of these donations totaling $105,500 supported a local community service organization that collects funds and distributes them to various educational, health, and economic development-related initiatives throughout the assessment area.

SERVICE TEST

The bank's service delivery systems are accessible to individuals and geographies of different income levels in the Tulsa MSA, and the bank's record of opening and closing branches has generally not adversely affected the accessibility of those service delivery systems. Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Lastly, the bank is a leader in providing community development services in the assessment area.

**Accessibility of Delivery Systems**

The bank operates 23, or 9.5 percent, of its 241 branches in the Tulsa MSA assessment area. The following table displays the location of the bank's branches and stand-alone ATMs by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|---|---|---|---|---|---|---|
| **Dataset** | **Geography Income Level** | | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | **Unknown** | |
| Branches | 1 | 7 | 10 | 5 | 0 | **23** |
| | 4.3% | 30.4% | 43.5% | 21.7% | 0.0% | **100%** |
| Stand-Alone ATMs | 0 | 1 | 5 | 0 | 0 | **6** |
| | 0.0% | 16.7% | 83.3% | 0.0% | 0.0% | **100%** |
| Census Tracts | 6.3% | 27.9% | 40.8% | 25.0% | 0.0% | **100%** |
| Household Population | 5.1% | 25.5% | 42.7% | 26.7% | 0.0% | **100%** |

As shown above, the bank's branches in LMI census tracts represent 34.8 percent of the bank's total branches in the assessment area. This aligns with the combined percentage of assessment area census tracts that are LMI (34.2 percent) and exceeds the household population in LMI census tracts (30.6 percent). In addition, the bank operates six stand-alone ATMs throughout the assessment area, four of which are deposit-accepting, and three LPO locations, one of which is in a moderate-income census tract, which further increases the accessibility of some of its banking services. Therefore, based on the distribution of these services as well as the availability of alternative delivery systems such as online and mobile banking, the bank's service delivery systems are accessible to geographies and individuals of different income levels in the Tulsa MSA, particularly LMI geographies and individuals.

## Changes in Branch Locations

During the review period, the bank opened one branch in an upper-income census tract and closed six branches, three of which were in moderate-income census tracts and three of which were middle-income census tracts. Two of the closed branches in moderate-income census tracts were located within 2.0 miles of the nearest Arvest Bank branch, resulting in a minimal impact to accessibility. The remaining closed branch in a moderate-income census tract was in the city of Sand Springs just west of Tulsa, an area that includes three LMI census tracts and no other Arvest Bank branches. While Arvest bank operates branch locations a short distance away in the western portion of Tulsa, the bank's service delivery systems are generally less accessible to residents of this area following the branch closure. Given that only one of the bank's branch closures had a significant impact on LMI geographies in the assessment area, the bank's overall record of opening and closing branches in the Tulsa MSA has generally not adversely affected the accessibility of its service delivery systems.

## Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services offered are consistent throughout the assessment area. The bank's branches in the Tulsa MSA operate weekday lobby hours from 8:00 a.m. to 6:00 p.m. All but one of the 23 branches in the assessment area operate Saturday lobby hours, including all branches in LMI geographies. Drive-through facilities are operated at 21 out of 23 branch locations, all of which also operate Saturday drive-through hours from 9:00 a.m. to 1:00 p.m. Lastly, lenders are equally dispersed throughout the assessment area's branches, including those in LMI geographies. As such, business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals.

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**Community Development Services**

The bank is a leader in providing community development services in the assessment area. During the review period, 66 bank employees provided 881 hours of community development service activities to 40 different organizations. The bulk of these efforts consisted of financial literacy training at schools or through various community organizations in the assessment area. Other bank employees provided financial or technical expertise as board members for various affordable housing, health, or community service organizations. As noted by community contacts, the assessment area has great need of financial literacy training; given this context, the extent of its financial literacy efforts, and the number of organizations and individuals reached, these activities are considered particularly impactful. Bank employees provided 562 hours of financial literacy training to local schools, nonprofits, and community organizations in the Tulsa MSA. Financial literacy courses provided in schools focused on the basics of banking, while those for other organizations included homebuyer education, credit building, and budgeting. Of note, nine bank employees taught financial literacy events through a local nonprofit organization specializing in offering financial literacy events. Through this organization, bank employees taught financial literacy courses for both consumers and businesses, including some courses offered in Spanish. Lastly, Arvest Bank opened and maintained nine IDAs and 295 RPAs for LMI individuals in the assessment area during the review period.

# LAWTON, OKLAHOMA MSA

*(Limited-Scope Review)*

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LAWTON MSA ASSESSMENT AREA

This assessment area includes the entirety of Comanche and Cotton counties, both counties that make up the full Lawton MSA. The bank operates five branches in this assessment area, one of which was relocated during the review period. Additionally, the bank closed one branch during the review period and did not open any branches. The tables below detail key demographics relating to this assessment area.

| Assessment Area Demographics by Population Income Level | | | | | |
|---|---|---|---|---|---|
| **Demographic Type** | **Population Income Level** | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | |
| Family Population | 6,772 | 5,437 | 5,604 | 12,204 | **30,017** |
| | 22.6% | 18.1% | 18.7% | 40.7% | **100%** |
| Household Population | 10,856 | 7,462 | 8,141 | 19,210 | **45,669** |
| | 23.8% | 16.3% | 17.8% | 42.1% | **100%** |

| Assessment Area Demographics by Geography Income Level | | | | | | |
|---|---|---|---|---|---|---|
| **Dataset** | **Geography Income Level** | | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | **Unknown-** | |
| Census Tracts | 3 | 10 | 13 | 7 | 1 | **34** |
| | 8.8% | 29.4% | 38.2% | 20.6% | 2.9% | **100%** |
| Family Population | 1,688 | 5.854 | 12,949 | 9,518 | 8 | **30,017** |
| | 5.6% | 19.5% | 43.1% | 31.7% | 0.0% | **100%** |
| Household Population | 2,931 | 10,423 | 19,093 | 13,214 | 8 | **45,669** |
| | 6.4% | 22.8% | 41.8% | 28.9% | 0.0% | **100%** |
| Business Institutions | 225 | 1,347 | 1,357 | 976 | 5 | **3,910** |
| | 5.8% | 34.5% | 34.7% | 25.0% | 0.1% | **100%** |

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## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LAWTON MSA ASSESSMENT AREA

LENDING TEST

The bank's Lending Test performance in this assessment area is consistent with the Lending Test performance in the full-scope MSA assessment areas in Oklahoma, as detailed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in *Appendix C*.

| Lending Test Criteria | Performance |
|---|---|
| Lending Activity | Consistent |
| Geographic Distribution of Loans | Exceeds |
| Distribution of Loans by Borrower's Profile | Consistent |
| Community Development Lending Activity | Consistent |
| **OVERALL** | **Consistent** |

During the review period, the bank made seven community development loans totaling $23.2 million in the Lawton MSA. Additional consideration was given to the level of community development PPP lending in the assessment area, which included an additional 24 loans totaling $9.2 million. One noteworthy community development loan totaling $10.3 million qualified for a purpose of economic development. This loan funded the purchase and expansion of a manufacturing facility, retaining existing LMI jobs, and creating new, permanent LMI jobs for workers at the facility.

INVESTMENT TEST

The bank's Investment Test performance in the Tulsa MSA assessment area is below the investment performance in the full-scope MSA assessment areas. The bank's qualified investments included $518,003 in MBS supporting affordable housing loans for LMI individuals in the assessment area. Of this total, $226,000 was made in the current review period, while the bank also received credit for $292,003 in MBS investments made in a prior review period but still outstanding. Lastly, the bank made 40 qualified donations totaling $18,762.

SERVICE TEST

Performance under the Service Test in the Lawton MSA assessment area is consistent with the bank's performance in the full-scope MSA assessment areas, as shown in the table that follows.

| Service Test Criteria | Performance |
|---|---|
| Accessibility of Delivery Systems | Consistent |
| Changes in Branch Locations | Consistent |
| Reasonableness of Business Hours and Services | Consistent |
| Community Development Services | Consistent |
| **OVERALL** | **Consistent** |

During the review period, 11 bank employees provided 161 hours of community development service activities to eight different organizations. Bank employees served as board members for several community service and nonprofit organizations throughout the assessment area. Additionally, Arvest Bank opened and maintained 68 RPA accounts for LMI individuals in the assessment area during the review period.

# NONMSA OKLAHOMA
*(Full-Scope Review)*

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMSA OKLAHOMA

### Bank Structure

The bank operates 32 branches, or 13.3 percent of its total branches, in nonMSA Oklahoma. The locations of these branches by geography income level are displayed in the table below.

| Branch Location by Census Tract Income Level | | | |
|---|---|---|---|
| **Low-Income** | **Moderate-Income** | **Middle-Income** | **Upper-Income** |
| 3 | 8 | 18 | 3 |

The bank closed five branches during the review period and did not open any new branches. In addition, the bank operates 20 stand-alone ATMs throughout the assessment area, seven of which are deposit accepting and four of which are in moderate-income census tracts. Based on this branch and ATM network and other service delivery systems, such as online and mobile banking, the bank is well positioned to deliver financial services to substantially all of the assessment area.

### General Demographics

The nonMSA Oklahoma assessment area is composed of three separate, noncontiguous assessment areas. The first includes 22 contiguous counties in eastern Oklahoma, while the remaining two consist of noncontiguous Jackson and Payne counties further west. Together, these assessment areas comprise the nonMSA portions of the state surrounding the Tulsa, Oklahoma City, and Lawton MSAs in which the bank also operates. Given their similar demographic characteristics, economic conditions, and credit needs, these three assessment areas are combined for analysis as a single nonMSA assessment area. The combined assessment area includes 24 counties, which are listed in the table below.

| Counties Making up the NonMSA Oklahoma Assessment Area | | | |
|---|---|---|---|
| Adair | Hughes | McIntosh | Pittsburgh |
| Cherokee | Jackson | Muskogee | Pontotoc |
| Craig | Latimer | Nowata | Pottawatomie |
| Delaware | Le Flore | Okfuskee | Seminole |
| Garvin | Mayes | Ottawa | Stephens |
| Haskell | McCurtain | Payne | Washington |

The assessment area is large, mostly rural, and covers a broad portion of the state surrounding the more metropolitan areas of Tulsa, Oklahoma City, and Lawton. The counties in the assessment area range in population from 10,555 (Nowata County) to 79,423 (Payne County), adding up to a total assessment area population of 842,469. While agricultural production is prevalent throughout the assessment area, other specialized industries are heavily concentrated in certain portions of the assessment area. For instance, Payne County includes Oklahoma State University, a large public university with a total enrollment of approximately 25,000, while community contacts also noted that Mayes County hosts an industrial park with several large employers. The assessment area is also diverse demographically, with a large American Indian population comprising 13.2 percent

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of the total assessment area population. Reflective of its diverse population and economy, credit needs in the assessment area are varied and include an array of consumer and commercial loan and deposit products. Other needs identified by community contacts include small dollar consumer loans, workforce development programs, and affordable rental housing development.

Competition among financial institutions is relatively high in the assessment area, with 87 FDIC-insured depository institutions operating 297 branches. In addition, the assessment area also hosts numerous tribal governments, many of which offer credit products to their members, which further increases competition for financial services in the assessment area. Arvest Bank is the market leader in the assessment area in terms of both deposit market share (12.0 percent of total assessment area deposits) and number of branches. Deposits held in nonMSA Oklahoma represent 10.0 percent of the bank's total deposits. Competition for loans is similarly high in the assessment area. An analysis of 2019 lending activity reveals that 466 entities reported HMDA lending activity and 104 entities reported CRA lending activity in the assessment area. Of these, Arvest Bank ranked first in total HMDA lending activity and second in CRA lending activity.

## Income and Wealth Demographics

The following table displays the distribution of census tracts by income level and the family population within those census tracts.

| Assessment Area Demographics by Geography Income Level | | | | |
|---|---|---|---|---|
| | Census Tracts | | Family Population | |
| Low | 6 | 2.8% | 2,307 | 1.1% |
| Moderate | 45 | 21.0% | 37,705 | 17.7% |
| Middle | 130 | 60.8% | 134,587 | 63.1% |
| Upper | 33 | 15.4% | 38,550 | 18.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% |
| **TOTAL** | **214** | **100%** | **213,149** | **100%** |

As shown above, the assessment area includes 51 LMI census tracts in total, representing 23.8 percent of all census tracts. Meanwhile, 18.8 percent of families in the assessment area reside in these LMI census tracts. These LMI census tracts are distributed relatively equally throughout the assessment area and are not concentrated in any particular county or portion of the assessment area. Most of the assessment area census tracts are middle income, with many of these being designated as distressed, underserved, or both during the review period, as detailed below.

- There are 58 census tracts designated as distressed due to poverty in Adair, Cherokee, Haskell, Hughes, Latimer, Le Flore, McCurtain, McIntosh, Muskogee, Okfuskee, Payne, and Seminole counties.

- Nine census tracts are designated as distressed due to unemployment in Haskell, Latimer, and McIntosh counties.

- Six census tracts are designated as underserved due to their remote rural location in McCurtain County.

Based on 2015 ACS data, the median family income for the assessment area was $50,300, which was lower than the median family income for all of nonMSA Oklahoma ($51,491). More recently, the FFIEC estimates the median family income for nonMSA Oklahoma to be $54,500 in 2018 and $55,800 in 2019. The following table displays the distribution of assessment area families by income level compared to nonMSA Oklahoma as a whole.

| Family Population by Income Level | | | | |
|---|---|---|---|---|
| | Assessment Area | | NonMSA Oklahoma | |
| Low | 48,340 | 22.7% | 72,915 | 21.7% |
| Moderate | 37,933 | 17.8% | 59,056 | 17.6% |
| Middle | 43,224 | 20.3% | 67,112 | 20.0% |
| Upper | 83,652 | 39.3% | 137,073 | 40.8% |
| **TOTAL** | **213,149** | **100%** | **336,156** | **100%** |

When compared with the data in the first table in this section, a significantly higher percentage of assessment area families are LMI (40.5 percent) than reside in LMI geographies (18.8 percent). This percentage is slightly higher than the LMI family percentage for nonMSA Oklahoma as a whole (39.3 percent). Moreover, the percentage of assessment area families below the poverty level (15.2 percent) also exceeds the level for nonMSA Oklahoma overall (14.2 percent). Given this data and the previously discussed income figures, the assessment area is slightly less affluent than nonMSA Oklahoma as a whole.

## Housing Demographics

The following table displays housing demographics for the assessment area and nonMSA Oklahoma as a whole.

| Housing Demographics | | | | |
|---|---|---|---|---|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) | Housing Cost Burden |
| Assessment Area | $94,874 | 42.2% | $638 | 40.4% |
| NonMSA Oklahoma | $91,490 | 44.0% | $634 | 37.7% |

Based on the data in the table above, median housing values and median gross rents are slightly higher in the assessment area compared to all of nonMSA Oklahoma. Additionally, considering income levels, homeownership is less affordable in the assessment area and the rental cost burden is on average higher than in nonMSA Oklahoma. Despite this, housing in the assessment area is relatively affordable overall based on the affordability ratio, though some counties in the assessment area experience much higher housing costs than the assessment area average. For instance, the affordability ratios in Payne County (27.8 percent) and Delaware County (34.8 percent) are much lower than the assessment area average, which likely hinders some LMI residents from attaining homeownership in those areas. One potential barrier to homeownership for LMI residents is the median age of housing stock in the assessment area (44 years). As discussed in previous sections, the home improvements that are often necessary to maintain an aging housing stock have the potential to render otherwise affordable housing as too costly for many LMI residents and increases the need for affordable home improvement loans in the assessment area.

## Industry and Employment Demographics

The assessment area economy is characterized by its small business and small farm sectors; in 2019, 90.2 percent of businesses and 98.2 percent of farms reported annual revenues of $1 million or less. Of the 269,103 paid employees in the assessment area, the largest sectors of the assessment area economy are government (28.0 percent), retail trade (12.2 percent), and manufacturing (9.8 percent). Additionally, while not captured in county business patterns data, agriculture plays a key role in the assessment area economy. According to 2019 Dun & Bradstreet data, there were a total of 1,335 farms operating throughout the assessment area.

The following table displays unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and state of Oklahoma.

| Unemployment Levels | | | |
|---|---|---|---|
| Dataset | Time Period (Annual Average) | | |
| | 2018 | 2019 | YTD 2020 |
| Assessment Area | 3.9% | 3.9% | 6.8% |
| Oklahoma | 3.4% | 3.3% | 6.9% |

As shown above, unemployment levels in the assessment area were higher than statewide levels for much of the review period but were comparable in 2020. Of note, several counties in the assessment area experienced consistently higher unemployment levels than the assessment area average, including Latimer, McIntosh, and McCurtain counties.

## Community Contact Information

For the nonMSA Oklahoma assessment area, two community contact interviews were conducted. Given that the assessment area encompasses a broad portion of the state, these community contacts represent organizations that serve larger regional areas, thereby ensuring that the economic conditions and credit needs of the entire assessment area are captured. One of these individuals represents an organization specializing in agricultural loan services, while the second contact represents an economic development organization.

Both community contacts indicated that economic conditions in the nonMSA portion of the state vary somewhat by region. For instance, the southeastern portion of the state has relatively higher levels of poverty and lower levels of income compared to other portions of the state. Areas closer to MSAs such as Tulsa are generally more affluent, while one contact also noted that nonMSA areas west of Tulsa are predominantly agriculture based and have lower levels of poverty/unemployment than do eastern portions of the state. Both contacts confirmed that the Cherokee Nation, the governing body for one of the three federally recognized Cherokee Indian tribes, is the largest employer in the assessment area, with agriculture also playing a significant role. The contacts offered varied assessments of the impact of the pandemic on the local economy, but both pointed out that the cost of building materials has increased dramatically in the previous year, which has increased housing costs and disproportionately affected LMI individuals in the assessment area. According to both contacts, the assessment area has remained stable demographically, though one contact noted the population of the assessment area is aging, which has increased the need for health care services throughout the area. One contact described that

there are relatively few branches in many of the more rural portions of the assessment area. The contacts both pointed to high demand for small dollar consumer loans, particularly for LMI individuals, and stated that many LMI borrowers will utilize alternative lending sources to obtain these loans in lieu of using traditional financial institutions.

Affordable housing options are generally available throughout the assessment area, according to one community contact. While some counties have an aging housing stock or lack of quality affordable housing stock, affordable housing options and financing are accessible for most residents in the area. Affordable rental housing, on the other hand, is in higher demand and represents a need in the assessment area. Barriers to homeownership in the assessment area for the LMI population include lack of down payment funds, poor credit history, and high debt-to-income ratios. The contact familiar with small business and farm needs in the assessment area pointed to a lack of qualified workers as a barrier to small business growth, suggesting a need for workforce development initiatives in the assessment area. Lastly, one community contact identified Arvest Bank as being active in meeting the needs of small businesses and farms in the assessment area and seeking community development opportunities.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMSA OKLAHOMA

LENDING TEST

The bank's lending activity levels reflect excellent responsiveness to credit needs in the assessment area. The geographic distribution of loans reflects excellent penetration throughout the assessment area. Furthermore, the overall distribution of loans by borrower's income/revenue profile reflects good penetration among borrowers of different income levels and businesses and farms of different revenue sizes. Lastly, the bank is a leader in providing community development loans in nonMSA Oklahoma.

## Lending Activity

The following table displays the combined 2018 and 2019 lending volume by number and dollar amount in the assessment area.

| Summary of Lending Activity January 1, 2018 through December 31, 2019 | | | | |
|---|---|---|---|---|
| Loan Type | # | % | $(000s) | % |
| Home Improvement | 223 | 3.4% | 10,984 | 2.0% |
| Home Purchase | 1,409 | 21.6% | 183,444 | 33.6% |
| Multifamily Housing | 22 | 0.3% | 5,454 | 1.0% |
| Refinancing | 829 | 12.7% | 80,121 | 14.7% |
| Other Purpose LOC | 93 | 1.4% | 3,746 | 0.7% |
| Other Purpose Closed/Exempt | 88 | 1.3% | 5,276 | 1.0% |
| Purpose Not Applicable | 1 | 0.0% | 111 | 0.0% |
| **Total HMDA** | **2,665** | **40.8%** | **289,136** | **52.9%** |
| Small Business | 1,778 | 27.2% | 148,278 | 27.1% |
| Small Farm | 2,087 | 32.0% | 108,827 | 19.9% |
| **TOTAL LOANS** | **6,530** | **100.0%** | **546,241** | **100.0%** |

Of the bank's total HMDA and CRA loans made in 2018 and 2019, 12.0 percent were made in nonMSA Oklahoma. This exceeds the percentage of total bank deposits held in the assessment area (10.0 percent) and is slightly below the percentage of total bank branches in nonMSA Oklahoma (13.3 percent). However, Arvest Bank ranks first out of 466 institutions that reported HMDA lending activity in the assessment area and second out of 104 institutions with CRA lending activity. This demonstrates the bank's prominent role in meeting the credit needs of the nonMSA Oklahoma assessment area. Therefore, the bank's lending activity levels reflect excellent responsiveness to credit needs in the assessment area.

| Arvest Bank | | CRA Performance Evaluation |
|---|---|---|
| Fayetteville, Arkansas | NonMSA Oklahoma | September 27, 2021 |

**Geographic Distribution of Loans**

Based on performance for all three products reviewed, the bank's overall geographic distribution of loans in nonMSA Oklahoma is excellent. Primary consideration was given to HMDA lending performance, with small farm and small business lending weighted equally. Additionally, as there are far more moderate-income than low-income census tracts in the assessment area, greater emphasis is placed on the bank's performance lending in moderate-income census tracts.

*Home Mortgage Disclosure Act (HMDA) Lending*

The geographic distribution of HMDA loans reflects an excellent dispersion to geographies of different income levels. The bank originated 0.2 percent of its HMDA loans in low-income geographies in 2018, which is considered adequate when compared to aggregate lending levels (0.4 percent) and the percentage of assessment area families who are low income (0.6 percent). Lending in moderate-income geographies, representing 15.5 percent of the bank's HMDA loans in 2018, exceeded aggregate lending performance (14.2 percent) and was in line with the demographic figure (15.8 percent). Additional consideration was given to the distribution of the bank's HMDA loans by product type. Overall, the bank originated 8.7 percent of all HMDA loans in the assessment area in 2018. Additionally, the bank originated 24 home-improvement loans in moderate-income geographies in 2018, which represents 27.0 percent of the volume of home-improvement loans made in moderate-income geographies by all lenders in the assessment area. As discussed in the *Housing Demographics* section, the assessment area has need for affordable home-improvement loans to address the challenges of an aging housing stock, which Arvest Bank has been active in meeting. Given this context and the bank's performance relative to peer institutions in the assessment area, lending in moderate-income census tracts demonstrates excellent performance.

In 2019, the bank originated 0.4 percent of its HMDA loans in low-income census tracts as compared to 0.5 percent for aggregate lenders in the assessment area. When considering this and the demographic figure (0.6 percent), bank performance is adequate. The bank's performance lending in moderate-income geographies (15.3 percent) exceeded that of peer institutions in the assessment area (13.3 percent) and matched the demographic figure. Moreover, Arvest Bank accounts for a significant portion of total HMDA loans made in the assessment area in 2019; when removing Arvest Bank totals from aggregate lending data, the bank's performance compares even more favorably to that of peer institutions. Therefore, the bank's performance lending in moderate-income geographies is considered excellent.

Furthermore, the bank had significant HMDA lending activity in middle-income census tracts that were designated as distressed or underserved during the review period. Across both years of data, the bank originated 807 HMDA loans in distressed or underserved middle-income geographies, representing 50.4 percent of all its HMDA loans in middle-income geographies. This context further reflects an excellent distribution of HMDA loans by geography income level, along with the bank's performance lending in moderate-income geographies.

*Small Business Lending*

Overall, the geographic distribution of small business loans is adequate. In 2018, the bank originated 3.5 percent of its small business loans in low-income census tracts and 16.0 percent in moderate-income census tracts. This performance was closely aligned with peer performance of 3.0 percent in low-income census tracts and 16.2 percent in moderate-income census tracts but below the demographic figures (4.2 percent in low-income census tracts and 22.9 percent in moderate-income census tracts), reflecting adequate performance for both income categories.

In 2019, the bank originated a slightly lower percentage of small business loans in low-income census tracts (2.6 percent), though aggregate performance was slightly lower as well (2.8 percent) and the demographic figure remained stable at 4.1 percent; this reflects adequate performance. Lending in moderate-income geographies (12.7 percent), however, was below both aggregate lending levels (15.1 percent) and the demographic figure of 21.2 percent, reflecting poor performance.

*Small Farm Lending*

The distribution of small farm loans is considered excellent overall. The bank made only one small farm loan in a low-income census tract in both 2018 and 2019, representing 0.1 percent of its small farm loans. However, assessment area demographics indicate that there were only three farming institutions located in low-income tracts in the assessment area. Therefore, this level of lending is considered adequate in both years.

Given the limited opportunities for small farm lending in low-income geographies, greater emphasis is placed on performance lending in moderate-income geographies. In 2018, the bank originated 17.7 percent of its small farm loans in moderate-income census tracts, well above the aggregate figure of 10.8 percent and the 10.9 percent of total assessment area farms located in moderate-income census tracts. Similarly, the bank's performance in 2019 (18.4 percent), exceeded aggregate (11.7 percent) and demographic (10.6 percent) comparison data by a wide margin. This performance reflects an excellent geographic distribution for both years of data. Furthermore, across both years of data, the bank originated 692 small farm loans in distressed or underserved middle-income geographies, representing over half of its total small farm loans in middle-income census tracts. This further demonstrates the bank's willingness to make credit available to small farms throughout the assessment area and supports the conclusion that the geographic distribution of small farm loans is excellent.

Lastly, no conspicuous lending gaps were identified based on an analysis of the dispersion of all three loan products. The bank had loan activity in 89.3 percent of all assessment area census tracts in 2018 and in 86.3 percent of LMI census tracts. Similarly, the bank originated loans in 87.9 percent of all census tracts in the assessment area in 2019 and 82.4 percent of LMI geographies.

## Loan Distribution by Borrower's Profile

The overall borrower distribution of loans in nonMSA Oklahoma is good. HMDA lending performance receiving primary consideration towards overall conclusions, with small business and small farm lending weighted equally.

*Home Mortgage Disclosure Act (HMDA) Lending*

The distribution of HMDA loans by borrower's income profile reflects good performance overall. In 2018, the bank originated 7.4 percent of its HMDA loans to low-income borrowers and 17.2 percent to moderate-income borrowers, while at the same time peer institutions in the assessment area made 5.2 percent of HMDA loans to low-income borrowers and 13.7 percent to moderate-income borrowers. While below the demographic figures (22.6 percent of families in the assessment area are low income and 17.8 percent are moderate income), a significant portion of these families are unlikely to qualify for a mortgage loan, as evidenced by the overall assessment area poverty level of 15.2 percent and other credit factors described by community contacts, such as poor credit history. When compared to the performance of peer institutions in the assessment area, the bank's performance in 2018 is considered good for both income categories.

Lending to low-income borrowers represented 4.9 percent of the bank's total HMDA loans in the assessment area in 2019. This performance was closely aligned with aggregate lending performance (4.8 percent) and below the demographic figure (22.7 percent), reflecting adequate performance. The bank's lending to moderate-income borrowers (16.7 percent), however, exceeded aggregate lending levels (13.6 percent) and was in line with the demographic figure (17.8 percent), reflecting good performance.

*Small Business Lending*

The bank demonstrates good performance lending to businesses of different sizes in nonMSA Oklahoma. Of its total small business loans originated in 2018, 79.6 percent were made to businesses with annual revenues of $1 million or less. By comparison, the percentage of aggregate small business loans to businesses with the same revenue profile in the assessment area was much lower (48.8 percent), though assessment area demographics estimate that 89.6 percent of businesses in the assessment area have annual revenues of $1 million or less. In 2019, a slightly lower percentage of the bank's loans were made to businesses with annual revenues of $1 million or less (68.4 percent), though this performance still exceeded aggregate lending performance (49.3 percent) by a wide margin, while remaining below the demographic level of 90.2 percent. Furthermore, across both years of data, 85.1 percent of the bank's small business loans to businesses with annual revenues of $1 million or less were in amounts of $100,000 or less; these loan amounts are those typically requested by small businesses and are therefore considered more responsive to small business credit needs in general. Given this context and the bank's performance relative to other lenders in the assessment area, the distribution of small business loans by business revenue profile is considered good in both 2018 and 2019.

*Small Farm Lending*

The bank's small farm lending reflects an excellent distribution of loans to farms of different sizes. In 2018, the bank made 97.9 percent of its small farm loans to farms with annual revenues of $1 million or less, outperforming peer institutions in the assessment area (83.8 percent) by a wide margin and nearly surpassing the demographic figure of 98.1 percent, reflecting excellent performance. In 2019, the bank's record of lending to small farms (87.9 percent) exceeded aggregate lending performance (83.7 percent), though by a lower margin, and was below the demographic figure (98.2 percent), reflecting good performance. Across both years of data, 87.0

percent of the bank's loans to farms with annual revenues of $1 million or less were in amounts of $100,000 or less, which demonstrates the bank's responsiveness to the credit needs of farms in the assessment area. Therefore, the overall distribution of small farm loans by farm revenue profile is considered excellent.

## Community Development Lending Activity

Arvest Bank is a leader in making community development loans in nonMSA Oklahoma. As shown in the table below, the bank made 25 community development loans totaling $45.5 million and 112 PPP loans totaling $37.3 million. The most impactful of these loans are discussed below the following table.

| Community Development Lending | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | Affordable Housing | | Community Services | | Revitalization/ Stabilization | | Economic Development | | Total | |
| | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) |
| CD Loans | 3 | 1,046 | 4 | 2,160 | 9 | 17,408 | 9 | 24,927 | 25 | 45,542 |
| PPP Loans | - | - | - | - | - | - | 112 | 37,273 | 112 | 37,273 |

- The bank made three community development loans totaling $1.0 million, all of which financed affordable multifamily housing developments in the assessment area. These multifamily units offer affordable rental rates and are occupied exclusively by LMI renters. According to community contacts, the assessment area has need of more affordable rental options for LMI borrowers, as over 40.0 percent of renters in the assessment area have rental costs that exceed 30.0 percent of their income.

- Two community development loans totaling $3.4 million financed the construction of a new behavioral health facility in a distressed middle-income census tract. These loans qualify as revitalizing/stabilizing a distressed middle-income geography by helping to attract and retain new residents by providing essential health services. As much of the assessment area is rural, access to specialized health services such as those provided by this facility is a need.

- The bank made two loans totaling $6.3 million that provided a working LOC to one of the largest farming supplies auction services in Oklahoma. The business is in a moderate-income census tract but also services several surrounding distressed middle-income census tracts. These loans help to revitalize/stabilize these geographies by helping to retain farming operations in the area, which are critical to the assessment area economy. The proceeds of these loans also support LMI job retention, as the business employs 25 LMI individuals.

- Two community development loans totaling $3.4 million financed the acquisition of several restaurant facilities in the assessment area. These loans qualified for a purpose of economic development and supported LMI job creation and retention. In total, 185 LMI individuals will be employed at the properties. These loans are considered impactful given the large number of LMI jobs impacted.

INVESTMENT TEST

The bank makes an excellent level of qualified community development investments and grants in the assessment area and is often in a leadership position. In total, the bank made $34.5 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed below the table.

| Summary of Investments – NonMSA Oklahoma | | | |
|---|---|---|---|
| Investment Type | Current Period | Prior Period, Still Outstanding | Total |
| MBS | $5.4 million | $1.9 million | **$7.3 million** |
| LIHTCs/NMTCs | - | $3.8 million | **$3.8 million** |
| Municipal/private bonds | $23.3 million | - | **$23.3 million** |
| Donations | $77,298 | - | **$77,298** |
| **TOTAL** | **$28.8 million** | **$5.7 million** | **$34.5 million** |

- The bank continues to invest in a LIHTC project from a prior period that is still outstanding. The project is part of an equity fund developed to acquire, construct, and operate low-income residential rental properties throughout the assessment area. As one community contact noted the importance of developing and maintaining affordable rental properties in the area, this investment remains impactful.

- The bank maintains active investments in two NMTC projects. One investment with an outstanding balance of $1.8 million supports a health and wellness clinic providing health services to patients, more than 80.0 percent of whom qualify for Medicare/Medicaid, in seven counties in nonMSA Oklahoma. A second NMTC investment with an outstanding balance of $2.0 million supports a manufacturing and recycling facility in Adair, Oklahoma, which created 40 new jobs in the assessment area.

- The bank made a substantial number of donations throughout nonMSA Oklahoma. In total, the bank made 130 donations to a variety of organizations including food banks, housing agencies, nonprofits, crisis centers, medical clinics, homeless shelters, schools, economic development organizations, and other community service-based organizations.

SERVICE TEST

Service delivery systems are readily accessible to geographies and individuals of different income levels in nonMSA Oklahoma. The bank's record of opening and closing branches has generally not adversely affected the accessibility of these service delivery systems. Furthermore, business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Lastly, the bank is a leader in providing community development services in the assessment area.

**Accessibility of Delivery Systems**

The bank operates 32 branches and 20 stand-alone ATMs, seven of which are deposit accepting, throughout the assessment area. The following table displays the location of the bank's branches and stand-alone ATMs by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|---|---|---|---|---|---|---|
| **Dataset** | **Geography Income Level** | | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | **Unknown** | |
| Branches | 3 | 8 | 18 | 3 | 0 | **32** |
| | 9.4% | 25.0% | 56.3% | 9.4% | 0.0% | **100%** |
| Stand-alone ATMs | 0 | 4 | 15 | 1 | 0 | **20** |
| | 0.0% | 20.0% | 75.0% | 5.0% | 0.0% | **100%** |
| Census Tracts | 2.8% | 21.0% | 60.7% | 15.4% | 0.0% | **100%** |
| Household Population | 1.1% | 17.7% | 63.1% | 18.1% | 0.0% | **100%** |

The bank operates 11, or 34.4 percent, of its total branches in the assessment area in LMI census tracts. This far exceeds the percentage of assessment area census tracts that are LMI (23.8 percent) and the household population within those census tracts (18.8 percent). Moreover, four of the bank's 20 stand-alone ATMs are in moderate-income census tracts, which further increases the accessibility of the bank's services. The majority of the bank's branches are in middle-income geographies, many of which are distressed or underserved, which aligns with the overall distribution of census tracts by income level. Therefore, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels in nonMSA Oklahoma, particularly LMI geographies and individuals.

**Changes in Branch Locations**

The bank closed five branches during the review period: two in low-income census tracts and one in a moderate-, one in a middle-, and one in an upper-income census tract. The impact of branch closures located in or near LMI geographies is discussed below.

- One branch location was closed in a moderate-income census tract in the city of Shawnee, where the bank operates two additional branches, the closest of which is approximately 2.2 miles away.

- One branch location was closed in the city of Ada. While this location was in a middle-income census tract, the branch location also served a moderate-income census tract in Ada where the bank does not operate any additional branches. While this reduces the accessibility of service delivery systems to residents in this city, it impacts only one of the 45 moderate-income census tracts in the assessment area and therefore has only a limited impact on accessibility in the assessment area as a whole.

- Two locations were closed in low-income census tracts in the city of Muskogee. One of these locations was a drive-through only facility with the adjacent full-service branch still operational; thus, this closure has a negligible impact to accessibility in the assessment area. The impact of the second closure was similarly limited, as the bank operates another branch approximately 2.0 miles away from the closed location.

Considering this context, changes in branch locations have generally not adversely affected the accessibility of the bank's service delivery systems overall.

**Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

Business hours vary somewhat across the assessment area, though not in a way that inconveniences any portions of the population or assessment area. Most branch locations operate weekday lobby hours either from 8:00 a.m. to 6:00 p.m. or 9:00 a.m. to 5:00 p.m., with many locations offering extended lobby hours on Fridays. Five of the 32 branch locations in the assessment area are drive-through only, one of which is in a moderate-income census tract and the remaining four of which are in middle-income census tracts. Of the 27 full-service branch locations, 14 operate Saturday lobby hours, including five in LMI census tracts. Drive-through facilities are offered at nearly all branch locations, most of which also operate Saturday drive-through hours. Lastly, lenders are equally dispersed throughout the assessment area, with lenders present at seven of the full-service branch locations in LMI geographies.

**Community Development Services**

Arvest Bank is a leader in providing community development services in nonMSA Oklahoma. During the review period, 57 bank employees provided 736 hours of community development service activities to 58 different organizations. Bank employees served as board members and provided financial expertise/technical assistance to a variety of organizations across the assessment area including nonprofits, housing agencies, economic and small business development organizations, and health clinics. In addition, many bank employees provided in financial literacy training events hosted by schools or other community service organizations in the assessment area. Noteworthy service activities include the following.

- Four bank employees provided 50 hours of community development service activities to four different affordable housing organizations in the assessment area. These organizations all support new affordable housing development for LMI individuals, which is responsive to community development needs identified by community contacts.

- Numerous bank employees participated in financial literacy training events at schools or community service organizations in the assessment area. In total, bank employees contributed 201 hours of financial literacy training in the assessment area; these activities focused on banking basics in schools or homebuyer education at community service organizations or nonprofits.

Lastly, the bank opened and maintained a significant number of IDAs and RPAs for LMI individuals in the assessment area. During the review period, the bank opened 38 new IDAs and 349 RPAs, all of which benefitted LMI individuals.

# MISSOURI

**CRA RATING FOR MISSOURI:**                            **SATISFACTORY**
**The Lending Test is rated:**                                      **Low Satisfactory**
**The Investment Test is rated:**                             **Low Satisfactory**
**The Service Test is rated:**                                      **Low Satisfactory**

Major factors supporting the institution's Missouri rating include the following.

- The bank's lending activity levels reflect good responsiveness to the credit needs of the Missouri assessment areas.

- The geographic distribution of loans reflects poor penetration throughout the Missouri assessment areas.

- The distribution of loans in the Missouri assessment areas reflects good penetration among individuals of different income levels (including LMI levels) and businesses and farms of different sizes.

- The bank makes a relatively high level of community development loans throughout the Missouri assessment areas.

- The bank makes use of innovative and/or flexible lending practices in serving the credit needs of the Missouri assessment areas.

- The bank makes an adequate level of qualified community development investments and grants and is rarely in a leadership position.

- Delivery systems are reasonably accessible to geographies and individuals of different income levels in the Missouri assessment areas. Changes in branch locations have not adversely affected the accessibility of the bank's delivery systems, and business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly in LMI geographies.

- The bank provides an adequate level of community development services throughout the Missouri assessment areas.

## SCOPE OF EXAMINATION

Scoping considerations applicable to the review of Missouri assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. In all assessment areas, HMDA lending received the greatest weight in the analysis. Small farm lending received the least weight in the MSA assessment areas but was weighted equally with small business lending in the nonMSA assessment area.

| Arvest Bank | | CRA Performance Evaluation |
|---|---|---|
| Fayetteville, Arkansas | Missouri | September 27, 2021 |

The bank operates three assessment areas in Missouri located in two MSAs and one contiguous nonMSA assessment area. Of the three Missouri assessment areas, the Joplin MSA and nonMSA Missouri assessment areas were reviewed under full-scope procedures. When considering branch structure and loan/deposit activity, CRA performance in the nonMSA Missouri assessment area carried the greatest weight when forming overall state conclusions.

To augment the evaluation of the full-scope review assessment areas in Missouri, four community contact interviews were conducted. These interviews were used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from these interviews are included in the *Description of Institution's Operations* sections, as applicable to the assessment areas in which the community contacts were made.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN MISSOURI

The bank operates 30, or 12.4 percent, of its branches throughout the three assessment areas in Missouri. The following table gives additional detail regarding the bank's operations within Missouri.

| Assessment Area | Offices | | Deposits As of June 30, 2020 | | Review Procedures |
|---|---|---|---|---|---|
| | # | % | $ | % | |
| Joplin MSA | 8 | 26.7% | $644,019 | 35.6% | Full scope |
| Springfield MSA | 8 | 26.7% | $415,521 | 23.0% | Limited scope |
| NonMSA Missouri | 14 | 46.7% | $749,041 | 41.4% | Full scope |
| **TOTAL** | **30** | **100%** | **$1,808,581** | **100%** | **2 – Full scope** |

As shown above, the bank's deposits in Missouri total $1.8 billion, or 8.0 percent of total bank deposits. In addition to the branch locations shown in the table above, the bank also operates nine stand-alone ATMs, two of which are deposit accepting. The bank's operations in the state of Missouri are most heavily concentrated in the nonMSA Missouri assessment area; as such, greater emphasis was placed on performance in this assessment area when assessing statewide performance. Lastly, the bank closed 11 branches and did not open any new branches in Missouri during the review period.

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

LENDING TEST

The bank's Lending Test rating in Missouri is Low Satisfactory. The bank's performance under each of the criteria of the Lending Test is displayed in the tables that follow.

**Lending Activity**

| Full-Scope Review Areas | Lending Activity |
|---|---|
| Joplin MSA | Good |
| NonMSA Missouri | Good |
| **OVERALL** | **GOOD** |

| Limited-Scope Review Areas | Lending Activity |
|---|---|
| Springfield MSA | Consistent |

The bank's overall level of lending reflects good responsiveness to the credit needs of the Missouri assessment areas. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank's overall importance to each assessment area.

**Geographic and Borrower Distribution**

As displayed in the following tables, the bank's overall geographic distribution of loans reflects poor penetration throughout Missouri.

| Full-Scope Review Areas | Geographic Distribution of Loans |
|---|---|
| Joplin MSA | Good |
| NonMSA Missouri | Poor |
| **OVERALL** | **POOR** |

| Limited-Scope Review Areas | Geographic Distribution of Loans |
|---|---|
| Springfield MSA | Exceeds |

As shown above, the bank's performance under this criterion varied between the two full-scope assessment areas. While the geographic distribution of loans in the Joplin MSA assessment area reflected a good penetration of geographies of different income levels, performance in nonMSA Missouri, which carried more weight toward the statewide conclusions, was poor. As a result, the overall geographic distribution of loans in Missouri is considered poor.

Throughout Missouri, the distribution of loans by borrower's income or business/farm revenue profile is good, as displayed in the following tables.

| Arvest Bank | | CRA Performance Evaluation |
| Fayetteville, Arkansas | Missouri | September 27, 2021 |

| Full-Scope Review Areas | Loan Distribution by Borrower's Profile |
| --- | --- |
| Joplin MSA | Good |
| NonMSA Missouri | Good |
| **OVERALL** | **GOOD** |

| Limited-Scope Review Areas | Loan Distribution by Borrower's Profile |
| --- | --- |
| Springfield MSA | Consistent |

## Community Development Lending Activities

| Full-Scope Review Areas | Community Development Lending Activities |
| --- | --- |
| Joplin MSA | Leader |
| NonMSA Missouri | Relatively high level |
| **OVERALL** | **RELATIVELY HIGH LEVEL** |

| Limited-Scope Review Areas | Community Development Lending Activities |
| --- | --- |
| Springfield MSA | Consistent |

The bank makes a relatively high level of community development loans throughout Missouri, as shown in the tables above. The bank made 24 community development loans totaling $122.6 million during the review period, a significant increase from $45.2 million in Missouri at the previous evaluation. Additionally, the bank made 64 PPP loans totaling $37.0 million to businesses impacted by the pandemic. This represents a significant volume of PPP loans relative to other lenders in the state and further demonstrates the bank's efforts to meet the community development needs of its Missouri assessment areas.

## Product Innovation

The bank makes use of flexible lending practices in serving the credit needs of the Missouri assessment areas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document. The bank's use of flexible and/or innovative lending products in Missouri is described below.

- The bank originated 132 loans totaling $14.1 million through the HomeReady program. These loans provide flexible, long-term financing for LMI borrowers, which was noted by community contacts in several assessment areas as a credit need. This represents a substantial increase from the 27 loans totaling $2.3 million originated at the previous evaluation.

- Through the Missouri Housing Development Commission, the bank awarded 35 down payment assistance grants totaling $121,089 to qualified borrowers in Missouri. This also represents a substantial increase from the previous evaluation, which included only $3,000 in down payment assistance grants in Missouri.

- The bank also originated a significant volume of mortgage loans through government loan programs, including 189 FHA loans ($20.8 million), 123 RD loans ($12.8 million), and 53 VA loans ($6.6 million).

INVESTMENT TEST

Overall, the bank's performance in Missouri is rated Low Satisfactory under the Investment Test. The following tables display investment and grant activity performance in the Missouri assessment areas.

| Full-Scope Review Areas | Investment and Grant Activity |
|---|---|
| Joplin MSA | Adequate |
| NonMSA Missouri | Low level |
| **OVERALL** | **ADEQUATE** |

| Limited-Scope Review Areas | Investment and Grant Activity |
|---|---|
| Springfield MSA | Consistent |

As shown in the table below, the bank's total investment and grant activity included $10.3 million in qualified investments and grants and $417,229 in donations. These activities consisted primarily of investments in MBS supporting affordable housing throughout the Missouri assessment areas as well as municipal bonds supporting community service or revitalization efforts in LMI areas. As noted in the preceding table, the level of activity in the nonMSA Missouri assessment area represents a low level of investment and grant activity, while performance in the Joplin MSA assessment area is considered adequate. The bank also received credit for three municipal bond investments made outside of its assessment areas that funded improvements to schools with a majority LMI population. When factoring in this additional investment activity, the overall level and investment and grant activity in Missouri reflects adequate performance. Additional details regarding the composition of the bank's investments can be found in the *Investment Test* section for each of the respective assessment areas.

| Missouri Assessment Area | Investments/Grants ($) | Donations ($) |
|---|---|---|
| Joplin MSA | $659,781 | $30,461 |
| Springfield MSA | $6.6 million | $366,699 |
| NonMSA Missouri | $974,206 | $20,069 |
| Statewide Missouri | $2.1 million | - |
| **TOTAL** | **$10.3 million** | **$417,229** |

| Arvest Bank | | CRA Performance Evaluation |
|---|---|---|
| Fayetteville, Arkansas | Missouri | September 27, 2021 |

SERVICE TEST

The bank is rated Low Satisfactory under the Service Test in Missouri, which considers the following factors.

## Accessibility of Service Delivery Systems

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in Missouri, as shown below.

| Full-Scope Review Areas | Accessibility of Delivery Systems |
|---|---|
| Joplin MSA | Readily accessible |
| NonMSA Missouri | Reasonably accessible |
| OVERALL | REASONABLY ACCESSIBLE |

| Limited-Scope Review Areas | Accessibility of Delivery Systems |
|---|---|
| Springfield MSA | Below |

## Changes in Branch Locations

The bank's record of opening and closing branches in Missouri has not adversely affected the accessibility of its service delivery systems, particularly to LMI geographies and individuals. The tables below display the bank's performance under this criterion.

| Full-Scope Review Areas | Changes in Branch Locations |
|---|---|
| Joplin MSA | Not adversely affected |
| NonMSA Missouri | Not adversely affected |
| OVERALL | NOT ADVERSELY AFFECTED |

| Limited-Scope Review Areas | Changes in Branch Locations |
|---|---|
| Springfield MSA | Consistent |

## Reasonableness of Business Hours and Services in Meeting Assessment Area Credit Needs

The bank's business hours and banking services do not vary in a way that inconveniences certain portions of the Missouri assessment areas, as shown in the following tables.

| Full-Scope Review Areas | Reasonableness of Business Hours and Services |
|---|---|
| Joplin MSA | Do not vary in a way that inconveniences |
| NonMSA Missouri | Do not vary in a way that inconveniences |
| OVERALL | DO NOT VARY IN A WAY THAT INCONVENIENCES |

| Limited-Scope Review Areas | Reasonableness of Business Hours and Services |
|---|---|
| Springfield MSA | Consistent |

## Community Development Services

The bank provides an adequate level of community development services in Missouri, as displayed in the following tables.

| Full-Scope Review Areas | Community Development Services |
|---|---|
| Joplin MSA | Relatively high level |
| NonMSA Missouri | Adequate level |
| **OVERALL** | **ADEQUATE LEVEL** |

| Limited-Scope Review Areas | Changes in Branch Locations |
|---|---|
| Springfield MSA | Consistent |

During the review period, 33 bank employees provided 490 hours of community development service activities to 38 organizations throughout its Missouri assessment areas. Bank employees served in numerous capacities for nonprofit agencies and community service and economic development organizations and provided financial literacy and counseling services to various schools and community organizations. Details of the most impactful of these activities are included in the *Community Development Services* section for each full-scope assessment area.

# JOPLIN, MISSOURI MSA

*(Full-Scope Review)*

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JOPLIN MSA ASSESSMENT AREA

### Bank Structure

The bank operates eight branches in the Joplin MSA assessment area, representing 3.3 percent of the bank's total branches. The locations of these branches by geography income level are displayed in the table below.

| Branch Location by Census Tract Income Level | | | | |
|---|---|---|---|---|
| Low-Income | Moderate-Income | Middle-Income | Upper-Income | Unknown-Income |
| 0 | 3 | 4 | 1 | 0 |

During the review period, the bank closed three branches located in middle-income census tracts and did not open any branches. In addition to these branch locations, the bank also operates one stand-alone, deposit-accepting ATM in a middle-income census tract. Based on these branch and ATM locations as well as alternative delivery systems, such as online and mobile banking, the bank is well positioned to deliver financial services throughout the Joplin MSA assessment area.

### General Demographics

The bank's assessment area is comprised of Jasper and Newton counties, both counties that make up the full Joplin MSA. The assessment area has a total population of 175,961, most of which (117,184) is concentrated in Jasper County, which contains the city of Joplin. The banking market in the assessment area is relatively small, with three institutions accounting for 47.6 percent of the total deposit market share. In total, 16 FDIC-insured depository institutions operate 73 branches in the Joplin MSA, of which Arvest Bank ranks second, with 14.8 percent of the total deposit market share. Deposits held in the Joplin MSA assessment area represent 2.8 percent of the bank's total deposits.

While a relatively limited number of financial institutions operate a physical branch presence in the assessment area, a far greater number had lending activity within the Joplin MSA. An analysis of 2019 HMDA and CRA lending activity shows that 204 entities reported HMDA lending activity in the assessment area, and 62 reported CRA lending activity. Arvest Bank ranked second out of these entities with HMDA lending activity and fourth out of all entities with CRA lending activity in the assessment area, indicating that the bank plays an important role in making credit available in the assessment area.

Credit needs in the assessment area include a standard blend of consumer and commercial loan and deposit products, as well as agriculture loans. Other credit and community development needs identified by community contacts with knowledge of the assessment area include financial literacy and counseling services for both consumers and businesses, affordable home improvement loans, and small dollar loans for small businesses.

## Income and Wealth Demographics

The table below displays the distribution of census tracts in the Joplin MSA by geography income level alongside the family population that resides in those tracts.

| Assessment Area Demographics by Geography Income Level | | | | |
|---|---|---|---|---|
| | Census Tracts | | Family Population | |
| Low | 0 | 0.0% | 0 | 0.0% |
| Moderate | 6 | 17.6% | 5,739 | 12.6% |
| Middle | 23 | 67.6% | 31,783 | 69.9% |
| Upper | 5 | 14.7% | 7,957 | 17.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% |
| TOTAL | 34 | 100% | 45,479 | 100% |

As shown above, the assessment area contains no low-income census tracts and six moderate-income census tracts, representing 17.6 percent of all census tracts in the assessment area. Five of these moderate-income census tracts are in Jasper County, in and around the city of Joplin. Overall, most census tracts in the assessment area are middle income, and most families in the assessment area reside in middle-income census tracts.

Based on 2015 ACS data, median family income figures for the assessment area ($51,758) were below the statewide Missouri level of $60,809. More recently, however, the FFIEC estimates the median family income for the assessment area to be higher, reaching $56,700 in 2018 and $58,200 in 2019. The table below displays the distribution of families by income level in the assessment area compared to the state of Missouri.

| Family Population by Income Level | | | | |
|---|---|---|---|---|
| | Assessment Area | | Missouri | |
| Low | 9,062 | 19.9% | 327,271 | 21.4% |
| Moderate | 8,307 | 18.3% | 274,380 | 17.9% |
| Middle | 9,655 | 21.2% | 319,267 | 20.9% |
| Upper | 18,455 | 40.6% | 609,088 | 39.8% |
| TOTAL | 45,479 | 100% | 1,530,006 | 100% |

When compared with the data in the first table in this section, the table above demonstrates that a much higher percentage of families in the assessment area are LMI (38.2 percent) than reside in moderate-income census tracts (12.6 percent). Overall, a slightly higher percentage of families in Missouri are LMI (39.3 percent) than in the assessment area, though poverty levels in the assessment area (11.5 percent) slightly exceed statewide levels (11.1 percent). Based on this data and income levels, the assessment area is similarly affluent to the state of Missouri overall.

## Housing Demographics

Displayed in the following table are housing demographics for the assessment area and state of Missouri as a whole.

| Housing Demographics | | | | |
|---|---|---|---|---|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) | Housing Cost Burden |
| Assessment Area | $107,996 | 39.3% | $688 | 43.5% |
| Missouri | $138,400 | 34.8% | $746 | 44.4% |

Based on the data in the table above, housing is more affordable in the assessment area than in the rest of Missouri given lower affordability and housing cost burden ratios. While housing is generally more affordable than in Missouri as a whole, community contacts noted that new affordable housing development remains a significant credit need. The contact went on to explain that large portions of the available affordable housing stock need significant repairs and home improvements, which many LMI residents are unable to afford. This is supported by housing demographics for the assessment area, which show that the median age of housing stock in the assessment area (43 years) exceeds the median age of housing stock for Missouri as a whole (40 years). More specifically, the median age of housing stock in moderate-income census tracts is 61 years, indicating that a significant portion of the available housing in these census tracts is likely to need home improvements to maintain the condition of the home. As such, affordable home improvement loans are a particularly pressing need in the assessment area.

**Industry and Employment Demographics**

The assessment area economy supports strong manufacturing and small businesses sectors. According to demographic data for the assessment area, 91.0 percent of businesses and 99.2 percent of farms in the assessment area reported annual revenues of $1 million or less in 2019, indicating that small businesses and farms play a vital role in the local economy. The assessment area includes 77,055 paid employees overall, with the largest job sectors by share of total employees being manufacturing (17.7 percent), health care and social assistance (16.6 percent), and retail trade (12.8 percent). While not captured in county business patterns data, there are also a relatively high number of farms operating in the assessment area (249).

The following table displays unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Missouri.

| Unemployment Levels | | | |
|---|---|---|---|
| Dataset | Time Period (Annual Average) | | |
| | 2018 | 2019 | YTD 2020 |
| Assessment Area | 2.8% | 3.1% | 6.2% |
| Missouri | 3.2% | 3.3% | 6.7% |

As displayed in the table above, unemployment levels in the assessment area remained lower than statewide levels throughout the review period. An increase in unemployment in 2020 is attributable mainly to the impacts of the pandemic, which forced many small businesses in the assessment area to lay off employees or close entirely according to one community contact.

| Arvest Bank | | CRA Performance Evaluation |
|---|---|---|
| Fayetteville, Arkansas | Joplin MSA | September 27, 2021 |

**Community Contact Information**

Two community contact interviews were conducted with individuals knowledgeable of the assessment area's credit and community development needs. Information gained from these interviews was used to identify credit needs and opportunities for community development involvement by local financial institutions and offered additional context with which to gauge the bank's performance. One of these individuals represented an organization providing affordable housing services in the assessment area, while the other contact represented a small business development organization.

Both community contacts described the economy of the Joplin MSA as stable and noted that the assessment area is still recovering from a natural disaster in 2011 that destroyed much of the area's infrastructure. The contacts noted the importance of the manufacturing and health care industries to the local economy, the latter of which has grown considerably over the previous decade. Additionally, one contact noted that city and local governments have placed an emphasis on workforce development in recent years, though this has been hampered by a lack of affordable housing options within the MSA. As pointed out by another community contact, many residents live in the rural areas surrounding the MSA and commute longer distances to work. Both contacts described banking services as generally accessible, though one contact noted that these services are concentrated within the more urban areas of the assessment area, while the surrounding rural areas have far fewer bank branches.

According to the housing contact, the greatest credit needs for LMI borrowers in the assessment area are home purchase and home improvement loans, as well as the more recent need for mortgage loan modifications and forbearance programs for those impacted by job loss due to the pandemic. The contact indicated that new affordable housing development has been slow in the wake of the natural disaster in 2011, while the existing affordable housing stock is generally older and in need of repairs. Lastly, the contact identified access to down payment assistance programs and financial literacy initiatives as impactful to LMI borrowers in the assessment area.

The greatest small business needs in the assessment area, according to one community contact, are small dollar loans in amounts of $50,000 or less and financial literacy training and small business counseling services. The community contact stressed the importance of financial literacy training and small business counseling services given that many newer small businesses in the assessment area struggle with cash management skills and business planning as well as issues with personal credit histories. Regarding the performance of local financial institutions, the contact noted Arvest Bank as being responsive to the credit needs of small businesses in the assessment area.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JOPLIN MSA ASSESSMENT AREA

LENDING TEST

Lending activity levels reflect good responsiveness to the credit needs of the Joplin MSA. The bank's overall geographic distribution of loans reflects good penetration throughout the assessment area. Furthermore, the overall distribution of loans by borrower's income/revenue profile reflects good penetration among borrowers of different income levels and businesses and farms of different revenue sizes. Lastly, the bank is a leader in providing community development loans in the assessment area.

### Lending Activity

The following table displays the combined 2018 and 2019 lending volume by number and dollar amount in the assessment area.

| Summary of Lending Activity<br>January 1, 2018 through December 31, 2019 | | | | |
|---|---|---|---|---|
| **Loan Type** | **#** | **%** | **$(000s)** | **%** |
| Home Improvement | 69 | 4.3% | 3,137 | 1.7% |
| Home Purchase | 520 | 32.1% | 68,615 | 36.8% |
| Multifamily Housing | 15 | 0.9% | 7,214 | 3.9% |
| Refinancing | 283 | 17.5% | 28,653 | 15.4% |
| Other Purpose LOC | 36 | 2.2% | 2,015 | 1.1% |
| Other Purpose Closed/Exempt | 31 | 1.9% | 1,538 | 0.8% |
| Purpose Not Applicable | 0 | 0.0% | 0 | 0.0% |
| **Total HMDA** | **954** | **58.9%** | **111,172** | **59.6%** |
| Small Business | 498 | 30.7% | 58,661 | 31.4% |
| Small Farm | 168 | 10.4% | 16,718 | 9.0% |
| **TOTAL LOANS** | **1,620** | **100.0%** | **186,551** | **100.00%** |

Of the bank's total HMDA and CRA loans made in its combined assessment areas in 2018 and 2019, 3.0 percent were made in the Joplin MSA. This is closely aligned with the percentage of total bank deposits held in the assessment area (2.8 percent) and the percentage of total bank branches located in the Joplin MSA (3.3 percent). Additionally, consideration was given to the bank's lending activity levels relative to other lenders in the assessment area. As previously discussed, the bank ranked second and fourth out of all lenders with HMDA and CRA lending activity in the assessment area, respectively, demonstrating that the bank plays an important role in meeting the credit needs of the assessment area. Given this context, the bank's lending activity levels reflect good responsiveness to the credit needs of the Joplin MSA assessment area.

| Arvest Bank | | CRA Performance Evaluation |
|---|---|---|
| Fayetteville, Arkansas | Joplin MSA | September 27, 2021 |

## Geographic Distribution of Loans

Overall, the geographic distribution of loans in the assessment area is good based on all three products reviewed, with HMDA lending receiving primary consideration and small farm lending weighted least heavily. As there are no low-income census tracts in the assessment area, the bank's performance under this criterion is primarily based on lending performance in moderate-income census tracts.

*Home Mortgage Disclosure Act (HMDA) Lending*

The geographic distribution of HMDA loans is excellent overall. In 2018, the bank originated 16.3 percent of its HMDA loans in moderate-income census tracts as compared to 12.4 percent originated by peer institutions in the assessment area. The bank's performance also exceeded the percentage of owner-occupied housing units that are in moderate-income census tracts (10.7 percent), reflecting excellent performance. In 2019, the bank's performance (12.4 percent) was in line with aggregate lending performance (11.7 percent) but exceeded the demographic figure (10.7 percent), reflecting good performance. Additional consideration was given to the distribution of the bank's loans in moderate-income census tracts by product type. Of all its HMDA loans made in moderate-income census tracts in 2018 and 2019, 64.2 percent were home purchase loans, which are responsive to credit needs identified by community contacts for home purchase lending. Additionally, Arvest Bank accounts for 10.9 percent of all HMDA loans made in moderate-income census tracts in the assessment area, which further demonstrates its responsiveness to the credit needs of these geographies. Considering this context and the bank's performance across both years of data, the overall geographic distribution of HMDA loans is considered excellent.

*Small Business Lending*

The distribution of small business loans by geography income level is adequate overall. In both 2018 (14.6 percent) and 2019 (15.2 percent), the bank's level of small business lending in moderate-income census tracts was comparable to aggregate lending performance (17.0 percent in 2018 and 17.8 percent in 2019) but below the demographic figure (18.8 percent in 2018 and 2019). In both years, the bank's performance is considered adequate.

*Small Farm Lending*

The bank's lending reflects an adequate distribution of small farm loans in moderate-income census tracts. According to assessment area demographics, there are only six farms operating in moderate-income census tracts in the assessment area, representing 2.4 percent of total farms. Given the limited number of farms operating in these geographies, opportunities for small farm lending are limited. The bank made one small farm loan in a moderate-income census tract in both 2018 and 2019, representing 1.0 percent and 1.5 percent of its total small farm loans, respectively. These figures aligned with aggregate lending performance (1.4 percent in 2018 and 2.3 percent in 2019) and are considered adequate, especially considering the limited opportunities available for small farm lending in moderate-income census tracts.

**Loan Distribution by Borrower's Profile**

The bank's borrower distribution of loans in the Joplin MSA assessment area is considered good overall based on the performance of each of the three loan products reviewed. As previously noted, the weighting of these three products when determining overall conclusions was HMDA, small business, and then small farm lending.

*Home Mortgage Disclosure Act (HMDA) Lending*

The bank's HMDA lending reflects good penetration among individuals of different income levels in the assessment area overall, particularly LMI individuals. Loans to low-income borrowers represented 12.5 percent of the bank's total HMDA loans in 2018, which far exceeded the percentage of aggregate HMDA loans to low-income borrowers in the assessment area (7.3 percent). While 19.9 percent of families in the assessment area are low income, a significant portion of these families likely struggle to qualify for a home loan when considering the overall assessment area poverty level of 11.5 percent. Thus, the bank's performance is considered excellent when considering this context and in comparison to peer lending levels. The bank's performance lending to moderate-income borrowers in 2018 is also excellent. The bank originated 22.5 percent of its HMDA loans to moderate-income borrowers as compared to the aggregate lending level of 18.5 percent and the demographic figure of 18.3 percent.

In 2019, the percentage of the bank's HMDA loans to low-income borrowers (9.9 percent) exceeded aggregate lending performance (7.7 percent), though by a lower magnitude than in 2018, and trailed the demographic figure (19.9 percent), reflecting good performance. The bank originated 18.5 percent of its HMDA loans in 2019 to moderate-income borrowers, which was in line with the performance of peer institutions in the assessment area (19.1 percent) and the demographic figure (18.3 percent), reflecting adequate performance.

*Small Business Lending*

The bank's small business lending reflects a good distribution to businesses of different sizes overall. In 2018, the bank made 69.3 percent of its small business loans to businesses with annual revenues of $1 million or less; this performance exceeded that of peer institutions in the assessment area (45.5 percent) but was below the demographic estimate of assessment area businesses with this revenue profile (90.7 percent), reflecting good performance. Performance in 2019 is similarly considered good. The bank's level of lending to businesses with annual revenues of $1 million or less in 2019 (66.2 percent) exceeded aggregate lending performance (39.9 percent) by a wide margin and continued to trail the demographic figure (92.2 percent). Moreover, across both years of data reviewed, 81.1 percent of the bank's loans to businesses with annual revenues of $1 million or less were in amounts of $100,000 or less. This further reflects the bank's responsiveness to the credit needs of small businesses in the assessment area when considering information gained from community contacts that small dollar loan amounts are in high demand from businesses in the assessment area.

*Small Farm Lending*

Small farm lending to farms of different sizes in the assessment area is excellent. In 2018, the bank originated 97.0 percent of its small farm loans to farms with annual revenues of $1 million or less, which is considered excellent in comparison to the aggregate lending level of 72.1 percent and the demographic figure of 98.8 percent. The bank's level of lending to farms with this revenue profile in 2019 (89.6 percent) also exceeded aggregate lending performance (71.1 percent), though by a smaller magnitude than in 2018, and trailed the demographic figure (99.2 percent), reflecting good performance. Of all the bank's loans to farms with annual revenues of $1 million or less in 2018 and 2019, 67.7 percent were in amounts of $100,000 or less, which is generally considered more responsive to the needs of small businesses in the assessment area.

## Community Development Lending Activity

The bank is a leader in providing community development loans in the Joplin MSA. As shown in the table below, the bank's community development loans during the review period qualified for purposes of economic development, affordable housing, and community services targeted to LMI individuals. Overall, the bank made 10 community development loans totaling $58.1 million and received credit for 24 PPP loans with a community development purpose totaling $19.3 million. The most impactful of these loans are discussed following the table below.

| | Community Development Lending | | | | | | | | | |
| | Affordable Housing | | Community Services | | Revitalization/ Stabilization | | Economic Development | | Total | |
| | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) |
| CD Loans | 2 | 6,002 | 1 | 33 | - | - | 7 | 52,100 | 10 | 58,136 |
| PPP Loans | - | - | - | - | - | - | 24 | 19,308 | 24 | 19,308 |

- Two loans totaling $35.5 million were made to finance the expansion and purchase of additional equipment for a sawmill in the assessment area. As previously noted, manufacturing is the largest job sector in the assessment area economy by number of paid employees, demonstrating its importance to employment in the assessment area. These loans qualified for a purpose of economic development by supporting 10 permanent positions for LMI individuals.

- One loan for $3.6 million financed the construction of a new affordable multifamily housing development. The project was partially funded through LIHTCs, and all future residents will be LMI. This loan is considered responsive, as the project will have a targeted benefit to LMI individuals and is responsive to the need for affordable housing development identified by community contacts.

- One loan for $5.1 million financed the construction of a new nursing home in the assessment area. This loan qualified as economic development due to its creation of 125 new jobs for the assessment area, many of which will be LMI jobs for support staff at the facility. This loan is considered responsive given the substantial number of jobs created.

INVESTMENT TEST

The bank provides an adequate level of community development investments and grants and is rarely in a leadership position in the Joplin MSA assessment area. The bank's investment activity in the assessment area was composed of $659,781 in MBS supporting affordable housing loans for LMI individuals. Of this total, $318,225 were made in the current review period, while the bank also received credit for $341,556 in MBS investments with an outstanding balance. In addition to these activities, the bank made 39 donations totaling $30,461 to various community service, nonprofit, and economic development organizations in the assessment area. Of note, the bank made two donations totaling $3,900 to an economic development organization that seeks to attract and retain businesses and residents to the downtown Joplin area. This organization is supported by municipal resources in line with its strategic plan for increasing investment in the downtown Joplin area.

SERVICE TEST

The bank's service delivery systems are readily accessible to geographies and individuals of different income levels in the assessment area, and the bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems. Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Lastly, Arvest Bank provides a relatively high level of community development services in the assessment area.

**Accessibility of Delivery Systems**

Of its 241 total branches, the bank operates eight, or 3.3 percent, in the Joplin MSA assessment area. The location of these branches is shown below by geography income level along with the distribution of assessment area census tracts and the household population.

| Branch Distribution by Geography Income Level | | | | | | |
|---|---|---|---|---|---|---|
| **Dataset** | **Geography Income Level** | | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | **Unknown** | |
| Branches | 0 | 3 | 4 | 1 | 0 | **8** |
| | 0.0% | 37.5% | 50.0% | 12.5% | 0.0% | **100%** |
| Census Tracts | 0.0% | 17.7% | 67.7% | 14.7% | 0.0% | **100%** |
| Household Population | 0.0% | 15.2% | 68.2% | 16.5% | 0.0% | **100%** |

As shown above, the bank operates three branches in moderate-income census tracts, representing 37.5 percent of total bank branches in the assessment area. While not shown in the table above, the bank also operates one stand-alone, deposit-accepting ATM in the assessment area in a middle-income census tract. The distribution of branches in moderate-income geographies is higher than distribution of census tracts that are moderate income (17.7 percent) and the household population within those census tracts (15.2 percent). Additionally, the bank's branches are well dispersed throughout both counties in the assessment area and are accessible to all portions of the assessment area. As a result, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels in the assessment area, particularly LMI geographies and individuals.

## Changes in Branch Locations

The bank closed three branches in middle-income census tracts during the review period. These branch closures had a minimal impact on accessibility, as the bank operates nearby branches in adjacent census tracts that are accessible to residents of the census tract with the closed bank branch. Therefore, the bank's record of opening and closing branches in the assessment area has not adversely affected the accessibility of its service delivery systems, particularly to LMI geographies or individuals.

## Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours are consistent across the assessment area. All branches in the assessment area operate weekday lobby hours from 8:00 a.m. to 5:00 p.m. with extended Friday hours to 6:00 p.m. Saturday lobby hours are available at five branch locations, including three branches located in moderate-income census tracts. Additionally, all branches in the assessment area operate drive-through facilities that offer drive-through hours on Saturdays and have extended weekday drive-through hours beyond standard weekday lobby hours. Lastly, lenders are equally dispersed throughout the assessment area, including in branches located in moderate-income census tracts. As such, business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals.

## Community Development Services

The bank provides a relatively high level of community development services in the Joplin MSA assessment area. During the review period, nine bank employees provided 61 hours of community development service activities to nine different organizations in the assessment area. Of note, three bank employees served as board members or provided financial and technical expertise to four different economic development organizations in the assessment area. One of these organizations specializes in workforce development, while the other three organizations promote economic development initiatives and small business development in the assessment area. Lastly, Arvest Bank opened and maintained 53 RPA accounts for LMI individuals in the assessment area during the review period.

# SPRINGFIELD, MISSOURI MSA

*(Limited-Scope Review)*

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SPRINGFIELD MSA ASSESSMENT AREA**

This assessment area includes the entirety of the Springfield MSA, which includes Greene, Christian, Webster, Dallas, and Polk counties. The bank operates eight branches and two stand-alone ATMs in this assessment area. During the review period, the bank closed three branches in the assessment area and did not open any branches. The tables below detail key demographics relating to this assessment area.

| Assessment Area Demographics by Population Income Level | | | | | |
|---|---|---|---|---|---|
| **Demographic Type** | **Population Income Level** | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | |
| Family Population | 23,291 | 21,519 | 24,283 | 45,746 | **114,839** |
| | 20.3% | 18.7% | 21.1% | 39.8% | **100%** |
| Household Population | 39,728 | 31,117 | 32,562 | 75,103 | **178,510** |
| | 22.3% | 17.4% | 18.2% | 42.1% | **100%** |

| Assessment Area Demographics by Geography Income Level | | | | | | |
|---|---|---|---|---|---|---|
| **Dataset** | **Geography Income Level** | | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | **Unknown-** | |
| Census Tracts | 5 | 23 | 49 | 13 | 1 | **91** |
| | 5.5% | 23.3% | 53.9% | 14.3% | 1.1% | **100%** |
| Family Population | 3,596 | 19,711 | 71,184 | 20,307 | 41 | **114,839** |
| | 3.1% | 17.2% | 62.0% | 17.7% | 0.0% | **100%** |
| Household Population | 7,611 | 36,970 | 104,334 | 28,951 | 644 | **178,510** |
| | 4.3% | 20.7% | 58.5% | 16.2% | 0.4% | **100%** |
| Business Institutions | 436 | 4,733 | 11,020 | 3,155 | 49 | **19,393** |
| | 2.2% | 24.4% | 56.8% | 16.3% | 0.3% | **100%** |

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SPRINGFIELD MSA ASSESSMENT AREA**

LENDING TEST

The bank's Lending Test performance in this assessment area is consistent with the Lending Test performance in the Joplin MSA, as detailed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in *Appendix C*.

| Lending Test Criteria | Performance |
|---|---|
| Lending Activity | Consistent |
| Geographic Distribution of Loans | Exceeds |
| Distribution of Loans by Borrower's Profile | Consistent |
| Community Development Lending Activity | Consistent |
| **OVERALL** | **Consistent** |

During the review period, the bank made six community development loans totaling $51.6 million in the Springfield MSA. Additional consideration was given to the level of community development PPP lending in the assessment area, which included a further 15 loans totaling $6.0 million. The bank's community development lending included two noteworthy loans: one loan totaling $25.8 million qualified for a purpose of economic development and funded the construction of a multifamily housing complex, while a second loan totaling $16.9 million helped to revitalize and stabilize a moderate-income census tract in a redevelopment zone by constructing a golf facility. Together these two projects created an estimated 116 jobs for LMI individuals in the assessment area.

INVESTMENT TEST

The bank's Investment Test performance in the Springfield MSA assessment area is consistent with the investment performance in the Joplin MSA assessment area. The bank's qualified investment and grant activity in the assessment area totaled $6.9 million, as displayed in the table below.

| Summary of Investments – Springfield MSA | | | |
|---|---|---|---|
| Investment Type | Current Period | Prior Period, Still Outstanding | Total |
| MBS | $639,270 | $979,944 | $1.6 million |
| LIHTC | $5.0 million | - | $5.0 million |
| Donations | $366,699 | - | $366,699 |
| **TOTAL** | **$6.0 million** | **$979,944** | **$7.0 million** |

The bank's investment totals include one new investment in an LIHTC project totaling $5.0 million that supported the development of a new multifamily affordable housing development for foster children and low-income individuals in the assessment area. To facilitate this project, the bank sold a former branch location at below market value to the new organization, resulting in a $353,000 donation for which the bank also received credit.

| Arvest Bank | | CRA Performance Evaluation |
|---|---|---|
| Fayetteville, Arkansas | Springfield MSA | September 27, 2021 |

SERVICE TEST

Performance under the Service Test in the Springfield MSA assessment area is consistent with the bank's performance in the Joplin MSA assessment area, as shown in the table below.

| Service Test Criteria | Performance |
|---|---|
| Accessibility of Delivery Systems | Below |
| Changes in Branch Locations | Consistent |
| Reasonableness of Business Hours and Services | Consistent |
| Community Development Services | Consistent |
| **OVERALL** | **Consistent** |

During the review period, 13 bank employees provided 266 hours of community development service activities to 19 different organizations. Bank employees served as board members or provided financial/technical assistance for several community service and nonprofit organizations throughout the assessment area and provided financial literacy training at various schools and community organizations. Additionally, Arvest Bank opened and maintained 28 RPA accounts for LMI individuals in the assessment area during the review period.

# NONMSA MISSOURI

*(Full-Scope Review)*

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMSA MISSOURI

### Bank Structure

The bank operates 14 branches, which equates to 5.8 percent of the bank's total branches, in nonMSA Missouri. The locations of these branches by geography income level are displayed in the table below.

| Branch Location by Census Tract Income Level | | | | |
|---|---|---|---|---|
| **Low-Income** | **Moderate-Income** | **Middle-Income** | **Upper-Income** | **Unknown-Income** |
| 0 | 2 | 12 | 0 | 0 |

During the review period, the bank closed five branches in the assessment area: one in a moderate-income census tract and four in middle-income census tracts. In addition to the branch locations displayed in the table above, the bank operates seven stand-alone ATMs in the assessment area, all of which are in middle-income census tracts and two of which are deposit accepting. The bank's branches are generally well dispersed throughout the assessment area, which covers a large portion of southern Missouri. However, the bank does not operate any branches in Ozark or Douglas counties, which contain three of the ten moderate-income census tracts in the assessment area. While alternative delivery systems, such as online and mobile banking, are available to residents in these counties, the bank may struggle to fully serve those counties relative to the rest of the assessment area.

### General Demographics

The assessment area is largely rural and covers broad portions of southern Missouri surrounding the Joplin and Springfield MSAs. The bank's nonMSA Missouri assessment area includes 14 counties in their entirety, which are displayed in the table below.

| Counties Making Up the NonMSA Missouri Assessment Area | | | |
|---|---|---|---|
| Barry | Douglas | McDonald | Vernon |
| Barton | Howell | Ozark | Wright |
| Cedar | Laclede | Stone | |
| Dade | Lawrence | Taney | |

The counties in the assessment area range from 7,618 in population (Dade County) to 53,555 (Taney County), adding up to a total assessment area population of 353,559. While the assessment area as a whole is largely dependent on agriculture, the city of Branson in Taney County serves as a popular tourist destination and serves as a regional commercial and banking hub for surrounding counties. While rural, the assessment area hosts a relatively competitive banking market, with 44 FDIC-insured depository institutions operating 148 branches throughout the assessment area. Arvest Bank is the market leader among these institutions in terms of deposit market share (9.5 percent) and total branches. Of the bank's total deposits, 3.3 percent are held in nonMSA Missouri.

Competition for HMDA and CRA loans is similarly high. An analysis of 2019 lending data shows that while only 44 financial institutions operate a branch in the assessment area, 402 institutions reported HMDA lending activity and 88 reported CRA lending activity in the assessment area. Arvest Bank ranked first among all institutions with HMDA lending activity in 2019 and second in CRA lending activity, though the only institution with more CRA lending activity is an online-only lender with no branch presence in the assessment area.

Credit needs in the assessment area are varied and include a blend of consumer loan products and loan products designed to meet the needs of small businesses and farms in the assessment area. More specifically, community contacts identified the need for affordable home improvement loans, flexible agricultural loan products, and financial literacy training and counseling for both consumers and businesses.

## Income and Wealth Demographics

The following table displays the number of census tracts by income level and the percentage of assessment area families within those census tracts.

| Assessment Area Demographics by Geography Income Level | | | | |
|---|---|---|---|---|
| | Census Tracts | | Family Population | |
| Low | 0 | 0.0% | 0 | 0.0% |
| Moderate | 10 | 14.1% | 13,520 | 14.1% |
| Middle | 58 | 81.7% | 78,124 | 81.7% |
| Upper | 3 | 4.2% | 3,954 | 4.1% |
| TOTAL | 71 | 100% | 95,598 | 100% |

As shown above, there are no low-income census tracts in the assessment area and ten moderate-income census tracts, representing 14.1 percent of all census tracts. Most of the census tracts in the assessment area are middle income, and most assessment area families reside within those tracts. While designated as middle income, some of these geographies were also designated as distressed or underserved during the review period, as detailed below.

- There are 17 census tracts designated as distressed due to poverty in Barry, Douglas, Howell, Ozark, and Wright counties.

- Eight census tracts are designated as underserved due to their remote rural location in Dade, Ozark, and Vernon counties.

Based on 2015 ACS data, families in the assessment area earned a median income of $45,389, while the median family income for nonMSA Missouri as a whole was $48,341. More recently, the FFIEC estimates the median family income for nonMSA Missouri to be $53,100 in 2018 and $52,400 in 2019. Next, the following table reflects the distribution of assessment area families by income level compared to nonMSA Missouri as a whole.

| Family Population by Income Level | | | | |
|---|---|---|---|---|
| | Assessment Area | | NonMSA Missouri | |
| Low | 20,849 | 21.8% | 81,150 | 20.5% |
| Moderate | 18,657 | 19.5% | 72,084 | 18.2% |
| Middle | 20,940 | 21.9% | 84,064 | 21.2% |
| Upper | 35,152 | 36.8% | 159,212 | 40.2% |
| TOTAL | 95,598 | 100% | 396,510 | 100% |

While the previous table showed that only 14.1 percent of families in the assessment area reside in LMI census tracts, the data in the table above shows that a much larger percentage of families in the assessment area are LMI (41.3 percent). This percentage also exceeds the LMI family distribution in nonMSA Missouri as a whole (38.7 percent). Moreover, assessment area demographics indicate that 15.5 percent of families in the assessment area are below the poverty level, as compared to 14.2 percent in nonMSA Missouri as a whole. Considering these factors and the previously described income levels for both datasets, the assessment area is less affluent than nonMSA Missouri as a whole.

## Housing Demographics

The following table displays housing demographics for selected counties in the assessment area, the assessment area as a whole, and all of nonMSA Missouri.

| Housing Demographics | | | | |
|---|---|---|---|---|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) | Housing Cost Burden |
| Dade County | $79,900 | 46.4% | $594 | 41.0% |
| Stone County | $153,100 | 26.5% | $688 | 44.6% |
| Taney County | $121,700 | 31.5% | $694 | 42.9% |
| Vernon County | $90,800 | 44.8% | $626 | 39.8% |
| Assessment Area | $105,681 | 34.9% | $611 | 40.8% |
| NonMSA Missouri | $100,293 | 38.0% | $611 | 40.6% |

As shown above, housing in the assessment area as a whole is less affordable than in nonMSA Missouri based on a lower affordability ratio. However, housing affordability varied widely in the assessment area, as demonstrated by the affordability ratios for the selected counties included in the table. In more rural counties in the assessment area, such as Dade and Vernon, housing was significantly more affordable than the assessment area average for nonMSA Missouri as a whole, while housing costs in Stone and Taney counties were significant higher. As previously mentioned, these counties include the city of Branson and nearby Table Rock Lake, both of which are renowned tourist destinations. Housing costs here are higher relative to other parts of the assessment area due to higher construction costs and the demand for more expensive, secondary homes for tourists. Based on this context, homeownership is likely a challenge for LMI residents in Stone and Taney counties. While housing in the rest of the assessment area is generally more affordable, community contacts described that much of this housing stock is aging and in need of repair. Of the 14 counties in the assessment area, the median age of housing stock in four counties exceeds 40 years. As a result, the assessment area has a need for affordable home improvement loans to maintain the availability of affordable housing stock, particularly for LMI borrowers. Rental costs for the assessment area are closely aligned with statewide levels overall, though rental costs were highest in Stone and Taney counties, presenting additional challenges to LMI borrowers

seeking to obtain affordable housing in the assessment area. Lastly, across the assessment area as a whole, 13.1 percent of all owner-occupied housing units are in moderate-income census tracts.

## Industry and Employment Demographics

The assessment area supports strong small business and agriculture sectors. According to assessment area demographics, 91.8 percent of businesses and 98.7 percent of farms reported annual revenues of $1 million or less. Overall, the assessment area supports 113,506 paid employees, with the largest industries by number of paid employees being manufacturing (17.5 percent), government (15.8 percent), retail trade (13.6 percent), and accommodation and food services (11.1 percent). While not captured in county business patterns data, agriculture also plays a significant role in the area's economy, with 979 farms operating throughout the assessment area.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Missouri.

| Unemployment Levels | | | |
|---|---|---|---|
| Dataset | Time Period (Annual Average) | | |
| | 2018 | 2019 | YTD 2020 |
| Assessment Area | 3.8% | 4.5% | 8.6% |
| NonMSA Missouri | 3.7% | 4.0% | 6.9% |

As shown above, unemployment levels in the assessment area remained higher than in nonMSA Missouri as a whole throughout the review period. Several factors contributed to this disparity. Unemployment levels in Stone and Taney counties are impacted by the effects of seasonal unemployment connected to the tourism industry, as unemployment levels typically fall in the summer months and increase in the winter months. In 2019, unemployment levels in these two counties ranged from 12.3 percent in January to a low of 2.9 percent in September. In contrast, other counties in the assessment area did not experience the same level of seasonal variance. Additionally, community contacts noted that the pandemic has had a significant impact on the assessment area's economy in comparison to other portions of the state due to permanent job loss in the manufacturing, tourism, and agriculture industries. This is reflected in the data in the table above, as unemployment levels in the assessment area rose by a greater magnitude from 2019 to 2020 than did unemployment levels in nonMSA Missouri as a whole.

## Community Contact Information

For the nonMSA Missouri assessment area, two community contact interviews were conducted with individuals with knowledge of the economic conditions, credit needs, and community development opportunities of the assessment area. To ensure that the economic conditions and credit needs of the entire assessment area were captured, both community contacts represent organizations that serve broad, multicounty regional areas. One of these contacts represents a farm services agency, while the second contact represents a regional affordable housing organization.

Economic conditions are varied across the counties in the assessment area. For instance, Wright and Douglas counties are among the most rural in Missouri, are sparsely populated, and are heavily

reliant on agriculture production. Meanwhile, Stone and Taney counties are much more populous and have a more diversified economy that centers around the tourism industry in the city of Branson and nearby attractions like Table Rock Lake. Both contacts noted that many residents in the less populous counties commute long distances to work in nearby regional hubs such as Branson, Joplin, or Springfield. In addition, both community contacts described that the pandemic has had a significant impact on the assessment area's economy due largely to falling commodity prices impacting farming operations and job loss from tourism-related industries, which impact many residents in the assessment area. While commodity prices have risen more recently in the assessment area, higher compliance costs for dairy and pork farming have forced many smaller farming operations to close due to prohibitive costs, which both community contacts attributed to unemployment levels remaining elevated in the assessment area even as some sectors of the economy are recovering in the wake of the pandemic. Regarding access to banking services, neither contact identified gaps in the products and services offered though one contact noted that many businesses and farms in the assessment area struggle to qualify for conventional commercial loans due to stringent underwriting requirements. As a result, many businesses and farms have looked to alternative lending sources for loans.

One contact familiar with agricultural credit needs in the assessment area described that numerous banks do not offer guaranteed farm loan programs, which are preferred by many borrowers in the assessment area. As a result, potential borrowers go directly to government agencies such as the Farm Service Agency for agriculture loans. The contact went on to identify poor credit history, collateral requirements, and inflexible underwriting requirements as other barriers that many farmers in the assessment area face when qualifying for agriculture loans. The housing contact pointed to a need for improved affordable housing stock. While affordable housing is generally available, much of the housing stock is old and in need of repair, which has reduced the quality of available housing. This has increased the need for affordable rental housing, according to the contact, who described that many LMI residents are unable to save enough money for a down payment on a home, which contributes to the relatively high percentage of rental properties in the assessment area compared to owner-occupied units. Consequently, the assessment area also has need for affordable home improvement loans for LMI borrowers to address the challenges of an aging housing stock. Other community development or credit needs identified by the community contacts include financial literacy training and counseling for both consumers and businesses and increased partnerships with local affordable housing and agriculture agencies to increase flexibility in meeting the credit needs of consumers and farms in the assessment area.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMSA MISSOURI

LENDING TEST

The bank's lending activity levels reflect good responsiveness to the credit needs of the nonMSA Missouri assessment area. The overall geographic distribution of loans reflects poor penetration throughout the assessment area. Furthermore, the overall distribution of loans by borrower's income/revenue profile reflects good penetration among borrowers of different income levels and businesses and farms of different revenue sizes. Lastly, the bank makes a relatively high level of community development loans in the assessment area.

### Lending Activity

The following table displays the combined 2018 and 2019 lending volume by number and dollar amount in the assessment area.

| Summary of Lending Activity January 1, 2018 through December 31, 2019 | | | | |
|---|---|---|---|---|
| Loan Type | # | % | $(000s) | % |
| Home Improvement | 90 | 3.6% | 4,334 | 1.8% |
| Home Purchase | 584 | 23.5% | 70,108 | 29.7% |
| Multifamily Housing | 11 | 0.4% | 4,302 | 1.8% |
| Refinancing | 372 | 14.9% | 37,685 | 16.0% |
| Other Purpose LOC | 61 | 2.4% | 2,950 | 1.2% |
| Other Purpose Closed/Exempt | 34 | 1.4% | 1,543 | 0.7% |
| Purpose Not Applicable | 0 | 0.0% | 0 | 0.0% |
| **Total HMDA** | **1,152** | **46.3%** | **120,922** | **51.2%** |
| Small Business | 531 | 21.3% | 51,206 | 21.7% |
| Small Farm | 807 | 32.4% | 63,996 | 27.1% |
| **TOTAL LOANS** | **2,490** | **100.0%** | **236,124** | **100.0%** |

The bank's lending activity in nonMSA Missouri represents 4.6 percent of its total HMDA and CRA loans made within its combined assessment areas. By comparison, this exceeds the percentage of total bank deposits held in the assessment area (3.3 percent) and is slightly below the percentage of total bank branches located in the assessment area (5.8 percent). Additional consideration was given to the bank's overall role in meeting the credit needs of the assessment area. As previously noted, the bank ranked first out of 402 lenders in total HMDA lending activity and second out of 88 lenders in CRA lending activity in 2019, indicating that the bank plays a leading role in extending credit in the assessment area. As such, the bank's lending activity levels reflect good responsiveness to the credit needs of the nonMSA Missouri assessment area.

## Geographic Distribution of Loans

The geographic distribution of loans in nonMSA Missouri is poor overall. Primary consideration was given to the bank's HMDA lending performance when determining overall conclusions, with small business and small farm lending weighted equally. As there are no low-income census tracts in the assessment area, the bank's performance is solely based on its lending in moderate-income census tracts.

*Home Mortgage Disclosure Act (HMDA) Lending*

The geographic distribution of HMDA loans is poor overall. The bank originated 8.8 percent and 8.3 percent of its HMDA loans in moderate-income census tracts in 2018 and 2019, respectively. This is considered poor for both years, as the bank's performance was below peer lending performance in the assessment area (12.1 percent in 2018 and 11.0 percent in 2019) and the percentage of owner-occupied housing units located in moderate-income census tracts (14.0 percent in 2018 and 13.1 percent in 2019).

*Small Business Lending*

The overall geographic distribution of small business loans is poor. In 2018, the bank originated 6.8 percent of its small business loans in moderate-income census tracts while peer lenders in the assessment area made 10.9 percent of total small business loans in these geographies. The bank's performance was also below the demographic estimate of assessment area businesses located in moderate-income census tracts (13.2 percent). Considering this comparison data, the bank's performance is considered poor. Similarly, the bank's level of small business lending in moderate-income census tracts in 2019 (7.1 percent) was below aggregate lending levels (10.6 percent) and the demographic figure (13.1 percent), reflecting poor performance.

*Small Farm Lending*

The bank's geographic distribution of small farm loans is poor overall. The bank originated only 3.1 percent of its small farm loans in moderate-income census tracts in 2018 compared to 8.1 percent by peer lenders in the assessment area and the demographic figure of 9.8 percent. Similarly, the bank's performance in 2019 (3.3 percent) was below aggregate lending levels (8.8 percent) and the demographic figure (9.5 percent). This reflects poor performance for both years of data reviewed.

While the geographic distribution of loans is poor overall in the assessment area based on all three products reviewed, an analysis of the dispersion of these products did not reveal evidence of any conspicuous lending gaps. The bank had lending activity in all but one moderate-income census tract in the assessment area for 2018. In 2019, the bank had lending activity in all but three census tracts in the assessment area and all but one moderate-income tract.

## Loan Distribution by Borrower's Profile

The overall distribution of loans by borrower's income level or business and farm revenue size is good, based on all three products reviewed.

*Home Mortgage Disclosure Act (HMDA) Lending*

The bank's HMDA lending reflects an adequate penetration among borrowers of different income levels overall. In 2018, the bank originated 7.3 percent of its HMDA loans to low-income borrowers. This performance was in line with aggregate lending levels (6.9 percent) but below the percentage of assessment area families who are low income (22.0 percent), reflecting adequate performance. Similarly, lending to moderate-income borrowers in 2018 (17.4 percent) was in line with peer performance (17.4 percent) but below the demographic figure (19.5 percent) and is considered adequate.

The bank's overall level of lending to LMI borrowers improved slightly in 2019, with 7.1 percent of total HMDA loans made to low-income borrowers and 18.0 percent to moderate-income borrowers. By comparison, peer performance in the assessment area was in line with the bank's performance lending to low-income borrowers (6.0 percent) and below the bank's performance lending to moderate-income borrowers (15.4 percent). Therefore, the bank's HMDA loan distribution to low-income borrowers is considered adequate while performance lending to moderate-income borrowers is considered good.

*Small Business Lending*

Of the bank's total small business loans in the assessment area in 2018, 71.6 percent were made to businesses with annual revenues of $1 million or less. This was well above the performance of peer lenders in the assessment area (52.2 percent) but below the demographic figure of 91.2 percent, reflecting good performance. Similarly, 78.7 percent of the bank's small business loans in 2019 were made to businesses with annual revenues of $1 million or less which compared favorably to aggregate lending levels (50.8 percent) but was below demographic (90.5 percent), also reflecting good performance. Across both years of data in the review period, 87.9 percent of the bank's loans to businesses with annual revenues of $1 million or less in the assessment area were in amounts of $100,000 or less. These amounts are typically in higher demand from small businesses and demonstrate the bank's responsiveness to meeting the credit needs of businesses in the assessment area. Therefore, the overall distribution of small business loans by business revenue size in nonMSA Missouri is considered good.

*Small Farm Lending*

The bank's record of lending to farms of different sizes is good overall. In both 2018 (92.9 percent) and 2019 (87.0 percent), the bank originated a higher percentage of its small farm loans to farms with annual revenues of $1 million or less than did peer institutions in the assessment area (82.7 percent in 2018 and 80.0 percent in 2019). While below the demographic estimate of assessment area farms with this revenue profile (98.3 percent in 2018 and 98.7 percent in 2019), the bank's performance is nevertheless considered good for both years in comparison to peer lending levels and considering context provided by community contacts. As explained by community contacts, agriculture is an essential part of the assessment area economy, though many farmers in the assessment area struggle to qualify for traditional agriculture loans from local financial institutions. Arvest Bank ranked first out of all lenders with small farm loans in the assessment area, accounting for 24.9 percent of all small farm loans made in the assessment area in 2019.

**Community Development Lending Activity**

The bank makes a relatively high level of community development loans in nonMSA Missouri. As shown in the table below, the bank made eight community development loans totaling $12.9 million and 23 PPP loans totaling $5.5 million. The most impactful of these loans are discussed below the following table.

| Community Development Lending | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | Affordable Housing | | Community Services | | Revitalization/ Stabilization | | Economic Development | | Total | |
| | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) |
| CD Loans | - | - | - | - | 5 | 8,430 | 3 | 4,459 | 8 | 12,889 |
| PPP Loans | - | - | - | - | - | - | 23 | 5,518 | 5 | 5,518 |

- The bank made five loans totaling $8.4 million that financed three farm equipment and services business in the assessment area. These businesses operate and serve distressed middle-income geographies, helping to revitalize and stabilize these areas by retaining existing farms in the assessment area. Based on the information provided by community contacts, these loans are responsive to agricultural needs of the assessment area, as businesses such as these are essential to the continued operations and profitability of farming operations in the assessment area.

INVESTMENT TEST

The bank made a low level of community development investments and grants in nonMSA Missouri. As shown below, most the bank's qualified investments in nonMSA Missouri were in MBS, with all investment and grant activity in the assessment area totaling $994,275.

| Summary of Investments – NonMSA Missouri | | | |
|---|---|---|---|
| Investment Type | Current Period | Prior Period, Still Outstanding | Total |
| MBS | $343,466 | $630,740 | $974,206 |
| Donations | $20,069 | - | $20,069 |
| **TOTAL** | **$363,535** | **$630,740** | **$994,275** |

SERVICE TEST

The bank's service delivery systems are reasonably accessible to individuals and geographies of different income levels throughout the nonMSA Missouri assessment area, and the bank's record of opening and closing branches in the assessment area has not adversely affected the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Lastly, the bank provides an adequate level of community development services in the nonMSA Missouri assessment area.

**Accessibility of Delivery Systems**

The bank operates 14 branches throughout the assessment area, as shown in the table below. In addition, the bank also operates seven stand-alone ATMs, two of which are deposit accepting, in

middle-income census tracts in the assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown | |
|---|---|---|---|---|---|---|
| Branches | 0 | 2 | 12 | 0 | 0 | **16** |
| | 0.0% | 14.3% | 85.7 | 0.0% | 0.0% | **100%** |
| Census Tracts | 0.0% | 14.1% | 81.7% | 4.2% | 0.0% | **100%** |
| Household Population | 0.0% | 15.1% | 80.9% | 4.1% | 0.0% | **100%** |

*Branch Distribution by Geography Income Level*

The bank operates two branches in moderate-income census tracts in the assessment area, representing 14.3 percent of the bank's total branches in nonMSA Missouri. In addition, one branch located in a middle-income census tract in the city of West Plains borders an adjacent moderate-income census tract and is accessible to residents of that tract, while four other branches in middle-income census tracts are in distressed or underserved geographies. This branch distribution aligns with the percentage of census tracts that are moderate income (14.1 percent) and the household population within those tracts (15.1 percent) and demonstrates that the bank's service delivery systems are reasonably accessible to individuals and geographies of different income levels in the assessment area.

## Changes in Branch Locations

During the review period, the bank closed one branch in a moderate-income census tract and four in middle-income census tracts. The closed location in a moderate-income tract is within one mile of a nearby Arvest Bank branch in the same census tract; thus, this branch closure had no impact on the accessibility of the bank's service delivery systems. Moreover, none of the closed branches in middle-income census tracts bordered LMI census tracts or impacted the accessibility of the bank's service to LMI geographies. Overall, the bank's record of opening and closing branches in the nonMSA Missouri assessment area has not adversely affected the accessibility of the bank's service delivery systems, particularly to LMI geographies or individuals.

## Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours are relatively consistent across the bank's branches in the assessment area. All branches operate lobby hours starting between 8:00 a.m. and 9:00 a.m. and close between 4:00 p.m. and 6:00 p.m., with many of these locations offering extended lobby hours on Fridays. Eight branches in the assessment area operate Saturday lobby hours as well, including one of the two branches in moderate-income census tracts. All bank branches in the assessment area operate drive-through facilities on weekdays and on Saturdays, many of which operate beyond the bank's weekday lobby hours. Lastly, lenders are equally dispersed throughout the bank's branches in the assessment area, including in branches located in moderate-income census tracts. As such, business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals.

**Community Development Services**

Arvest Bank provides an adequate level of community development services in the nonMSA Missouri assessment area. During the review period, 11 bank employees provided 163 hours of community development service activities to ten different organizations in the assessment area. Bank employees served as board members and provided financial and technical expertise to various organizations with community development purposes, including youth service organizations, food banks, a medical center, and other community service organizations.

# FORT SMITH, ARKANSAS-OKLAHOMA MULTISTATE MSA[4]

**CRA RATING FOR FORT SMITH MSA:**      **SATISFACTORY**
**The Lending Test is rated:**      **High Satisfactory**
**The Investment Test is rated:**      **High Satisfactory**
**The Service Test is rated:**      **Outstanding**

Major factors supporting the institution's Fort Smith MSA rating include the following:

- The bank's lending activity levels reflect good responsiveness to the credit needs of the Fort Smith MSA.

- The geographic distribution of loans reflects good penetration throughout the Fort Smith MSA.

- The distribution of loans reflects good penetration among individuals of different income levels (including LMI levels) and businesses and farms of different sizes.

- The bank is a leader in providing community development loans in the Fort Smith MSA.

- The bank makes use of innovative and/or flexible lending practices in serving the credit needs of the Fort Smith MSA.

- The bank makes a significant level of qualified community development investments and grants and is occasionally in a leadership position.

- Delivery systems are accessible to geographies and individuals of different income levels in the Fort Smith MSA. Changes in branch locations have not adversely affected the accessibility of the bank's delivery systems, and business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly in LMI geographies.

- The bank is a leader in providing community development services.

**SCOPE OF EXAMINATION**

Examination scope considerations applicable to the review of the Fort Smith MSA are consistent with the overall CRA examination scope as presented in the *Institution/Scope of Examination* section. Based on loan demand and the bank's lending activity, HMDA lending received primary consideration in the analysis of the bank's lending performance followed by small business lending and, to a lesser extent, small farm lending.

The Fort Smith MSA was reviewed under full-scope examination procedures and utilized information gained from two community contacts to ascertain specific community credit needs,

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[4] This rating reflects performance within the multistate MSA. The Arkansas and Oklahoma statewide evaluations are adjusted and do not reflect performance in the multistate MSA.

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community development opportunities, and local economic conditions. Details from these interviews are included in the section that follows.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FORT SMITH MSA

### Bank Structure

The bank operates 11 branches in the Fort Smith MSA, representing 4.6 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

| Branch Location by Census Tract Income Level | | | |
|---|---|---|---|
| Low-Income | Moderate-Income | Middle-Income | Upper-Income |
| 0 | 3 | 5 | 3 |

During the review period, the bank closed one branch in a moderate-income census tract and one branch in a middle-income census tract. In addition to this branch network, other service delivery systems in the assessment area include four stand-alone, deposit-accepting ATMs, two of which are in moderate-income census tracts. Based on this branch network and other service delivery systems such as online and mobile banking, the bank is well positioned to deliver financial services to the entirety of the Fort Smith MSA.

### General Demographics

The bank has designated the entirety of the Fort Smith MSA as its assessment area, which includes Crawford, Franklin, and Sebastian counties in Arkansas and Sequoyah County in Oklahoma. Sebastian and Crawford counties are the most populous of the counties in the assessment area, with populations of 127,273 and 61,748, for a combined 76.1 percent of the 248,351 total residents in the assessment area. While the surrounding counties in the assessment area are more rural, Sebastian County hosts the bulk of the city of Fort Smith as well as a large military base and two universities.

While a total of 20 FDIC-insured depository institutions operate 107 branches in the assessment area, nearly 40.0 percent of the total deposit market share is held by two financial institutions, one of which is Arvest Bank, who ranks second with 18.1 percent of all deposit dollars held in the assessment area. Deposits held in the Fort Smith MSA represent 4.5 percent of the bank's total deposits. While only 20 depository institutions operate branch locations within the Fort Smith MSA, a much higher number of entities reported lending activity in the assessment area. Based on an analysis of 2019 HMDA lending activity, there were 224 entities with lending activity in the assessment area, of which Arvest Bank ranked first. Of the 73 entities with CRA lending activity in the assessment area, the bank ranked fourth, though two of the entities ahead of the bank do not operate a branch location in the assessment area.

This assessment area covers a metropolitan area, and the population and demographics are diverse. As a result, credit needs in the area vary and include a blend of consumer and business credit products. Other credit needs in the assessment area, as noted primarily by community contacts, include home purchase and home improvement loans for LMI borrowers, down payment assistance programs, small business counseling, and micro loans for small businesses. Lastly, various nonprofit, government assistance, and community and economic development

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organizations are active in the Fort Smith MSA, indicating that there are ample opportunities for community development involvement within the assessment area.

## Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

| Assessment Area Demographics by Geography Income Level | | | | |
|---|---|---|---|---|
| | Census Tracts | | Family Population | |
| Low | 0 | 0.0% | 0 | 0.0% |
| Moderate | 13 | 26.5% | 12,320 | 18.6% |
| Middle | 26 | 53.1% | 39,586 | 59.9% |
| Upper | 10 | 20.4% | 14,182 | 21.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% |
| TOTAL | 49 | 100% | 66,088 | 100% |

As shown above, there are no low-income census tracts in the assessment area, while moderate-income census tracts account for 26.5 percent of total assessment area census tracts. Meanwhile, 18.6 percent of families in the assessment area reside in moderate-income census tracts. Of the 13 moderate-income census tracts, nine are concentrated in the city of Fort Smith in Sebastian County.

Based on 2015 U.S. Census data, the median family income for the Fort Smith MSA was $48,258. At the same time, median family incomes for Arkansas and Oklahoma were $51,782 and $58,029, respectively. More recently, the FFIEC estimates the median family income for the Fort Smith MSA to be $52,400 in 2018 and $51,800 in 2019. The following table displays population percentages of assessment area families by income level compared to the Arkansas and Oklahoma family populations.

| Family Population by Income Level | | | | | | |
|---|---|---|---|---|---|---|
| | Assessment Area | | Arkansas | | Oklahoma | |
| Low | 14,809 | 22.4% | 164,346 | 21.6% | 208,222 | 21.6% |
| Moderate | 11,698 | 17.7% | 134,818 | 17.7% | 170,327 | 17.6% |
| Middle | 12,489 | 18.9% | 149,580 | 19.7% | 195,424 | 20.2% |
| Upper | 27,092 | 41.0% | 311,180 | 40.9% | 392,036 | 40.6% |
| TOTAL | 66,088 | 100% | 759,924 | 100% | 966,009 | 100% |

When compared with the data in the first table, a much higher percentage of families in the assessment area are LMI (40.1 percent) than reside in LMI geographies (18.6 percent). Moreover, the LMI family population in the assessment area exceeds that of both Arkansas (39.3 percent) and Oklahoma (39.2 percent), though only slightly. While not shown in the table above, the Fort Smith MSA also has a higher percentage of families who are below the poverty line (17.4 percent) than do the states of Arkansas (14.3 percent) and Oklahoma (12.4 percent) as a whole. Therefore, when considering this information and the previously discussed income figures for the assessment area, families in the Fort Smith MSA are less affluent than families in Arkansas and Oklahoma as a whole.

## Housing Demographics

The following table displays housing demographics for the assessment area, the state of Arkansas, and the state of Oklahoma.

| Housing Demographics | | | | |
|---|---|---|---|---|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) | Housing Cost Burden |
| Assessment Area | $106,718 | 36.4% | $626 | 44.4% |
| Arkansas | $111,400 | 37.1% | $677 | 42.7% |
| Oklahoma | $117,900 | 39.7% | $727 | 41.1% |

Based on the data in the table above, housing is slightly less affordable in the Fort Smith MSA than in Arkansas or Oklahoma as a whole, when accounting for income levels. While median housing values in the assessment area are lower than in Arkansas and Oklahoma, the affordability ratio in the assessment area is lower. Also, the housing cost burden is higher than the statewide comparison figures, pointing to higher housing costs relative to income levels in the assessment area. Housing costs are least affordable in Sebastian County, where the affordability ratio (33.7 percent) and housing cost burden (46.2 percent) reflect significantly higher housing costs than the other counties in the assessment area. Community contacts echoed this point when describing affordable housing conditions in the assessment area, noting that the demand for affordable housing far outpaces the supply, particularly in Sebastian and Crawford counties. Additionally, community contacts noted that the available affordable rental stock is aging and in poor condition, which further compounds the challenges many LMI residents face in obtaining safe, affordable housing in the assessment area. Lastly, assessment area demographics indicate that just 14.2 percent of all owner-occupied housing units in the assessment area are in moderate-income census tracts.

## Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector, as evidenced by the fact that 88.4 percent of businesses in the assessment area reported annual revenues of $1 million or less in 2019. County business patterns indicate that there are 97,386 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are manufacturing (17.6 percent) followed by government (14.3 percent), and health care and social assistance (13.7 percent).

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the states of Arkansas and Oklahoma.

| Unemployment Levels for the Assessment Area | | | |
|---|---|---|---|
| Time Period (Annual Average) | Assessment Area | Arkansas | Oklahoma |
| 2018 | 3.7% | 3.6% | 3.4% |
| 2019 | 3.4% | 3.6% | 3.3% |
| 2020 YTD | 6.9% | 7.0% | 6.9% |

As shown in the preceding table, unemployment levels in the assessment area were closely aligned with statewide levels in Arkansas and Oklahoma during the review period. As discussed in previous sections, the increase in unemployment levels in the assessment area and Arkansas and Oklahoma overall in 2020 are largely attributable to the impacts of the pandemic. While unemployment in the assessment area remained closely aligned with statewide levels, community contacts indicated that the assessment area experienced a less significant economic impact overall than did other parts of Arkansas or Oklahoma.

**Community Contact Information**

Two community contact interviews were conducted with individuals to obtain information regarding economic and demographic conditions as well as credit and community development needs in the assessment area. One of these individuals represents a community development organization, while the second contact represents a small business development organization in the assessment area.

Overall, the assessment area economy is stable, though the economic dynamics of the assessment area are changing in that more residents are leaving Sebastian County, the most populous county in the assessment area, which includes the core of the city of Fort Smith, while the adjacent counties are experiencing more growth. The contacts pointed to more families moving to Crawford County who commute to nearby Fayetteville or Fort Smith, as well as growth in certain economic sectors in Sequoyah County as exemplifying this trend. Regarding the  pandemic, the overall impact to the Fort Smith MSA was not as severe as in other portions of Arkansas or Oklahoma, as the area even benefitted from some population growth and tourism. One contact also pointed to job growth in the health care and social assistance sectors as benefitting the area's economy, particularly through its creation of additional jobs for LMI residents in the assessment area. When describing the availability of banking services in the assessment area, the contacts noted that most of the banking activity is centered in the core of Fort Smith, with far fewer financial institutions operating a branch outside of Sebastian County. Additionally, one community contact noted that access to credit is underutilized by many LMI residents in the assessment area due to strict underwriting standards or mistrust of banks.

One contact more familiar with affordable housing noted that there is existing affordable housing stock in the assessment area in good condition, but the demand for affordable housing exceeds the supply. Compounding this issue is the lack of new affordable housing development, which pushes many LMI residents to rental housing even if they do have the funds available for a down payment due to the lack of available single family affordable housing units. The contact went on to explain that rental housing, by comparison, was in far worse condition, which has increased the need for home improvement loans and new rental housing developments. Additionally, the housing cost burden in the assessment area, particularly in Sebastian County, is very high, which prevents many LMI residents from saving funds for a down payment. As a result, many LMI residents in the assessment area struggle to find access to qualify affordable housing options. The contact pointed to the need for credit counseling services and development of more innovative and affordable lending products designed for LMI borrowers to address these issues.

Small business conditions in the assessment area are generally favorable, according to the second community contact, though the contact did note that access to quality commercial real estate space

and business experience were barriers for many small businesses. The contact described that most lenders in the area have stringent underwriting requirements for businesses loans that prevent access to traditional credit for many new or startup businesses and stressed the need for small dollar micro loans to assist new businesses.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FORT SMITH MSA

LENDING TEST

Lending activity levels reflect good responsiveness to the credit needs of the Fort Smith MSA. The bank's overall geographic distribution of loans reflects good penetration throughout the assessment area. Furthermore, the overall distribution of loans by borrower's income/revenue profile reflects good penetration among borrowers of different income levels and businesses and farms of different revenue sizes. The bank is a leader in providing community development loans in the Fort Smith MSA. Lastly, the bank makes use of innovative and/or flexible lending practices in meeting the credit needs of the assessment area.

### Lending Activity

The following table displays the combined 2018 and 2019 lending volume by number and dollar amount in the assessment area.

| Summary of Lending Activity<br>January 1, 2018 through December 31, 2019 | | | | |
|---|---|---|---|---|
| Loan Type | # | % | $(000s) | % |
| Home Improvement | 94 | 4.4% | 5,158 | 2.2% |
| Home Purchase | 747 | 34.9% | 107,990 | 46.6% |
| Multifamily Housing | 20 | 0.9% | 7,324 | 3.2% |
| Refinancing | 473 | 22.1% | 48,395 | 20.9% |
| Other Purpose LOC | 33 | 1.5% | 1,951 | 0.8% |
| Other Purpose Closed/Exempt | 73 | 3.4% | 3,421 | 1.5% |
| Purpose Not Applicable | 0 | 0.0% | 0 | 0.0% |
| **Total HMDA** | **1,440** | **67.3%** | **174,239** | **75.1%** |
| Small Business | 611 | 28.5% | 50,529 | 21.8% |
| Small Farm | 90 | 4.2% | 7,194 | 3.1% |
| **TOTAL LOANS** | **2,141** | **100.0%** | **231,962** | **100.0%** |

The bank's combined HMDA and CRA lending activity in the Fort Smith MSA represents 3.9 percent of its total loan activity across all assessment areas. These lending levels are in line with the percentage of total bank branches in the assessment area (4.6 percent) and the percentage of total bank deposits held in the assessment area (4.5 percent). Additional consideration was given to competitive factors and the bank's overall role in meeting the HMDA and CRA credit needs of the assessment area. As previously mentioned, Arvest Bank ranks second out of 224 lenders with HMDA lending activity in the assessment area and fourth out of 73 lenders with CRA lending activity. These factors demonstrate that the bank plays an important role in meeting the credit needs of the assessment area despite significant competition. Therefore, the bank's lending activity in the assessment area is considered good.

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## Geographic Distribution of Loans

The overall geographic distribution of loans is good when considering performance from all three lending products reviewed, with primary emphasis placed on the bank's HMDA lending performance. As the assessment area contains no low-income census tracts, the bank's performance is primarily based on performance lending in moderate-income census tracts.

*Home Mortgage Disclosure Act (HMDA) Lending*

The overall geographic distribution of HMDA loans reflects an excellent distribution in moderate-income census tracts. In 2018, the bank originated 15.8 percent of its HMDA loans in moderate-income census tracts, which exceeded the performance of peer institutions in the assessment area (14.6 percent) and was in line with the demographic figure (15.3 percent), reflecting good performance. The percentage of the bank's loans in moderate-income census tracts in 2019 (17.1 percent) exceeded both the aggregate lending level (13.0 percent) and demographic figure (14.2 percent), reflecting excellent performance. As previously noted, the bank ranks first among lenders in the assessment area with HMDA lending activity and represents a significant portion of the total HMDA lending activity in the assessment area. When removing Arvest Bank loans from the pool of total aggregate HMDA loans in the assessment area, the bank's performance lending in moderate-income tracts compares even more favorably to the performance of peer institutions in the assessment area. Considering this context and the bank's performance across both years of data reviewed, the overall geographic distribution of HMDA loans in the assessment area is excellent.

*Small Business Lending*

The bank's small business lending levels in moderate-income census tracts varied between 2018 and 2019. In 2018, the percentage of the bank's small business loans in moderate-income census tracts (30.7 percent) is considered excellent when compared to aggregate lending levels (26.7 percent) and the demographic figure (27.8 percent). In 2019, however, the bank made 23.0 percent of its small business loans in moderate-income geographies, which was in line with aggregate lending levels (23.8 percent) and the demographic figure (26.4 percent), reflecting adequate performance. Therefore, when considering performance across both years of the data, the overall geographic distribution of small business loans in the Fort Smith MSA is considered good.

*Small Farm Lending*

The bank's small farm lending is considered poor in both 2018 and 2019 in moderate-income census tracts. While a limited number of farming operations are present in these geographies, the bank did not make any small farm loans in moderate-income census tracts in either year, reflecting poor performance. By comparison, aggregate lending levels in moderate-income census tracts were 4.8 percent and 4.3 percent in 2018 and 2019, respectively.

An analysis of the dispersion of each of the three loan products reviewed did not reveal evidence of any conspicuous lending gaps in LMI geographies. The bank had loan activity in all census tracts in the assessment area in 2018 and 2019. This dispersion supports the conclusion that the overall geographic distribution of the bank's loans is good.

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## Loan Distribution by Borrower's Profile

The bank's distribution of loans by borrower's profile is good overall based on all three products reviewed, with primary emphasis placed on HMDA lending. While HMDA lending is considered adequate, the bank's small business and small farm lending are considered good and excellent, respectively, resulting in an overall borrower distribution conclusion of good.

*Home Mortgage Disclosure Act (HMDA) Lending*

The bank's record of HMDA lending to borrowers of different income profiles is adequate overall. The bank originated 5.7 percent of its HMDA loans to low-income borrowers in 2018, which aligned closely with the performance of peer institutions in the assessment area (5.2 percent) but was below the percentage of assessment area families who are low income (22.3 percent), reflecting adequate performance. Similarly, the bank's lending to moderate-income borrowers (13.6 percent) was in line with aggregate lending performance (13.9 percent) but below the demographic figure (17.6 percent) and is also considered adequate.

In 2019, the bank made 5.4 percent of its HMDA loans to low-income borrowers, which is in line with aggregate lending level of 4.7 percent but below the demographic figure of 23.0 percent, reflecting adequate performance. Similarly, bank lending to moderate-income borrowers (14.0 percent) is in line with aggregate lending levels (13.5 percent) and below the demographic of 16.7 percent, also reflecting adequate performance.

*Small Business Lending*

The overall distribution of small business loans by business revenue profile is considered good. In both 2018 and 2019, the bank made a higher percentage of small business loans to businesses with annual revenues of $1 million or less (65.0 percent in 2018 and 65.6 percent in 2019) than did peer lenders in the assessment area (40.4 percent in 2018 and 39.7 percent in 2019). While exceeding aggregate lending levels, the bank's performance was below the demographic estimates of businesses in the assessment area with annual revenues of $1 million or less (87.7 percent in 2018 and 88.4 percent in 2019). Additional consideration was given to the distribution of the bank's small business loans by dollar amount. Across both years of data reviewed, 80.7 percent of the bank's small business loans to businesses with annual revenues of $1 million or less were made in amounts of $100,000 or less. Business loans in these amounts are typically considered more responsive to the credit needs of small businesses and are in high demand in the assessment area, according to community contacts.

*Small Farm Lending*

The bank's small farm lending reflects an excellent distribution to farms of different sizes. In 2018, the bank made 95.3 percent of its small farm loans to farms with annual revenues of $1 million or less. This performance is considered excellent in comparison to aggregate lending levels (65.9 percent) and the demographic figure (96.1 percent). The bank's level of lending to farms with this revenue profile in 2019 (85.1 percent) was slightly lower but still far exceeded aggregate lending levels (67.9 percent) and was below demographic levels (96.3 percent), reflecting good performance. Across both years of data, 79.0 percent of the bank's small farm loans that were

made to farms with annual revenues of $1 million or less were made in amounts of $100,000 or less. This further demonstrates the bank's willingness to extend credit to small farms in the assessment area.

## Community Development Lending Activity

Arvest Bank is a leader in providing community development loans in the Fort Smith MSA. As shown in the table below, the bank made 15 qualified community development loans totaling $39.6 million and 22 PPP loans totaling $12.1 million. These loans are displayed by community development purpose, with noteworthy or impactful loans discussed below.

| Community Development Lending | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Affordable Housing | | Community Services | | Revitalization/ Stabilization | | Economic Development | | Total | |
| | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) |
| CD Loans | 3 | 9,465 | 2 | 800 | 3 | 8,499 | 7 | 20,810 | 15 | 39,574 |
| PPP Loans | - | - | - | - | - | - | 22 | 12,129 | 22 | 12,129 |

- Throughout the review period, the bank made three loans totaling $18.0 million to a small poultry farming operation in the assessment area. These loans qualified as economic development as they supported up to 90 jobs, the majority of which are LMI.

- One loan totaling $6.1 million financed the construction of 50 affordable single family housing units in the assessment area. This development qualified for LIHTCs and directly benefits LMI individuals. As noted by community contacts, the assessment area has great need of new affordable housing development, and this loan helps to meet that need.

## Product Innovation

The bank makes use of flexible lending practices in serving the credit needs of the Fort Smith MSA. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document. The bank's use of flexible and/or innovative lending products in the Fort Smith MSA is described below.

- Through the ADFA, the bank facilitated down payment assistance grants to 11 borrowers totaling $57,041. These grants are especially impactful given their role in increasing homeownership for LMI residents. According to community contacts, obtaining funds for a down payment on a home is one of the largest barriers to homeownership for many LMI residents.

- The bank originated 20 loans totaling $1.7 million through the HomeReady program. These loans provide flexible, long-term financing for LMI borrowers, which was noted by community contacts as a credit need in the assessment area. This represents a substantial increase from the two loans totaling $139,000 originated at the previous evaluation.

- Through various programs with the FHLB, the bank awarded eight grants totaling $488,503. These grants include one grant through the AHP program, four grants through the SNAP program, and three grants through the PGP program. One grant through the AHP program totaling $440,000 provided funds for an affordable housing development in the assessment area, which was noted as a pressing need by community contacts.

- The bank also originated a significant volume of mortgage loans through government loan programs, including 91 FHA loans ($8.9 million), 35 RD loans ($3.6 million), and 22 VA loans ($2.6 million).

- Lastly, the bank awarded three grants totaling $206,308 through the HUD Section 184 Loan Program, which offers flexible mortgage loans to Native Americans in eligible states.

INVESTMENT TEST

The bank's Investment Test rating in the Fort Smith MSA is High Satisfactory. The bank makes a significant level of qualified community development investments and grants in the assessment area and is occasionally in a leadership position. During the review period, the bank's qualified investments totaled $8.7 million, which included investment and grant activity made in the current review period as well as prior period investments that are still outstanding. The bank's investment and grant activity in the assessment area is displayed in the table below.

| Summary of Investments – Fort Smith MSA | | | |
|---|---|---|---|
| Investment Type | Current Period | Prior Period, Still Outstanding | Total |
| MBS | - | $237,349 | $237,349 |
| Municipal/Private Bonds | - | $8.4 million | $8.4 million |
| Donations | $114,275 | - | $114,275 |
| **TOTAL** | **$114,275** | **$8.6 million** | **$8.7 million** |

- The bank made eight donations totaling $59,700 to the local chapter of a national philanthropic organization that in turn supports various schools and community service organizations throughout the assessment area. The majority of this organization's efforts benefit LMI individuals or are targeted to LMI geographies in the assessment area.

- The bank made one donation totaling $4,500 to an affordable living facility for LMI senior citizens in the assessment area.

SERVICE TEST

The bank is rated Outstanding under the Service Test in the Fort Smith MSA. The bank's service delivery systems are accessible to individuals and geographies of different income levels, particularly LMI geographies, and changes in branch locations have not adversely affected the accessibility of those service delivery systems. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies and individuals. Lastly, the bank is a leader in providing community development services in the Fort Smith MSA.

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## Accessibility of Delivery Systems

The bank operates 11, or 4.6 percent, of its 241 branches in the Fort Smith MSA along with four stand-alone, deposit-accepting ATMs. The following table displays the location of the bank's branches and stand-alone ATMs by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|---|---|---|---|---|---|---|
| **Dataset** | **Geography Income Level** | | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | **Unknown** | |
| Branches | 0 | 3 | 5 | 3 | 0 | **11** |
| | 0.0% | 27.3% | 45.5% | 27.3% | 0.0% | **100%** |
| Stand-alone ATMs | 0 | 2 | 1 | 1 | 0 | **4** |
| | 0.0% | 50.0% | 25.0% | 25.0% | 0.0% | **100%** |
| Census Tracts | 0.0% | 26.5% | 53.1% | 20.4% | 0.0% | **100%** |
| Household Population | 0.0% | 21.1% | 57.6% | 21.4% | 0.0% | **100%** |

As shown above, the bank operates three branches in moderate-income census tracts, representing 27.3 percent of the bank's total branches in the assessment area. By comparison, this distribution is in line with the percentage of assessment area census tracts that are moderate income (26.5 percent) and exceeds the household population within moderate-income census tracts. In addition, the bank also operates two stand-alone, deposit-accepting ATMs within moderate-income census tracts, including one in a census tract that the bank does not also operate a branch location in, which further increases the accessibility of the bank's services in the assessment area. Therefore, service delivery systems are accessible to individuals and geographies of different income levels throughout the assessment area, particularly LMI.

## Changes in Branch Locations

During the review period the bank closed one branch in a moderate-income census tract and one branch in a middle-income census tract and did not open any branch locations. Overall, these branch closures had a minimal impact on the accessibility of the bank's service delivery systems, as the bank operates other branch locations near both closed locations. Therefore, the bank's record of opening and closing branches in the Fort Smith MSA has not adversely affected the accessibility of its service delivery systems, particularly to LMI geographies and individuals.

## Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services are consistent throughout the assessment area. All branches operate lobby hours from 8:00 a.m. to 6:00 p.m. on weekdays, with four locations also operating Saturday lobby hours from 9:00 a.m. to 1:00 p.m. In addition, each branch operates drive-through facilities, all but one of which operates drive-through hours on Saturdays. Lastly, lenders are well dispersed throughout the bank's branches in the assessment area. As a result, business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies or individuals.

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**Community Development Services**

Arvest Bank is a leader in providing community development services in the Fort Smith MSA. During the review period, 58 bank employees provided 400 hours of community development service activities to 32 different organizations in the assessment area. The bank's service activities consisted of a mix of bank employees serving as board members and providing technical or financial expertise to various community service, affordable housing, or economic development organizations as well as bank employees participating in financial literacy training events. The most noteworthy of these activities include the following.

- Four bank employees provided community development services to two different affordable housing organizations that oversee the development and allocation of affordable housing infrastructure in the assessment area. Two of the bank's employees serve as a board members for the organizations, while the other two employees provided financial literacy training events hosted by one of the organizations. As noted by community contacts, activities that promote increased affordable housing development are responsive to credit needs in the assessment area.

- Bank employees engaged in a significant level of financial literacy events at various schools, nonprofits, and community organizations in the assessment area during the review period. In total, 41 bank employees were involved with financial literacy events for 15 different organizations for a total of 142 hours of service activities.

In addition, Arvest Bank opened and managed ten IDAs and 197 RPAs for LMI individuals in the Fort Smith MSA during the review period.

# KANSAS CITY, KANSAS-MISSOURI

# MULTISTATE MSA[5]

**CRA RATING FOR KANSAS CITY MSA:**          **OUTSTANDING**
**The Lending Test is rated:**          **High Satisfactory**
**The Investment Test is rated:**          **Outstanding**
**The Service Test is rated:**          **Outstanding**

Major factors supporting the institution's Kansas City assessment area rating include:

- The bank's lending activity levels reflect good responsiveness to the credit needs of the Kansas City assessment area.

- The geographic distribution of loans reflects good penetration throughout the Kansas City assessment area.

- The distribution of loans reflects an adequate penetration among individuals of different income levels, including LMI levels, and businesses and farms of different sizes.

- The bank provides a relatively high level of community development loans in the Kansas City assessment area.

- The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of the Kansas City assessment area.

- The bank makes an excellent level of qualified community development investments and grants and is often in a leadership position.

- Delivery systems are reasonably accessible to geographies and individuals of different income levels in the Kansas City assessment area, and changes in branch locations have not adversely affected the accessibility of the bank's delivery systems. Additionally, business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly in LMI geographies.

- The bank is a leader in providing community development services.

**SCOPE OF EXAMINATION**

Examination scope considerations applicable to the review of the Kansas City assessment area are consistent with the overall CRA examination scope as presented in the *Institution/Scope of Examination* section. However, small farm lending was not analyzed and did not play a role in assessing the lending performance in the assessment area, as it is not a primary focus of the bank in the Kansas City assessment area. Based on loan demand and the bank's lending activity, HMDA

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[5] This rating reflects performance within the multistate MSA. The Missouri and Kansas statewide evaluations are adjusted and do not reflect performance in the multistate MSA.

lending received primary consideration in the analysis of the bank's lending performance, followed by small business lending.

The assessment area was reviewed under full-scope examination procedures that utilized information gained from two community contacts to ascertain specific community credit needs, community development opportunities, and local economic conditions. Details from these interviews are included in the section that follows.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE KANSAS CITY ASSESSMENT AREA

### Bank Structure

The bank operates 19 branches, or 7.9 percent of its total branches, in the Kansas City assessment area, as shown in the table below.

| Branch Location by Census Tract Income Level | | | |
|---|---|---|---|
| **Low-Income** | **Moderate-Income** | **Middle-Income** | **Upper-Income** |
| 3 | 2 | 7 | 7 |

In addition to the branch locations displayed in the table above, the bank operates 12 stand-alone ATMs throughout the assessment area, all of which are in middle- and upper-income census tracts, and one LPO location located in an upper-income census tract. During the review period, the bank opened one branch in a moderate-income census tract and two branches in upper-income census tracts and did not close any branches. The bank's branches and ATM locations are well dispersed throughout the core of the Kansas City metro area where the population is most heavily concentrated, and the bank is well positioned to deliver financial services throughout most of the assessment area. However, the bank does not maintain a significant branch presence in the far northern or southern portions of the assessment area in Clay, Clinton, and Cass counties and may have some difficulty in fully serving those portions of the assessment area.

### General Demographics

The assessment area includes 7 of the 14 counties that make up the Kansas City MSA. The following table lists the counties in the bank's assessment area along with their respective populations.

| State | County | Population |
|---|---|---|
| Missouri | Cass County | 100,781 |
| | Clay County | 230.361 |
| | Clinton County | 20,498 |
| | Jackson County | 680,905 |
| | Platte County | 93,394 |
| Kansas | Johnson County | 566,814 |
| | Wyandotte County | 160,806 |
| **TOTAL ASSESSMENT AREA POPULATION** | | **1,853,559** |

As shown above, Jackson County in Missouri and Johnson County in Kansas are the most populous of the counties in the bank's assessment area and include most of the Kansas City metro area. The assessment area is largely urban, though several of the outlying counties are significantly less populous and more rural in nature. As the assessment area is vast and diverse, credit needs are varied. Specific credit needs identified by community contacts include affordable home improvement and home purchase loans in LMI areas, down payment assistance programs for consumers, micro loans for small businesses, and financial literacy and small businesses counseling services. Both community contacts also confirmed that the assessment area has ample opportunities for community development initiatives through partnerships with community development financial institutions (CDFIs), LIHTC investments, and numerous government assistance and nonprofit organizations operating throughout the assessment area.

The Kansas City assessment area hosts a highly competitive banking market, with 106 FDIC-insured depository institutions operating 594 branch locations. Of these institutions, Arvest Bank ranks twenty-first in terms of deposit market share, with 0.9 percent of the total deposit dollars in the assessment area, and eleventh in terms of total branch locations. Of the bank's total deposit dollars, 3.1 percent are held in the Kansas City assessment area. Competition for HMDA and CRA loans is also extremely high in the assessment area. An analysis of 2019 reportable loan activity shows that 639 entities reported HMDA lending activity in the assessment area, while 160 entities reported CRA lending activity. Of these, Arvest Bank ranked seventeenth in terms of total HMDA lending activity and nineteenth in terms of total CRA lending activity.

## Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

| Assessment Area Demographics by Geography Income Level | | | | |
|---|---|---|---|---|
| | **Census Tracts** | | **Family Population** | |
| Low | 78 | 16.0% | 38,810 | 8.3% |
| Moderate | 108 | 22.2% | 92,718 | 19.8% |
| Middle | 152 | 31.2% | 175,004 | 37.4% |
| Upper | 130 | 26.7% | 160,052 | 34.2% |
| Unknown | 19 | 3.9% | 988 | 0.2% |
| **TOTAL** | **487** | **100%** | **467,572** | **100%** |

As shown in the preceding table, 38.2 percent of the census tracts in the assessment area are LMI,

but only 28.1 percent of the family population resides in these tracts. These LMI areas are primarily concentrated in and around the metro area of Kansas City in Jackson and Clay counties in Missouri and Johnson and Wyandotte counties in Kansas.

Based on 2015 ACS data, the median family income for the assessment area was $73,048. At the same time, median family incomes for Missouri and Kansas were $60,809 and $66,389, respectively. More recently, the FFIEC estimates the median family income for the Kansas City MSA to be $79,900 in 2018 and $82,400 in 2019. The following table displays the family populations for the assessment area, Missouri, and Kansas by geography income level.

| Family Population by Income Level | | | | | | |
|---|---|---|---|---|---|---|
| | Assessment Area | | Kansas | | Missouri | |
| Low | 99,366 | 21.3% | 137,650 | 18.9% | 327,271 | 21.4% |
| Moderate | 81,289 | 17.4% | 128,930 | 17.7% | 274,380 | 17.9% |
| Middle | 94,729 | 20.3% | 154,601 | 21.2% | 319,267 | 20.9% |
| Upper | 192,188 | 41.1% | 308,287 | 42.3% | 609,088 | 39.8% |
| TOTAL | 467,572 | 100% | 729,468 | 100% | 1,530,006 | 100% |

When compared with the data in the preceding table, the table above shows that a much higher percentage of families in the assessment area are LMI (38.7 percent) than reside in LMI geographies (28.1 percent). Overall, the LMI family percentage in the assessment area is slightly higher than in Kansas (36.6 percent) and in line with the figure for Missouri (39.3 percent). While not shown in the table above, the percentage of families in the assessment area that are below the poverty level (9.1 percent) mirrors the figure for the state of Kansas as a whole and is lower than the statewide figure for Missouri (11.1 percent). Considering these factors and income levels, the assessment area is similarly affluent to the state of Kansas as a whole and slightly more affluent than Missouri.

## Housing Demographics

The following table displays key housing demographics for the assessment area compared to the states of Kansas and Missouri.

| Housing Demographics | | | | |
|---|---|---|---|---|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) | Housing Cost Burden |
| Assessment Area | $161,332 | 35.8% | $851 | 44.0% |
| Kansas | $132,000 | 39.6% | $757 | 41.0% |
| Missouri | $138,400 | 34.8% | $746 | 44.4% |

Based on the data in the table above, housing costs in the assessment area are higher than in Missouri and Kansas based on median housing values and median gross rents. However, when adjusting for income levels, housing is similarly affordable to Missouri and less affordable than in Kansas based on the affordability ratio and housing cost burden. In general, housing costs in the counties comprising the core of the Kansas City metro area, particularly Johnson, Jackson, and Wyandotte counties, are higher than the rest of the assessment area, where housing is much more affordable than the rest of the assessment area and statewide figures for Kansas and Missouri. One

problem in these areas identified by community contacts is the impact of an aging housing stock on the availability of affordable housing. The median age of housing stock for the assessment area (46 years) is significantly higher than in Missouri (40 years) and Kansas (43 years) and is as high as 55 years in Wyandotte County. As described by community contacts, this creates a need for home improvement loans to maintain the quality of existing housing stock, which many LMI residents are unable to afford. As a result, access to quality affordable housing is a challenge for many LMI residents in the assessment area, particularly in the three previously mentioned counties.

## Industry and Employment Demographics

The assessment area supports a large and diverse business community, including strong medical and manufacturing sectors and several universities and colleges. While several larger businesses and organizations are headquartered in the Kansas City MSA, 90.1 percent of businesses in the assessment area reported annual revenues of $1 million or less, indicating that small businesses also play a crucial role in the assessment area's economy. County business patterns indicate that there are 997,464 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are health care and social assistance (13.5 percent) followed by government (13.3 percent), retail trade (10.3 percent) and professional and technical services (9.0 percent).

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area, Missouri, and Kansas.

| Unemployment Levels for the Assessment Area | | | |
|---|---|---|---|
| Time Period (Annual Average) | Assessment Area | Kansas | Missouri |
| 2018 | 3.3% | 3.3% | 3.2% |
| 2019 | 3.2% | 3.2% | 3.3% |
| 2020 YTD | 6.9% | 6.7% | 6.7% |

As shown in the table above, unemployment levels in the assessment area were closely aligned with statewide figures for Kansas and Missouri. Unemployment levels for the assessment area and both states increased in 2020 in large part due to the pandemic. While community contacts noted that the impacts of the pandemic were relatively isolated in the assessment area, county-level unemployment data indicates that some counties in the assessment area were impacted to a greater degree than others. For instance, unemployment levels in Wyandotte and Clay counties increased by a higher magnitude in 2020 than did the assessment area as a whole. Though unemployment levels in the assessment area were relatively consistent, unemployment in Wyandotte County was consistently higher than the rest of the assessment area throughout the review period, with a 2020 YTD unemployment level of 9.0 percent.

## Community Contact Information

For the Kansas City MSA, two community contact interviews were completed with individuals knowledgeable of the economic and demographic conditions of the assessment area, as well as specific community development and credit needs. One of these individuals represented an

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affordable housing development organization, while the second contact represented an economic development organization.

Both community contacts characterized the Kansas City MSA economy as growing in the period leading up to the pandemic in 2020 and stable thereafter, with much of the impact of the pandemic more isolated to certain service-related industries as compared to other areas of the country that were more severely impacted. The contacts attributed these trends to growth in other sectors of the area's economy, such as health care and manufacturing, and the growth of key large employers. Both contacts noted that while the assessment area's economy has been stable overall, there are still pockets of concentrated poverty and lower-income areas throughout Kansas City that have not experienced the same growth rates as the rest of the assessment area. These areas tend to be concentrated in the southeast portion of the assessment area and in eastern Wyandotte and Johnson counties. Regarding access to banking services, both contacts noted that some portions of the assessment area have far fewer banking options than others. Specifically, banking services are less accessible in lower-income areas of Wyandotte, Johnson, and Jackson counties relative to more affluent areas of the Kansas City MSA.

The housing contact noted the lack of affordable housing development throughout much of the assessment area. In Jackson County in particular, newer affordable housing development has been scarce, while at the same time existing affordable housing stock has aged and repairs are often needed to maintain the condition of the homes. These trends have increased the need for affordable home improvement loans, as well as affordable home purchase loans in LMI areas and newer affordable housing development. Additionally, the contact noted that down payment assistance programs were also a need, as a lack of down payment funds is a common barrier to homeownership cited by many LMI residents. Lastly, the contact pointed to the need for low-fee personal loans and savings accounts, both of which would help increase access to banking services for LMI residents who are unbanked in the assessment area.

Regarding small business needs, one contact identified flexible small dollar loans in amounts of $50,000 or less and small business counseling services as the two greatest small business needs in the assessment area. According to the contact, many newer businesses in particular face challenges in preparing documentation to support loan requests without the assistance of expensive software packages, thus increasing the need for small business counseling and financial literacy services. Additionally, small business loans with more flexible underwriting criteria, such as higher allowable loan-to-value ratios, would be particularly impactful.

Other opportunities for community development involvement were identified by both community contacts. These include enhanced partnerships with intermediaries such as CDFIs or affordable housing development commissions, investment in affordable housing projects through LIHTCs, and participation in financial literacy and workforce development programs.

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## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KANSAS CITY MSA ASSESSMENT AREA

LENDING TEST

The bank's Lending Test rating in the Kansas City assessment area is High Satisfactory. Lending levels reflect good responsiveness to the credit needs of the assessment area. The bank's overall geographic distribution of loans reflects good penetration throughout the assessment area. Furthermore, the overall distribution of loans by borrower's income/revenue profile reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. The bank makes extensive use of innovative and/or flexible lending practices in meeting the needs of the assessment area. Lastly, the bank provides a relatively high level of community development loans in the Kansas City assessment area.

### Lending Activity

The following table displays the combined 2018 and 2019 lending volume by number and dollar amount in the assessment area.

| Summary of Lending Activity<br>January 1, 2018 through December 31, 2019 | | | | |
|---|---|---|---|---|
| Loan Type | # | % | $(000s) | % |
| Home Improvement | 168 | 5.8% | 14,681 | 2.3% |
| Home Purchase | 1,368 | 46.9% | 335,385 | 53.2% |
| Multifamily Housing | 16 | 0.5% | 24,662 | 3.9% |
| Refinancing | 651 | 22.3% | 166,043 | 26.3% |
| Other Purpose LOC | 87 | 3.0% | 6,056 | 1.0% |
| Other Purpose Closed/Exempt | 57 | 2.0% | 5,600 | 0.9% |
| Purpose Not Applicable | 0 | 0.0% | 0 | 0.0% |
| **Total HMDA** | **2,347** | **80.4%** | **552,427** | **87.7%** |
| Small Business | 569 | 19.5% | 77,086 | 12.2% |
| Small Farm | 2 | 0.1% | 695 | 0.1% |
| **TOTAL LOANS** | **2,918** | **100.0%** | **630,208** | **100.0%** |

Of the bank's total HMDA and CRA loan activity in 2018 and 2019, 5.4 percent of loans were made in the Kansas City assessment area. This figure is slightly below the share of total bank branches in the assessment area (7.9 percent) but compares favorably to the percentage of total bank deposits that are held in the assessment area (3.1 percent). As previously mentioned, the assessment area hosts an extremely competitive banking market. While Arvest Bank is not in a leadership position in terms of lending activity, the bank's lending activity levels are significant relative to its deposit share. This demonstrates that the bank takes an active approach to extending credit in the assessment area and reflects good responsiveness to the credit needs of the Kansas City assessment area.

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## Geographic Distribution of Loans

The overall geographic distribution of loans in the assessment area is good, with HMDA lending receiving primary consideration toward overall conclusions.

*Home Mortgage Disclosure Act (HMDA) Lending*

The bank's distribution of HMDA loans reflects good penetration among geographies of different income levels, particularly LMI geographies. In 2018, the bank originated 3.7 percent of its HMDA loans in low-income census tracts, which is in line with aggregate lending levels (3.0 percent) but was below the percentage of owner-occupied housing units in low-income geographies (6.1 percent). However, additional consideration was given to the distribution of the bank's loans by loan type. Of the bank's total loans in low-income geographies, 69.2 percent were home purchase loans, which were specifically identified by community contacts as a pressing need in LMI geographies. Therefore, the bank's performance is considered good. The bank's performance lending in moderate-income geographies in 2018 (16.5 percent) was in line with both the aggregate lending level (15.9 percent) and the demographic figure (17.6 percent), reflecting adequate performance.

In 2019, the bank's geographic distribution of HMDA loans in low-income census tracts (3.6 percent) is considered good. This level of lending is also in line with the performance of peer institutions in the assessment area (2.8 percent) but is below the demographic figure (6.1 percent). However, 65.2 percent of the bank's total loans in low-income geographies were home purchase loans, which help to meet a credit need identified by community contacts. Similar to the bank's performance in 2018, lending in moderate-income census tracts in 2019 (15.9 percent) was in line with aggregate lending performance (14.6 percent) and slightly below the demographic figure (17.6 percent), reflecting adequate performance. When assessing overall performance across both years of data, 66.6 percent of the bank's total HMDA loans in LMI census tracts were home purchase loans. As this is directly responsive to a credit need identified by community contacts, the bank's geographic distribution of HMDA loans is considered good overall.

*Small Business Lending*

The bank's small business lending in LMI geographies is excellent overall. In 2018, the bank made 10.3 percent of its small business loans in low-income geographies. This performance is considered excellent, as it exceeds both aggregate lending levels (6.7 percent) and the percentage of assessment area businesses that are in low-income geographies (7.0 percent). Lending in moderate-income geographies in 2018 (18.8 percent) again exceeded aggregate lending levels (16.9 percent) and was in line with the demographic figure (19.1 percent), reflecting good performance.

The bank's level of lending in low-income geographies in 2019 (7.7 percent) was slightly higher than peer lending performance (6.8 percent) and in line with the demographic figure (7.2 percent), reflecting good performance. The percentage of the bank's small business loans in moderate-income census tracts in 2019 (24.7 percent), however, is considered excellent when contrasted with the performance of peer institutions in the assessment area (17.2 percent) and the demographic figure (19.3 percent). When assessing overall performance, the combined percentage

of the bank's small business loans in LMI geographies exceeds the combined aggregate lending level and combined demographic figures for LMI geographies in both years, reflecting excellent performance overall.

Lastly, an analysis of the dispersion of both loan products did not reveal evidence of conspicuous lending gaps in LMI geographies throughout the assessment area. In 2018, bank had loan activity in 76.0 percent of all assessment area census tracts and 61.8 percent of all LMI geographies. In 2019, the bank had lending activity in 78.6 percent of census tracts in the assessment area and 61.8 percent of LMI geographies in the assessment area. While not all census tracts in the assessment area contained loan activity, the dispersion of the bank's loans was most heavily concentrated in the areas surrounding its branch offices and did not reveal evidence of conspicuous lending gaps or impact the assessment of the bank's geographic distribution performance.

## **Loan Distribution by Borrower's Profile**

The overall borrower distribution of the bank's HMDA and small business loans in the assessment area is adequate, with primary emphasis placed on HMDA lending performance.

*Home Mortgage Disclosure Act (HMDA) Lending*

The distribution of the bank's HMDA loans by borrower's income profile reflects adequate performance overall. Of the bank's total HMDA loans in the assessment area in 2018, 7.8 percent were made to low-income borrowers, while 18.7 percent were made to moderate-income borrowers. Performance in both categories is considered adequate in comparison to peer lending levels (8.2 percent for low-income borrowers and 19.7 percent for moderate-income borrowers) and the percentages of assessment area families who are LMI (21.3 percent low-income and 17.4 percent moderate-income).

Similarly, the bank's lending performance in 2019 reflects an adequate distribution to both low- and moderate-income borrowers. The percentage of the bank's total HMDA loans made to low-income borrowers (7.5 percent) was closely aligned with the performance of peer institutions in the assessment area (8.0 percent) but below the demographic figure (21.3 percent). Conversely, the bank's level of lending to moderate-income borrowers (16.4 percent) was in line with the percentage of assessment area families who are moderate income (17.4 percent) but slightly below aggregate lending performance (18.3 percent). Across both years of data reviewed, 69.3 percent of the bank's HMDA loans that were made to LMI borrowers were home purchase loans. This is considered responsive to credit needs identified by community contacts in the assessment area, who pointed to the need for greater access to affordable home purchase loans both in LMI geographies and to LMI borrowers.

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*Small Business Lending*

The bank's overall levels of small business lending reflect an adequate distribution to businesses with annual revenues of $1 million or less. In 2018, 51.1 percent of the bank's small business loans were made to businesses with annual revenues of $1 million or less, which above aggregate lending levels (43.2 percent) but significantly below the demographic estimate of businesses in the assessment area with this revenue profile (89.7 percent). Therefore, the borrower distribution of small business loans in 2018 is considered adequate.

In 2019, the percentage of the bank's small business loans to businesses with annual revenues of $1 million or less (46.0 percent) mirrored the performance of peer institutions in the assessment area but was again below the demographic figure for businesses with this revenue profile (90.1 percent), reflecting adequate performance. Of note, 80.4 percent of the bank's small business loans that were made to businesses with annual revenues of $1 million or less were in amounts of $100,000 or less. These loans amounts were cited by community contacts as being one of the greatest credit needs for many small businesses in the assessment area.

## Community Development Lending Activity

Arvest Bank makes a relatively high level of community development loans throughout the Kansas City assessment area. As shown in the table below, the bank made 21 community development loans totaling $57.4 million, which met a variety of community development purposes within the assessment area, as well as two community development loans totaling $7.0 million in the broader, MSA region. In addition, the bank made 50 qualified PPP community development loans totaling $33.8 million, lending further support to the conclusion that the bank plays an active role in community development lending in the assessment area. The most impactful of these loans are discussed below.

| Community Development Lending | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | Affordable Housing | | Community Services | | Revitalization/ Stabilization | | Economic Development | | Total | |
| | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) | # | $(000s) |
| CD Loans | 3 | 2,719 | 2 | 1,040 | 6 | 9,518 | 10 | 44,142 | 21 | 57,419 |
| PPP Loans | - | - | - | - | - | - | 50 | 33,822 | 50 | 33,822 |

- The bank made one loan totaling $500,000 to a micro lending program for small businesses impacted by the pandemic. While being responsive to the need identified by community contacts for micro loans for small businesses, this loan was also directly responsive to relief efforts for businesses impacted by the pandemic and is considered particularly impactful.

- One of the bank's affordable housing community development loans totaling $1.6 million provided funds for the purchase and renovation of an affordable multifamily housing unit located in a moderate-income census tract in the southeast Kansas City area. As noted by community contacts and discussed in the *Housing Demographics* section, this portion of the assessment area has great need for affordable housing development, and this loan is responsive to that need.

- The bank made ten community development loans totaling $44.1 million that qualified for a purpose of economic development. These loans financed small businesses and supported permanent job creation and retention for LMI individuals. In total, these loans supported more than 100 LMI jobs in the assessment area. The largest of these loans, a $13.4 million loan to finance the construction of a new hotel and restaurant, created 43 new LMI jobs in the assessment area.

## **Product Innovation**

The bank makes extensive use of flexible lending practices in serving the credit needs of the Kansas City assessment area. While the bank utilizes the same flexible and/or innovative lending products as in its other assessment areas, the total dollar volume of these products in the Kansas City assessment area is extensive. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document. The bank's use of flexible and/or innovative lending products in the Kansas City assessment area is described below.

- Through the Missouri Housing Development Commission, the bank facilitated down payment assistance grants to 25 borrowers totaling $95,545. These grants are especially impactful given their role in increasing homeownership for LMI residents. According to community contacts, obtaining funds for a down payment on a home is one of the largest barriers to homeownership for many LMI residents.

- The bank originated 150 loans totaling $22.8 million through the HomeReady program. These loans provide flexible, long-term financing for LMI borrowers, which is responsive to the need for affordable home loans for LMI borrowers identified by community contacts. This represents a substantial increase from the 26 loans totaling $3.5 million originated at the previous evaluation.

- The bank also originated a significant volume of mortgage loans through government loan programs, including 130 FHA loans ($19.9 million), five RD loans ($820,002), and 29 VA loans ($5.3 million).

## INVESTMENT TEST

The bank is rated Outstanding under the Investment Test in the Kansas City assessment area. The bank made an excellent level of qualified investments, grants, and donations and was occasionally in a leadership position. As displayed in the table below, the bank made total investments and grants of $28.5 million, which include both those made in the current review period and investments from prior review periods that are still outstanding. The most impactful of these activities are described below.

| Summary of Investments – Kansas City Assessment Area | | | |
|---|---|---|---|
| **Investment Type** | **Current Period** | **Prior Period, Still Outstanding** | **Total** |
| MBS | $989,589 | $7,064,665 | $8.1 million |
| Municipal/Private Bonds | - | $20.3 million | $20.3 million |
| Donations | $87,130 | - | $87,130 |
| **TOTAL** | **$1.1 million** | **$27.4 million** | **$28.5 million** |

- The bank's MBS activity provided affordable mortgage loans for LMI individuals who were predominantly located in Jackson and Johnson counties in the assessment area. These areas were identified by community contacts as areas where affordable housing is least attainable for LMI residents due to certain housing demographics. Therefore, the bank's MBS investments in these areas in particular are considered responsive to credit needs in the assessment area.

- The bank continues to invest in two private education bonds totaling $19.4 million that help finance a local university. These bonds are part of the city's Troost Corridor Action Plan, a formal revitalization plan for the Troost Avenue area of downtown Kansas City, which includes several LMI geographies. While made in a prior review period, these bonds nevertheless remain impactful given their ongoing contributions as part of a formalized redevelopment plan of LMI geographies.

- The bank made two donations totaling $10,000 to a nonprofit community development corporation providing a variety of affordable housing, community service, and education initiatives in targeted LMI areas of Kansas City, including the southeastern portion of the Kansas City metro area. The organization's efforts include initiatives to redevelop vacant homes into affordable housing units and redevelopment projects in areas designated for revitalization by local government.

SERVICE TEST

The bank is rated Outstanding under the Service Test in the Kansas City assessment area. The bank's service delivery systems are reasonably accessible throughout the assessment area, particularly to LMI individuals and geographies, and changes in branch locations have not adversely affected the accessibility of those service delivery systems. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies and individuals. Lastly, the bank is a leader in providing community development services in the Kansas City assessment area.

**Accessibility of Delivery Systems**

The bank operates 19 branches in the Kansas City assessment area, which represent 7.9 percent of the bank's total branches. In addition, the bank also operates 12 stand-alone ATMs throughout the assessment area. The locations of these service delivery systems are displayed in the following table along with the distribution of assessment area census tracts and household population by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|---|---|---|---|---|---|---|
| **Dataset** | **Geography Income Level** | | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | **Unknown** | |
| Branches | 3 | 2 | 7 | 7 | 0 | **19** |
| | 15.8% | 10.5% | 36.8% | 36.8% | 0.0% | **100%** |
| Stand-alone ATMs | 0 | 0 | 6 | 6 | 0 | **12** |
| | 0.0% | 0.0% | 50.0% | 50.0% | 0.0% | **100%** |
| Census Tracts | 16.0% | 22.2% | 31.2% | 26.7% | 3.9% | **100%** |
| Household Population | 9.9% | 22.0% | 37.7% | 30.1% | 0.4% | **100%** |

The bank operates five, or 26.3 percent, of its total branches in the assessment area within LMI census tracts. This distribution is below the percentage of assessment area census tracts that are LMI (38.2 percent) and slightly below the household population within those geographies (31.9 percent). While slightly below comparison data, the bank's branches are concentrated in the core of the Kansas City metro area, where a majority of LMI census tracts are located. Many of the bank's branches that are not located directly in LMI geographies are near and are accessible to nearby LMI geographies. Overall, the bank's service delivery systems are reasonably accessible to individuals and geographies of different income levels, particularly those that are LMI.

## Changes in Branch Locations

During the review period, the bank opened three branches and did not close any branches. The bank opened a new branch in a moderate-income census tract in Shawnee, Kansas, to the southwest of Kansas City. Two other branches were opened in upper-income census tracts, also to the southwest of the Kansas City metro area. The new branch location in Shawnee is the bank's only branch in that city and therefore increases the accessibility of the bank's services to residents in the area. However, all three of the bank's new locations are located outside of the Kansas City metro area and had a limited effect on the overall accessibility of the bank's service delivery systems, particularly for LMI geographies and individuals. Therefore, changes in branch locations have not adversely affected the accessibility of the bank's service delivery systems.

## Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services are consistent throughout the assessment area. All branches operate weekday lobby hours from 9:00 a.m. to 5:00 p.m., with most branches also operating Saturday lobby hours. Additionally, all branches operate drive-through facilities, most of which operate extended weekday hours and Saturday drive-through hours. Lastly, lenders are well dispersed throughout the bank's branches in the assessment area, including those in LMI geographies. As such, business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals.

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**Community Development Services**

The bank is a leader in providing community development services in the Kansas City assessment area. During the review period, 43 bank employees provided 1,221 hours of community development service activities to 71 different organizations in the assessment area. Bank employees served on the board of directors or provided financial and technical expertise for various community service, economic development, and affordable housing organizations throughout the assessment area, in addition to significant financial literacy efforts at various schools and community organizations. Noteworthy service activities are as follows.

- One employee offered financial expertise to an economic development organization that was involved with setting up a micro loan fund for businesses impacted by the pandemic.

- Two bank employees serve on the board of directors for an economic development organization that pools resources for various economic development initiatives in targeted LMI areas of Kansas City. These efforts include affordable housing renovations and targeted investments in certain LMI geographies.

- Numerous bank employees were involved in financial literacy events at schools and at various nonprofit or community organizations throughout the assessment area. In total, 26 bank employees contributed 288 hours of service for financial literacy events for both businesses and consumers, which was identified as a need in the assessment area by community contacts.

Lastly, the bank opened and maintained 79 new RPA accounts for LMI individuals in the assessment area during the review period.

# KANSAS[6]

**CRA RATING FOR KANSAS:**          **SATISFACTORY**
**The Lending Test is rated:**          **High Satisfactory**
**The Investment Test is rated:**          **Low Satisfactory**
**The Service Test is rated:**          **Low Satisfactory**

Major factors supporting the institution's Kansas assessment area rating include:

- The bank's lending activity levels reflect adequate responsiveness to the credit needs of the Kansas assessment area.

- The geographic distribution of loans reflects excellent penetration throughout the Kansas assessment area.

- The distribution of loans reflects a good penetration among individuals of different income levels, including LMI levels, and businesses and farms of different sizes.

- The bank provides an adequate level of community development loans in the Kansas assessment area.

- The bank makes limited use of innovative and/or flexible lending practices in serving the credit needs of the Kansas assessment area.

- The bank makes an adequate level of qualified community development investments and grants and is rarely in a leadership position.

- Delivery systems are reasonably accessible to geographies and individuals of different income levels in the Kansas assessment area, and changes in branch locations have not adversely affected the accessibility of the bank's delivery systems. Additionally, business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly in LMI geographies.

- The bank provides a limited level of community development services.

## SCOPE OF EXAMINATION

Examination scope considerations applicable to the review of the Kansas assessment area are consistent with the overall CRA examination scope as presented in the *Institution/Scope of Examination* section. Based on loan demand and the bank's lending activity, all three lending products were weighted equally when assessing the bank's lending performance in the assessment area.

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[6] The bank has branches located in Kansas that are also part of the Kansas City Multistate MSA. Consequently, the statewide evaluation is adjusted to not reflect performance in the areas of Kansas contained in the Kansas City Multistate MSA. Refer to the Kansas City Multistate MSA section for ratings of the institution's performance in that area.

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The bank has delineated two noncontiguous assessment areas in the nonMSA portion of Kansas. Given their proximity to each other and similar economic and demographic characteristics, these assessment areas are combined for analysis into a single nonMSA Kansas assessment area. To augment this evaluation, two community contact interviews were conducted to ascertain specific community credit needs, community development opportunities, and local economic conditions. Details from these interviews are included in the *Description of Institution's Operations* section that follows.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMSA KANSAS

### Bank Structure

The bank operates three branches in nonMSA Kansas, one in a moderate-, one in a middle-, and one in an upper-income census tract, and has not opened or closed any branches during the review period. The bank's branches in nonMSA Kansas represent 1.2 percent of the bank's total branches. In addition, the bank also operates two stand-alone ATMs in the assessment area, one of which is deposit accepting. The bank's branch locations are in central Franklin County, southwest Montgomery County, and southeast Crawford County. While the bank is well positioned to provide financial services to these portions of the assessment area, the bank does not operate any branches in Labette or Cherokee counties and may have some difficulty in fully serving these areas.

### General Demographics

The nonMSA Kansas assessment area is composed of two noncontiguous assessment areas in eastern Kansas. The first assessment area consists of Franklin County, located just to the west of the Kansas City MSA, while the second assessment area is composed of Montgomery, Crawford, Labette, and Cherokee counties in southeastern Kansas. Overall, the assessment area is largely rural, with a total population of 141,241 spread across the five counties in the assessment area. The banking market is not highly competitive, with only 26 FDIC-insured depository institutions operating 75 branch locations throughout the assessment area. Of these institutions, Arvest Bank ranks eighth, with 4.2 percent of all assessment area deposit dollars. Deposits held in nonMSA Kansas represent 0.6 percent of total bank deposits.

While only 26 financial institutions operate a branch location in the assessment area, an analysis of reported HMDA and CRA lending activity for 2019 shows that a much higher number of institutions had lending activity in the assessment area. Arvest Bank ranked sixth out of 200 financial institutions in the assessment area with HMDA lending activity and sixth out of 70 institutions with CRA lending activity.

Credit needs in the assessment area include a standard blend of consumer, commercial, and agricultural loan products. In addition, community contacts pointed to affordable home improvement loans, small dollar small business loans, and financial literacy and homeownership efforts as other specific credit and community development needs in the assessment area. Moreover, the community contacts described that there are opportunities for community development projects through various community development organizations and enterprise zones located in the assessment area.

## Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

| Assessment Area Demographics by Geography Income Level | | | | |
|---|---|---|---|---|
| | Census Tracts | | Family Population | |
| Low | 0 | 0.0% | 0 | 0.0% |
| Moderate | 14 | 32.6% | 7,337 | 20.5% |
| Middle | 27 | 62.8% | 25,934 | 72.3% |
| Upper | 2 | 4.7% | 2,577 | 7.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% |
| TOTAL | 43 | 100% | 35,848 | 100% |

As shown above, 32.6 percent of the census tracts in the assessment area are LMI geographies, but only 20.5 percent of the family population resides in these tracts. These LMI geographies are dispersed throughout the assessment area and are not concentrated in any one area. Of note, three of the 14 moderate-income census tracts in the assessment area are in Labette and Cherokee counties, where the bank does not operate any branch locations.

Based on 2015 ACS data, the median family income for the assessment area ($53,652) was lower than the median family income for nonMSA Kansas as a whole ($57,229). More recently, the FFIEC estimates the median family income for nonMSA Kansas to be $61,100 in 2018 and $62,400 in 2019. The following table displays the distribution of assessment area families by income level compared to all of nonMSA Kansas.

| Family Population by Income Level | | | | |
|---|---|---|---|---|
| | Assessment Area | | NonMSA Kansas | |
| Low | 7,610 | 21.2% | 45,918 | 19.2% |
| Moderate | 7,107 | 19.8% | 44,851 | 18.7% |
| Middle | 8,120 | 22.7% | 53,309 | 22.3% |
| Upper | 13,011 | 36.3% | 95,151 | 39.8% |
| TOTAL | 35,848 | 100% | 239,229 | 100% |

When comparing the data in the table above with the first table in this section, a much higher percentage of families in the assessment area are LMI (41.0 percent) than reside in LMI census tracts (20.5 percent). The percentage of LMI families in the assessment area also exceeds the LMI family percentage for all of nonMSA Kansas (37.9 percent). Lastly, the percentage of families in the assessment area that are below the poverty level (11.8 percent) exceeds the statewide nonMSA level of 10.2 percent. Based on these factors, the assessment area appears less affluent than nonMSA Kansas as a whole.

## Housing Demographics

The following table displays key housing demographics for each county in the assessment area, the assessment area as a whole, and all of nonMSA Kansas.

| Housing Demographics | | | | |
|---|---|---|---|---|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (Monthly) | Housing Cost Burden |
| Cherokee County | $72,500 | 57.1% | $657 | 39.9% |
| Crawford County | $85,900 | 42.5% | $673 | 53.4% |
| Franklin County | $122,900 | 41.6% | $741 | 44.5% |
| Labette County | $70,200 | 59.0% | $559 | 42.6% |
| Montgomery County | $70,600 | 58.2% | $624 | 42.9% |
| **Assessment Area** | **$82,343** | **51.0%** | **$656** | **46.4%** |
| NonMSA Kansas | $88,625 | 51.0% | $623 | 41.0% |

As shown in the table above, the assessment area as a whole is similarly affordable to all of nonMSA Kansas especially when considering differences in income levels, as evidenced by identical affordability ratios. However, housing affordability varied within the assessment area, and housing is comparatively less affordable in Crawford and Franklin counties than in the rest of the assessment area. As noted by community contacts, these areas have the greatest need for affordable housing development and home improvement loans. The need for affordable home improvement lending is further demonstrated by the median age of housing stock for the assessment area (58 years), which indicates that a large share of the available affordable housing stock is more likely to need costly home improvements to maintain the quality of the housing. This has the potential to hinder homeownership levels for LMI residents, in particular, in the absence of widely available affordable home improvement loans. Lastly, assessment area demographics show that 17.8 percent of all owner-occupied housing units in the assessment area were in moderate-income geographies in 2018 and 19.6 percent in 2019.

## Industry and Employment Demographics

The economy of the nonMSA Kansas assessment area is heavily dependent on manufacturing, as noted by community contacts, but also supports a strong small business sector. Overall, 88.6 percent of all businesses and 98.6 percent of all farms in the assessment area reported annual revenues of $1 million or less in 2019. County business patterns indicate that there are 54,813 paid employees in the assessment area. By number of paid employees, the three largest economic sectors in the assessment area are government (23.3 percent), manufacturing (18.2 percent), and retail trade (10.1 percent). The high number of government employees is attributable in part to employees of Pittsburgh State University, a large public university in Pittsburgh, Kansas.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and nonMSA Kansas as a whole.

| Unemployment Levels | | | |
|---|---|---|---|
| Dataset | Time Period (Annual Average) | | |
| | 2018 | 2019 | YTD 2020 |
| Assessment Area | 3.9% | 3.8% | 6.6% |
| NonMSA Kansas | 3.1% | 3.1% | 5.1% |

As shown in the preceding table, unemployment levels in the assessment area were consistently higher than in the rest of nonMSA Kansas during the review period. Moreover, the gap between unemployment levels between the two datasets increased in 2020, indicating that the assessment area was likely impacted by the pandemic to a greater extent than nonMSA Kansas as a whole. According to community contacts, many manufacturing employers in the assessment area initiated temporary layoffs in response to the pandemic, which likely contributed to the increase in unemployment in the assessment area relative to nonMSA Kansas as a whole.

### Community Contact Information

To augment the evaluation of the bank's lending performance and identify credit needs and community development opportunities in the assessment area, two community contact interviews were completed with individuals with direct knowledge of these factors in the assessment area. One interview was conducted with an individual representing a public affordable housing organization, while the second was with an individual representing an economic development organization.

According to the community contacts, economic conditions vary somewhat across the assessment area. Conditions in Montgomery County were noted as stable overall, though temporary shutdowns of key manufacturing employers had a significant impact on the area's economy given the heavy concentration of manufacturing in the assessment area. The contact went on to describe that Montgomery County has one of the highest unemployment levels in the state but also one of the lowest poverty levels. Conversely, a second community contact described the economy of Crawford County as expanding rapidly. Most of this growth is being driven by investments and continued economic diversification in the city of Pittsburgh, with the health care industry in particular experiencing continued growth. This portion of the assessment area was also impacted by temporary disruptions caused by the pandemic, however, particularly in the manufacturing sector. Both community contacts noted that banking services are generally accessible throughout the assessment area, though one contact noted that few banks in the assessment area offer loan products that are tailored to the needs of LMI individuals.

One contact familiar with affordable housing needs pointed to the need for affordable home improvement loans. According to the contact, much of the housing stock in the assessment area is aging and in need of repair, a barrier that often prevents many LMI individuals from obtaining or maintaining quality affordable housing in the assessment area. The contact also pointed to the need for financial literacy and homeownership counseling efforts for consumers in the assessment area, particularly LMI individuals, to enhance utilization of programs such as down payment assistance or credit repair. This community contact also identified Arvest Bank as being proactive in meeting some of these needs in the assessment area.

Regarding the needs of small businesses in the assessment area, one community contact stated that access to flexible lending products such as SBA loans is good, though small dollar loans remain a pressing need for many small businesses. The contact went on to identify participation in revolving loan funds for startup businesses, lending for industrial park projects in Coffeyville and Independence, and participation in revitalization efforts in designated enterprise zones as the greatest opportunities for financial institutions to further meet the needs of small businesses in the assessment area.

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

LENDING TEST

The bank's Lending Test rating for the nonMSA Kansas assessment area is high satisfactory. Lending activity levels reflect adequate responsiveness to the credit needs of the assessment area. The bank's overall geographic distribution of loans reflects an excellent penetration throughout nonMSA Kansas. Furthermore, the overall distribution of loans by borrower's income/revenue profile reflects good penetration among borrowers of different income levels and businesses and farms of different revenue sizes. The bank makes an adequate level of community development loans throughout nonMSA Kansas. Lastly, the bank makes limited use of flexible and/or innovative lending practices in meeting the credit needs of nonMSA Kansas.

**Lending Activity**

The following table displays the combined 2018 and 2019 lending volume by number and dollar amount in the assessment area.

| Summary of Lending Activity January 1, 2018 through December 31, 2019 | | | | |
|---|---|---|---|---|
| **Loan Type** | **#** | **%** | **$(000s)** | **%** |
| Home Improvement | 9 | 2.2% | 441 | 0.9% |
| Home Purchase | 103 | 25.7% | 12,487 | 24.4% |
| Multifamily Housing | 3 | 0.7% | 2,221 | 4.3% |
| Refinancing | 54 | 13.5% | 6,065 | 11.8% |
| Other Purpose LOC | 5 | 1.2% | 156 | 0.3% |
| Other Purpose Closed/Exempt | 9 | 2.2% | 666 | 1.3% |
| Purpose Not Applicable | 0 | 0.00% | 0 | 0.0% |
| **Total HMDA** | **183** | **45.6%** | **22,036** | **43.0%** |
| Small Business | 145 | 36.2% | 25,759 | 50.2% |
| Small Farm | 73 | 18.2% | 3,476 | 6.8% |
| **TOTAL LOANS** | **401** | **100.0%** | **51,271** | **100.0%** |

From 2018 to 2019, the bank made 0.7 percent of its total HMDA and CRA loans in the nonMSA Kansas assessment area. This figure was in line with the share of total bank deposits held in the assessment area (0.6 percent) and the percentage of total bank branches located in the assessment area (1.2 percent). Additionally, the bank's lending activity levels relative to other lenders in the assessment area, as discussed in the *General Demographics* section, reflect that the bank plays an active role in lending throughout the assessment area. Therefore, lending activity levels reflect an adequate responsiveness to credit needs in nonMSA Kansas.

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## **Geographic Distribution of Loans**

Overall, the geographic distribution of the bank's loans reflects an excellent dispersion throughout geographies of different income levels based on all three products reviewed. As there are no low-income census tracts in the assessment area, the bank's performance was primarily based on lending activity in moderate-income census tracts. Lastly, all three lending products were weighted equally when assessing the bank's overall performance in nonMSA Kansas.

*Home Mortgage Disclosure Act (HMDA) Lending*

The bank's HMDA lending in moderate-income census tracts is considered good overall. In 2018, the bank made 17.0 percent of its total HMDA loans in the assessment area in moderate-income census tracts. This distribution was comparable to the performance of peer institutions in the assessment area (16.4 percent) and the percentage of total owner-occupied housing located in these geographies (17.8 percent). Therefore, the geographic distribution of HMDA loans in 2018 is considered adequate. The bank's lending levels improved in 2019, with 22.1 percent of total HMDA loans originated in moderate-income census tracts. This level of lending exceeded aggregate lending performance (17.5 percent) and the demographic figure (19.6 percent), reflecting excellent performance.

*Small Business Lending*

The bank's small business lending in moderate-income census tracts is considered excellent in both 2018 and 2019. The distribution of the bank's small business loans in moderate-income census tracts in 2018 (38.6 percent) and 2019 (43.9 percent) far exceeded aggregate lending levels (24.3 percent in 2018 and 23.8 percent in 2019) and the demographic estimate of assessment area businesses that are in moderate-income geographies (28.7 percent in 2018 and 30.3 percent in 2019).

*Small Farm Lending*

Small farm lending is also considered excellent in both 2018 and 2019. Of the bank's total small farm loans, 7.3 percent were made in moderate-income census tracts in 2018, which exceeded both the performance of peer institutions in the assessment area (4.4 percent) and the demographic figure (4.5 percent). Similarly, the bank's small farm loan distribution in moderate-income census tracts in 2019 (9.4 percent) exceeded aggregate lending levels (4.8 percent) and the demographic figure (4.7 percent). Therefore, the geographic distribution of small farm loans is considered excellent.

Lastly, based on an analysis of the dispersion of all three lending products, the bank's lending activity does not reveal evidence of any conspicuous lending gaps in LMI geographies. In 2018, the bank recorded lending activity in 76.7 percent of all census tracts in the assessment area and 78.6 percent of all LMI geographies. In 2019, the bank had lending activity in 72.1 percent of all census tracts in the assessment area and 78.6 percent of all LMI geographies.

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## Loan Distribution by Borrower's Profile

The bank's overall borrower distribution in the nonMSA Kansas assessment area is considered good. All three lending products were weighted equally when assessing the bank's performance in this assessment area.

*Home Mortgage Disclosure Act (HMDA) Lending*

The bank's HMDA lending reflects an adequate distribution to borrowers of different income profiles overall, including those who are LMI. In 2018, the percentage of the bank's HMDA loans made to low-income borrowers in the assessment area (9.1 percent) was closely aligned with aggregate lending performance (8.7 percent) but below the percentage of assessment area families who are low income (21.0 percent). While below the demographic figure, the bank's performance is considered adequate when accounting for the percentage of families in the assessment area who are below the poverty level (11.8 percent) and unlikely to qualify for a home loan and when comparing the bank's performance to other financial institutions in the assessment area. On the other hand, the bank's lending to moderate-income borrowers (26.1 percent) outperformed peer institutions in the assessment area (18.6 percent) and exceeded the percentage of assessment area families who are moderate income (19.7 percent), reflecting excellent performance.

In 2019, the bank made 9.5 percent of its HMDA loans in the assessment area to low-income borrowers. This performance was closely aligned with that of peer institutions in the assessment area (9.1 percent) but below the demographic figure (21.2 percent), reflecting adequate performance. Similarly, the distribution of the bank's HMDA loans to moderate-income borrowers (17.9 percent) mirrored aggregate lending performance but was below the demographic figure (19.8 percent), also reflecting adequate performance.

*Small Business Lending*

The bank's lending levels to businesses with annual revenues of $1 million or less is good overall. The bank made 64.8 percent and 73.7 percent of its small business loans to businesses with annual revenues of $1 million or less in 2018 and 2019, respectively. By comparison, aggregate lending levels were below the bank's performance (44.7 percent in 2018 and 45.0 percent in 2019), while the demographic estimate of businesses in the assessment area with this revenue profile (88.4 percent in 2018 and 91.8 percent in 2019) was higher. Additional consideration was given to the distribution of the bank's loans by dollar amount, as community contacts pointed to the need for small dollar loans for businesses in the assessment area. Across both years of data reviewed, 66.7 percent of the bank's small business loans to businesses with annual revenues of $1 million or less were in amounts of $100,000 or less and are considered more responsive to the credit needs of small businesses in the assessment area. When considering this context and the bank's performance relative to other lenders in the assessment area, the distribution of the bank's small business loans is considered good in both 2018 and 2019.

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*Small Farm Lending*

The bank's small business lending reflects an excellent distribution to farms of different sizes. In 2018, 97.6 percent of the bank's small farm loans were made to farms with annual revenues of $1 million or less. This performance is considered excellent, as the bank's lending levels far exceeded aggregate lending performance (58.2 percent) and were aligned with the demographic figure (98.7 percent). Similarly, the percentage of the bank's farm loans to farms with annual revenues of $1 million or less in 2019 (96.9 percent) was significantly higher than peer lending levels in the assessment area (56.1 percent) and in line with the demographic figure (98.6 percent), reflecting excellent performance. Moreover, of the bank's small farm loans to farms with annual revenues of $1 million or less, 90.1 percent were in amounts of $100,000 or less, which further demonstrates the bank's willingness to meet the credit needs of small farms in the assessment area.

## Community Development Lending Activity

The bank makes an adequate level of community development loans in the assessment area. During the review period, the bank originated six PPP loans to businesses impacted by the pandemic totaling $3.1 million that received community development lending credit.

As the bank met the credit needs of its Kansas assessment area, additional consideration was given for community development loans made in Kansas but outside of the bank's nonMSA Kansas assessment area. These included two loans totaling $9.1 million, both of which provided capital and financing to a paper products factory in Bourbon County that employs numerous LMI individuals; and the bank made an additional 5 PPP loans totaling $6.5 million in the broader, statewide Kansas area. At the statewide level, the bank's total community development lending includes 13 loans totaling $18.8 million.

## Product Innovation

The bank makes limited use of flexible lending practices in serving the credit needs of nonMSA Kansas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document. The bank's use of flexible and/or innovative lending products in nonMSA Kansas is described below.

- The bank originated nine loans totaling $621,760 through the HomeReady program. These loans provide flexible, long-term financing for LMI borrowers, which was noted by community contacts as a credit need.

- The bank utilized several government loan programs, including 13 FHA loans ($1.2 million), 11 RD loans ($806,812), and 4 VA loans ($335,571).

INVESTMENT TEST

The bank's Investment Test rating in nonMSA Kansas is Low Satisfactory. The bank had an adequate level of community development investment and grant activity and was rarely in a leadership position. The bank's qualified investment activity included $587,494 in MBS, of which

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$386,623 was made in the current review period, while the remainder were previously made MBS that are still outstanding as of the date of this evaluation. The bank also made 13 donations totaling $9,348 during the review period.

SERVICE TEST

The bank is rated Low Satisfactory under the Service Test in the nonMSA Kansas assessment area. The bank's service delivery systems are reasonably accessible to individuals and geographies of different income levels, and the bank's record of opening and closing branches has not adversely affected the accessibility of those delivery systems. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies or individuals. Lastly, the bank makes a limited level of community development services in nonMSA Kansas.

## **Accessibility of Delivery Systems**

The bank operates three branches in nonMSA Kansas, representing 1.2 percent of the bank's total branches. The table below displays the distribution of these branch locations along with the distribution of assessment area census tracts and household population by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|---|---|---|---|---|---|---|
| **Dataset** | **Geography Income Level** | | | | | **TOTAL** |
| | **Low-** | **Moderate-** | **Middle-** | **Upper-** | **Unknown** | |
| Branches | 0 | 1 | 1 | 1 | 0 | **3** |
| | 0.0% | 33.3% | 33.3% | 33.3% | 0.0% | **100%** |
| Census Tracts | 0.0% | 32.7% | 62.8% | 4.6% | 0.0% | **100%** |
| Household Population | 0.0% | 21.6% | 69.7% | 8.8% | 0.0% | **100%** |

As shown above, the bank operates one branch in a moderate-income census tract. As a share of the bank's total branches, this distribution aligns with the percentage of census tracts in the assessment area that are moderate-income (32.7 percent) and exceeds the household population in moderate-income census tracts (21.6 percent). In addition to these branch locations, the bank also operates two stand-alone ATMs in the assessment area, one of which is also deposit accepting and both of which are in moderate-income census tracts. The bank's stand-alone, deposit-accepting ATM in the assessment area is in a moderate-income census tract in which the bank does not also operate a branch location, which further enhances the accessibility of the bank's services. While the bank does not operate any branch locations in Labette or Cherokee counties, which contain three moderate-income census tracts, overall service delivery systems are reasonably accessible to individuals and geographies of different income levels in nonMSA Kansas.

## **Changes in Branch Locations**

The bank did not open or close any branch locations in the assessment area during the review period. Therefore, changes in branch locations have not adversely affected the accessibility of the bank's service delivery systems.

**Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

Business hours and banking services are relatively consistent across the three branches in the assessment area. The bank's branch locations operate weekday lobby hours generally within standard banking hours of 8:00 a.m. to 5:00 p.m., with one branch location open until 6:00 p.m. However, all three branch locations operate drive-through facilities with extended weekday hours and Saturday hours, which offers extended accessibility for each of the branch locations. In addition, one branch location also operates Saturday lobby hours from 9:00 a.m. to 1:00 p.m. Lastly, lenders are present at two of three branch locations in the assessment area. Therefore, the bank's business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies or individuals.

**Community Development Services**

The bank makes a limited level of community development services in nonMSA Kansas. During the review period, four bank employees provided ten hours of community development service activities to four different organizations. All of these activities consisted of financial literacy events at schools located throughout the assessment area. In addition, the bank also opened and maintained 29 new RPA accounts for LMI individuals in the assessment area during the review period.

<div align="right"><strong>Appendix A</strong></div>

## SCOPE OF EXAMINATION TABLES

| Scope of Examination | | |
|---|---|---|
| **TIME PERIOD REVIEWED** | January 1, 2018 – December 31, 2019 for HMDA, small business, and small farm lending.<br><br>July 30, 2018 – June 30, 2021 for community development loans, investment, and service activities. | |
| | | |
| **FINANCIAL INSTITUTION**<br><br>Arvest Bank<br>Fayetteville, Arkansas | | **PRODUCTS REVIEWED**<br><br>HMDA<br>Small Business<br>Small Farm |
| | | |
| **AFFILIATE(S)**<br><br>N/A | **AFFILIATE RELATIONSHIP**<br><br>N/A | **PRODUCTS REVIEWED**<br><br>N/A |

| Assessment Area – Examination Scope Details | | | | | |
|---|---|---|---|---|---|
| Assessment Area | Rated Area | # of Offices | Deposits ($000s) (as of June 30, 2021) | Branches Visited | CRA Review Procedures |
| Fayetteville MSA | Arkansas | 46 | $7,166,202 | 0 | Full scope |
| Little Rock MSA | Arkansas | 20 | $3,012,338 | 0 | Full scope |
| Hot Springs MSA | Arkansas | 5 | $526,567 | 0 | Full scope |
| Jonesboro MSA | Arkansas | 3 | $147,824 | 0 | Limited scope |
| Texarkana MSA | Arkansas | 1 | $41,825 | 0 | Limited scope |
| NonMSA Arkansas | Arkansas | 23 | $1,427,315 | 0 | Full scope |
| Oklahoma City MSA | Oklahoma | 20 | $1,558,387 | 0 | Full scope |
| Tulsa MSA | Oklahoma | 23 | $2,584,392 | 0 | Full scope |
| Lawton MSA | Oklahoma | 5 | $344,278 | 0 | Limited scope |
| NonMSA Oklahoma | Oklahoma | 32 | $2,274,534 | 0 | Full scope |
| Joplin MSA | Missouri | 8 | $644,019 | 0 | Full scope |
| Springfield MSA | Missouri | 8 | $415,521 | 0 | Limited scope |
| NonMSA Missouri | Missouri | 14 | $749,041 | 0 | Full scope |
| Fort Smith Multistate MSA | Fort Smith | 11 | $1,022,880 | 0 | Full scope |
| Kansas City Multistate MSA | Kansas City | 19 | $698,764 | 0 | Full scope |
| NonMSA Kansas | Kansas | 3 | $133,637 | 0 | Full scope |
| **OVERALL** | | **241** | **$22,746,984** | **1** | **12 Full scope** |

## SUMMARY OF STATE AND MULTISTATE
## METROPOLITAN STATISTICAL AREA RATINGS

| State or Multistate MSA | Lending Test Rating | Investment Test Rating | Service Test Rating | Overall Rating |
|---|---|---|---|---|
| Arkansas | High Satisfactory | High Satisfactory | High Satisfactory | **Satisfactory** |
| Oklahoma | High Satisfactory | High Satisfactory | Outstanding | **Satisfactory** |
| Missouri | Low Satisfactory | Low Satisfactory | Low Satisfactory | **Satisfactory** |
| Fort Smith Multistate MSA | High Satisfactory | High Satisfactory | Outstanding | **Satisfactory** |
| Kansas City Multistate MSA | High Satisfactory | Outstanding | Outstanding | **Outstanding** |
| Kansas | High Satisfactory | Low Satisfactory | Needs to Improve | **Satisfactory** |

The following table depicts the previous ratings table in numerical form, which is used in determining the overall rating for each rated area for large banks. Summing the points from the Lending, Service, and Investment Tests, each rated area is given a total point value, which equates to an overall rating in accordance with the FFIEC's *Interagency Large Institution CRA Examination Procedures.*

| State or Multistate MSA | Lending Test Rating | Investment Test Rating | Service Test Rating | Total Points | Overall Rating |
|---|---|---|---|---|---|
| Arkansas | 9 | 4 | 4 | **17** | **Satisfactory** |
| Oklahoma | 9 | 4 | 6 | **19** | **Satisfactory** |
| Missouri | 6 | 3 | 3 | **12** | **Satisfactory** |
| Fort Smith Multistate MSA | 9 | 4 | 6 | **19** | **Satisfactory** |
| Kansas City Multistate MSA | 9 | 6 | 6 | **21** | **Outstanding** |
| Kansas | 9 | 3 | 1 | **13** | **Satisfactory** |

# LENDING PERFORMANCE TABLES BY ASSESSMENT AREA

## ARKANSAS

### Fayetteville MSA

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 8.1** **Distribution of 2018 Home Mortgage Lending** **By Income Level of Geography** | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 10 | 0.4% | 902 | 0.2% | 0.4% | 0.4% | 0.2% |
| Moderate | 304 | 12.8% | 46,534 | 10.1% | 15.7% | 11.4% | 8.9% |
| Middle | 990 | 41.5% | 163,263 | 35.3% | 46.2% | 41.9% | 37.3% |
| Upper | 1,080 | 45.3% | 251,925 | 54.5% | 37.7% | 46.3% | 53.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **2,384** | **100.0%** | **462,624** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 2 | 0.2% | 137 | 0.1% | 0.4% | 0.3% | 0.2% |
| 22+Moderate | 174 | 13.1% | 13,830 | 9.0% | 15.7% | 12.9% | 9.9% |
| Middle | 602 | 45.2% | 63,574 | 41.6% | 46.2% | 44.5% | 40.4% |
| Upper | 554 | 41.6% | 75,358 | 49.3% | 37.7% | 42.3% | 49.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1,332** | **100.0%** | **152,899** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.4% | 0.1% | 0.1% |
| Moderate | 43 | 10.4% | 1,970 | 7.6% | 15.7% | 10.7% | 7.8% |
| Middle | 177 | 42.9% | 10,809 | 41.8% | 46.2% | 43.0% | 42.9% |
| Upper | 193 | 46.7% | 13,056 | 50.5% | 37.7% | 46.2% | 49.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **413** | **100.0%** | **25,835** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.9% | 1.5% | 0.1% |
| Moderate | 9 | 40.9% | 2,661 | 6.1% | 37.5% | 35.6% | 26.6% |
| Middle | 8 | 36.4% | 7,841 | 17.9% | 30.8% | 39.3% | 35.4% |
| Upper | 5 | 22.7% | 33,306 | 76.0% | 29.8% | 23.7% | 37.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **22** | **100.0%** | **43,808** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| | Other Purpose LOC | | | | % of Owner-Occupied Units | | |
|---|---|---|---|---|---|---|---|
| Low | 2 | 0.6% | 46 | 0.2% | 0.4% | 0.4% | 0.1% |
| Moderate | 45 | 14.2% | 2,354 | 12.0% | 15.7% | 11.9% | 9.8% |
| Middle | 117 | 37.0% | 6,794 | 34.5% | 46.2% | 36.9% | 31.6% |
| Upper | 152 | 48.1% | 10,479 | 53.3% | 37.7% | 50.8% | 58.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **316** | **100.0%** | **19,673** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.4% | 0.0% | 0.0% |
| Moderate | 12 | 10.7% | 975 | 12.9% | 15.7% | 11.6% | 8.7% |
| Middle | 56 | 50.0% | 3,301 | 43.5% | 46.2% | 50.3% | 44.9% |
| Upper | 44 | 39.3% | 3,311 | 43.6% | 37.7% | 38.1% | 46.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **112** | **100.0%** | **7,587** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.4% | 0.4% | 0.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.7% | 15.8% | 13.8% |
| Middle | 1 | 100.0% | 118 | 100.0% | 46.2% | 50.4% | 49.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 37.7% | 33.5% | 37.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1** | **100.0%** | **118** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 14 | 0.3% | 1,085 | 0.2% | 0.4% | 0.4% | 0.2% |
| Moderate | 587 | 12.8% | 68,324 | 9.6% | 15.7% | 11.9% | 10.6% |
| Middle | 1,951 | 42.6% | 255,700 | 35.9% | 46.2% | 42.6% | 37.9% |
| Upper | 2,028 | 44.3% | 387,435 | 54.4% | 37.7% | 45.1% | 51.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **4,580** | **100.0%** | **712,544** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 8.1 Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | $ | $ % | | # % | $ % |
| **Home Purchase Loans** | | | | | | | |
| Low | 21 | 0.9% | 2,906 | 0.6% | 0.6% | 0.7% | 0.5% |
| Moderate | 361 | 15.0% | 57,958 | 11.9% | 18.1% | 11.6% | 9.2% |
| Middle | 997 | 41.5% | 188,171 | 38.5% | 45.3% | 42.2% | 38.9% |
| Upper | 1,023 | 42.6% | 239,686 | 49.0% | 36.0% | 45.6% | 51.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **2,402** | **100.0%** | **488,721** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Refinance | | | | | | |
|---|---|---|---|---|---|---|
| Low | 12 | 0.7% | 1,304 | 0.5% | 0.6% | 0.6% | 0.3% |
| Moderate | 244 | 14.4% | 26,711 | 10.7% | 18.1% | 12.6% | 9.3% |
| Middle | 721 | 42.6% | 100,601 | 40.3% | 45.3% | 41.3% | 38.0% |
| Upper | 714 | 42.2% | 120,971 | 48.5% | 36.0% | 45.5% | 52.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1,691** | **100.0%** | **249,587** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | |
| Low | 1 | 0.2% | 178 | 0.7% | 0.6% | 0.8% | 1.4% |
| Moderate | 54 | 13.0% | 2,804 | 10.9% | 18.1% | 14.1% | 11.5% |
| Middle | 173 | 41.7% | 9,278 | 36.0% | 45.3% | 40.4% | 34.8% |
| Upper | 187 | 45.1% | 13,481 | 52.4% | 36.0% | 44.6% | 52.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **415** | **100.0%** | **25,741** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Multifamily Loans | | | | % of Multifamily Units | | |
|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 11.3% | 7.4% | 7.5% |
| Moderate | 11 | 40.7% | 12,481 | 25.9% | 28.9% | 34.2% | 25.5% |
| Middle | 13 | 48.1% | 16,021 | 33.3% | 30.2% | 35.6% | 48.8% |
| Upper | 3 | 11.1% | 19,664 | 40.8% | 29.6% | 22.8% | 18.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **27** | **100.0%** | **48,166** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose LOC | | | | % of Owner-Occupied Units | | |
|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 0.6% | 0.0% | 0.0% |
| Moderate | 42 | 14.1% | 2,317 | 12.3% | 18.1% | 13.0% | 12.1% |
| Middle | 125 | 41.9% | 7,040 | 37.2% | 45.3% | 41.8% | 38.8% |
| Upper | 131 | 44.0% | 9,555 | 50.5% | 36.0% | 45.3% | 49.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **298** | **100.0%** | **18,912** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | |
| Low | 1 | 0.8% | 140 | 1.1% | 0.6% | 0.3% | 0.4% |
| Moderate | 15 | 12.6% | 1,569 | 12.8% | 18.1% | 14.9% | 11.5% |
| Middle | 52 | 43.7% | 4,403 | 35.8% | 45.3% | 40.8% | 37.1% |
| Upper | 51 | 42.9% | 6,189 | 50.3% | 36.0% | 44.0% | 51.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **119** | **100.0%** | **12,301** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Appendix C (continued)**

| Purpose Not Applicable | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 0.6% | 0.4% | 0.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.1% | 19.2% | 15.2% |
| Middle | 1 | 100.0% | 127 | 100.0% | 45.3% | 41.6% | 35.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 36.0% | 38.8% | 49.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1** | **100.0%** | **127** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 35 | 0.7% | 4,528 | 0.5% | 0.6% | 0.7% | 1.2% |
| Moderate | 727 | 14.7% | 103,840 | 12.3% | 18.1% | 12.3% | 11.0% |
| Middle | 2,082 | 42.0% | 325,641 | 38.6% | 45.3% | 41.8% | 39.6% |
| Upper | 2,109 | 42.6% | 409,546 | 48.6% | 36.0% | 45.3% | 48.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **4,953** | **100.0%** | **843,555** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9 Distribution of 2018 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 20 | 1.0% | $2,944 | 1.3% | 1.1% | 0.9% | 1.5% |
| Moderate | 324 | 16.6% | $37,720 | 16.6% | 16.9% | 15.2% | 14.3% |
| Middle | 980 | 50.2% | $113,002 | 49.8% | 47.3% | 46.7% | 48.3% |
| Upper | 628 | 32.2% | $73,250 | 32.3% | 34.6% | 36.4% | 35.7% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.8% | 0.2% |
| **TOTAL** | **1,952** | **100.0%** | **$226,916** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9 Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 35 | 1.9% | $4,533 | 2.3% | 1.9% | 1.5% | 2.7% |
| Moderate | 365 | 19.8% | $42,790 | 22.0% | 18.6% | 16.5% | 17.4% |
| Middle | 890 | 48.3% | $91,617 | 47.2% | 45.5% | 43.9% | 45.4% |
| Upper | 552 | 30.0% | $55,215 | 28.4% | 34.0% | 36.4% | 33.9% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 1.8% | 0.6% |
| **TOTAL** | **1,842** | **100.0%** | **$194,155** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Appendix C (continued)**

| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
|---|---|---|---|---|---|---|---|
| **Table 10** Distribution of 2018 Small Farm Lending By Income Level of Geography | | | | | | | |
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 0.2% | 0.0% | 0.0% |
| Moderate | 191 | 21.4% | $7,475 | 17.3% | 17.0% | 20.5% | 15.1% |
| Middle | 589 | 66.0% | $29,100 | 67.3% | 59.6% | 66.4% | 68.3% |
| Upper | 112 | 12.6% | $6,647 | 15.4% | 23.2% | 13.1% | 16.6% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.1% | 0.0% |
| **TOTAL** | **892** | **100.0%** | **$43,222** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
|---|---|---|---|---|---|---|---|
| **Table 10** Distribution of 2019 Small Farm Lending By Income Level of Geography | | | | | | | |
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 0.9% | 0.0% | 0.0% |
| Moderate | 252 | 28.7% | $13,275 | 26.4% | 20.0% | 26.7% | 25.5% |
| Middle | 533 | 60.7% | $30,409 | 60.5% | 55.5% | 60.2% | 59.1% |
| Upper | 93 | 10.6% | $6,550 | 13.0% | 23.7% | 12.7% | 15.4% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.5% | 0.1% |
| **TOTAL** | **878** | **100.0%** | **$50,234** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| | Table 12.1 Distribution of 2018 Home Mortgage Lending By Borrower Income Level | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Loans** | | | | **Families by Family Income %** | **Aggregate HMDA Data** | |
| | **#** | **# %** | **$** | **$ %** | | **# %** | **$ %** |
| **Home Purchase Loans** | | | | | | | |
| Low | 183 | 7.7% | 19,241 | 4.2% | 20.0% | 5.7% | 3.2% |
| Moderate | 395 | 16.6% | 50,297 | 10.9% | 18.3% | 15.8% | 11.3% |
| Middle | 488 | 20.5% | 76,363 | 16.5% | 20.2% | 19.9% | 17.2% |
| Upper | 1,086 | 45.6% | 276,258 | 59.7% | 41.5% | 41.2% | 52.1% |
| Unknown | 232 | 9.7% | 40,465 | 8.7% | 0.0% | 17.3% | 16.2% |
| **TOTAL** | **2,384** | **100.0%** | **462,624** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 109 | 8.2% | 7,236 | 4.7% | 20.0% | 8.5% | 4.5% |
| Moderate | 200 | 15.0% | 16,405 | 10.7% | 18.3% | 15.0% | 10.1% |
| Middle | 252 | 18.9% | 22,744 | 14.9% | 20.2% | 19.3% | 15.5% |
| Upper | 594 | 44.6% | 85,176 | 55.7% | 41.5% | 41.5% | 52.6% |
| Unknown | 177 | 13.3% | 21,338 | 14.0% | 0.0% | 15.7% | 17.3% |
| **TOTAL** | **1,332** | **100.0%** | **152,899** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 18 | 4.4% | 722 | 2.8% | 20.0% | 5.3% | 3.2% |
| Moderate | 42 | 10.2% | 1,644 | 6.4% | 18.3% | 9.2% | 5.7% |
| Middle | 73 | 17.7% | 3,734 | 14.5% | 20.2% | 17.4% | 13.5% |
| Upper | 234 | 56.7% | 16,221 | 62.8% | 41.5% | 56.4% | 60.2% |
| Unknown | 46 | 11.1% | 3,514 | 13.6% | 0.0% | 11.6% | 17.5% |
| **TOTAL** | **413** | **100.0%** | **25,835** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.3% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.2% | 0.0% | 0.0% |
| Upper | 3 | 13.6% | 1,880 | 4.3% | 41.5% | 6.7% | 1.4% |
| Unknown | 19 | 86.4% | 41,928 | 95.7% | 0.0% | 93.3% | 98.6% |
| **TOTAL** | **22** | **100.0%** | **43,808** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 22 | 7.0% | 614 | 3.1% | 20.0% | 6.5% | 4.3% |
| Moderate | 36 | 11.4% | 1,611 | 8.2% | 18.3% | 11.5% | 8.2% |
| Middle | 65 | 20.6% | 2,781 | 14.1% | 20.2% | 19.4% | 13.7% |
| Upper | 160 | 50.6% | 11,922 | 60.6% | 41.5% | 55.4% | 64.1% |
| Unknown | 33 | 10.4% | 2,745 | 14.0% | 0.0% | 7.3% | 9.7% |
| **TOTAL** | **316** | **100.0%** | **19,673** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | |
|---|---|---|---|---|---|---|
| Low | 11 | 9.8% | 458 | 6.0% | 20.0% | 10.6% | 6.0% |
| Moderate | 16 | 14.3% | 696 | 9.2% | 18.3% | 15.2% | 10.2% |
| Middle | 28 | 25.0% | 2,344 | 30.9% | 20.2% | 21.0% | 17.1% |
| Upper | 51 | 45.5% | 3,926 | 51.7% | 41.5% | 43.9% | 52.5% |
| Unknown | 6 | 5.4% | 163 | 2.1% | 0.0% | 9.4% | 14.2% |
| **TOTAL** | **112** | **100.0%** | **7,587** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.0% | 0.8% | 0.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.3% | 0.8% | 0.4% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.2% | 3.4% | 4.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.5% | 6.4% | 14.4% |
| Unknown | 1 | 100.0% | 118 | 100.0% | 0.0% | 88.7% | 80.6% |
| **TOTAL** | **1** | **100.0%** | **118** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | |
| Low | 343 | 7.5% | 28,271 | 4.0% | 20.0% | 6.3% | 3.2% |
| Moderate | 689 | 15.0% | 70,653 | 9.9% | 18.3% | 15.0% | 9.9% |
| Middle | 906 | 19.8% | 107,966 | 15.2% | 20.2% | 19.3% | 15.2% |
| Upper | 2,128 | 46.5% | 395,383 | 55.5% | 41.5% | 41.5% | 47.7% |
| Unknown | 514 | 11.2% | 110,271 | 15.5% | 0.0% | 17.9% | 24.0% |
| **TOTAL** | **4,580** | **100.0%** | **712,544** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1 Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | |
|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | $ | $ % | | # % | $ % |
| Home Purchase Loans | | | | | | |
| Low | 158 | 6.6% | 18,400 | 3.8% | 20.4% | 5.4% | 3.0% |
| Moderate | 456 | 19.0% | 64,942 | 13.3% | 18.6% | 17.1% | 12.3% |
| Middle | 446 | 18.6% | 74,632 | 15.3% | 20.3% | 19.2% | 16.6% |
| Upper | 1,094 | 45.5% | 283,494 | 58.0% | 40.7% | 42.9% | 53.4% |
| Unknown | 248 | 10.3% | 47,253 | 9.7% | 0.0% | 15.4% | 14.8% |
| **TOTAL** | **2,402** | **100.0%** | **488,721** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Refinance | | | | | | |
| Low | 139 | 8.2% | 9,662 | 3.9% | 20.4% | 6.9% | 3.3% |
| Moderate | 238 | 14.1% | 21,271 | 8.5% | 18.6% | 13.7% | 8.6% |
| Middle | 284 | 16.8% | 29,686 | 11.9% | 20.3% | 15.7% | 12.1% |
| Upper | 828 | 49.0% | 159,892 | 64.1% | 40.7% | 44.2% | 55.1% |
| Unknown | 202 | 11.9% | 29,076 | 11.6% | 0.0% | 19.4% | 20.9% |
| **TOTAL** | **1,691** | **100.0%** | **249,587** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Home Improvement | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 15 | 3.6% | 608 | 2.4% | 20.4% | 5.5% | 3.6% |
| Moderate | 53 | 12.8% | 2,153 | 8.4% | 18.6% | 13.3% | 9.8% |
| Middle | 74 | 17.8% | 3,183 | 12.4% | 20.3% | 18.2% | 14.5% |
| Upper | 218 | 52.5% | 13,885 | 53.9% | 40.7% | 52.6% | 56.3% |
| Unknown | 55 | 13.3% | 5,912 | 23.0% | 0.0% | 10.5% | 15.8% |
| **TOTAL** | **415** | **100.0%** | **25,741** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.4% | 0.7% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.6% | 0.7% | 0.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.3% | 0.7% | 0.1% |
| Upper | 2 | 7.4% | 459 | 1.0% | 40.7% | 8.1% | 1.8% |
| Unknown | 25 | 92.6% | 47,707 | 99.0% | 0.0% | 89.9% | 97.9% |
| **TOTAL** | **27** | **100.0%** | **48,166** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 13 | 4.4% | 386 | 2.0% | 20.4% | 4.1% | 2.0% |
| Moderate | 39 | 13.1% | 1,756 | 9.3% | 18.6% | 12.1% | 8.5% |
| Middle | 52 | 17.4% | 2,372 | 12.5% | 20.3% | 17.9% | 12.7% |
| Upper | 155 | 52.0% | 10,702 | 56.6% | 40.7% | 56.8% | 63.1% |
| Unknown | 39 | 13.1% | 3,696 | 19.5% | 0.0% | 9.1% | 13.6% |
| **TOTAL** | **298** | **100.0%** | **18,912** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 6 | 5.0% | 221 | 1.8% | 20.4% | 6.8% | 3.0% |
| Moderate | 23 | 19.3% | 979 | 8.0% | 18.6% | 17.3% | 10.3% |
| Middle | 27 | 22.7% | 2,010 | 16.3% | 20.3% | 19.6% | 16.1% |
| Upper | 53 | 44.5% | 8,135 | 66.1% | 40.7% | 47.3% | 58.4% |
| Unknown | 10 | 8.4% | 956 | 7.8% | 0.0% | 8.9% | 12.2% |
| **TOTAL** | **119** | **100.0%** | **12,301** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.4% | 0.4% | 0.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.6% | 0.4% | 0.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.3% | 2.4% | 2.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.7% | 9.6% | 21.1% |
| Unknown | 1 | 100.0% | 127 | 100.0% | 0.0% | 87.2% | 76.2% |
| **TOTAL** | **1** | **100.0%** | **127** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Total Home Mortgage Loans | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 331 | 6.7% | 29,277 | 3.5% | 20.4% | 5.7% | 2.8% |
| Moderate | 809 | 16.3% | 91,101 | 10.8% | 18.6% | 15.6% | 9.9% |
| Middle | 883 | 17.8% | 111,883 | 13.3% | 20.3% | 17.8% | 13.5% |
| Upper | 2,350 | 47.4% | 476,567 | 56.5% | 40.7% | 43.3% | 48.5% |
| Unknown | 580 | 11.7% | 134,727 | 16.0% | 0.0% | 17.5% | 25.3% |
| **TOTAL** | **4,953** | **100.0%** | **843,555** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Table 13**
**Distribution of 2018 Small Business Lending**
**By Borrower Income Level**

| Business Revenue and Loan Size | | 2018 | | | | | |
|---|---|---|---|---|---|---|---|
| | | Count | | | Dollars | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| Business Revenue | $1 Million or Less | 1349 | 69.1% | 46.7% | $123,374 | 54.4% | 44.6% | 91.0% |
| | Over $1 Million/ Unknown | 603 | 30.9% | 53.3% | $103,542 | 45.6% | 55.4% | 9.0% |
| | **TOTAL** | **1952** | **100.0%** | **100.0%** | **$226,916** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 1409 | 72.2% | 86.7% | $53,644 | 23.6% | 27.7% | |
| | $100,001–$250,000 | 307 | 15.7% | 7.4% | $53,197 | 23.4% | 21.6% | |
| | $250,001–$1 Million | 236 | 12.1% | 5.9% | $120,075 | 52.9% | 50.7% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **1952** | **100.0%** | **100.0%** | **$226,916** | **100.0%** | **100.0%** | |
| Loan Size | Revenue $1 Million or Less | $100,000 or Less | 1042 | 77.2% | | $36,856 | 29.9% | |
| | | $100,001–$250,000 | 199 | 14.8% | | $34,085 | 27.6% | |
| | | $250,001–$1 Million | 108 | 8.0% | | $52,433 | 42.5% | |
| | | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | |
| | | **TOTAL** | **1349** | **100.0%** | | **$123,374** | **100.0%** | |

| Table 13<br>Distribution of 2019 Small Business Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Business Revenue and Loan Size** | | **2019** | | | | | |
| | | **Count** | | **Dollars** | | | **Total Businesses** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Business Revenue** | $1 Million or Less | 1195 | 64.9% | 43.5% | $94,882 | 48.9% | 40.3% | 91.5% |
| | Over $1 Million/ Unknown | 647 | 35.1% | 56.5% | $99,273 | 51.1% | 59.7% | 8.5% |
| | **TOTAL** | **1842** | **100.0%** | **100.0%** | **$194,155** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 1381 | 75.0% | 89.1% | $54,883 | 28.3% | 32.4% | |
| | $100,001–$250,000 | 256 | 13.9% | 6.1% | $44,264 | 22.8% | 20.7% | |
| | $250,001–$1 Million | 205 | 11.1% | 4.8% | $95,008 | 48.9% | 46.9% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **1842** | **100.0%** | **100.0%** | **$194,155** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 968 | 52.6% | | $33,946 | 17.5% | | |
| | $100,001–$250,000 | 149 | 8.1% | | $24,877 | 12.8% | | |
| | $250,001–$1 Million | 78 | 4.2% | | $36,059 | 18.6% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **1195** | **64.9%** | | **$94,882** | **48.9%** | | |

| Table 14 Distribution of 2018 Small Farm Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Farm Revenue and Loan Size** | | **2018** | | | | | |
| | | **Count** | | **Dollars** | | | **Farms** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Farm Revenue** | $1 Million or Less | 859 | 96.3% | 89.6% | 38,460 | 89.0% | 86.2% | 97.5% |
| | Over $1 Million/ Unknown | 33 | 3.7% | 10.4% | 4,762 | 11.0% | 13.8% | 2.5% |
| | **TOTAL** | **892** | **100.0%** | **100.0%** | **43,222** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 777 | 87.1% | 86.5% | 21,992 | 50.9% | 47.6% | |
| | $100,001–$250,000 | 96 | 10.8% | 10.7% | 14,866 | 34.4% | 33.2% | |
| | $250,001–$500,000 | 19 | 2.1% | 2.8% | 6,364 | 14.7% | 19.1% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **892** | **100.0%** | **100.0%** | **43,222** | **100.0%** | **100.0%** | |
| **Loan Size** **Revenue $1 Million or Less** | $100,000 or Less | 759 | 88.4% | | 21,108 | 54.9% | | |
| | $100,001–$250,000 | 87 | 10.1% | | 13,180 | 34.3% | | |
| | $250,001–$1 Million | 13 | 1.5% | | 4,172 | 10.8% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **859** | **100.0%** | | **38,460** | **100.0%** | | |

| Table 14<br>Distribution of 2019 Small Farm Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Farm Revenue and Loan Size** | | **2019** | | | | | |
| | | **Count** | | | **Dollars** | | **Farms** |
| | | **Bank** | | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| Farm Revenue | $1 Million or Less | 711 | 81.0% | 74.2% | 43,052 | 85.7% | 83.8% | 97.1% |
| | Over $1 Million/ Unknown | 167 | 19.0% | 25.8% | 7,182 | 14.3% | 16.2% | 2.9% |
| | **TOTAL** | **878** | **100.0%** | **100.0%** | **50,234** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 748 | 85.2% | 85.8% | 21,791 | 43.4% | 42.6% | |
| | $100,001–$250,000 | 94 | 10.7% | 10.0% | 15,163 | 30.2% | 29.6% | |
| | $250,001–$500,000 | 36 | 4.1% | 4.1% | 13,280 | 26.4% | 27.8% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **878** | **100.0%** | **100.0%** | **50,234** | **100.0%** | **100.0%** | |
| Loan Size / Revenue $1 Million or Less | $100,000 or Less | 599 | 84.2% | | 17,770 | 41.3% | | |
| | $100,001–$250,000 | 78 | 11.0% | | 12,652 | 29.4% | | |
| | $250,001–$1 Million | 34 | 4.8% | | 12,630 | 29.3% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **711** | **100.0%** | | **43,052** | **100.0%** | | |

## Little Rock MSA

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 8.1** Distribution of 2018 Home Mortgage Lending By Income Level of Geography | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 8 | 1.1% | 1,090 | 1.0% | 2.4% | 1.2% | 0.7% |
| Moderate | 72 | 10.2% | 6,899 | 6.3% | 17.1% | 10.7% | 7.4% |
| Middle | 314 | 44.5% | 41,587 | 37.8% | 43.8% | 44.5% | 39.4% |
| Upper | 310 | 44.0% | 59,967 | 54.5% | 36.4% | 43.5% | 52.5% |
| Unknown | 1 | 0.1% | 400 | 0.4% | 0.3% | 0.1% | 0.0% |
| **TOTAL** | **705** | **100.0%** | **109,943** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 9 | 2.4% | 683 | 1.8% | 2.4% | 1.4% | 0.8% |
| Moderate | 60 | 15.9% | 3,121 | 8.4% | 17.1% | 12.9% | 8.2% |
| Middle | 142 | 37.6% | 13,720 | 36.8% | 43.8% | 41.5% | 35.7% |
| Upper | 165 | 43.7% | 19,663 | 52.7% | 36.4% | 44.0% | 55.2% |
| Unknown | 2 | 0.5% | 94 | 0.3% | 0.3% | 0.1% | 0.1% |
| **TOTAL** | **378** | **100.0%** | **37,281** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 2 | 1.6% | 71 | 1.0% | 2.4% | 2.6% | 2.3% |
| Moderate | 23 | 18.7% | 550 | 8.1% | 17.1% | 14.1% | 8.9% |
| Middle | 46 | 37.4% | 2,588 | 38.0% | 43.8% | 35.9% | 32.7% |
| Upper | 52 | 42.3% | 3,595 | 52.8% | 36.4% | 47.2% | 56.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.3% | 0.1% | 0.1% |
| **TOTAL** | **123** | **100.0%** | **6,804** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | % of Multifamily Units | | |
| Low | 3 | 15.0% | 738 | 6.3% | 8.7% | 10.7% | 3.3% |
| Moderate | 8 | 40.0% | 8,494 | 72.4% | 23.8% | 39.3% | 27.0% |
| Middle | 5 | 25.0% | 1,138 | 9.7% | 28.1% | 32.7% | 26.7% |
| Upper | 4 | 20.0% | 1,357 | 11.6% | 39.1% | 16.7% | 42.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.7% | 0.3% |
| **TOTAL** | **20** | **100.0%** | **11,727** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | % of Owner-Occupied Units | | |
| Low | 1 | 1.4% | 35 | 1.2% | 2.4% | 1.0% | 0.6% |
| Moderate | 5 | 7.2% | 112 | 3.8% | 17.1% | 8.2% | 6.4% |
| Middle | 31 | 44.9% | 1,441 | 49.0% | 43.8% | 36.2% | 28.1% |
| Upper | 32 | 46.4% | 1,352 | 46.0% | 36.4% | 54.6% | 64.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.3% | 0.0% | 0.0% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **TOTAL** | **69** | **100.0%** | **2,940** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.4% | 1.5% | 0.8% |
| Moderate | 2 | 6.5% | 93 | 5.7% | 17.1% | 12.4% | 16.0% |
| Middle | 17 | 54.8% | 800 | 48.8% | 43.8% | 42.9% | 28.6% |
| Upper | 12 | 38.7% | 748 | 45.6% | 36.4% | 43.2% | 54.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.3% | 0.0% | 0.0% |
| **TOTAL** | **31** | **100.0%** | **1,641** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.4% | 3.7% | 2.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.1% | 22.1% | 15.1% |
| Middle | 1 | 100.0% | 115 | 100.0% | 43.8% | 50.5% | 50.3% |
| Upper | 0 | 0.0% | 0 | 0.0% | 36.4% | 23.3% | 32.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.3% | 0.3% | 0.2% |
| **TOTAL** | **1** | **100.0%** | **115** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 23 | 1.7% | 2,617 | 1.5% | 2.4% | 1.4% | 1.0% |
| Moderate | 170 | 12.8% | 19,269 | 11.3% | 17.1% | 11.9% | 9.2% |
| Middle | 556 | 41.9% | 61,389 | 36.0% | 43.8% | 43.6% | 37.8% |
| Upper | 575 | 43.3% | 86,682 | 50.9% | 36.4% | 43.0% | 52.0% |
| Unknown | 3 | 0.2% | 494 | 0.3% | 0.3% | 0.1% | 0.1% |
| **TOTAL** | **1,327** | **100.0%** | **170,451** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Table 8.1**
**Distribution of 2019 Home Mortgage Lending**
**By Income Level of Geography**

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Home Purchase Loans** | | | | | | | |
| Low | 12 | 1.6% | 1,137 | 0.9% | 2.4% | 1.3% | 0.8% |
| Moderate | 67 | 9.1% | 6,531 | 4.9% | 17.1% | 10.8% | 7.2% |
| Middle | 295 | 40.0% | 44,110 | 33.3% | 43.8% | 44.7% | 39.7% |
| Upper | 363 | 49.2% | 79,813 | 60.3% | 36.4% | 43.2% | 52.1% |
| Unknown | 1 | 0.1% | 721 | 0.5% | 0.3% | 0.1% | 0.2% |
| **TOTAL** | **738** | **100.0%** | **132,312** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 7 | 1.4% | 537 | 0.8% | 2.4% | 0.8% | 0.4% |
| Moderate | 56 | 11.4% | 4,473 | 7.1% | 17.1% | 9.7% | 6.3% |
| Middle | 183 | 37.3% | 20,383 | 32.2% | 43.8% | 40.4% | 35.2% |
| Upper | 243 | 49.6% | 37,834 | 59.8% | 36.4% | 49.0% | 58.0% |
| Unknown | 1 | 0.2% | 10 | 0.0% | 0.3% | 0.1% | 0.1% |
| **TOTAL** | **490** | **100.0%** | **63,237** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Home Improvement | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 2 | 1.7% | 55 | 0.9% | 2.4% | 2.1% | 0.9% |
| Moderate | 14 | 12.0% | 335 | 5.4% | 17.1% | 13.8% | 10.1% |
| Middle | 45 | 38.5% | 2,111 | 34.2% | 43.8% | 36.4% | 30.8% |
| Upper | 55 | 47.0% | 3,642 | 59.0% | 36.4% | 47.4% | 58.0% |
| Unknown | 1 | 0.9% | 30 | 0.5% | 0.3% | 0.3% | 0.1% |
| **TOTAL** | **117** | **100.0%** | **6,173** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | **% of Multifamily Units** | | | |
| Low | 1 | 10.0% | 102 | 0.6% | 8.7% | 15.2% | 6.6% |
| Moderate | 2 | 20.0% | 413 | 2.5% | 23.8% | 32.9% | 24.6% |
| Middle | 4 | 40.0% | 6,505 | 39.4% | 28.1% | 27.2% | 22.5% |
| Upper | 3 | 30.0% | 9,477 | 57.4% | 39.1% | 24.7% | 46.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| **TOTAL** | **10** | **100.0%** | **16,497** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | **% of Owner-Occupied Units** | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.4% | 0.5% | 0.3% |
| Moderate | 4 | 5.7% | 268 | 8.1% | 17.1% | 7.7% | 5.4% |
| Middle | 33 | 47.1% | 1,263 | 38.2% | 43.8% | 36.2% | 29.2% |
| Upper | 33 | 47.1% | 1,774 | 53.7% | 36.4% | 55.6% | 65.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.3% | 0.0% | 0.0% |
| **TOTAL** | **70** | **100.0%** | **3,305** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 1 | 3.6% | 26 | 0.8% | 2.4% | 1.7% | 0.9% |
| Moderate | 3 | 10.7% | 248 | 7.2% | 17.1% | 10.7% | 6.2% |
| Middle | 9 | 32.1% | 544 | 15.8% | 43.8% | 41.9% | 28.2% |
| Upper | 15 | 53.6% | 2,626 | 76.2% | 36.4% | 45.7% | 64.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.3% | 0.0% | 0.0% |
| **TOTAL** | **28** | **100.0%** | **3,444** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.4% | 3.3% | 2.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.1% | 22.1% | 16.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 43.8% | 49.7% | 48.8% |
| Upper | 0 | 0.0% | 0 | 0.0% | 36.4% | 24.9% | 33.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.3% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |

**Appendix C (continued)**

| Total Home Mortgage Loans | | | | | | |
|---|---|---|---|---|---|---|
| Low | 23 | 1.6% | 1,857 | 0.8% | 2.4% | 1.3% | 1.3% |
| Moderate | 146 | 10.0% | 12,268 | 5.5% | 17.1% | 11.0% | 8.9% |
| Middle | 569 | 39.2% | 74,916 | 33.3% | 43.8% | 43.2% | 36.7% |
| Upper | 712 | 49.0% | 135,166 | 60.1% | 36.4% | 44.4% | 53.0% |
| Unknown | 3 | 0.2% | 761 | 0.3% | 0.3% | 0.1% | 0.1% |
| **TOTAL** | **1,453** | **100.0%** | **224,968** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9 Distribution of 2018 Small Business Lending By Income Level of Geography | | | | | | |
|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 24 | 3.6% | $2,294 | 3.2% | 4.7% | 4.6% | 7.0% |
| Moderate | 146 | 22.0% | $21,559 | 29.7% | 20.7% | 18.6% | 21.0% |
| Middle | 209 | 31.5% | $19,271 | 26.5% | 33.5% | 33.7% | 29.3% |
| Upper | 284 | 42.8% | $29,492 | 40.6% | 40.8% | 42.1% | 42.4% |
| Unknown | 1 | 0.2% | $50 | 0.1% | 0.2% | 1.0% | 0.3% |
| **TOTAL** | **664** | **100.0%** | **$72,666** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9 Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | |
|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 25 | 4.5% | $2,359 | 3.5% | 4.7% | 4.9% | 8.6% |
| Moderate | 114 | 20.4% | $19,359 | 29.0% | 20.5% | 18.0% | 20.0% |
| Middle | 193 | 34.6% | $19,726 | 29.5% | 33.4% | 33.1% | 28.1% |
| Upper | 225 | 40.3% | $25,332 | 37.9% | 41.1% | 41.8% | 42.7% |
| Unknown | 1 | 0.2% | $50 | 0.1% | 0.2% | 2.1% | 0.6% |
| **TOTAL** | **558** | **100.0%** | **$66,826** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Appendix C (continued)**

| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 1.2% | 0.8% | 0.2% |
| Moderate | 2 | 7.7% | $64 | 3.8% | 17.0% | 8.6% | 9.2% |
| Middle | 16 | 61.5% | $1,459 | 85.8% | 49.2% | 66.7% | 68.1% |
| Upper | 8 | 30.8% | $177 | 10.4% | 32.5% | 23.4% | 22.5% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.5% | 0.1% |
| **TOTAL** | **26** | **100.0%** | **$1,700** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

Table 10
Distribution of 2018 Small Farm Lending
By Income Level of Geography

| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 1.0% | 0.8% | 1.5% |
| Moderate | 1 | 4.5% | $45 | 4.3% | 17.0% | 9.2% | 7.6% |
| Middle | 16 | 72.7% | $906 | 86.5% | 49.6% | 63.2% | 65.5% |
| Upper | 5 | 22.7% | $96 | 9.2% | 32.5% | 25.1% | 25.3% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 1.8% | 0.3% |
| **TOTAL** | **22** | **100.0%** | **$1,047** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

Table 10
Distribution of 2019 Small Farm Lending
By Income Level of Geography

| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 12.1 Distribution of 2018 Home Mortgage Lending By Borrower Income Level** | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 52 | 7.4% | 4,054 | 3.7% | 21.3% | 5.5% | 2.9% |
| Moderate | 140 | 19.9% | 15,671 | 14.3% | 17.6% | 19.2% | 14.0% |
| Middle | 185 | 26.2% | 25,713 | 23.4% | 19.9% | 21.3% | 19.6% |
| Upper | 262 | 37.2% | 57,288 | 52.1% | 41.2% | 33.8% | 44.9% |
| Unknown | 66 | 9.4% | 7,217 | 6.6% | 0.0% | 20.3% | 18.6% |
| **TOTAL** | **705** | **100.0%** | **109,943** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 17 | 4.5% | 1,094 | 2.9% | 21.3% | 7.4% | 3.8% |
| Moderate | 66 | 17.5% | 4,289 | 11.5% | 17.6% | 14.5% | 9.8% |
| Middle | 80 | 21.2% | 6,046 | 16.2% | 19.9% | 21.7% | 17.9% |
| Upper | 170 | 45.0% | 21,280 | 57.1% | 41.2% | 40.4% | 52.5% |
| Unknown | 45 | 11.9% | 4,572 | 12.3% | 0.0% | 16.1% | 16.0% |
| **TOTAL** | **378** | **100.0%** | **37,281** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 1 | 0.8% | 8 | 0.1% | 21.3% | 6.6% | 3.5% |
| Moderate | 13 | 10.6% | 383 | 5.6% | 17.6% | 13.8% | 10.2% |
| Middle | 31 | 25.2% | 1,260 | 18.5% | 19.9% | 19.2% | 16.0% |
| Upper | 63 | 51.2% | 4,217 | 62.0% | 41.2% | 49.0% | 53.9% |
| Unknown | 15 | 12.2% | 936 | 13.8% | 0.0% | 11.4% | 16.5% |
| **TOTAL** | **123** | **100.0%** | **6,804** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.6% | 1.3% | 0.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.9% | 0.7% | 0.0% |
| Upper | 2 | 10.0% | 90 | 0.8% | 41.2% | 6.7% | 1.2% |
| Unknown | 18 | 90.0% | 11,637 | 99.2% | 0.0% | 91.3% | 98.5% |
| **TOTAL** | **20** | **100.0%** | **11,727** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 4.6% | 2.5% |
| Moderate | 12 | 17.4% | 331 | 11.3% | 17.6% | 12.3% | 6.9% |
| Middle | 14 | 20.3% | 519 | 17.7% | 19.9% | 21.3% | 14.4% |
| Upper | 37 | 53.6% | 1,734 | 59.0% | 41.2% | 58.2% | 73.2% |
| Unknown | 6 | 8.7% | 356 | 12.1% | 0.0% | 3.6% | 3.0% |
| **TOTAL** | **69** | **100.0%** | **2,940** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 3 | 9.7% | 63 | 3.8% | 21.3% | 9.4% | 4.8% |
| Moderate | 6 | 19.4% | 199 | 12.1% | 17.6% | 16.5% | 8.4% |
| Middle | 5 | 16.1% | 343 | 20.9% | 19.9% | 24.1% | 17.1% |
| Upper | 16 | 51.6% | 964 | 58.7% | 41.2% | 44.0% | 50.4% |
| Unknown | 1 | 3.2% | 72 | 4.4% | 0.0% | 6.0% | 19.4% |
| **TOTAL** | **31** | **100.0%** | **1,641** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 0.3% | 0.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.6% | 0.6% | 0.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.9% | 1.0% | 0.5% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.2% | 1.8% | 1.1% |
| Unknown | 1 | 100.0% | 115 | 100.0% | 0.0% | 96.3% | 97.9% |
| **TOTAL** | **1** | **100.0%** | **115** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 73 | 5.5% | 5,219 | 3.1% | 21.3% | 5.7% | 2.8% |
| Moderate | 237 | 17.9% | 20,873 | 12.2% | 17.6% | 17.1% | 11.8% |
| Middle | 315 | 23.7% | 33,881 | 19.9% | 19.9% | 20.4% | 17.3% |
| Upper | 550 | 41.4% | 85,573 | 50.2% | 41.2% | 34.8% | 42.5% |
| Unknown | 152 | 11.5% | 24,905 | 14.6% | 0.0% | 22.1% | 25.6% |
| **TOTAL** | **1,327** | **100.0%** | **170,451** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1<br>Distribution of 2019 Home Mortgage Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | $ | $ % | | # % | $ % |
| Home Purchase Loans | | | | | | | |
| Low | 75 | 10.2% | 6,833 | 5.2% | 21.3% | 6.7% | 3.6% |
| Moderate | 181 | 24.5% | 23,401 | 17.7% | 17.6% | 20.6% | 15.5% |
| Middle | 147 | 19.9% | 23,371 | 17.7% | 19.9% | 21.2% | 19.7% |
| Upper | 292 | 39.6% | 72,536 | 54.8% | 41.2% | 33.5% | 44.7% |
| Unknown | 43 | 5.8% | 6,171 | 4.7% | 0.0% | 18.0% | 16.5% |
| **TOTAL** | **738** | **100.0%** | **132,312** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Refinance | | | | | | | |
| Low | 28 | 5.7% | 1,688 | 2.7% | 21.3% | 5.6% | 2.7% |
| Moderate | 68 | 13.9% | 5,348 | 8.5% | 17.6% | 11.7% | 6.9% |
| Middle | 86 | 17.6% | 8,077 | 12.8% | 19.9% | 18.8% | 15.1% |
| Upper | 242 | 49.4% | 38,245 | 60.5% | 41.2% | 41.1% | 52.0% |
| Unknown | 66 | 13.5% | 9,879 | 15.6% | 0.0% | 22.8% | 23.3% |
| **TOTAL** | **490** | **100.0%** | **63,237** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Home Improvement | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 2 | 1.7% | 30 | 0.5% | 21.3% | 7.7% | 4.2% |
| Moderate | 17 | 14.5% | 549 | 8.9% | 17.6% | 15.8% | 11.3% |
| Middle | 24 | 20.5% | 816 | 13.2% | 19.9% | 20.5% | 16.3% |
| Upper | 60 | 51.3% | 3,972 | 64.3% | 41.2% | 46.3% | 56.9% |
| Unknown | 14 | 12.0% | 806 | 13.1% | 0.0% | 9.8% | 11.3% |
| **TOTAL** | **117** | **100.0%** | **6,173** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.6% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.9% | 1.3% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.2% | 2.5% | 0.3% |
| Unknown | 10 | 100.0% | 16,497 | 100.0% | 0.0% | 96.2% | 99.7% |
| **TOTAL** | **10** | **100.0%** | **16,497** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 3 | 4.3% | 103 | 3.1% | 21.3% | 4.7% | 2.3% |
| Moderate | 10 | 14.3% | 172 | 5.2% | 17.6% | 15.9% | 7.7% |
| Middle | 13 | 18.6% | 571 | 17.3% | 19.9% | 18.6% | 15.5% |
| Upper | 40 | 57.1% | 2,029 | 61.4% | 41.2% | 57.3% | 67.9% |
| Unknown | 4 | 5.7% | 430 | 13.0% | 0.0% | 3.6% | 6.5% |
| **TOTAL** | **70** | **100.0%** | **3,305** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 8.2% | 4.8% |
| Moderate | 7 | 25.0% | 446 | 13.0% | 17.6% | 18.6% | 10.8% |
| Middle | 7 | 25.0% | 239 | 6.9% | 19.9% | 24.4% | 21.6% |
| Upper | 12 | 42.9% | 2,718 | 78.9% | 41.2% | 41.6% | 55.0% |
| Unknown | 2 | 7.1% | 41 | 1.2% | 0.0% | 7.2% | 7.8% |
| **TOTAL** | **28** | **100.0%** | **3,444** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 0.3% | 0.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.6% | 0.4% | 0.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.9% | 0.3% | 0.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.2% | 0.5% | 0.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 98.5% | 98.8% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |

| Total Home Mortgage Loans | | | | | | |
|---|---|---|---|---|---|---|
| Low | 108 | 7.4% | 8,654 | 3.8% | 21.3% | 6.2% | 3.0% |
| Moderate | 283 | 19.5% | 29,916 | 13.3% | 17.6% | 17.3% | 11.3% |
| Middle | 277 | 19.1% | 33,074 | 14.7% | 19.9% | 19.8% | 16.2% |
| Upper | 646 | 44.5% | 119,500 | 53.1% | 41.2% | 35.1% | 41.8% |
| Unknown | 139 | 9.6% | 33,824 | 15.0% | 0.0% | 21.5% | 27.8% |
| **TOTAL** | **1,453** | **100.0%** | **224,968** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Table 13**
**Distribution of 2018 Small Business Lending**
**By Borrower Income Level**

| Business Revenue and Loan Size | | | 2018 | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | Count | | Dollars | | | Total Businesses |
| | | | Bank | Aggregate | Bank | | Aggregate | |
| | | | # | % | % | $ (000s) | $ % | $ % | % |
| Business Revenue | | $1 Million or Less | 437 | 65.8% | 43.4% | $35,531 | 48.9% | 37.7% | 89.8% |
| | | Over $1 Million/ Unknown | 227 | 34.2% | 56.6% | $37,135 | 51.1% | 62.3% | 10.2% |
| | | **TOTAL** | **664** | **100.0%** | **100.0%** | **$72,666** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | | $100,000 or Less | 491 | 73.9% | 89.9% | $18,965 | 26.1% | 31.0% | |
| | | $100,001–$250,000 | 89 | 13.4% | 5.3% | $14,748 | 20.3% | 18.5% | |
| | | $250,001–$1 Million | 84 | 12.7% | 4.8% | $38,953 | 53.6% | 50.4% | |
| | | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | | **TOTAL** | **664** | **100.0%** | **100.0%** | **$72,666** | **100.0%** | **100.0%** | |
| Loan Size | Revenue $1 Million or Less | $100,000 or Less | 357 | 81.7% | | $13,081 | 36.8% | | |
| | | $100,001–$250,000 | 46 | 10.5% | | $7,329 | 20.6% | | |
| | | $250,001–$1 Million | 34 | 7.8% | | $15,121 | 42.6% | | |
| | | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | | **TOTAL** | **437** | **100.0%** | | **$35,531** | **100.0%** | | |

| Table 13<br>Distribution of 2019 Small Business Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | 2019 | | | | | |
| Business Revenue and Loan Size | | Count | | Dollars | | | Total Businesses |
| | | Bank | Aggregate | Bank | | Aggregate | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| **Business Revenue** | $1 Million or Less | 333 | 59.7% | 41.8% | $25,387 | 38.0% | 36.5% | 90.4% |
| | Over $1 Million/ Unknown | 225 | 40.3% | 58.2% | $41,439 | 62.0% | 63.5% | 9.6% |
| | **TOTAL** | **558** | **100.0%** | **100.0%** | **$66,826** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 402 | 72.0% | 90.8% | $17,379 | 26.0% | 33.0% | |
| | $100,001–$250,000 | 89 | 15.9% | 4.8% | $15,690 | 23.5% | 17.7% | |
| | $250,001–$1 Million | 67 | 12.0% | 4.3% | $33,757 | 50.5% | 49.3% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **558** | **100.0%** | **100.0%** | **$66,826** | **100.0%** | **100.0%** | |
| **Loan Size** **Revenue $1 Million or Less** | $100,000 or Less | 275 | 49.3% | | $10,059 | 15.1% | | |
| | $100,001–$250,000 | 39 | 7.0% | | $6,641 | 9.9% | | |
| | $250,001–$1 Million | 19 | 3.4% | | $8,687 | 13.0% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **333** | **59.7%** | | **$25,387** | **38.0%** | | |

| Table 14 Distribution of 2018 Small Farm Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | 2018 | | | | | |
| | | Count | | | Dollars | | Farms |
| Farm Revenue and Loan Size | | Bank | | Aggregate | Bank | | Aggregate |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| Farm Revenue | $1 Million or Less | 25 | 96.2% | 61.6% | 1,668 | 98.1% | 74.6% | 97.8% |
| | Over $1 Million/ Unknown | 1 | 3.8% | 38.4% | 32 | 1.9% | 25.4% | 2.2% |
| | **TOTAL** | **26** | **100.0%** | **100.0%** | **1,700** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 23 | 88.5% | 85.5% | 697 | 41.0% | 35.6% | |
| | $100,001–$250,000 | 1 | 3.8% | 8.6% | 187 | 11.0% | 25.8% | |
| | $250,001–$500,000 | 2 | 7.7% | 5.9% | 816 | 48.0% | 38.6% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **26** | **100.0%** | **100.0%** | **1,700** | **100.0%** | **100.0%** | |
| Loan Size Revenue $1 Million or Less | $100,000 or Less | 22 | 88.0% | | 665 | 39.9% | | |
| | $100,001–$250,000 | 1 | 4.0% | | 187 | 11.2% | | |
| | $250,001–$1 Million | 2 | 8.0% | | 816 | 48.9% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **25** | **100.0%** | | **1,668** | **100.0%** | | |

| Table 14 Distribution of 2019 Small Farm Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Farm Revenue and Loan Size** | | **2019** | | | | | |
| | | **Count** | | **Dollars** | | | **Farms** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Farm Revenue** | $1 Million or Less | 14 | 63.6% | 60.1% | 758 | 72.4% | 71.7% | 97.8% |
| | Over $1 Million/ Unknown | 8 | 36.4% | 39.9% | 289 | 27.6% | 28.3% | 2.2% |
| | **TOTAL** | **22** | **100.0%** | **100.0%** | **1,047** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 19 | 86.4% | 83.1% | 571 | 54.5% | 33.7% | |
| | $100,001–$250,000 | 3 | 13.6% | 10.7% | 476 | 45.5% | 30.9% | |
| | $250,001–$500,000 | 0 | 0.0% | 6.1% | 0 | 0.0% | 35.4% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **22** | **100.0%** | **100.0%** | **1,047** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 11 | 78.6% | | 282 | 37.2% | | |
| | $100,001–$250,000 | 3 | 21.4% | | 476 | 62.8% | | |
| | $250,001–$1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **14** | **100.0%** | | **758** | **100.0%** | | |

## Hot Springs MSA

| Table 8.1 Distribution of 2018 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | $ | $ % | | # % | $ % |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 0.6% | 57 | 0.2% | 3.4% | 2.7% | 1.3% |
| Moderate | 17 | 11.0% | 1,929 | 8.0% | 11.8% | 8.9% | 7.2% |
| Middle | 68 | 43.9% | 7,610 | 31.6% | 49.1% | 46.7% | 39.3% |
| Upper | 69 | 44.5% | 14,454 | 60.1% | 35.6% | 41.7% | 52.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 155 | 100.0% | 24,050 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 3 | 3.6% | 113 | 1.2% | 3.4% | 4.6% | 2.0% |
| Moderate | 5 | 6.0% | 156 | 1.7% | 11.8% | 7.9% | 5.7% |
| Middle | 32 | 38.6% | 2,469 | 26.6% | 49.1% | 41.5% | 33.1% |
| Upper | 43 | 51.8% | 6,530 | 70.5% | 35.6% | 46.0% | 59.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 83 | 100.0% | 9,268 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.4% | 2.2% | 1.0% |
| Moderate | 1 | 3.4% | 45 | 2.8% | 11.8% | 11.2% | 4.7% |
| Middle | 20 | 69.0% | 1,005 | 61.7% | 49.1% | 53.0% | 42.5% |
| Upper | 8 | 27.6% | 580 | 35.6% | 35.6% | 33.6% | 51.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 29 | 100.0% | 1,630 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 8.0% | 24.1% | 43.8% |
| Moderate | 2 | 100.0% | 273 | 100.0% | 25.4% | 31.0% | 28.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 49.1% | 24.1% | 11.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 17.5% | 20.7% | 16.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 273 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.4% | 2.3% | 0.5% |
| Moderate | 2 | 14.3% | 25 | 4.0% | 11.8% | 10.5% | 10.9% |
| Middle | 6 | 42.9% | 341 | 54.9% | 49.1% | 43.0% | 31.9% |
| Upper | 6 | 42.9% | 255 | 41.1% | 35.6% | 44.2% | 56.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **TOTAL** | **14** | **100.0%** | **621** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.4% | 1.7% | 1.1% |
| Moderate | 1 | 10.0% | 100 | 10.0% | 11.8% | 15.5% | 12.2% |
| Middle | 3 | 30.0% | 266 | 26.5% | 49.1% | 41.4% | 36.4% |
| Upper | 6 | 60.0% | 638 | 63.5% | 35.6% | 41.4% | 50.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **10** | **100.0%** | **1,004** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.4% | 11.6% | 3.8% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 11.8% | 14.5% | 4.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 49.1% | 36.2% | 45.7% |
| Upper | 0 | 0.0% | 0 | 0.0% | 35.6% | 37.7% | 45.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 4 | 1.4% | 170 | 0.5% | 3.4% | 3.5% | 3.0% |
| Moderate | 28 | 9.6% | 2,528 | 6.9% | 11.8% | 9.2% | 7.6% |
| Middle | 129 | 44.0% | 11,691 | 31.7% | 49.1% | 45.2% | 37.0% |
| Upper | 132 | 45.1% | 22,457 | 60.9% | 35.6% | 42.1% | 52.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **293** | **100.0%** | **36,846** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 8.1** **Distribution of 2019 Home Mortgage Lending** **By Income Level of Geography** | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 4 | 3.4% | 269 | 1.4% | 3.4% | 3.8% | 1.7% |
| Moderate | 8 | 6.7% | 686 | 3.7% | 11.8% | 9.6% | 7.0% |
| Middle | 63 | 52.9% | 8,421 | 45.2% | 49.1% | 47.0% | 41.5% |
| Upper | 44 | 37.0% | 9,246 | 49.7% | 35.6% | 39.7% | 49.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **119** | **100.0%** | **18,622** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 2 | 1.9% | 55 | 0.5% | 3.4% | 1.7% | 0.8% |
| Moderate | 11 | 10.7% | 830 | 7.1% | 11.8% | 10.5% | 8.8% |
| Middle | 49 | 47.6% | 4,501 | 38.3% | 49.1% | 40.7% | 32.6% |
| Upper | 41 | 39.8% | 6,353 | 54.1% | 35.6% | 47.0% | 57.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **103** | **100.0%** | **11,739** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 2 | 8.3% | 23 | 2.3% | 3.4% | 8.2% | 3.6% |
| Moderate | 5 | 20.8% | 148 | 14.5% | 11.8% | 8.2% | 5.4% |
| Middle | 9 | 37.5% | 449 | 44.1% | 49.1% | 44.5% | 41.4% |
| Upper | 8 | 33.3% | 398 | 39.1% | 35.6% | 39.0% | 49.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **24** | **100.0%** | **1,018** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 8.0% | 14.7% | 5.8% |
| Moderate | 3 | 50.0% | 370 | 7.1% | 25.4% | 26.5% | 10.6% |
| Middle | 2 | 33.3% | 872 | 16.6% | 49.1% | 35.3% | 49.5% |
| Upper | 1 | 16.7% | 4,000 | 76.3% | 17.5% | 23.5% | 34.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **6** | **100.0%** | **5,242** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose LOC | | | | | % of Owner-Occupied Units | | |
|---|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 3.4% | 1.6% | 0.4% |
| Moderate | 1 | 7.7% | 40 | 5.9% | 11.8% | 4.8% | 3.5% |
| Middle | 4 | 30.8% | 184 | 26.9% | 49.1% | 38.1% | 30.7% |
| Upper | 8 | 61.5% | 459 | 67.2% | 35.6% | 55.6% | 65.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **13** | **100.0%** | **683** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 1 | 20.0% | 142 | 31.5% | 3.4% | 3.5% | 3.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 11.8% | 5.3% | 3.2% |
| Middle | 4 | 80.0% | 309 | 68.5% | 49.1% | 61.4% | 46.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 35.6% | 29.8% | 46.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **5** | **100.0%** | **451** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.4% | 2.0% | 1.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 11.8% | 18.0% | 10.8% |
| Middle | 0 | 0.0% | 0 | 0.0% | 49.1% | 44.0% | 34.7% |
| Upper | 0 | 0.0% | 0 | 0.0% | 35.6% | 36.0% | 53.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 9 | 3.3% | 489 | 1.3% | 3.4% | 3.5% | 1.6% |
| Moderate | 28 | 10.4% | 2,074 | 5.5% | 11.8% | 9.9% | 7.6% |
| Middle | 131 | 48.5% | 14,736 | 39.0% | 49.1% | 45.1% | 39.1% |
| Upper | 102 | 37.8% | 20,456 | 54.2% | 35.6% | 41.5% | 51.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **270** | **100.0%** | **37,755** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9 Distribution of 2018 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | % | $ % |
| Low | 10 | 6.5% | $1,083 | 7.4% | 6.9% | 6.9% | 6.6% |
| Moderate | 30 | 19.5% | $2,815 | 19.2% | 19.1% | 20.0% | 21.4% |
| Middle | 70 | 45.5% | $7,503 | 51.2% | 45.2% | 39.6% | 44.6% |
| Upper | 44 | 28.6% | $3,264 | 22.3% | 28.8% | 32.7% | 27.2% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.6% | 0.3% |
| **TOTAL** | **154** | **100.0%** | **$14,665** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Appendix C (continued)**

| Table 9<br>Distribution of 2019 Small Business Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | % | $ % |
| Low | 10 | 6.0% | $271 | 1.6% | 6.8% | 4.9% | 3.0% |
| Moderate | 38 | 22.9% | $3,957 | 24.0% | 19.1% | 20.8% | 19.8% |
| Middle | 88 | 53.0% | $8,597 | 52.1% | 44.9% | 40.5% | 46.2% |
| Upper | 30 | 18.1% | $3,681 | 22.3% | 29.2% | 32.2% | 30.4% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 1.5% | 0.6% |
| TOTAL | 166 | 100.0% | $16,506 | 100.0% | 100.0% | 100.0% | 100.0% |

| Table 10<br>Distribution of 2018 Small Farm Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 1.8% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | $0 | 0.0% | 18.2% | 0.0% | 0.0% |
| Middle | 3 | 30.0% | $98 | 17.6% | 32.7% | 41.9% | 36.6% |
| Upper | 7 | 70.0% | $458 | 82.4% | 47.3% | 58.1% | 63.4% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 10 | 100.0% | $556 | 100.0% | 100.0% | 100.0% | 100.0% |

| Table 10<br>Distribution of 2019 Small Farm Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 1.8% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | $0 | 0.0% | 12.7% | 2.9% | 0.7% |
| Middle | 5 | 62.5% | $177 | 51.3% | 34.5% | 57.1% | 52.2% |
| Upper | 3 | 37.5% | $168 | 48.7% | 50.9% | 40.0% | 47.1% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 8 | 100.0% | $345 | 100.0% | 100.0% | 100.0% | 100.0% |

| Table 12.1 Distribution of 2018 Home Mortgage Lending By Borrower Income Level | | | | | | |
|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Loans** | | | | **Families by Family Income %** | **Aggregate HMDA Data** | |
| | **#** | **# %** | **$** | **$ %** | | **# %** | **$ %** |
| **Home Purchase Loans** | | | | | | | |
| Low | 10 | 6.5% | 509 | 2.1% | 23.2% | 5.3% | 2.4% |
| Moderate | 18 | 11.6% | 1,562 | 6.5% | 16.7% | 14.2% | 9.3% |
| Middle | 29 | 18.7% | 3,952 | 16.4% | 19.6% | 18.3% | 14.5% |
| Upper | 83 | 53.5% | 15,514 | 64.5% | 40.4% | 44.2% | 57.2% |
| Unknown | 15 | 9.7% | 2,513 | 10.4% | 0.0% | 17.9% | 16.6% |
| **TOTAL** | **155** | **100.0%** | **24,050** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 4 | 4.8% | 126 | 1.4% | 23.2% | 8.6% | 3.6% |
| Moderate | 15 | 18.1% | 806 | 8.7% | 16.7% | 12.9% | 7.3% |
| Middle | 14 | 16.9% | 1,092 | 11.8% | 19.6% | 17.3% | 13.8% |
| Upper | 41 | 49.4% | 4,827 | 52.1% | 40.4% | 47.3% | 57.6% |
| Unknown | 9 | 10.8% | 2,417 | 26.1% | 0.0% | 14.0% | 17.7% |
| **TOTAL** | **83** | **100.0%** | **9,268** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 1 | 3.4% | 45 | 2.8% | 23.2% | 6.7% | 2.7% |
| Moderate | 2 | 6.9% | 110 | 6.7% | 16.7% | 13.4% | 8.1% |
| Middle | 7 | 24.1% | 502 | 30.8% | 19.6% | 20.1% | 16.4% |
| Upper | 13 | 44.8% | 532 | 32.6% | 40.4% | 49.3% | 51.7% |
| Unknown | 6 | 20.7% | 441 | 27.1% | 0.0% | 10.4% | 21.1% |
| **TOTAL** | **29** | **100.0%** | **1,630** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.2% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.7% | 0.0% | 0.0% |
| Middle | 1 | 50.0% | 65 | 23.8% | 19.6% | 6.9% | 0.9% |
| Upper | 1 | 50.0% | 208 | 76.2% | 40.4% | 24.1% | 17.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 69.0% | 81.3% |
| **TOTAL** | **2** | **100.0%** | **273** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.2% | 3.5% | 3.5% |
| Moderate | 1 | 7.1% | 10 | 1.6% | 16.7% | 11.6% | 6.6% |
| Middle | 7 | 50.0% | 268 | 43.2% | 19.6% | 25.6% | 16.0% |
| Upper | 5 | 35.7% | 293 | 47.2% | 40.4% | 57.0% | 72.6% |
| Unknown | 1 | 7.1% | 50 | 8.1% | 0.0% | 2.3% | 1.3% |
| **TOTAL** | **14** | **100.0%** | **621** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 23.2% | 10.3% | 3.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.7% | 24.1% | 19.5% |
| Middle | 3 | 30.0% | 266 | 26.5% | 19.6% | 15.5% | 11.5% |
| Upper | 7 | 70.0% | 738 | 73.5% | 40.4% | 46.6% | 62.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.4% | 3.1% |
| **TOTAL** | **10** | **100.0%** | **1,004** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.2% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.7% | 1.4% | 0.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.6% | 1.4% | 1.6% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.4% | 4.3% | 0.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 92.8% | 97.7% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 15 | 5.1% | 680 | 1.8% | 23.2% | 6.0% | 2.6% |
| Moderate | 36 | 12.3% | 2,488 | 6.8% | 16.7% | 13.6% | 8.4% |
| Middle | 61 | 20.8% | 6,145 | 16.7% | 19.6% | 17.8% | 13.6% |
| Upper | 150 | 51.2% | 22,112 | 60.0% | 40.4% | 44.5% | 55.1% |
| Unknown | 31 | 10.6% | 5,421 | 14.7% | 0.0% | 18.1% | 20.3% |
| **TOTAL** | **293** | **100.0%** | **36,846** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1<br>Distribution of 2019 Home Mortgage Lending<br>By Borrower Income Level | | | | | | |
|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data |
| | # | # % | $ | $ % | | # % | $ % |
| Home Purchase Loans | | | | | | | |
| Low | 13 | 10.9% | 782 | 4.2% | 23.2% | 6.7% | 3.2% |
| Moderate | 18 | 15.1% | 1,739 | 9.3% | 16.7% | 17.2% | 11.7% |
| Middle | 26 | 21.8% | 3,246 | 17.4% | 19.6% | 19.8% | 17.4% |
| Upper | 47 | 39.5% | 10,617 | 57.0% | 40.4% | 40.8% | 52.8% |
| Unknown | 15 | 12.6% | 2,238 | 12.0% | 0.0% | 15.4% | 14.9% |
| **TOTAL** | **119** | **100.0%** | **18,622** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Refinance | | | | | | | |
| Low | 15 | 14.6% | 724 | 6.2% | 23.2% | 6.9% | 2.6% |
| Moderate | 13 | 12.6% | 671 | 5.7% | 16.7% | 11.8% | 6.1% |
| Middle | 28 | 27.2% | 2,519 | 21.5% | 19.6% | 17.7% | 12.8% |
| Upper | 37 | 35.9% | 5,750 | 49.0% | 40.4% | 44.3% | 55.9% |
| Unknown | 10 | 9.7% | 2,075 | 17.7% | 0.0% | 19.3% | 22.5% |
| **TOTAL** | **103** | **100.0%** | **11,739** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Home Improvement | | | | | | | |
| Low | 2 | 8.3% | 53 | 5.2% | 23.2% | 13.0% | 9.8% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Moderate | 6 | 25.0% | 155 | 15.2% | 16.7% | 17.8% | 11.7% |
| Middle | 4 | 16.7% | 210 | 20.6% | 19.6% | 21.9% | 16.0% |
| Upper | 9 | 37.5% | 417 | 41.0% | 40.4% | 38.4% | 50.7% |
| Unknown | 3 | 12.5% | 183 | 18.0% | 0.0% | 8.9% | 11.8% |
| **TOTAL** | **24** | **100.0%** | **1,018** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.2% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.7% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.6% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.4% | 8.8% | 4.5% |
| Unknown | 6 | 100.0% | 5,242 | 100.0% | 0.0% | 91.2% | 95.5% |
| **TOTAL** | **6** | **100.0%** | **5,242** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 1 | 7.7% | 46 | 6.7% | 23.2% | 6.3% | 3.3% |
| Moderate | 2 | 15.4% | 125 | 18.3% | 16.7% | 14.3% | 12.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.6% | 27.0% | 24.2% |
| Upper | 8 | 61.5% | 429 | 62.8% | 40.4% | 46.0% | 54.5% |
| Unknown | 2 | 15.4% | 83 | 12.2% | 0.0% | 6.3% | 5.9% |
| **TOTAL** | **13** | **100.0%** | **683** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 2 | 40.0% | 84 | 18.6% | 23.2% | 14.0% | 5.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.7% | 17.5% | 15.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.6% | 12.3% | 8.8% |
| Upper | 3 | 60.0% | 367 | 81.4% | 40.4% | 50.9% | 67.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 5.3% | 2.7% |
| **TOTAL** | **5** | **100.0%** | **451** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.2% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.7% | 2.0% | 1.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.6% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.4% | 2.0% | 10.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 96.0% | 88.2% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 33 | 12.2% | 1,689 | 4.5% | 23.2% | 7.0% | 3.0% |
| Moderate | 39 | 14.4% | 2,690 | 7.1% | 16.7% | 15.3% | 9.5% |
| Middle | 58 | 21.5% | 5,975 | 15.8% | 19.6% | 18.8% | 15.1% |
| Upper | 104 | 38.5% | 17,580 | 46.6% | 40.4% | 41.0% | 51.5% |
| Unknown | 36 | 13.3% | 9,821 | 26.0% | 0.0% | 17.9% | 20.9% |
| **TOTAL** | **270** | **100.0%** | **37,755** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Appendix C (continued)**

| Table 13 Distribution of 2018 Small Business Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Business Revenue and Loan Size** | | **2018** | | | | | |
| | | **Count** | | **Dollars** | | | **Total Businesses** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Business Revenue** | $1 Million or Less | 96 | 62.3% | 40.6% | $6,659 | 45.4% | 44.0% | 92.2% |
| | Over $1 Million/ Unknown | 58 | 37.7% | 59.4% | $8,006 | 54.6% | 56.0% | 7.8% |
| | **TOTAL** | **154** | **100.0%** | **100.0%** | **$14,665** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 119 | 77.3% | 91.5% | $4,631 | 31.6% | 33.2% | |
| | $100,001–$250,000 | 23 | 14.9% | 4.7% | $4,282 | 29.2% | 20.4% | |
| | $250,001–$1 Million | 12 | 7.8% | 3.8% | $5,752 | 39.2% | 46.4% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **154** | **100.0%** | **100.0%** | **$14,665** | **100.0%** | **100.0%** | |
| **Loan Size** **Revenue $1 Million or Less** | $100,000 or Less | 80 | 83.3% | | $2,764 | 41.5% | | |
| | $100,001–$250,000 | 11 | 11.5% | | $1,852 | 27.8% | | |
| | $250,001–$1 Million | 5 | 5.2% | | $2,043 | 30.7% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **96** | **100.0%** | | **$6,659** | **100.0%** | | |

| Table 13 Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Business Revenue and Loan Size** | | **2019** | | | | | |
| | | **Count** | | **Dollars** | | | **Total Businesses** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Business Revenue** | $1 Million or Less | 107 | 64.5% | 39.3% | $9,231 | 55.9% | 48.9% | 92.4% |
| | Over $1 Million/ Unknown | 59 | 35.5% | 60.7% | $7,275 | 44.1% | 51.1% | 7.6% |
| | **TOTAL** | **166** | **100.0%** | **100.0%** | **$16,506** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 118 | 71.1% | 92.7% | $4,419 | 26.8% | 36.5% | |
| | $100,001–$250,000 | 37 | 22.3% | 4.7% | $6,637 | 40.2% | 23.9% | |
| | $250,001–$1 Million | 11 | 6.6% | 2.6% | $5,450 | 33.0% | 39.5% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **166** | **100.0%** | **100.0%** | **$16,506** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 77 | 46.4% | | $2,411 | 14.6% | | |
| | $100,001–$250,000 | 24 | 14.5% | | $4,270 | 25.9% | | |
| | $250,001–$1 Million | 6 | 3.6% | | $2,550 | 15.4% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **107** | **64.5%** | | **$9,231** | **55.9%** | | |

| Table 14<br>Distribution of 2018 Small Farm Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Farm Revenue and Loan Size** | | **2018** | | | | | **Farms** |
| | | **Count** | | **Dollars** | | | |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| Farm Revenue | $1 Million or Less | 9 | 90.0% | 80.6% | 455 | 81.8% | 89.2% | 98.2% |
| | Over $1 Million/ Unknown | 1 | 10.0% | 19.4% | 101 | 18.2% | 10.8% | 1.8% |
| | **TOTAL** | **10** | **100.0%** | **100.0%** | **556** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 8 | 80.0% | 80.6% | 265 | 47.7% | 38.4% | |
| | $100,001–$250,000 | 2 | 20.0% | 16.1% | 291 | 52.3% | 44.9% | |
| | $250,001–$500,000 | 0 | 0.0% | 3.2% | 0 | 0.0% | 16.6% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **10** | **100.0%** | **100.0%** | **556** | **100.0%** | **100.0%** | |
| Loan Size Revenue $1 Million or Less | $100,000 or Less | 8 | 88.9% | | 265 | 58.2% | | |
| | $100,001–$250,000 | 1 | 11.1% | | 190 | 41.8% | | |
| | $250,001–$1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **9** | **100.0%** | | **455** | **100.0%** | | |

| Table 14 Distribution of 2019 Small Farm Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Farm Revenue and Loan Size** | | **2019** | | | | | **Farms** |
| | | **Count** | | **Dollars** | | | |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| Farm Revenue | $1 Million or Less | 7 | 87.5% | 65.7% | 334 | 96.8% | 90.4% | 98.2% |
| | Over $1 Million/ Unknown | 1 | 12.5% | 34.3% | 11 | 3.2% | 9.6% | 1.8% |
| | **TOTAL** | **8** | **100.0%** | **100.0%** | **345** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 7 | 87.5% | 80.0% | 209 | 60.6% | 28.4% | |
| | $100,001–$250,000 | 1 | 12.5% | 17.1% | 136 | 39.4% | 51.4% | |
| | $250,001–$500,000 | 0 | 0.0% | 2.9% | 0 | 0.0% | 20.2% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **8** | **100.0%** | **100.0%** | **345** | **100.0%** | **100.0%** | |
| Loan Size Revenue $1 Million or Less | $100,000 or Less | 6 | 85.7% | | 198 | 59.3% | | |
| | $100,001–$250,000 | 1 | 14.3% | | 136 | 40.7% | | |
| | $250,001–$1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **7** | **100.0%** | | **334** | **100.0%** | | |

**Jonesboro MSA**

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 8.1** <br> **Distribution of 2018 Home Mortgage Lending** <br> **By Income Level of Geography** | | | | | | | |
| *Home Purchase Loans* | | | | | | | |
| Low | 1 | 1.5% | 104 | 1.1% | 3.0% | 2.6% | 2.5% |
| Moderate | 7 | 10.4% | 626 | 6.8% | 9.9% | 9.3% | 7.4% |
| Middle | 40 | 59.7% | 4,752 | 51.9% | 58.5% | 52.5% | 47.0% |
| Upper | 19 | 28.4% | 3,677 | 40.1% | 28.6% | 35.7% | 43.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **67** | **100.0%** | **9,159** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| *Refinance* | | | | | | | |
| Low | 6 | 12.0% | 398 | 7.5% | 3.0% | 5.3% | 3.0% |
| Moderate | 4 | 8.0% | 253 | 4.8% | 9.9% | 7.7% | 5.5% |
| Middle | 29 | 58.0% | 2,214 | 41.7% | 58.5% | 54.7% | 52.0% |
| Upper | 11 | 22.0% | 2,438 | 46.0% | 28.6% | 32.3% | 39.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **50** | **100.0%** | **5,303** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| *Home Improvement* | | | | | | | |
| Low | 1 | 16.7% | 12 | 2.4% | 3.0% | 4.7% | 3.8% |
| Moderate | 1 | 16.7% | 340 | 66.9% | 9.9% | 12.8% | 12.3% |
| Middle | 2 | 33.3% | 118 | 23.2% | 58.5% | 50.7% | 46.5% |
| Upper | 2 | 33.3% | 38 | 7.5% | 28.6% | 31.8% | 37.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **6** | **100.0%** | **508** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | % of Multifamily Units | | |
| Low | 1 | 33.3% | 1,129 | 29.3% | 28.5% | 25.0% | 12.1% |
| Moderate | 1 | 33.3% | 1,050 | 27.3% | 38.6% | 14.3% | 50.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 24.7% | 57.1% | 34.3% |
| Upper | 1 | 33.3% | 1,671 | 43.4% | 8.3% | 3.6% | 3.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **3** | **100.0%** | **3,850** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.0% | 3.4% | 4.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 9.9% | 6.9% | 8.5% |
| Middle | 1 | 100.0% | 40 | 100.0% | 58.5% | 62.1% | 47.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 28.6% | 27.6% | 40.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **TOTAL** | **1** | **100.0%** | **40** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| **Other Purpose Closed/Exempt** | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 3.0% | 2.4% | 0.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 9.9% | 7.1% | 4.1% |
| Middle | 1 | 100.0% | 24 | 100.0% | 58.5% | 57.1% | 62.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 28.6% | 33.3% | 33.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1** | **100.0%** | **24** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| **Purpose Not Applicable** | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 3.0% | 6.2% | 10.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 9.9% | 19.8% | 13.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 58.5% | 51.9% | 46.5% |
| Upper | 0 | 0.0% | 0 | 0.0% | 28.6% | 22.2% | 29.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |

| **Total Home Mortgage Loans** | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 9 | 7.0% | 1,643 | 8.7% | 3.0% | 3.7% | 4.0% |
| Moderate | 13 | 10.2% | 2,269 | 12.0% | 9.9% | 9.3% | 12.7% |
| Middle | 73 | 57.0% | 7,148 | 37.9% | 58.5% | 53.2% | 46.5% |
| Upper | 33 | 25.8% | 7,824 | 41.4% | 28.6% | 33.8% | 36.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **128** | **100.0%** | **18,884** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| **Table 8.1** <br> **Distribution of 2019 Home Mortgage Lending** <br> **By Income Level of Geography** | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Loans** | | | | **% of Owner-Occupied Units** | **Aggregate HMDA Data** | |
| | **#** | **# %** | **$** | **$ %** | | **# %** | **$ %** |
| **Home Purchase Loans** | | | | | | | |
| Low | 7 | 6.5% | 581 | 4.0% | 3.0% | 3.4% | 2.6% |
| Moderate | 11 | 10.3% | 1,405 | 9.8% | 9.9% | 8.1% | 7.1% |
| Middle | 66 | 61.7% | 8,058 | 56.2% | 58.5% | 51.8% | 44.6% |
| Upper | 23 | 21.5% | 4,304 | 30.0% | 28.6% | 36.7% | 45.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **107** | **100.0%** | **14,348** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 9 | 7.2% | 483 | 3.2% | 3.0% | 3.8% | 2.5% |
| Moderate | 7 | 5.6% | 569 | 3.8% | 9.9% | 7.9% | 7.1% |
| Middle | 79 | 63.2% | 8,408 | 55.7% | 58.5% | 53.7% | 50.5% |
| Upper | 30 | 24.0% | 5,622 | 37.3% | 28.6% | 34.6% | 40.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **125** | **100.0%** | **15,082** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Home Improvement | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 1 | 11.1% | 204 | 29.7% | 3.0% | 5.7% | 7.5% |
| Moderate | 2 | 22.2% | 92 | 13.4% | 9.9% | 10.7% | 9.1% |
| Middle | 4 | 44.4% | 222 | 32.3% | 58.5% | 50.9% | 41.9% |
| Upper | 2 | 22.2% | 170 | 24.7% | 28.6% | 32.7% | 41.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **9** | **100.0%** | **688** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 3 | 42.9% | 864 | 33.4% | 28.5% | 20.8% | 8.0% |
| Moderate | 1 | 14.3% | 480 | 18.5% | 38.6% | 11.1% | 5.0% |
| Middle | 2 | 28.6% | 761 | 29.4% | 24.7% | 52.8% | 53.2% |
| Upper | 1 | 14.3% | 484 | 18.7% | 8.3% | 15.3% | 33.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **7** | **100.0%** | **2,589** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **% of Owner-Occupied Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.0% | 0.0% | 0.0% |
| Moderate | 1 | 20.0% | 70 | 30.7% | 9.9% | 10.9% | 9.0% |
| Middle | 3 | 60.0% | 78 | 34.2% | 58.5% | 62.0% | 52.9% |
| Upper | 1 | 20.0% | 80 | 35.1% | 28.6% | 27.2% | 38.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **5** | **100.0%** | **228** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.0% | 3.0% | 2.0% |
| Moderate | 1 | 33.3% | 98 | 49.2% | 9.9% | 6.1% | 4.0% |
| Middle | 1 | 33.3% | 21 | 10.6% | 58.5% | 45.5% | 48.5% |
| Upper | 1 | 33.3% | 80 | 40.2% | 28.6% | 45.5% | 45.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **3** | **100.0%** | **199** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.0% | 1.5% | 0.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 9.9% | 13.6% | 10.9% |
| Middle | 0 | 0.0% | 0 | 0.0% | 58.5% | 68.2% | 62.8% |
| Upper | 0 | 0.0% | 0 | 0.0% | 28.6% | 16.7% | 26.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |

| Total Home Mortgage Loans | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 20 | 7.8% | 2,132 | 6.4% | 3.0% | 3.8% | 3.2% |
| Moderate | 23 | 9.0% | 2,714 | 8.2% | 9.9% | 8.3% | 6.9% |
| Middle | 155 | 60.5% | 17,548 | 53.0% | 58.5% | 52.7% | 47.4% |
| Upper | 58 | 22.7% | 10,740 | 32.4% | 28.6% | 35.2% | 42.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **256** | **100.0%** | **33,134** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9<br>Distribution of 2018 Small Business Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | % | $ % |
| Low | 5 | 2.7% | $1,249 | 5.9% | 12.1% | 9.6% | 10.5% |
| Moderate | 22 | 11.7% | $2,330 | 11.0% | 17.4% | 12.6% | 13.5% |
| Middle | 131 | 69.7% | $13,866 | 65.3% | 50.8% | 56.3% | 56.8% |
| Upper | 30 | 16.0% | $3,783 | 17.8% | 19.6% | 21.1% | 19.1% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.4% | 0.1% |
| **TOTAL** | **188** | **100.0%** | **$21,228** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9<br>Distribution of 2019 Small Business Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | % | $ % |
| Low | 5 | 2.6% | $660 | 3.1% | 11.8% | 8.0% | 8.2% |
| Moderate | 17 | 9.0% | $2,963 | 13.8% | 17.9% | 12.7% | 16.5% |
| Middle | 126 | 66.7% | $13,802 | 64.3% | 50.0% | 54.7% | 54.9% |
| Upper | 41 | 21.7% | $4,044 | 18.8% | 20.3% | 22.8% | 20.1% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 1.8% | 0.4% |
| **TOTAL** | **189** | **100.0%** | **$21,469** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10 Distribution of 2018 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 1 | 2.4% | $10 | 0.2% | 1.3% | 0.6% | 0.1% |
| Moderate | 1 | 2.4% | $15 | 0.3% | 4.8% | 4.0% | 1.9% |
| Middle | 33 | 80.5% | $4,907 | 87.3% | 63.5% | 68.6% | 65.3% |
| Upper | 6 | 14.6% | $690 | 12.3% | 30.3% | 26.5% | 32.6% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.3% | 0.1% |
| **TOTAL** | **41** | **100.0%** | **$5,622** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10 Distribution of 2019 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 1.3% | 1.0% | 0.3% |
| Moderate | 1 | 2.6% | $15 | 0.3% | 4.9% | 2.0% | 1.5% |
| Middle | 28 | 73.7% | $3,805 | 79.8% | 62.1% | 63.3% | 61.9% |
| Upper | 9 | 23.7% | $950 | 19.9% | 31.7% | 32.8% | 36.2% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 1.0% | 0.1% |
| **TOTAL** | **38** | **100.0%** | **$4,770** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1 Distribution of 2018 Home Mortgage Lending By Borrower Income Level | | | | | | |
|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | $ | $ % | | # % | $ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 3.1% | 1.7% |
| Moderate | 7 | 10.4% | 512 | 5.6% | 16.9% | 15.0% | 10.9% |
| Middle | 9 | 13.4% | 1,076 | 11.7% | 19.4% | 19.8% | 16.8% |
| Upper | 23 | 34.3% | 3,921 | 42.8% | 43.9% | 39.3% | 50.3% |
| Unknown | 28 | 41.8% | 3,650 | 39.9% | 0.0% | 22.8% | 20.4% |
| TOTAL | 67 | 100.0% | 9,159 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 3 | 6.0% | 129 | 2.4% | 19.9% | 4.3% | 1.7% |
| Moderate | 4 | 8.0% | 436 | 8.2% | 16.9% | 11.4% | 6.7% |
| Middle | 6 | 12.0% | 653 | 12.3% | 19.4% | 15.9% | 12.3% |
| Upper | 24 | 48.0% | 2,838 | 53.5% | 43.9% | 49.0% | 61.1% |
| Unknown | 13 | 26.0% | 1,247 | 23.5% | 0.0% | 19.4% | 18.1% |
| TOTAL | 50 | 100.0% | 5,303 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 3.4% | 2.3% |
| Moderate | 1 | 16.7% | 18 | 3.5% | 16.9% | 13.5% | 8.4% |
| Middle | 1 | 16.7% | 80 | 15.7% | 19.4% | 19.6% | 21.2% |
| Upper | 4 | 66.7% | 410 | 80.7% | 43.9% | 53.4% | 55.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 10.1% | 13.0% |
| TOTAL | 6 | 100.0% | 508 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.9% | 1.8% | 0.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.4% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 43.9% | 14.3% | 3.4% |
| Unknown | 3 | 100.0% | 3,850 | 100.0% | 0.0% | 83.9% | 96.4% |
| TOTAL | 3 | 100.0% | 3,850 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | Families by Family Income % | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 6.9% | 2.6% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.9% | 6.9% | 4.9% |
| Middle | 1 | 100.0% | 40 | 100.0% | 19.4% | 17.2% | 15.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 43.9% | 65.5% | 75.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.4% | 1.5% |
| TOTAL | 1 | 100.0% | 40 | 100.0% | 100.0% | 100.0% | 100.0% |

| Other Purpose Closed/Exempt | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 7.1% | 4.4% |
| Moderate | 1 | 100.0% | 24 | 100.0% | 16.9% | 14.3% | 5.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.4% | 14.3% | 11.3% |
| Upper | 0 | 0.0% | 0 | 0.0% | 43.9% | 64.3% | 78.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1** | **100.0%** | **24** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.9% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.4% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 43.9% | 2.5% | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 97.5% | 100.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 3 | 2.3% | 129 | 0.7% | 19.9% | 3.4% | 1.5% |
| Moderate | 13 | 10.2% | 990 | 5.2% | 16.9% | 13.5% | 8.4% |
| Middle | 17 | 13.3% | 1,849 | 9.8% | 19.4% | 18.1% | 13.5% |
| Upper | 51 | 39.8% | 7,169 | 38.0% | 43.9% | 41.6% | 46.2% |
| Unknown | 44 | 34.4% | 8,747 | 46.3% | 0.0% | 23.5% | 30.5% |
| **TOTAL** | **128** | **100.0%** | **18,884** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1<br>Distribution of 2019 Home Mortgage Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Loans** | | | | **Families by Family Income %** | **Aggregate HMDA Data** | |
| | # | # % | $ | $ % | | # % | $ % |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 0.9% | 137 | 1.0% | 19.9% | 2.3% | 1.3% |
| Moderate | 23 | 21.5% | 2,419 | 16.9% | 16.9% | 13.8% | 9.8% |
| Middle | 25 | 23.4% | 3,485 | 24.3% | 19.4% | 20.9% | 18.1% |
| Upper | 37 | 34.6% | 5,971 | 41.6% | 43.9% | 42.2% | 52.6% |
| Unknown | 21 | 19.6% | 2,336 | 16.3% | 0.0% | 20.8% | 18.1% |
| **TOTAL** | **107** | **100.0%** | **14,348** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Refinance | | | | | | | |
| Low | 1 | 0.8% | 40 | 0.3% | 19.9% | 1.8% | 0.8% |
| Moderate | 12 | 9.6% | 607 | 4.0% | 16.9% | 8.0% | 4.3% |
| Middle | 15 | 12.0% | 1,182 | 7.8% | 19.4% | 14.9% | 10.3% |
| Upper | 64 | 51.2% | 8,340 | 55.3% | 43.9% | 50.6% | 59.9% |
| Unknown | 33 | 26.4% | 4,913 | 32.6% | 0.0% | 24.7% | 24.6% |
| **TOTAL** | **125** | **100.0%** | **15,082** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Home Improvement | | | | | | | |
| Low | 1 | 11.1% | 29 | 4.2% | 19.9% | 3.1% | 2.8% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.9% | 8.8% | 4.9% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.4% | 18.9% | 14.4% |
| Upper | 7 | 77.8% | 492 | 71.5% | 43.9% | 56.0% | 65.1% |
| Unknown | 1 | 11.1% | 167 | 24.3% | 0.0% | 13.2% | 12.7% |
| **TOTAL** | **9** | **100.0%** | **688** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.9% | 2.8% | 0.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.4% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 43.9% | 5.6% | 0.7% |
| Unknown | 7 | 100.0% | 2,589 | 100.0% | 0.0% | 91.7% | 98.9% |
| **TOTAL** | **7** | **100.0%** | **2,589** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 6.5% | 3.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.9% | 7.6% | 3.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.4% | 8.7% | 4.0% |
| Upper | 4 | 80.0% | 198 | 86.8% | 43.9% | 72.8% | 85.4% |
| Unknown | 1 | 20.0% | 30 | 13.2% | 0.0% | 4.3% | 3.0% |
| **TOTAL** | **5** | **100.0%** | **228** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 3.0% | 1.2% |
| Moderate | 1 | 33.3% | 98 | 49.2% | 16.9% | 16.7% | 11.4% |
| Middle | 1 | 33.3% | 21 | 10.6% | 19.4% | 19.7% | 18.0% |
| Upper | 1 | 33.3% | 80 | 40.2% | 43.9% | 60.6% | 69.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **3** | **100.0%** | **199** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.9% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.4% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 43.9% | 0.0% | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 100.0% | 100.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 3 | 1.2% | 206 | 0.6% | 19.9% | 2.2% | 1.1% |
| Moderate | 36 | 14.1% | 3,124 | 9.4% | 16.9% | 11.5% | 7.1% |
| Middle | 41 | 16.0% | 4,688 | 14.1% | 19.4% | 18.2% | 13.7% |
| Upper | 113 | 44.1% | 15,081 | 45.5% | 43.9% | 44.7% | 48.9% |
| Unknown | 63 | 24.6% | 10,035 | 30.3% | 0.0% | 23.4% | 29.2% |
| **TOTAL** | **256** | **100.0%** | **33,134** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Appendix C (continued)**

| Table 13 Distribution of 2018 Small Business Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Business Revenue and Loan Size** | | **2018** | | | | | |
| | | **Count** | | **Dollars** | | | **Total Businesses** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| **Business Revenue** | $1 Million or Less | 97 | 51.6% | 45.2% | $7,646 | 36.0% | 41.3% | 88.8% |
| | Over $1 Million/ Unknown | 91 | 48.4% | 54.8% | $13,582 | 64.0% | 58.7% | 11.2% |
| | **TOTAL** | **188** | **100.0%** | **100.0%** | **$21,228** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 134 | 71.3% | 88.1% | $3,827 | 18.0% | 32.0% | |
| | $100,001–$250,000 | 25 | 13.3% | 6.6% | $4,126 | 19.4% | 20.1% | |
| | $250,001–$1 Million | 29 | 15.4% | 5.3% | $13,275 | 62.5% | 47.9% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **188** | **100.0%** | **100.0%** | **$21,228** | **100.0%** | **100.0%** | |
| **Loan Size** **Revenue $1 Million or Less** | $100,000 or Less | 77 | 79.4% | | $2,517 | 32.9% | | |
| | $100,001–$250,000 | 10 | 10.3% | | $1,662 | 21.7% | | |
| | $250,001–$1 Million | 10 | 10.3% | | $3,467 | 45.3% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **97** | **100.0%** | | **$7,646** | **100.0%** | | |

**Appendix C (continued)**

<table>
<tr><td colspan="8"><b>Table 13</b><br><b>Distribution of 2019 Small Business Lending</b><br><b>By Borrower Income Level</b></td></tr>
<tr><td colspan="2" rowspan="4"><b>Business Revenue and Loan Size</b></td><td colspan="6"><b>2019</b></td></tr>
<tr><td colspan="2"><b>Count</b></td><td colspan="2"><b>Dollars</b></td><td rowspan="2"><b>Total Businesses</b></td></tr>
<tr><td><b>Bank</b></td><td><b>Aggregate</b></td><td><b>Bank</b></td><td><b>Aggregate</b></td></tr>
<tr><td><b>#</b></td><td><b>%</b></td><td><b>%</b></td><td><b>$ (000s)</b></td><td><b>$ %</b></td><td><b>$ %</b></td><td><b>%</b></td></tr>
<tr><td rowspan="3"><b>Business Revenue</b></td><td>$1 Million or Less</td><td>106</td><td>56.1%</td><td>47.0%</td><td>$11,032</td><td>51.4%</td><td>50.4%</td><td>89.5%</td></tr>
<tr><td>Over $1 Million/ Unknown</td><td>83</td><td>43.9%</td><td>53.0%</td><td>$10,437</td><td>48.6%</td><td>49.6%</td><td>10.5%</td></tr>
<tr><td><b>TOTAL</b></td><td><b>189</b></td><td><b>100.0%</b></td><td><b>100.0%</b></td><td><b>$21,469</b></td><td><b>100.0%</b></td><td><b>100.0%</b></td><td><b>100.0%</b></td></tr>
<tr><td rowspan="5"><b>Loan Size</b></td><td>$100,000 or Less</td><td>135</td><td>71.4%</td><td>88.0%</td><td>$4,904</td><td>22.8%</td><td>31.8%</td><td></td></tr>
<tr><td>$100,001–$250,000</td><td>30</td><td>15.9%</td><td>6.7%</td><td>$5,304</td><td>24.7%</td><td>19.9%</td><td></td></tr>
<tr><td>$250,001–$1 Million</td><td>24</td><td>12.7%</td><td>5.3%</td><td>$11,261</td><td>52.5%</td><td>48.3%</td><td></td></tr>
<tr><td>Over $1 Million</td><td>0</td><td>0.0%</td><td>0.0%</td><td>$0</td><td>0.0%</td><td>0.0%</td><td></td></tr>
<tr><td><b>TOTAL</b></td><td><b>189</b></td><td><b>100.0%</b></td><td><b>100.0%</b></td><td><b>$21,469</b></td><td><b>100.0%</b></td><td><b>100.0%</b></td><td></td></tr>
<tr><td rowspan="5"><b>Loan Size</b></td><td rowspan="5"><b>Revenue $1 Million or Less</b></td></tr>
<tr><td>$100,000 or Less</td><td>78</td><td>41.3%</td><td></td><td>$2,990</td><td>13.9%</td><td></td><td></td></tr>
<tr><td>$100,001–$250,000</td><td>18</td><td>9.5%</td><td></td><td>$2,946</td><td>13.7%</td><td></td><td></td></tr>
<tr><td>$250,001–$1 Million</td><td>10</td><td>5.3%</td><td></td><td>$5,096</td><td>23.7%</td><td></td><td></td></tr>
<tr><td>Over $1 Million</td><td>0</td><td>0.0%</td><td></td><td>$0</td><td>0.0%</td><td></td><td></td></tr>
<tr><td><b>TOTAL</b></td><td><b>106</b></td><td><b>56.1%</b></td><td></td><td><b>$11,032</b></td><td><b>51.4%</b></td><td></td><td></td></tr>
</table>

| Table 14 Distribution of 2018 Small Farm Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Farm Revenue and Loan Size** | | **2018** | | | | | |
| | | **Count** | | | **Dollars** | | **Farms** |
| | | **Bank** | | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Farm Revenue** | $1 Million or Less | 28 | 68.3% | 57.3% | 2,949 | 52.5% | 70.9% | 97.4% |
| | Over $1 Million/ Unknown | 13 | 31.7% | 42.7% | 2,673 | 47.5% | 29.1% | 2.6% |
| | **TOTAL** | **41** | **100.0%** | **100.0%** | **5,622** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 26 | 63.4% | 70.7% | 1,248 | 22.2% | 20.8% | |
| | $100,001–$250,000 | 5 | 12.2% | 16.5% | 737 | 13.1% | 29.7% | |
| | $250,001–$500,000 | 10 | 24.4% | 12.8% | 3,637 | 64.7% | 49.4% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **41** | **100.0%** | **100.0%** | **5,622** | **100.0%** | **100.0%** | |
| **Loan Size** **Revenue $1 Million or Less** | $100,000 or Less | 20 | 71.4% | | 903 | 30.6% | | |
| | $100,001–$250,000 | 3 | 10.7% | | 481 | 16.3% | | |
| | $250,001–$1 Million | 5 | 17.9% | | 1,565 | 53.1% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **28** | **100.0%** | | **2,949** | **100.0%** | | |

| Table 14 Distribution of 2019 Small Farm Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Farm Revenue and Loan Size** | | **2019** | | | | | |
| | | **Count** | | **Dollars** | | | **Farms** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Farm Revenue** | $1 Million or Less | 26 | 68.4% | 57.6% | 3,120 | 65.4% | 79.8% | 96.8% |
| | Over $1 Million/ Unknown | 12 | 31.6% | 42.4% | 1,650 | 34.6% | 20.2% | 3.2% |
| | **TOTAL** | **38** | **100.0%** | **100.0%** | **4,770** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 25 | 65.8% | 69.5% | 1,297 | 27.2% | 18.4% | |
| | $100,001–$250,000 | 9 | 23.7% | 17.6% | 1,670 | 35.0% | 32.8% | |
| | $250,001–$500,000 | 4 | 10.5% | 12.9% | 1,803 | 37.8% | 48.8% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **38** | **100.0%** | **100.0%** | **4,770** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 16 | 61.5% | | 842 | 27.0% | | |
| | $100,001–$250,000 | 8 | 30.8% | | 1,470 | 47.1% | | |
| | $250,001–$1 Million | 2 | 7.7% | | 808 | 25.9% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **26** | **100.0%** | | **3,120** | **100.0%** | | |

## Texarkana MSA

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 8.1 Distribution of 2018 Home Mortgage Lending By Income Level of Geography** | | | | | | | |
| *Home Purchase Loans* | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.9% | 0.9% | 0.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.4% | 14.8% | 13.0% |
| Middle | 9 | 81.8% | 896 | 72.7% | 59.7% | 59.6% | 48.3% |
| Upper | 2 | 18.2% | 337 | 27.3% | 23.8% | 24.7% | 38.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| **TOTAL** | **11** | **100.0%** | **1,233** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| *Refinance* | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.9% | 0.3% | 0.6% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.4% | 13.8% | 11.4% |
| Middle | 5 | 100.0% | 476 | 100.0% | 59.7% | 47.9% | 41.7% |
| Upper | 0 | 0.0% | 0 | 0.0% | 23.8% | 38.0% | 46.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| **TOTAL** | **5** | **100.0%** | **476** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| *Home Improvement* | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.4% | 12.5% | 9.4% |
| Middle | 1 | 100.0% | 45 | 100.0% | 59.7% | 75.0% | 80.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 23.8% | 12.5% | 10.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| **TOTAL** | **1** | **100.0%** | **45** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| *Multifamily Loans* | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 12.3% | 10.0% | 50.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 22.6% | 30.0% | 26.8% |
| Middle | 1 | 100.0% | 600 | 100.0% | 46.4% | 60.0% | 22.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 18.8% | 0.0% | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1** | **100.0%** | **600** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| *Other Purpose LOC* | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.4% | 14.3% | 16.2% |
| Middle | 1 | 100.0% | 48 | 100.0% | 59.7% | 57.1% | 58.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 23.8% | 28.6% | 25.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |

| | # | # % | $ | $ % | | # % | $ % |
|---|---|---|---|---|---|---|---|
| **TOTAL** | **1** | **100.0%** | **48** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.4% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 59.7% | 71.0% | 73.8% |
| Upper | 0 | 0.0% | 0 | 0.0% | 23.8% | 29.0% | 26.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.4% | 15.2% | 14.8% |
| Middle | 0 | 0.0% | 0 | 0.0% | 59.7% | 72.7% | 65.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 23.8% | 12.1% | 20.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.9% | 0.7% | 6.8% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.4% | 14.2% | 14.2% |
| Middle | 17 | 89.5% | 2,065 | 86.0% | 59.7% | 57.5% | 44.5% |
| Upper | 2 | 10.5% | 337 | 14.0% | 23.8% | 27.6% | 34.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| **TOTAL** | **19** | **100.0%** | **2,402** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 8.1** **Distribution of 2019 Home Mortgage Lending** **By Income Level of Geography** | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.9% | 0.1% | 0.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.4% | 15.3% | 10.9% |
| Middle | 12 | 92.3% | 1,702 | 91.6% | 59.7% | 57.8% | 53.7% |
| Upper | 1 | 7.7% | 157 | 8.4% | 23.8% | 26.4% | 34.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.4% | 0.6% |
| **TOTAL** | **13** | **100.0%** | **1,859** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.9% | 0.6% | 0.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.4% | 10.5% | 7.9% |
| Middle | 5 | 83.3% | 391 | 75.8% | 59.7% | 54.9% | 48.1% |
| Upper | 1 | 16.7% | 125 | 24.2% | 23.8% | 33.7% | 43.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.3% | 0.2% |
| **TOTAL** | **6** | **100.0%** | **516** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Home Improvement | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 1.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.4% | 27.3% | 19.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 59.7% | 52.3% | 50.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 23.8% | 20.5% | 29.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 12.3% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 22.6% | 50.0% | 41.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 46.4% | 50.0% | 58.5% |
| Upper | 0 | 0.0% | 0 | 0.0% | 18.8% | 0.0% | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | **% of Owner-Occupied Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.4% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 59.7% | 50.0% | 40.5% |
| Upper | 0 | 0.0% | 0 | 0.0% | 23.8% | 50.0% | 59.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.4% | 15.8% | 15.6% |
| Middle | 0 | 0.0% | 0 | 0.0% | 59.7% | 63.2% | 50.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 23.8% | 21.1% | 34.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.4% | 20.8% | 15.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 59.7% | 54.2% | 52.5% |
| Upper | 0 | 0.0% | 0 | 0.0% | 23.8% | 25.0% | 32.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |

| Total Home Mortgage Loans | | | | | | |
|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 1.9% | 0.2% | 0.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.4% | 14.5% | 12.8% |
| Middle | 17 | 89.5% | 2,093 | 88.1% | 59.7% | 56.6% | 52.4% |
| Upper | 2 | 10.5% | 282 | 11.9% | 23.8% | 28.2% | 34.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.3% | 0.4% |
| **TOTAL** | **19** | **100.0%** | **2,375** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9 Distribution of 2018 Small Business Lending By Income Level of Geography | | | | | | |
|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 2.1% | 2.0% | 2.1% |
| Moderate | 1 | 2.0% | $8 | 0.2% | 30.7% | 21.3% | 20.4% |
| Middle | 36 | 73.5% | $3,162 | 80.7% | 48.8% | 45.5% | 48.4% |
| Upper | 12 | 24.5% | $746 | 19.1% | 18.1% | 29.8% | 25.8% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.3% | 1.4% | 3.3% |
| **TOTAL** | **49** | **100.0%** | **$3,916** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9 Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | |
|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 2.0% | 2.1% | 3.8% |
| Moderate | 1 | 2.9% | $327 | 11.7% | 30.2% | 22.9% | 22.6% |
| Middle | 28 | 80.0% | $2,274 | 81.2% | 48.1% | 47.1% | 49.0% |
| Upper | 6 | 17.1% | $200 | 7.1% | 19.4% | 27.4% | 24.3% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.3% | 0.5% | 0.4% |
| **TOTAL** | **35** | **100.0%** | **$2,801** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10 Distribution of 2018 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Farm Loans** | | | | **% of Farms** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **# %** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | $0 | 0.0% | 2.1% | 7.1% | 2.8% |
| Middle | 29 | 100.0% | $1,647 | 100.0% | 73.2% | 83.7% | 90.6% |
| Upper | 0 | 0.0% | $0 | 0.0% | 24.7% | 8.2% | 6.5% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 1.0% | 0.1% |
| **TOTAL** | **29** | **100.0%** | **$1,647** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10 Distribution of 2019 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Farm Loans** | | | | **% of Farms** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **# %** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | $0 | 0.0% | 3.1% | 2.4% | 1.2% |
| Middle | 24 | 100.0% | $1,757 | 100.0% | 71.4% | 75.0% | 63.6% |
| Upper | 0 | 0.0% | $0 | 0.0% | 25.5% | 21.8% | 33.6% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.8% | 1.6% |
| **TOTAL** | **24** | **100.0%** | **$1,757** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1 Distribution of 2018 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Loans** | | | | **Families by Family Income %** | **Aggregate HMDA Data** | |
| | **#** | **# %** | **$** | **$ %** | | **# %** | **$ %** |
| **Home Purchase Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.8% | 4.0% | 1.7% |
| Moderate | 1 | 9.1% | 116 | 9.4% | 16.0% | 13.9% | 8.0% |
| Middle | 3 | 27.3% | 297 | 24.1% | 20.8% | 19.5% | 15.3% |
| Upper | 5 | 45.5% | 684 | 55.5% | 39.5% | 44.3% | 52.3% |
| Unknown | 2 | 18.2% | 136 | 11.0% | 0.0% | 18.2% | 22.7% |
| **TOTAL** | **11** | **100.0%** | **1,233** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.8% | 5.6% | 3.0% |
| Moderate | 1 | 20.0% | 127 | 26.7% | 16.0% | 9.5% | 5.6% |
| Middle | 1 | 20.0% | 150 | 31.5% | 20.8% | 22.6% | 17.9% |
| Upper | 3 | 60.0% | 199 | 41.8% | 39.5% | 46.9% | 57.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 15.4% | 15.7% |
| **TOTAL** | **5** | **100.0%** | **476** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 1 | 100.0% | 45 | 100.0% | 23.8% | 12.5% | 7.7% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.0% | 3.1% | 5.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.8% | 18.8% | 17.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.5% | 56.3% | 55.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 9.4% | 15.0% |
| **TOTAL** | **1** | **100.0%** | **45** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.8% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.0% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.8% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.5% | 20.0% | 0.7% |
| Unknown | 1 | 100.0% | 600 | 100.0% | 0.0% | 80.0% | 99.3% |
| **TOTAL** | **1** | **100.0%** | **600** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.8% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.0% | 0.0% | 0.0% |
| Middle | 1 | 100.0% | 48 | 100.0% | 20.8% | 57.1% | 52.8% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.5% | 42.9% | 47.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1** | **100.0%** | **48** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 23.8% | 6.5% | 4.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.0% | 16.1% | 11.4% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.8% | 25.8% | 20.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.5% | 48.4% | 63.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.2% | 0.7% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.8% | 3.0% | 2.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.0% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.8% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.5% | 3.0% | 5.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 93.9% | 92.2% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 1 | 5.3% | 45 | 1.9% | 23.8% | 4.7% | 1.9% |
| Moderate | 2 | 10.5% | 243 | 10.1% | 16.0% | 11.8% | 6.3% |
| Middle | 5 | 26.3% | 495 | 20.6% | 20.8% | 20.0% | 13.9% |
| Upper | 8 | 42.1% | 883 | 36.8% | 39.5% | 44.0% | 46.5% |
| Unknown | 3 | 15.8% | 736 | 30.6% | 0.0% | 19.5% | 31.3% |
| **TOTAL** | **19** | **100.0%** | **2,402** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1 Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Loans** | | | | **Families by Family Income %** | **Aggregate HMDA Data** | |
| | **#** | **# %** | **$** | **$ %** | | **# %** | **$ %** |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 7.7% | 55 | 3.0% | 23.8% | 4.8% | 2.5% |
| Moderate | 3 | 23.1% | 348 | 18.7% | 16.0% | 18.1% | 12.5% |
| Middle | 2 | 15.4% | 172 | 9.3% | 20.8% | 21.2% | 20.0% |
| Upper | 7 | 53.8% | 1,284 | 69.1% | 39.5% | 40.9% | 48.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 15.0% | 16.1% |
| **TOTAL** | **13** | **100.0%** | **1,859** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.8% | 3.5% | 1.5% |
| Moderate | 1 | 16.7% | 117 | 22.7% | 16.0% | 9.6% | 6.1% |
| Middle | 1 | 16.7% | 41 | 7.9% | 20.8% | 21.8% | 16.2% |
| Upper | 4 | 66.7% | 358 | 69.4% | 39.5% | 45.3% | 50.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 19.8% | 26.2% |
| **TOTAL** | **6** | **100.0%** | **516** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Home Improvement | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 23.8% | 11.4% | 11.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.0% | 9.1% | 5.2% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.8% | 25.0% | 14.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.5% | 47.7% | 65.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 6.8% | 3.8% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | **% of Multifamily Units** | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.8% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.0% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.8% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.5% | 0.0% | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 100.0% | 100.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | **Families by Family Income %** | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.8% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.0% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.8% | 33.3% | 29.5% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.5% | 58.3% | 58.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 8.3% | 12.5% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.8% | 10.5% | 6.8% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.0% | 21.1% | 17.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.8% | 36.8% | 42.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.5% | 21.1% | 26.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 10.5% | 6.8% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.8% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.0% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.8% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.5% | 0.0% | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 100.0% | 100.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |

| Total Home Mortgage Loans | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 1 | 5.3% | 55 | 2.3% | 23.8% | 4.6% | 2.2% |
| Moderate | 4 | 21.1% | 465 | 19.6% | 16.0% | 14.7% | 9.4% |
| Middle | 3 | 15.8% | 213 | 9.0% | 20.8% | 21.3% | 17.1% |
| Upper | 11 | 57.9% | 1,642 | 69.1% | 39.5% | 41.2% | 44.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 18.2% | 26.6% |
| **TOTAL** | **19** | **100.0%** | **2,375** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Table 13**
**Distribution of 2018 Small Business Lending**
**By Borrower Income Level**

| Business Revenue and Loan Size | | 2018 | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | Count | | Dollars | | | | Total Businesses |
| | | Bank | Aggregate | Bank | | Aggregate | | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| Business Revenue | $1 Million or Less | 31 | 63.3% | 47.5% | $1,764 | 45.0% | 50.4% | 90.8% |
| | Over $1 Million/ Unknown | 18 | 36.7% | 52.5% | $2,152 | 55.0% | 49.6% | 9.2% |
| | **TOTAL** | **49** | **100.0%** | **100.0%** | **$3,916** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 35 | 71.4% | 88.6% | $1,259 | 32.2% | 34.5% | |
| | $100,001–$250,000 | 11 | 22.4% | 6.9% | $1,582 | 40.4% | 24.6% | |
| | $250,001–$1 Million | 3 | 6.1% | 4.4% | $1,075 | 27.5% | 40.8% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **49** | **100.0%** | **100.0%** | **$3,916** | **100.0%** | **100.0%** | |
| Loan Size Revenue $1 Million or Less | $100,000 or Less | 24 | 77.4% | | $813 | 46.1% | | |
| | $100,001–$250,000 | 7 | 22.6% | | $951 | 53.9% | | |
| | $250,001–$1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **31** | **100.0%** | | **$1,764** | **100.0%** | | |

| Table 13 Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | 2019 | | | | | |
| | | Count | | Dollars | | | Total Businesses |
| Business Revenue and Loan Size | | Bank | Aggregate | Bank | | Aggregate | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| Business Revenue | $1 Million or Less | 24 | 68.6% | 44.0% | $1,595 | 56.9% | 56.5% | 91.1% |
| | Over $1 Million/ Unknown | 11 | 31.4% | 56.0% | $1,206 | 43.1% | 43.5% | 8.9% |
| | **TOTAL** | **35** | **100.0%** | **100.0%** | **$2,801** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 25 | 71.4% | 92.0% | $696 | 24.8% | 45.4% | |
| | $100,001–$250,000 | 6 | 17.1% | 5.1% | $951 | 34.0% | 21.5% | |
| | $250,001–$1 Million | 4 | 11.4% | 2.8% | $1,154 | 41.2% | 33.1% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **35** | **100.0%** | **100.0%** | **$2,801** | **100.0%** | **100.0%** | |
| Loan Size Revenue $1 Million or Less | $100,000 or Less | 19 | 54.3% | | $464 | 16.6% | | |
| | $100,001–$250,000 | 3 | 8.6% | | $489 | 17.5% | | |
| | $250,001–$1 Million | 2 | 5.7% | | $642 | 22.9% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **24** | **68.6%** | | **$1,595** | **56.9%** | | |

| Table 14<br>Distribution of 2018 Small Farm Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Farm Revenue and Loan Size** | | **2018** | | | | | |
| | | **Count** | | | **Dollars** | | **Farms** |
| | | **Bank** | | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Farm Revenue** | $1 Million or Less | 23 | 79.3% | 68.4% | 1,512 | 91.8% | 77.4% | 95.9% |
| | Over $1 Million/ Unknown | 6 | 20.7% | 31.6% | 135 | 8.2% | 22.6% | 4.1% |
| | **TOTAL** | **29** | **100.0%** | **100.0%** | **1,647** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 25 | 86.2% | 87.8% | 767 | 46.6% | 47.3% | |
| | $100,001–$250,000 | 3 | 10.3% | 8.2% | 430 | 26.1% | 20.7% | |
| | $250,001–$500,000 | 1 | 3.4% | 4.1% | 450 | 27.3% | 32.0% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **29** | **100.0%** | **100.0%** | **1,647** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 19 | 82.6% | | 632 | 41.8% | | |
| | $100,001–$250,000 | 3 | 13.0% | | 430 | 28.4% | | |
| | $250,001–$1 Million | 1 | 4.3% | | 450 | 29.8% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **23** | **100.0%** | | **1,512** | **100.0%** | | |

| Table 14 Distribution of 2019 Small Farm Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Farm Revenue and Loan Size** | | **2019** | | | | | |
| | | **Count** | | **Dollars** | | | **Farms** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Farm Revenue** | $1 Million or Less | 18 | 75.0% | 81.5% | 1,489 | 84.7% | 84.5% | 95.9% |
| | Over $1 Million/ Unknown | 6 | 25.0% | 18.5% | 268 | 15.3% | 15.5% | 4.1% |
| | **TOTAL** | **24** | **100.0%** | **100.0%** | **1,757** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 17 | 70.8% | 78.2% | 440 | 25.0% | 37.2% | |
| | $100,001–$250,000 | 6 | 25.0% | 17.7% | 867 | 49.3% | 37.8% | |
| | $250,001–$500,000 | 1 | 4.2% | 4.0% | 450 | 25.6% | 25.0% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **24** | **100.0%** | **100.0%** | **1,757** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 13 | 72.2% | | 398 | 26.7% | | |
| | $100,001–$250,000 | 4 | 22.2% | | 641 | 43.0% | | |
| | $250,001–$1 Million | 1 | 5.6% | | 450 | 30.2% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **18** | **100.0%** | | **1,489** | **100.0%** | | |

## NonMSA Arkansas

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| Table 8.1 Distribution of 2018 Home Mortgage Lending By Income Level of Geography | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 26 | 4.6% | 2,926 | 4.0% | 5.7% | 5.0% | 4.2% |
| Middle | 421 | 73.9% | 51,429 | 71.0% | 81.5% | 80.1% | 77.4% |
| Upper | 123 | 21.6% | 18,070 | 24.9% | 12.8% | 15.0% | 18.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **570** | **100.0%** | **72,425** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 17 | 4.4% | 1,297 | 4.3% | 5.7% | 5.2% | 4.1% |
| Middle | 307 | 80.2% | 22,724 | 75.4% | 81.5% | 78.4% | 75.7% |
| Upper | 59 | 15.4% | 6,124 | 20.3% | 12.8% | 16.4% | 20.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.1% |
| **TOTAL** | **383** | **100.0%** | **30,145** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 8 | 6.0% | 202 | 3.3% | 5.7% | 5.1% | 3.0% |
| Middle | 96 | 71.6% | 4,586 | 73.9% | 81.5% | 80.2% | 81.7% |
| Upper | 30 | 22.4% | 1,418 | 22.8% | 12.8% | 14.7% | 15.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **134** | **100.0%** | **6,206** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 6.7% | 2,161 | 23.7% | 13.8% | 11.6% | 25.0% |
| Middle | 13 | 86.7% | 6,756 | 74.1% | 82.2% | 81.2% | 72.8% |
| Upper | 1 | 6.7% | 204 | 2.2% | 4.0% | 7.2% | 2.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **15** | **100.0%** | **9,121** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 2 | 4.2% | 26 | 1.1% | 5.7% | 3.1% | 1.1% |
| Middle | 39 | 81.3% | 1,838 | 79.5% | 81.5% | 84.5% | 83.3% |
| Upper | 7 | 14.6% | 448 | 19.4% | 12.8% | 12.4% | 15.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |

| | # | #% | $ | $% | % Owner-Occ | #% | $% |
|---|---|---|---|---|---|---|---|
| **TOTAL** | **48** | **100.0%** | **2,312** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 2 | 6.7% | 81 | 4.3% | 5.7% | 5.6% | 4.2% |
| Middle | 26 | 86.7% | 1,574 | 83.8% | 81.5% | 81.6% | 78.3% |
| Upper | 2 | 6.7% | 224 | 11.9% | 12.8% | 12.8% | 17.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **30** | **100.0%** | **1,879** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 5.7% | 5.7% | 4.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 81.5% | 82.3% | 80.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 12.8% | 12.0% | 15.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 56 | 4.7% | 6,693 | 5.5% | 5.7% | 5.1% | 5.1% |
| Middle | 902 | 76.4% | 88,907 | 72.8% | 81.5% | 79.8% | 76.9% |
| Upper | 222 | 18.8% | 26,488 | 21.7% | 12.8% | 15.1% | 18.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1,180** | **100.0%** | **122,088** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Table 8.1**
**Distribution of 2019 Home Mortgage Lending**
**By Income Level of Geography**

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | #% | $ | $% | | #% | $ % |
| **Home Purchase Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 35 | 5.2% | 3,682 | 4.4% | 5.7% | 4.1% | 3.5% |
| Middle | 510 | 75.8% | 60,316 | 71.9% | 81.5% | 80.4% | 77.8% |
| Upper | 128 | 19.0% | 19,921 | 23.7% | 12.8% | 15.2% | 18.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.3% | 0.4% |
| **TOTAL** | **673** | **100.0%** | **83,919** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 29 | 5.5% | 2,083 | 3.9% | 5.7% | 4.1% | 3.1% |
| Middle | 413 | 78.2% | 39,244 | 73.5% | 81.5% | 79.3% | 76.7% |
| Upper | 86 | 16.3% | 12,033 | 22.6% | 12.8% | 16.2% | 19.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.4% | 0.5% |
| **TOTAL** | **528** | **100.0%** | **53,360** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Home Improvement | | | | | | |
|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 6 | 6.1% | 329 | 7.7% | 5.7% | 7.5% | 9.0% |
| Middle | 74 | 75.5% | 2,983 | 69.5% | 81.5% | 72.4% | 69.7% |
| Upper | 18 | 18.4% | 980 | 22.8% | 12.8% | 19.3% | 20.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.9% | 1.1% |
| **TOTAL** | **98** | **100.0%** | **4,292** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 5.0% | 277 | 2.9% | 13.8% | 8.9% | 6.0% |
| Middle | 17 | 85.0% | 7,965 | 82.5% | 82.2% | 81.0% | 79.4% |
| Upper | 2 | 10.0% | 1,407 | 14.6% | 4.0% | 10.1% | 14.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **20** | **100.0%** | **9,649** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | **% of Owner-Occupied Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 5.7% | 1.4% | 0.7% |
| Middle | 34 | 73.9% | 1,028 | 67.0% | 81.5% | 73.9% | 71.2% |
| Upper | 12 | 26.1% | 506 | 33.0% | 12.8% | 24.6% | 28.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **46** | **100.0%** | **1,534** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 3 | 8.3% | 168 | 8.4% | 5.7% | 5.5% | 4.6% |
| Middle | 25 | 69.4% | 1,351 | 67.4% | 81.5% | 79.6% | 71.1% |
| Upper | 8 | 22.2% | 485 | 24.2% | 12.8% | 14.9% | 24.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **36** | **100.0%** | **2,004** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 5.7% | 10.2% | 7.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 81.5% | 78.5% | 80.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 12.8% | 11.3% | 12.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |

| Total Home Mortgage Loans | | | | | | |
|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 74 | 5.3% | 6,539 | 4.2% | 5.7% | 4.4% | 3.6% |
| Middle | 1,073 | 76.6% | 112,887 | 72.9% | 81.5% | 79.6% | 77.3% |
| Upper | 254 | 18.1% | 35,332 | 22.8% | 12.8% | 15.7% | 18.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.3% | 0.4% |
| **TOTAL** | **1,401** | **100.0%** | **154,758** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9 Distribution of 2018 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 55 | 5.9% | $2,931 | 4.0% | 8.1% | 6.4% | 5.2% |
| Middle | 811 | 86.6% | $65,734 | 89.0% | 81.5% | 78.8% | 82.3% |
| Upper | 71 | 7.6% | $5,211 | 7.1% | 10.4% | 12.9% | 11.8% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 1.9% | 0.6% |
| **TOTAL** | **937** | **100.0%** | **$73,876** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9 Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 43 | 5.7% | $2,689 | 4.2% | 8.2% | 6.4% | 6.8% |
| Middle | 641 | 84.9% | $54,477 | 85.6% | 81.4% | 78.3% | 79.8% |
| Upper | 71 | 9.4% | $6,455 | 10.1% | 10.4% | 12.3% | 12.6% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 3.0% | 0.8% |
| **TOTAL** | **755** | **100.0%** | **$63,621** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Appendix C (continued)**

| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
|---|---|---|---|---|---|---|---|
| **Table 10**<br>**Distribution of 2018 Small Farm Lending**<br>**By Income Level of Geography** | | | | | | | |
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 47 | 8.1% | $1,663 | 6.3% | 4.4% | 7.2% | 8.1% |
| Middle | 492 | 85.1% | $22,708 | 86.4% | 80.4% | 81.3% | 82.8% |
| Upper | 39 | 6.7% | $1,917 | 7.3% | 15.2% | 10.7% | 8.8% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.8% | 0.2% |
| **TOTAL** | **578** | **100.0%** | **$26,288** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
|---|---|---|---|---|---|---|---|
| **Table 10**<br>**Distribution of 2019 Small Farm Lending**<br>**By Income Level of Geography** | | | | | | | |
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 37 | 7.5% | $1,126 | 4.9% | 4.7% | 7.4% | 6.1% |
| Middle | 423 | 85.6% | $20,170 | 87.1% | 80.8% | 80.4% | 82.3% |
| Upper | 34 | 6.9% | $1,873 | 8.1% | 14.4% | 11.0% | 11.2% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 1.2% | 0.4% |
| **TOTAL** | **494** | **100.0%** | **$23,169** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1 Distribution of 2018 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | $ | $ % | | # % | $ % |
| **Home Purchase Loans** | | | | | | | |
| Low | 27 | 4.7% | 1,697 | 2.3% | 19.7% | 5.0% | 2.6% |
| Moderate | 101 | 17.7% | 8,961 | 12.4% | 19.1% | 16.1% | 11.6% |
| Middle | 120 | 21.1% | 13,391 | 18.5% | 20.8% | 20.1% | 18.0% |
| Upper | 285 | 50.0% | 44,469 | 61.4% | 40.4% | 38.3% | 47.4% |
| Unknown | 37 | 6.5% | 3,907 | 5.4% | 0.0% | 20.5% | 20.4% |
| **TOTAL** | **570** | **100.0%** | **72,425** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 35 | 9.1% | 1,374 | 4.6% | 19.7% | 7.8% | 4.1% |
| Moderate | 52 | 13.6% | 3,001 | 10.0% | 19.1% | 15.3% | 10.4% |
| Middle | 71 | 18.5% | 5,161 | 17.1% | 20.8% | 19.7% | 16.6% |
| Upper | 179 | 46.7% | 17,156 | 56.9% | 40.4% | 43.9% | 53.5% |
| Unknown | 46 | 12.0% | 3,453 | 11.5% | 0.0% | 13.2% | 15.5% |
| **TOTAL** | **383** | **100.0%** | **30,145** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 11 | 8.2% | 396 | 6.4% | 19.7% | 10.2% | 5.8% |
| Moderate | 22 | 16.4% | 761 | 12.3% | 19.1% | 13.0% | 10.2% |
| Middle | 25 | 18.7% | 1,242 | 20.0% | 20.8% | 20.2% | 19.2% |
| Upper | 56 | 41.8% | 2,853 | 46.0% | 40.4% | 46.0% | 50.0% |
| Unknown | 20 | 14.9% | 954 | 15.4% | 0.0% | 10.5% | 14.8% |
| **TOTAL** | **134** | **100.0%** | **6,206** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.7% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.1% | 0.0% | 0.0% |
| Middle | 1 | 6.7% | 55 | 0.6% | 20.8% | 5.8% | 1.9% |
| Upper | 6 | 40.0% | 1,155 | 12.7% | 40.4% | 36.2% | 13.1% |
| Unknown | 8 | 53.3% | 7,911 | 86.7% | 0.0% | 58.0% | 85.0% |
| **TOTAL** | **15** | **100.0%** | **9,121** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | Families by Family Income % | | |
| Low | 6 | 12.5% | 196 | 8.5% | 19.7% | 6.2% | 4.8% |
| Moderate | 5 | 10.4% | 207 | 9.0% | 19.1% | 11.6% | 9.4% |
| Middle | 14 | 29.2% | 471 | 20.4% | 20.8% | 24.8% | 19.0% |
| Upper | 22 | 45.8% | 1,340 | 58.0% | 40.4% | 56.6% | 65.2% |
| Unknown | 1 | 2.1% | 98 | 4.2% | 0.0% | 0.8% | 1.5% |
| **TOTAL** | **48** | **100.0%** | **2,312** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 3 | 10.0% | 102 | 5.4% | 19.7% | 11.2% | 8.1% |
| Moderate | 8 | 26.7% | 241 | 12.8% | 19.1% | 23.5% | 15.6% |
| Middle | 7 | 23.3% | 521 | 27.7% | 20.8% | 18.4% | 18.0% |
| Upper | 11 | 36.7% | 1,005 | 53.5% | 40.4% | 41.9% | 52.0% |
| Unknown | 1 | 3.3% | 10 | 0.5% | 0.0% | 5.0% | 6.3% |
| **TOTAL** | **30** | **100.0%** | **1,879** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.7% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.1% | 1.4% | 1.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.8% | 1.4% | 1.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.4% | 2.9% | 4.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 94.3% | 92.8% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 82 | 6.9% | 3,765 | 3.1% | 19.7% | 6.0% | 3.0% |
| Moderate | 188 | 15.9% | 13,171 | 10.8% | 19.1% | 15.4% | 10.5% |
| Middle | 238 | 20.2% | 20,841 | 17.1% | 20.8% | 19.5% | 16.6% |
| Upper | 559 | 47.4% | 67,978 | 55.7% | 40.4% | 39.7% | 46.9% |
| Unknown | 113 | 9.6% | 16,333 | 13.4% | 0.0% | 19.5% | 23.0% |
| **TOTAL** | **1,180** | **100.0%** | **122,088** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1 Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Loans** | | | | **Families by Family Income %** | **Aggregate HMDA Data** | |
| | **#** | **# %** | **$** | **$ %** | | **# %** | **$ %** |
| **Home Purchase Loans** | | | | | | | |
| Low | 46 | 6.8% | 3,107 | 3.7% | 19.7% | 4.5% | 2.4% |
| Moderate | 126 | 18.7% | 11,571 | 13.8% | 19.1% | 16.9% | 12.0% |
| Middle | 165 | 24.5% | 17,750 | 21.2% | 20.8% | 19.8% | 18.0% |
| Upper | 303 | 45.0% | 47,827 | 57.0% | 40.4% | 40.7% | 50.1% |
| Unknown | 33 | 4.9% | 3,664 | 4.4% | 0.0% | 18.1% | 17.5% |
| **TOTAL** | **673** | **100.0%** | **83,919** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 23 | 4.4% | 988 | 1.9% | 19.7% | 5.8% | 2.7% |
| Moderate | 89 | 16.9% | 5,443 | 10.2% | 19.1% | 13.1% | 8.4% |
| Middle | 109 | 20.6% | 8,560 | 16.0% | 20.8% | 18.8% | 14.5% |
| Upper | 249 | 47.2% | 31,978 | 59.9% | 40.4% | 44.6% | 52.9% |
| Unknown | 58 | 11.0% | 6,391 | 12.0% | 0.0% | 17.7% | 21.6% |
| **TOTAL** | **528** | **100.0%** | **53,360** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 5 | 5.1% | 101 | 2.4% | 19.7% | 9.5% | 5.5% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Moderate | 13 | 13.3% | 499 | 11.6% | 19.1% | 15.2% | 11.2% |
| Middle | 12 | 12.2% | 362 | 8.4% | 20.8% | 17.8% | 16.1% |
| Upper | 56 | 57.1% | 2,544 | 59.3% | 40.4% | 50.3% | 59.3% |
| Unknown | 12 | 12.2% | 786 | 18.3% | 0.0% | 7.2% | 7.8% |
| **TOTAL** | **98** | **100.0%** | **4,292** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.7% | 1.3% | 0.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.1% | 2.5% | 0.9% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.8% | 3.8% | 0.6% |
| Upper | 5 | 25.0% | 2,580 | 26.7% | 40.4% | 25.3% | 20.9% |
| Unknown | 15 | 75.0% | 7,069 | 73.3% | 0.0% | 67.1% | 77.6% |
| **TOTAL** | **20** | **100.0%** | **9,649** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 1 | 2.2% | 30 | 2.0% | 19.7% | 2.2% | 1.8% |
| Moderate | 5 | 10.9% | 176 | 11.5% | 19.1% | 15.2% | 11.4% |
| Middle | 9 | 19.6% | 264 | 17.2% | 20.8% | 15.9% | 10.9% |
| Upper | 28 | 60.9% | 908 | 59.2% | 40.4% | 63.0% | 72.5% |
| Unknown | 3 | 6.5% | 156 | 10.2% | 0.0% | 3.6% | 3.4% |
| **TOTAL** | **46** | **100.0%** | **1,534** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 1 | 2.8% | 37 | 1.8% | 19.7% | 10.9% | 6.3% |
| Moderate | 9 | 25.0% | 519 | 25.9% | 19.1% | 20.4% | 15.2% |
| Middle | 6 | 16.7% | 144 | 7.2% | 20.8% | 21.4% | 18.6% |
| Upper | 17 | 47.2% | 1,182 | 59.0% | 40.4% | 42.3% | 55.8% |
| Unknown | 3 | 8.3% | 122 | 6.1% | 0.0% | 5.0% | 4.1% |
| **TOTAL** | **36** | **100.0%** | **2,004** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.7% | 0.6% | 0.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.1% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.8% | 0.6% | 0.3% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.4% | 0.6% | 2.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 98.3% | 97.1% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 76 | 5.4% | 4,263 | 2.8% | 19.7% | 5.1% | 2.5% |
| Moderate | 242 | 17.3% | 18,208 | 11.8% | 19.1% | 15.3% | 10.4% |
| Middle | 301 | 21.5% | 27,080 | 17.5% | 20.8% | 18.9% | 16.1% |
| Upper | 658 | 47.0% | 87,019 | 56.2% | 40.4% | 41.8% | 49.9% |
| Unknown | 124 | 8.9% | 18,188 | 11.8% | 0.0% | 19.0% | 21.1% |
| **TOTAL** | **1,401** | **100.0%** | **154,758** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| | | Table 13 Distribution of 2018 Small Business Lending By Borrower Income Level | | | | | |
|---|---|---|---|---|---|---|---|
| | | **2018** | | | | | |
| | | **Count** | | **Dollars** | | | **Total Businesses** |
| **Business Revenue and Loan Size** | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Business Revenue** | $1 Million or Less | 709 | 75.7% | 45.3% | $44,002 | 59.6% | 47.5% | 90.3% |
| | Over $1 Million/ Unknown | 228 | 24.3% | 54.7% | $29,874 | 40.4% | 52.5% | 9.7% |
| | **TOTAL** | **937** | **100.0%** | **100.0%** | **$73,876** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 760 | 81.1% | 90.9% | $24,985 | 33.8% | 38.1% | |
| | $100,001–$250,000 | 116 | 12.4% | 5.8% | $19,385 | 26.2% | 22.8% | |
| | $250,001–$1 Million | 61 | 6.5% | 3.3% | $29,506 | 39.9% | 39.1% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **937** | **100.0%** | **100.0%** | **$73,876** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 606 | 85.5% | | $19,392 | 44.1% | | |
| | $100,001–$250,000 | 76 | 10.7% | | $12,567 | 28.6% | | |
| | $250,001–$1 Million | 27 | 3.8% | | $12,043 | 27.4% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **709** | **100.0%** | | **$44,002** | **100.0%** | | |

| Table 13<br>Distribution of 2019 Small Business Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | 2019 | | | | | |
| Business Revenue and Loan Size | | Count | | Dollars | | | Total Businesses |
| | | Bank | Aggregate | Bank | | Aggregate | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| Business Revenue | $1 Million or Less | 530 | 70.2% | 45.4% | $36,620 | 57.6% | 47.5% | 90.5% |
| | Over $1 Million/ Unknown | 225 | 29.8% | 54.6% | $27,001 | 42.4% | 52.5% | 9.5% |
| | **TOTAL** | **755** | **100.0%** | **100.0%** | **$63,621** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 573 | 75.9% | 91.1% | $19,913 | 31.3% | 38.4% | |
| | $100,001–$250,000 | 134 | 17.7% | 5.9% | $21,720 | 34.1% | 24.8% | |
| | $250,001–$1 Million | 48 | 6.4% | 3.0% | $21,988 | 34.6% | 36.8% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **755** | **100.0%** | **100.0%** | **$63,621** | **100.0%** | **100.0%** | |
| Loan Size Revenue $1 Million or Less | $100,000 or Less | 422 | 55.9% | | $13,202 | 20.8% | | |
| | $100,001–$250,000 | 85 | 11.3% | | $13,306 | 20.9% | | |
| | $250,001–$1 Million | 23 | 3.0% | | $10,112 | 15.9% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **530** | **70.2%** | | **$36,620** | **57.6%** | | |

| Table 14<br>Distribution of 2018 Small Farm Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Farm Revenue and Loan Size** | | **2018** | | | | | |
| | | **Count** | | **Dollars** | | | **Farms** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Farm Revenue** | $1 Million or Less | 520 | 90.0% | 72.1% | 24,274 | 92.3% | 84.4% | 96.1% |
| | Over $1 Million/ Unknown | 58 | 10.0% | 27.9% | 2,014 | 7.7% | 15.6% | 3.9% |
| | **TOTAL** | **578** | **100.0%** | **100.0%** | **26,288** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 517 | 89.4% | 88.4% | 14,275 | 54.3% | 46.0% | |
| | $100,001–$250,000 | 49 | 8.5% | 8.0% | 7,491 | 28.5% | 27.1% | |
| | $250,001–$500,000 | 12 | 2.1% | 3.6% | 4,522 | 17.2% | 26.9% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **578** | **100.0%** | **100.0%** | **26,288** | **100.0%** | **100.0%** | |
| **Loan Size** **Revenue $1 Million or Less** | $100,000 or Less | 462 | 88.8% | | 12,838 | 52.9% | | |
| | $100,001–$250,000 | 46 | 8.8% | | 6,914 | 28.5% | | |
| | $250,001–$1 Million | 12 | 2.3% | | 4,522 | 18.6% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **520** | **100.0%** | | **24,274** | **100.0%** | | |

| Table 14<br>Distribution of 2019 Small Farm Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | 2019 | | | | | |
| | | Count | | | Dollars | | Farms |
| **Farm Revenue and Loan Size** | | Bank | | Aggregate | Bank | | Aggregate |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| **Farm Revenue** | $1 Million or Less | 409 | 82.8% | 73.5% | 18,971 | 81.9% | 82.2% | 96.4% |
| | Over $1 Million/ Unknown | 85 | 17.2% | 26.5% | 4,198 | 18.1% | 17.8% | 3.6% |
| | **TOTAL** | **494** | **100.0%** | **100.0%** | **23,169** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 433 | 87.7% | 87.5% | 11,570 | 49.9% | 45.7% | |
| | $100,001–$250,000 | 48 | 9.7% | 8.9% | 7,407 | 32.0% | 28.9% | |
| | $250,001–$500,000 | 13 | 2.6% | 3.6% | 4,192 | 18.1% | 25.5% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **494** | **100.0%** | **100.0%** | **23,169** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 361 | 88.3% | | 10,011 | 52.8% | | |
| | $100,001–$250,000 | 38 | 9.3% | | 5,685 | 30.0% | | |
| | $250,001–$1 Million | 10 | 2.4% | | 3,275 | 17.3% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **409** | **100.0%** | | **18,971** | **100.0%** | | |

## Oklahoma City MSA

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Home Purchase Loans** | | | | | | | |
| Low | 4 | 0.8% | 379 | 0.4% | 3.4% | 1.5% | 0.8% |
| Moderate | 60 | 11.9% | 6,376 | 6.5% | 18.4% | 14.0% | 9.1% |
| Middle | 218 | 43.2% | 36,261 | 36.7% | 44.1% | 41.0% | 35.7% |
| Upper | 222 | 44.0% | 55,536 | 56.3% | 34.1% | 43.3% | 54.2% |
| Unknown | 1 | 0.2% | 168 | 0.2% | 0.1% | 0.1% | 0.2% |
| **TOTAL** | **505** | **100.0%** | **98,720** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 2 | 0.8% | 120 | 0.4% | 3.4% | 2.0% | 0.9% |
| Moderate | 34 | 12.9% | 2,196 | 6.8% | 18.4% | 14.9% | 9.9% |
| Middle | 111 | 42.2% | 11,007 | 34.2% | 44.1% | 43.1% | 36.2% |
| Upper | 116 | 44.1% | 18,878 | 58.6% | 34.1% | 39.9% | 52.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.3% |
| **TOTAL** | **263** | **100.0%** | **32,201** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.4% | 2.6% | 1.9% |
| Moderate | 14 | 13.3% | 590 | 9.3% | 18.4% | 15.5% | 11.7% |
| Middle | 42 | 40.0% | 2,285 | 36.2% | 44.1% | 39.9% | 34.2% |
| Upper | 49 | 46.7% | 3,440 | 54.5% | 34.1% | 41.9% | 51.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.2% | 0.7% |
| **TOTAL** | **105** | **100.0%** | **6,315** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 8.5% | 9.6% | 6.4% |
| Moderate | 2 | 50.0% | 487 | 8.5% | 39.3% | 40.8% | 25.7% |
| Middle | 1 | 25.0% | 61 | 1.1% | 33.4% | 38.6% | 54.0% |
| Upper | 1 | 25.0% | 5,200 | 90.5% | 17.5% | 9.2% | 11.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1.3% | 1.8% | 2.4% |
| **TOTAL** | **4** | **100.0%** | **5,748** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | % of Owner Occupied Units | | |
| Low | 1 | 2.0% | 15 | 0.5% | 3.4% | 0.9% | 0.3% |
| Moderate | 4 | 8.0% | 158 | 5.2% | 18.4% | 7.7% | 4.2% |
| Middle | 20 | 40.0% | 1,397 | 46.1% | 44.1% | 38.0% | 34.5% |
| Upper | 25 | 50.0% | 1,461 | 48.2% | 34.1% | 53.1% | 60.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.3% | 0.5% |

Table 8.1
Distribution of 2018 Home Mortgage Lending
By Income Level of Geography

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **TOTAL** | **50** | **100.0%** | **3,031** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** |
| Low | 0 | 0.0% | 0 | 0.0% | 3.4% | 0.9% | 0.6% |
| Moderate | 2 | 5.7% | 31 | 1.1% | 18.4% | 12.3% | 9.5% |
| Middle | 19 | 54.3% | 1,279 | 44.2% | 44.1% | 42.9% | 33.1% |
| Upper | 14 | 40.0% | 1,581 | 54.7% | 34.1% | 43.8% | 56.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.2% |
| **TOTAL** | **35** | **100.0%** | **2,891** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** |
| Low | 0 | 0.0% | 0 | 0.0% | 3.4% | 4.3% | 2.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.4% | 20.8% | 20.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 44.1% | 44.3% | 38.8% |
| Upper | 0 | 0.0% | 0 | 0.0% | 34.1% | 30.6% | 39.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** |
| Low | 7 | 0.7% | 514 | 0.3% | 3.4% | 1.8% | 1.3% |
| Moderate | 116 | 12.1% | 9,838 | 6.6% | 18.4% | 14.5% | 10.6% |
| Middle | 411 | 42.7% | 52,290 | 35.1% | 44.1% | 41.5% | 37.0% |
| Upper | 427 | 44.4% | 86,096 | 57.8% | 34.1% | 42.0% | 50.7% |
| Unknown | 1 | 0.1% | 168 | 0.1% | 0.1% | 0.1% | 0.4% |
| **TOTAL** | **962** | **100.0%** | **148,906** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| **Table 8.1** <br> **Distribution of 2019 Home Mortgage Lending** <br> **By Income Level of Geography** |
| | **#** | **# %** | **$** | **$ %** | | **# %** | **$ %** |
| **Home Purchase Loans** |
| Low | 6 | 1.4% | 748 | 0.8% | 3.4% | 1.9% | 1.0% |
| Moderate | 53 | 12.1% | 6,236 | 6.6% | 18.4% | 13.2% | 8.6% |
| Middle | 184 | 41.9% | 30,696 | 32.6% | 44.1% | 39.7% | 34.4% |
| Upper | 196 | 44.6% | 56,615 | 60.0% | 34.1% | 45.0% | 55.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.2% |
| **TOTAL** | **439** | **100.0%** | **94,295** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** |
| Low | 1 | 0.4% | 7 | 0.0% | 3.4% | 1.6% | 0.8% |
| Moderate | 30 | 11.1% | 2,066 | 5.3% | 18.4% | 12.2% | 7.2% |
| Middle | 118 | 43.7% | 15,026 | 38.5% | 44.1% | 39.7% | 32.5% |
| Upper | 121 | 44.8% | 21,909 | 56.2% | 34.1% | 46.3% | 59.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.2% |
| **TOTAL** | **270** | **100.0%** | **39,008** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Home Improvement | | | | | | |
|---|---|---|---|---|---|---|
| Low | 2 | 1.9% | 105 | 1.3% | 3.4% | 2.2% | 1.6% |
| Moderate | 13 | 12.0% | 414 | 5.0% | 18.4% | 13.8% | 10.1% |
| Middle | 45 | 41.7% | 3,347 | 40.4% | 44.1% | 38.0% | 32.4% |
| Upper | 48 | 44.4% | 4,420 | 53.3% | 34.1% | 45.9% | 55.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.2% |
| **TOTAL** | **108** | **100.0%** | **8,286** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Multifamily Loans | | | | % of Multifamily Units | | |
|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 8.5% | 12.3% | 5.8% |
| Moderate | 2 | 100.0% | 244 | 100.0% | 39.3% | 38.8% | 31.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 33.4% | 32.5% | 46.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 17.5% | 15.7% | 16.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1.3% | 0.7% | 0.4% |
| **TOTAL** | **2** | **100.0%** | **244** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose LOC | | | | % of Owner-Occupied Units | | |
|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 3.4% | 0.8% | 0.5% |
| Moderate | 3 | 7.7% | 160 | 8.6% | 18.4% | 8.4% | 4.7% |
| Middle | 14 | 35.9% | 542 | 29.1% | 44.1% | 38.3% | 30.6% |
| Upper | 22 | 56.4% | 1,159 | 62.3% | 34.1% | 52.3% | 61.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.2% | 3.1% |
| **TOTAL** | **39** | **100.0%** | **1,861** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | |
|---|---|---|---|---|---|---|
| Low | 3 | 11.1% | 68 | 5.9% | 3.4% | 1.4% | 0.7% |
| Moderate | 3 | 11.1% | 119 | 10.2% | 18.4% | 11.8% | 8.0% |
| Middle | 9 | 33.3% | 291 | 25.0% | 44.1% | 43.3% | 32.9% |
| Upper | 12 | 44.4% | 684 | 58.9% | 34.1% | 43.5% | 58.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| **TOTAL** | **27** | **100.0%** | **1,162** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Purpose Not Applicable | | | | | | |
|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 3.4% | 2.6% | 1.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.4% | 20.2% | 11.8% |
| Middle | 0 | 0.0% | 0 | 0.0% | 44.1% | 44.8% | 41.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 34.1% | 32.5% | 46.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |

| Total Home Mortgage Loans | | | | | | |
|---|---|---|---|---|---|---|
| Low | 12 | 1.4% | 928 | 0.6% | 3.4% | 1.9% | 1.3% |
| Moderate | 104 | 11.8% | 9,239 | 6.4% | 18.4% | 13.3% | 9.8% |
| Middle | 370 | 41.8% | 49,902 | 34.4% | 44.1% | 39.8% | 34.9% |
| Upper | 399 | 45.1% | 84,787 | 58.5% | 34.1% | 44.9% | 53.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.2% |
| **TOTAL** | **885** | **100.0%** | **144,856** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9<br>Distribution of 2018 Small Business Lending<br>By Income Level of Geography | | | | | | |
|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 25 | 4.7% | $2,739 | 4.7% | 4.4% | 4.5% | 6.4% |
| Moderate | 127 | 23.7% | $18,424 | 31.4% | 22.2% | 19.6% | 20.5% |
| Middle | 194 | 36.2% | $19,301 | 32.8% | 37.7% | 36.5% | 37.0% |
| Upper | 180 | 33.6% | $17,705 | 30.1% | 32.8% | 35.8% | 31.6% |
| Unknown | 10 | 1.9% | $588 | 1.0% | 3.0% | 3.6% | 4.5% |
| **TOTAL** | **536** | **100.0%** | **$58,757** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9<br>Distribution of 2019 Small Business Lending<br>By Income Level of Geography | | | | | | |
|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 25 | 5.0% | $2,029 | 4.0% | 4.4% | 4.1% | 5.8% |
| Moderate | 106 | 21.2% | $12,905 | 25.5% | 22.3% | 18.4% | 20.2% |
| Middle | 204 | 40.8% | $19,472 | 38.4% | 37.5% | 36.0% | 36.1% |
| Upper | 160 | 32.0% | $16,015 | 31.6% | 32.8% | 36.4% | 33.0% |
| Unknown | 5 | 1.0% | $281 | 0.6% | 3.0% | 5.1% | 4.9% |
| **TOTAL** | **500** | **100.0%** | **$50,702** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10<br>Distribution of 2018 Small Farm Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Farm Loans** | | | | **% of Farms** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **# %** | **$ %** |
| Low | 2 | 2.4% | $173 | 4.3% | 1.7% | 0.8% | 0.4% |
| Moderate | 4 | 4.9% | $178 | 4.4% | 10.9% | 9.7% | 10.7% |
| Middle | 65 | 79.3% | $2,630 | 65.7% | 53.8% | 69.7% | 67.2% |
| Upper | 10 | 12.2% | $522 | 13.0% | 33.2% | 18.9% | 19.7% |
| Unknown | 1 | 1.2% | $500 | 12.5% | 0.4% | 0.9% | 2.0% |
| **TOTAL** | **82** | **100.0%** | **$4,003** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10<br>Distribution of 2019 Small Farm Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Farm Loans** | | | | **% of Farms** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **# %** | **$ %** |
| Low | 1 | 1.3% | $200 | 6.3% | 1.6% | 0.1% | 0.4% |
| Moderate | 5 | 6.6% | $150 | 4.7% | 11.7% | 11.0% | 12.2% |
| Middle | 63 | 82.9% | $2,642 | 83.2% | 54.4% | 68.1% | 70.0% |
| Upper | 7 | 9.2% | $183 | 5.8% | 32.1% | 19.0% | 15.5% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.2% | 1.8% | 1.9% |
| **TOTAL** | **76** | **100.0%** | **$3,175** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | **Table 12.1** **Distribution of 2018 Home Mortgage Lending** **By Borrower Income Level** | | | | | | |
| | # | # % | $ | $ % | | # % | $ % |
| **Home Purchase Loans** | | | | | | | |
| Low | 20 | 4.0% | 1,680 | 1.7% | 21.3% | 6.0% | 3.2% |
| Moderate | 121 | 24.0% | 15,393 | 15.6% | 17.5% | 18.5% | 13.8% |
| Middle | 110 | 21.8% | 19,115 | 19.4% | 20.5% | 21.2% | 19.9% |
| Upper | 218 | 43.2% | 56,235 | 57.0% | 40.7% | 33.2% | 44.0% |
| Unknown | 36 | 7.1% | 6,297 | 6.4% | 0.0% | 21.0% | 19.1% |
| **TOTAL** | **505** | **100.0%** | **98,720** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 11 | 4.2% | 467 | 1.5% | 21.3% | 7.5% | 3.7% |
| Moderate | 39 | 14.8% | 3,071 | 9.5% | 17.5% | 16.0% | 10.3% |
| Middle | 52 | 19.8% | 5,494 | 17.1% | 20.5% | 19.4% | 16.0% |
| Upper | 130 | 49.4% | 18,979 | 58.9% | 40.7% | 38.1% | 48.7% |
| Unknown | 31 | 11.8% | 4,190 | 13.0% | 0.0% | 19.1% | 21.2% |
| **TOTAL** | **263** | **100.0%** | **32,201** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 6 | 5.7% | 325 | 5.1% | 21.3% | 6.9% | 4.4% |
| Moderate | 14 | 13.3% | 488 | 7.7% | 17.5% | 14.7% | 10.0% |
| Middle | 16 | 15.2% | 885 | 14.0% | 20.5% | 18.6% | 14.4% |
| Upper | 60 | 57.1% | 3,920 | 62.1% | 40.7% | 49.0% | 51.1% |
| Unknown | 9 | 8.6% | 697 | 11.0% | 0.0% | 10.8% | 20.2% |
| **TOTAL** | **105** | **100.0%** | **6,315** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 0.9% | 0.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.5% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.5% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.7% | 4.4% | 0.8% |
| Unknown | 4 | 100.0% | 5,748 | 100.0% | 0.0% | 94.7% | 99.1% |
| **TOTAL** | **4** | **100.0%** | **5,748** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 2 | 4.0% | 150 | 4.9% | 21.3% | 7.6% | 5.6% |
| Moderate | 13 | 26.0% | 702 | 23.2% | 17.5% | 14.6% | 10.4% |
| Middle | 12 | 24.0% | 402 | 13.3% | 20.5% | 18.6% | 13.2% |
| Upper | 19 | 38.0% | 1,300 | 42.9% | 40.7% | 56.5% | 65.9% |
| Unknown | 4 | 8.0% | 477 | 15.7% | 0.0% | 2.7% | 4.9% |
| **TOTAL** | **50** | **100.0%** | **3,031** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 1 | 2.9% | 80 | 2.8% | 21.3% | 7.9% | 4.5% |
| Moderate | 3 | 8.6% | 52 | 1.8% | 17.5% | 15.6% | 11.3% |
| Middle | 5 | 14.3% | 187 | 6.5% | 20.5% | 22.4% | 17.1% |
| Upper | 23 | 65.7% | 2,451 | 84.8% | 40.7% | 49.5% | 61.3% |
| Unknown | 3 | 8.6% | 121 | 4.2% | 0.0% | 4.6% | 5.9% |
| **TOTAL** | **35** | **100.0%** | **2,891** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 1.3% | 0.8% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.5% | 3.5% | 3.6% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.5% | 3.2% | 3.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.7% | 5.7% | 9.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 86.3% | 82.5% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 40 | 4.2% | 2,702 | 1.8% | 21.3% | 6.2% | 3.1% |
| Moderate | 190 | 19.8% | 19,706 | 13.2% | 17.5% | 17.1% | 11.9% |
| Middle | 195 | 20.3% | 26,083 | 17.5% | 20.5% | 19.9% | 17.4% |
| Upper | 450 | 46.8% | 82,885 | 55.7% | 40.7% | 34.2% | 41.5% |
| Unknown | 87 | 9.0% | 17,530 | 11.8% | 0.0% | 22.5% | 26.2% |
| **TOTAL** | **962** | **100.0%** | **148,906** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1 Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | $ | $ % | | # % | $ % |
| Home Purchase Loans | | | | | | | |
| Low | 21 | 4.8% | 2,246 | 2.4% | 21.3% | 6.7% | 3.7% |
| Moderate | 98 | 22.3% | 14,176 | 15.0% | 17.5% | 19.8% | 15.2% |
| Middle | 94 | 21.4% | 17,021 | 18.1% | 20.5% | 20.8% | 20.0% |
| Upper | 176 | 40.1% | 53,784 | 57.0% | 40.7% | 32.8% | 43.7% |
| Unknown | 50 | 11.4% | 7,068 | 7.5% | 0.0% | 19.9% | 17.4% |
| **TOTAL** | **439** | **100.0%** | **94,295** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Refinance | | | | | | | |
| Low | 23 | 8.5% | 1,377 | 3.5% | 21.3% | 6.2% | 2.8% |
| Moderate | 30 | 11.1% | 2,945 | 7.5% | 17.5% | 13.0% | 8.1% |
| Middle | 51 | 18.9% | 5,961 | 15.3% | 20.5% | 17.5% | 13.6% |
| Upper | 129 | 47.8% | 23,129 | 59.3% | 40.7% | 37.0% | 46.0% |
| Unknown | 37 | 13.7% | 5,596 | 14.3% | 0.0% | 26.3% | 29.6% |
| **TOTAL** | **270** | **100.0%** | **39,008** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Home Improvement | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 6 | 5.6% | 291 | 3.5% | 21.3% | 6.2% | 3.5% |
| Moderate | 11 | 10.2% | 642 | 7.7% | 17.5% | 15.6% | 10.1% |
| Middle | 14 | 13.0% | 777 | 9.4% | 20.5% | 17.8% | 14.2% |
| Upper | 64 | 59.3% | 5,302 | 64.0% | 40.7% | 51.1% | 56.1% |
| Unknown | 13 | 12.0% | 1,274 | 15.4% | 0.0% | 9.3% | 16.1% |
| **TOTAL** | **108** | **100.0%** | **8,286** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | **% of Multifamily Units** | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 0.4% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.5% | 0.4% | 0.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.5% | 1.5% | 0.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.7% | 6.3% | 1.4% |
| Unknown | 2 | 100.0% | 244 | 100.0% | 0.0% | 91.4% | 98.3% |
| **TOTAL** | **2** | **100.0%** | **244** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | **Families by Family Income %** | | | |
| Low | 4 | 10.3% | 145 | 7.8% | 21.3% | 5.7% | 2.9% |
| Moderate | 5 | 12.8% | 185 | 9.9% | 17.5% | 12.1% | 7.5% |
| Middle | 7 | 17.9% | 374 | 20.1% | 20.5% | 24.4% | 14.6% |
| Upper | 18 | 46.2% | 735 | 39.5% | 40.7% | 53.3% | 67.3% |
| Unknown | 5 | 12.8% | 422 | 22.7% | 0.0% | 4.5% | 7.8% |
| **TOTAL** | **39** | **100.0%** | **1,861** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 4 | 14.8% | 87 | 7.5% | 21.3% | 7.0% | 3.9% |
| Moderate | 5 | 18.5% | 249 | 21.4% | 17.5% | 20.1% | 14.3% |
| Middle | 4 | 14.8% | 216 | 18.6% | 20.5% | 22.4% | 17.8% |
| Upper | 11 | 40.7% | 557 | 47.9% | 40.7% | 44.6% | 51.5% |
| Unknown | 3 | 11.1% | 53 | 4.6% | 0.0% | 5.9% | 12.6% |
| **TOTAL** | **27** | **100.0%** | **1,162** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 0.5% | 0.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.5% | 0.5% | 0.4% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.5% | 0.2% | 0.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.7% | 0.6% | 1.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 98.1% | 97.9% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |

| Total Home Mortgage Loans | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 58 | 6.6% | 4,146 | 2.9% | 21.3% | 6.3% | 3.2% |
| Moderate | 149 | 16.8% | 18,197 | 12.6% | 17.5% | 17.2% | 12.1% |
| Middle | 170 | 19.2% | 24,349 | 16.8% | 20.5% | 19.2% | 16.6% |
| Upper | 398 | 45.0% | 83,507 | 57.6% | 40.7% | 33.7% | 40.8% |
| Unknown | 110 | 12.4% | 14,657 | 10.1% | 0.0% | 23.6% | 27.4% |
| **TOTAL** | **885** | **100.0%** | **144,856** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 13 Distribution of 2018 Small Business Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | **2018** | | | | | |
| | | **Count** | | **Dollars** | | | **Total Businesses** |
| **Business Revenue and Loan Size** | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| Business Revenue | $1 Million or Less | 328 | 61.2% | 46.4% | $26,216 | 44.6% | 40.1% | 91.0% |
| | Over $1 Million/ Unknown | 208 | 38.8% | 53.6% | $32,541 | 55.4% | 59.9% | 9.0% |
| | **TOTAL** | **536** | **100.0%** | **100.0%** | **$58,757** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 401 | 74.8% | 90.2% | $16,003 | 27.2% | 29.8% | |
| | $100,001–$250,000 | 75 | 14.0% | 5.0% | $12,751 | 21.7% | 17.4% | |
| | $250,001–$1 Million | 60 | 11.2% | 4.8% | $30,003 | 51.1% | 52.8% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **536** | **100.0%** | **100.0%** | **$58,757** | **100.0%** | **100.0%** | |
| Loan Size Revenue $1 Million or Less | $100,000 or Less | 266 | 81.1% | | $9,731 | 37.1% | | |
| | $100,001–$250,000 | 37 | 11.3% | | $5,952 | 22.7% | | |
| | $250,001–$1 Million | 25 | 7.6% | | $10,533 | 40.2% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **328** | **100.0%** | | **$26,216** | **100.0%** | | |

| Table 13 Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Business Revenue and Loan Size** | | 2019 | | | | | |
| | | Count | | Dollars | | | Total Businesses |
| | | Bank | Aggregate | Bank | | Aggregate | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| Business Revenue | $1 Million or Less | 292 | 58.4% | 45.5% | $20,199 | 39.8% | 40.4% | 91.4% |
| | Over $1 Million/ Unknown | 208 | 41.6% | 54.5% | $30,503 | 60.2% | 59.6% | 8.6% |
| | **TOTAL** | **500** | **100.0%** | **100.0%** | **$50,702** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 386 | 77.2% | 92.8% | $15,607 | 30.8% | 36.0% | |
| | $100,001–$250,000 | 60 | 12.0% | 3.6% | $9,841 | 19.4% | 15.6% | |
| | $250,001–$1 Million | 54 | 10.8% | 3.6% | $25,254 | 49.8% | 48.5% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **500** | **100.0%** | **100.0%** | **$50,702** | **100.0%** | **100.0%** | |
| Loan Size — Revenue $1 Million or Less | $100,000 or Less | 250 | 50.0% | | $8,611 | 17.0% | | |
| | $100,001–$250,000 | 22 | 4.4% | | $3,606 | 7.1% | | |
| | $250,001–$1 Million | 20 | 4.0% | | $7,982 | 15.7% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **292** | **58.4%** | | **$20,199** | **39.8%** | | |

**Table 14**
**Distribution of 2018 Small Farm Lending**
**By Borrower Income Level**

| Farm Revenue and Loan Size | | 2018 | | | | | |
|---|---|---|---|---|---|---|---|
| | | Count | | Dollars | | | Farms |
| | | Bank | Aggregate | Bank | | Aggregate | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| Farm Revenue | $1 Million or Less | 78 | 95.1% | 77.7% | 3,592 | 89.7% | 88.5% | 97.8% |
| | Over $1 Million/ Unknown | 4 | 4.9% | 22.3% | 411 | 10.3% | 11.5% | 2.2% |
| | **TOTAL** | **82** | **100.0%** | **100.0%** | **4,003** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 73 | 89.0% | 86.6% | 2,347 | 58.6% | 43.4% | |
| | $100,001–$250,000 | 8 | 9.8% | 10.2% | 1,156 | 28.9% | 32.9% | |
| | $250,001–$500,000 | 1 | 1.2% | 3.2% | 500 | 12.5% | 23.6% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **82** | **100.0%** | **100.0%** | **4,003** | **100.0%** | **100.0%** | |
| Loan Size Revenue $1 Million or Less | $100,000 or Less | 71 | 91.0% | | 2,174 | 60.5% | | |
| | $100,001–$250,000 | 6 | 7.7% | | 918 | 25.6% | | |
| | $250,001–$1 Million | 1 | 1.3% | | 500 | 13.9% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **78** | **100.0%** | | **3,592** | **100.0%** | | |

**Table 14**
**Distribution of 2019 Small Farm Lending**
**By Borrower Income Level**

| Farm Revenue and Loan Size | | 2019 | | | | | |
|---|---|---|---|---|---|---|---|
| | | Count | | Dollars | | | Farms |
| | | Bank | Aggregate | Bank | | Aggregate | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| Farm Revenue | $1 Million or Less | 69 | 90.8% | 76.4% | 2,571 | 81.0% | 82.6% | 97.9% |
| | Over $1 Million/ Unknown | 7 | 9.2% | 23.6% | 604 | 19.0% | 17.4% | 2.1% |
| | **TOTAL** | **76** | **100.0%** | **100.0%** | **3,175** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 68 | 89.5% | 86.4% | 1,998 | 62.9% | 41.9% | |
| | $100,001–$250,000 | 8 | 10.5% | 9.9% | 1,177 | 37.1% | 32.0% | |
| | $250,001–$500,000 | 0 | 0.0% | 3.7% | 0 | 0.0% | 26.1% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **76** | **100.0%** | **100.0%** | **3,175** | **100.0%** | **100.0%** | |
| Loan Size Revenue $1 Million or Less | $100,000 or Less | 64 | 92.8% | | 1,855 | 72.2% | | |
| | $100,001–$250,000 | 5 | 7.2% | | 716 | 27.8% | | |
| | $250,001–$1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **69** | **100.0%** | | **2,571** | **100.0%** | | |

**Tulsa MSA**

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 8.1** **Distribution of 2018 Home Mortgage Lending** **By Income Level of Geography** | | | | | | | |
| *Home Purchase Loans* | | | | | | | |
| Low | 16 | 1.5% | 1,686 | 0.9% | 2.7% | 0.9% | 0.4% |
| Moderate | 182 | 17.5% | 17,735 | 9.3% | 19.4% | 14.2% | 9.1% |
| Middle | 415 | 39.8% | 68,364 | 35.7% | 45.7% | 44.0% | 38.9% |
| Upper | 429 | 41.2% | 103,554 | 54.1% | 32.1% | 40.9% | 51.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1,042** | **100.0%** | **191,339** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| *Refinance* | | | | | | | |
| Low | 7 | 1.4% | 309 | 0.5% | 2.7% | 1.3% | 0.5% |
| Moderate | 72 | 14.9% | 5,536 | 9.8% | 19.4% | 14.4% | 9.0% |
| Middle | 185 | 38.3% | 18,720 | 33.0% | 45.7% | 45.0% | 41.4% |
| Upper | 219 | 45.3% | 32,172 | 56.7% | 32.1% | 39.4% | 49.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **483** | **100.0%** | **56,737** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| *Home Improvement* | | | | | | | |
| Low | 3 | 1.5% | 77 | 0.6% | 2.7% | 1.5% | 1.1% |
| Moderate | 22 | 10.7% | 1,411 | 11.2% | 19.4% | 15.7% | 11.9% |
| Middle | 69 | 33.5% | 3,809 | 30.2% | 45.7% | 38.7% | 34.2% |
| Upper | 112 | 54.4% | 7,331 | 58.1% | 32.1% | 44.1% | 52.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **206** | **100.0%** | **12,628** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| *Multifamily Loans* | | | | | % of Multifamily Units | | |
| Low | 1 | 11.1% | 186 | 0.8% | 9.5% | 8.7% | 1.7% |
| Moderate | 2 | 22.2% | 13,505 | 56.3% | 36.7% | 56.0% | 48.0% |
| Middle | 5 | 55.6% | 9,772 | 40.7% | 32.8% | 25.3% | 26.7% |
| Upper | 1 | 11.1% | 518 | 2.2% | 21.0% | 10.0% | 23.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **9** | **100.0%** | **23,981** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| *Other Purpose LOC* | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.7% | 1.0% | 1.0% |
| Moderate | 15 | 19.2% | 548 | 11.9% | 19.4% | 10.7% | 8.4% |
| Middle | 29 | 37.2% | 1,481 | 32.2% | 45.7% | 38.7% | 31.6% |
| Upper | 34 | 43.6% | 2,566 | 55.8% | 32.1% | 49.6% | 59.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **78** | **100.0%** | **4,595** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 1 | 2.6% | 31 | 0.9% | 2.7% | 1.2% | 0.4% |
| Moderate | 7 | 17.9% | 340 | 10.1% | 19.4% | 13.8% | 9.8% |
| Middle | 14 | 35.9% | 729 | 21.7% | 45.7% | 49.8% | 41.5% |
| Upper | 17 | 43.6% | 2,263 | 67.3% | 32.1% | 35.2% | 48.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **39** | **100.0%** | **3,363** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.7% | 1.6% | 0.8% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.4% | 20.5% | 14.2% |
| Middle | 0 | 0.0% | 0 | 0.0% | 45.7% | 46.8% | 45.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 32.1% | 31.0% | 39.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 28 | 1.5% | 2,289 | 0.8% | 2.7% | 1.0% | 0.5% |
| Moderate | 300 | 16.2% | 39,075 | 13.4% | 19.4% | 14.7% | 12.0% |
| Middle | 717 | 38.6% | 102,875 | 35.2% | 45.7% | 43.9% | 38.6% |
| Upper | 812 | 43.7% | 148,404 | 50.7% | 32.1% | 40.3% | 48.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1,857** | **100.0%** | **292,643** | **100.0%** | **100.0%** | **100.0 %** | **100.0%** |

| Table 8.1<br>Distribution of 2019 Home Mortgage Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | $ | $ % | | # % | $ % |
| Home Purchase Loans | | | | | | | |
| Low | 9 | 1.0% | 654 | 0.4% | 2.7% | 0.7% | 0.3% |
| Moderate | 157 | 17.3% | 16,712 | 9.8% | 19.4% | 14.8% | 9.3% |
| Middle | 350 | 38.5% | 61,603 | 36.2% | 45.7% | 44.7% | 41.5% |
| Upper | 392 | 43.2% | 91,125 | 53.6% | 32.1% | 39.8% | 48.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **908** | **100.0%** | **170,094** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Refinance | | | | | | | |
| Low | 7 | 1.1% | 380 | 0.3% | 2.7% | 0.6% | 0.2% |
| Moderate | 98 | 15.3% | 8,307 | 7.2% | 19.4% | 11.9% | 7.2% |
| Middle | 231 | 36.0% | 36,372 | 31.3% | 45.7% | 42.2% | 37.0% |
| Upper | 305 | 47.6% | 71,066 | 61.2% | 32.1% | 45.3% | 55.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **641** | **100.0%** | **116,125** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Home Improvement | | | | | | | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 1 | 0.5% | 12 | 0.1% | 2.7% | 1.4% | 0.8% |
| Moderate | 24 | 13.2% | 956 | 8.0% | 19.4% | 14.8% | 10.8% |
| Middle | 74 | 40.7% | 5,074 | 42.3% | 45.7% | 40.6% | 37.5% |
| Upper | 83 | 45.6% | 5,945 | 49.6% | 32.1% | 43.2% | 50.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **182** | **100.0%** | **11,987** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 9.5% | 8.7% | 3.7% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 36.7% | 44.0% | 17.5% |
| Middle | 2 | 66.7% | 773 | 68.0% | 32.8% | 31.5% | 60.2% |
| Upper | 1 | 33.3% | 364 | 32.0% | 21.0% | 15.8% | 18.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **3** | **100.0%** | **1,137** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **% of Owner-Occupied Units** | | |
| Low | 1 | 1.2% | 11 | 0.2% | 2.7% | 0.7% | 0.1% |
| Moderate | 14 | 17.3% | 576 | 10.2% | 19.4% | 11.2% | 6.7% |
| Middle | 25 | 30.9% | 1,212 | 21.5% | 45.7% | 31.9% | 24.8% |
| Upper | 41 | 50.6% | 3,843 | 68.1% | 32.1% | 56.2% | 68.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **81** | **100.0%** | **5,642** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 1 | 2.4% | 20 | 0.4% | 2.7% | 1.1% | 0.8% |
| Moderate | 6 | 14.3% | 206 | 4.3% | 19.4% | 15.9% | 9.9% |
| Middle | 22 | 52.4% | 2,252 | 46.8% | 45.7% | 45.0% | 43.5% |
| Upper | 13 | 31.0% | 2,329 | 48.5% | 32.1% | 38.0% | 45.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **42** | **100.0%** | **4,807** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.7% | 1.8% | 1.8% |
| Moderate | 1 | 33.3% | 56 | 11.9% | 19.4% | 20.1% | 11.5% |
| Middle | 1 | 33.3% | 157 | 33.3% | 45.7% | 46.4% | 43.9% |
| Upper | 1 | 33.3% | 259 | 54.9% | 32.1% | 31.7% | 42.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **3** | **100.0%** | **472** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Appendix C (continued)**

| Total Home Mortgage Loans | | | | | | |
|---|---|---|---|---|---|---|
| Low | 19 | 1.0% | 1,077 | 0.3% | 2.7% | 0.8% | 0.6% |
| Moderate | 300 | 16.1% | 26,813 | 8.6% | 19.4% | 14.4% | 9.6% |
| Middle | 705 | 37.9% | 107,443 | 34.6% | 45.7% | 43.7% | 42.0% |
| Upper | 836 | 44.9% | 174,931 | 56.4% | 32.1% | 41.1% | 47.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1,860** | **100.0%** | **310,264** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9<br>Distribution of 2018 Small Business Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 28 | 2.8% | $2,660 | 2.6% | 3.1% | 2.6% | 3.1% |
| Moderate | 194 | 19.7% | $22,195 | 21.7% | 22.7% | 20.3% | 26.3% |
| Middle | 378 | 38.3% | $39,962 | 39.1% | 40.5% | 39.8% | 38.3% |
| Upper | 386 | 39.1% | $37,260 | 36.5% | 33.8% | 35.1% | 31.6% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 2.2% | 0.6% |
| **TOTAL** | **986** | **100.0%** | **$102,077** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9<br>Distribution of 2019 Small Business Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 28 | 3.9% | $5,011 | 5.8% | 3.1% | 2.5% | 3.5% |
| Moderate | 157 | 21.7% | $20,148 | 23.3% | 22.6% | 19.8% | 23.2% |
| Middle | 305 | 42.1% | $35,850 | 41.4% | 40.4% | 40.5% | 42.7% |
| Upper | 235 | 32.4% | $25,541 | 29.5% | 33.9% | 34.6% | 29.8% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 2.7% | 0.7% |
| **TOTAL** | **725** | **100.0%** | **$86,550** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10<br>Distribution of 2018 Small Farm Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Farm Loans** | | | | **% of Farms** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **# %** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 0.5% | 0.2% | 0.0% |
| Moderate | 9 | 10.0% | $183 | 2.8% | 12.0% | 8.7% | 4.7% |
| Middle | 70 | 77.8% | $5,248 | 81.4% | 58.8% | 73.0% | 76.7% |
| Upper | 11 | 12.2% | $1,016 | 15.8% | 28.7% | 17.7% | 18.5% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.4% | 0.1% |
| **TOTAL** | **90** | **100.0%** | **$6,447** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10<br>Distribution of 2019 Small Farm Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Farm Loans** | | | | **% of Farms** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **# %** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 0.4% | 0.0% | 0.0% |
| Moderate | 11 | 9.9% | $927 | 9.2% | 12.1% | 10.5% | 7.8% |
| Middle | 86 | 77.5% | $7,457 | 73.7% | 58.5% | 69.9% | 74.4% |
| Upper | 14 | 12.6% | $1,740 | 17.2% | 29.0% | 18.5% | 17.6% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 1.1% | 0.2% |
| **TOTAL** | **111** | **100.0%** | **$10,124** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 12.1** **Distribution of 2018 Home Mortgage Lending** **By Borrower Income Level** | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 106 | 10.2% | 9,439 | 4.9% | 21.5% | 5.9% | 3.1% |
| Moderate | 250 | 24.0% | 31,776 | 16.6% | 17.7% | 18.8% | 13.7% |
| Middle | 207 | 19.9% | 32,510 | 17.0% | 20.3% | 20.5% | 18.5% |
| Upper | 407 | 39.1% | 106,506 | 55.7% | 40.5% | 34.1% | 45.9% |
| Unknown | 72 | 6.9% | 11,108 | 5.8% | 0.0% | 20.7% | 18.8% |
| **TOTAL** | **1,042** | **100.0%** | **191,339** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 40 | 8.3% | 2,082 | 3.7% | 21.5% | 7.7% | 3.6% |
| Moderate | 63 | 13.0% | 4,726 | 8.3% | 17.7% | 15.3% | 10.0% |
| Middle | 78 | 16.1% | 8,418 | 14.8% | 20.3% | 18.7% | 14.3% |
| Upper | 244 | 50.5% | 34,398 | 60.6% | 40.5% | 43.1% | 55.9% |
| Unknown | 58 | 12.0% | 7,113 | 12.5% | 0.0% | 15.3% | 16.2% |
| **TOTAL** | **483** | **100.0%** | **56,737** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 12 | 5.8% | 421 | 3.3% | 21.5% | 7.1% | 4.8% |
| Moderate | 19 | 9.2% | 1,084 | 8.6% | 17.7% | 12.5% | 9.1% |
| Middle | 35 | 17.0% | 1,701 | 13.5% | 20.3% | 18.6% | 15.1% |
| Upper | 117 | 56.8% | 7,502 | 59.4% | 40.5% | 51.5% | 55.9% |
| Unknown | 23 | 11.2% | 1,920 | 15.2% | 0.0% | 10.4% | 15.1% |
| **TOTAL** | **206** | **100.0%** | **12,628** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.5% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.7% | 1.3% | 0.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.3% | 0.7% | 0.1% |
| Upper | 3 | 33.3% | 793 | 3.3% | 40.5% | 8.7% | 1.3% |
| Unknown | 6 | 66.7% | 23,188 | 96.7% | 0.0% | 89.3% | 98.5% |
| **TOTAL** | **9** | **100.0%** | **23,981** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 5 | 6.4% | 149 | 3.2% | 21.5% | 7.5% | 6.4% |
| Moderate | 11 | 14.1% | 657 | 14.3% | 17.7% | 14.2% | 10.4% |
| Middle | 19 | 24.4% | 824 | 17.9% | 20.3% | 21.1% | 13.9% |
| Upper | 38 | 48.7% | 2,410 | 52.4% | 40.5% | 54.5% | 65.3% |
| Unknown | 5 | 6.4% | 555 | 12.1% | 0.0% | 2.8% | 4.0% |
| **TOTAL** | **78** | **100.0%** | **4,595** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 3 | 7.7% | 164 | 4.9% | 21.5% | 9.1% | 6.7% |
| Moderate | 5 | 12.8% | 214 | 6.4% | 17.7% | 15.7% | 11.7% |
| Middle | 10 | 25.6% | 852 | 25.3% | 20.3% | 23.8% | 18.0% |
| Upper | 21 | 53.8% | 2,133 | 63.4% | 40.5% | 46.5% | 56.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 4.9% | 6.7% |
| **TOTAL** | **39** | **100.0%** | **3,363** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.5% | 0.4% | 0.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.7% | 3.5% | 4.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.3% | 4.7% | 5.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.5% | 7.3% | 13.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 84.0% | 76.6% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 166 | 8.9% | 12,255 | 4.2% | 21.5% | 6.2% | 3.0% |
| Moderate | 348 | 18.7% | 38,457 | 13.1% | 17.7% | 17.1% | 11.7% |
| Middle | 349 | 18.8% | 44,305 | 15.1% | 20.3% | 19.4% | 16.0% |
| Upper | 830 | 44.7% | 153,742 | 52.5% | 40.5% | 36.4% | 44.3% |
| Unknown | 164 | 8.8% | 43,884 | 15.0% | 0.0% | 20.9% | 25.0% |
| **TOTAL** | **1,857** | **100.0%** | **292,643** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| **Table 12.1** <br> **Distribution of 2019 Home Mortgage Lending** <br> **By Borrower Income Level** | | | | | | | |
| | # | # % | $ | $ % | | # % | $ % |
| **Home Purchase Loans** | | | | | | | |
| Low | 92 | 10.1% | 9,622 | 5.7% | 21.5% | 7.0% | 3.9% |
| Moderate | 241 | 26.5% | 31,930 | 18.8% | 17.7% | 20.6% | 15.0% |
| Middle | 187 | 20.6% | 30,826 | 18.1% | 20.3% | 21.6% | 19.6% |
| Upper | 323 | 35.6% | 86,551 | 50.9% | 40.5% | 33.8% | 46.8% |
| Unknown | 65 | 7.2% | 11,165 | 6.6% | 0.0% | 17.0% | 14.7% |
| **TOTAL** | **908** | **100.0%** | **170,094** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 33 | 5.1% | 2,457 | 2.1% | 21.5% | 6.4% | 3.0% |
| Moderate | 70 | 10.9% | 6,632 | 5.7% | 17.7% | 13.1% | 7.9% |
| Middle | 120 | 18.7% | 12,739 | 11.0% | 20.3% | 18.8% | 13.8% |
| Upper | 318 | 49.6% | 77,456 | 66.7% | 40.5% | 43.4% | 54.3% |
| Unknown | 100 | 15.6% | 16,841 | 14.5% | 0.0% | 18.3% | 20.9% |
| **TOTAL** | **641** | **100.0%** | **116,125** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Home Improvement | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 10 | 5.5% | 324 | 2.7% | 21.5% | 7.0% | 4.9% |
| Moderate | 16 | 8.8% | 644 | 5.4% | 17.7% | 13.6% | 9.5% |
| Middle | 31 | 17.0% | 1,324 | 11.0% | 20.3% | 19.9% | 15.3% |
| Upper | 95 | 52.2% | 7,147 | 59.6% | 40.5% | 48.5% | 55.7% |
| Unknown | 30 | 16.5% | 2,548 | 21.3% | 0.0% | 11.0% | 14.6% |
| **TOTAL** | **182** | **100.0%** | **11,987** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.5% | 0.5% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.7% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.3% | 2.2% | 0.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.5% | 5.4% | 0.5% |
| Unknown | 3 | 100.0% | 1,137 | 100.0% | 0.0% | 91.8% | 99.4% |
| **TOTAL** | **3** | **100.0%** | **1,137** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 4 | 4.9% | 184 | 3.3% | 21.5% | 5.2% | 2.9% |
| Moderate | 8 | 9.9% | 360 | 6.4% | 17.7% | 14.3% | 9.8% |
| Middle | 20 | 24.7% | 1,069 | 18.9% | 20.3% | 17.6% | 14.3% |
| Upper | 40 | 49.4% | 3,222 | 57.1% | 40.5% | 57.8% | 67.9% |
| Unknown | 9 | 11.1% | 807 | 14.3% | 0.0% | 5.2% | 5.0% |
| **TOTAL** | **81** | **100.0%** | **5,642** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 4 | 9.5% | 134 | 2.8% | 21.5% | 11.6% | 7.7% |
| Moderate | 10 | 23.8% | 610 | 12.7% | 17.7% | 19.8% | 15.5% |
| Middle | 7 | 16.7% | 381 | 7.9% | 20.3% | 16.8% | 12.7% |
| Upper | 19 | 45.2% | 3,633 | 75.6% | 40.5% | 44.8% | 55.4% |
| Unknown | 2 | 4.8% | 49 | 1.0% | 0.0% | 7.0% | 8.8% |
| **TOTAL** | **42** | **100.0%** | **4,807** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.5% | 0.4% | 0.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.7% | 0.6% | 0.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.3% | 0.4% | 0.2% |
| Upper | 1 | 33.3% | 259 | 54.9% | 40.5% | 0.7% | 1.4% |
| Unknown | 2 | 66.7% | 213 | 45.1% | 0.0% | 97.9% | 97.6% |
| **TOTAL** | **3** | **100.0%** | **472** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Total Home Mortgage Loans | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 143 | 7.7% | 12,721 | 4.1% | 21.5% | 6.7% | 3.3% |
| Moderate | 345 | 18.5% | 40,176 | 12.9% | 17.7% | 17.7% | 11.6% |
| Middle | 365 | 19.6% | 46,339 | 14.9% | 20.3% | 20.0% | 16.0% |
| Upper | 796 | 42.8% | 178,268 | 57.5% | 40.5% | 36.2% | 43.8% |
| Unknown | 211 | 11.3% | 32,760 | 10.6% | 0.0% | 19.3% | 25.4% |
| **TOTAL** | **1,860** | **100.0%** | **310,264** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 13 Distribution of 2018 Small Business Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | **2018** | | | | | |
| **Business Revenue and Loan Size** | | **Count** | | **Dollars** | | | **Total Businesses** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| Business Revenue | $1 Million or Less | 525 | 53.2% | 42.4% | $37,733 | 37.0% | 35.2% | 90.6% |
| | Over $1 Million/ Unknown | 461 | 46.8% | 57.6% | $64,344 | 63.0% | 64.8% | 9.4% |
| | **TOTAL** | **986** | **100.0%** | **100.0%** | **$102,077** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 760 | 77.1% | 91.9% | $26,939 | 26.4% | 31.9% | |
| | $100,001–$250,000 | 111 | 11.3% | 4.0% | $19,799 | 19.4% | 16.3% | |
| | $250,001–$1 Million | 115 | 11.7% | 4.1% | $55,339 | 54.2% | 51.8% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **986** | **100.0%** | **100.0%** | **$102,077** | **100.0%** | **100.0%** | |
| Loan Size — Revenue $1 Million or Less | $100,000 or Less | 444 | 84.6% | | $14,798 | 39.2% | | |
| | $100,001–$250,000 | 51 | 9.7% | | $8,706 | 23.1% | | |
| | $250,001–$1 Million | 30 | 5.7% | | $14,229 | 37.7% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **525** | **100.0%** | | **$37,733** | **100.0%** | | |

| | | Table 13 Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | |
|---|---|---|---|---|---|---|---|
| | | **2019** | | | | | |
| | | **Count** | | **Dollars** | | | **Total Businesses** |
| **Business Revenue and Loan Size** | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| **Business Revenue** | $1 Million or Less | 384 | 53.0% | 45.4% | $30,468 | 35.2% | 34.2% | 90.9% |
| | Over $1 Million/ Unknown | 341 | 47.0% | 54.6% | $56,082 | 64.8% | 65.8% | 9.1% |
| | **TOTAL** | **725** | **100.0%** | **100.0%** | **$86,550** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 517 | 71.3% | 92.5% | $20,024 | 23.1% | 33.3% | |
| | $100,001–$250,000 | 107 | 14.8% | 3.7% | $19,425 | 22.4% | 15.8% | |
| | $250,001–$1 Million | 101 | 13.9% | 3.8% | $47,101 | 54.4% | 50.8% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **725** | **100.0%** | **100.0%** | **$86,550** | **100.0%** | **100.0%** | |
| **Loan Size** **Revenue $1 Million or Less** | $100,000 or Less | 309 | 42.6% | | $10,174 | 11.8% | | |
| | $100,001–$250,000 | 47 | 6.5% | | $7,944 | 9.2% | | |
| | $250,001–$1 Million | 28 | 3.9% | | $12,350 | 14.3% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **384** | **53.0%** | | **$30,468** | **35.2%** | | |

| Table 14 Distribution of 2018 Small Farm Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | 2018 | | | | | |
| | | Count | | | Dollars | | Farms |
| **Farm Revenue and Loan Size** | | Bank | | Aggregate | Bank | | Aggregate |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| **Farm Revenue** | $1 Million or Less | 83 | 92.2% | 68.5% | 5,337 | 82.8% | 82.2% | 98.4% |
| | Over $1 Million/ Unknown | 7 | 7.8% | 31.5% | 1,110 | 17.2% | 17.8% | 1.6% |
| | **TOTAL** | **90** | **100.0%** | **100.0%** | **6,447** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 69 | 76.7% | 84.9% | 1,879 | 29.1% | 38.2% | |
| | $100,001–$250,000 | 14 | 15.6% | 10.2% | 2,112 | 32.8% | 30.3% | |
| | $250,001–$500,000 | 7 | 7.8% | 4.9% | 2,456 | 38.1% | 31.5% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **90** | **100.0%** | **100.0%** | **6,447** | **100.0%** | **100.0%** | |
| **Loan Size** **Revenue $1 Million or Less** | $100,000 or Less | 65 | 78.3% | | 1,644 | 30.8% | | |
| | $100,001–$250,000 | 12 | 14.5% | | 1,737 | 32.5% | | |
| | $250,001–$1 Million | 6 | 7.2% | | 1,956 | 36.6% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **83** | **100.0%** | | **5,337** | **100.0%** | | |

| Table 14 Distribution of 2019 Small Farm Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Farm Revenue and Loan Size** | | **2019** | | | | | |
| | | **Count** | | **Dollars** | | | **Farms** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |

| Farm Revenue | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
|---|---|---|---|---|---|---|---|---|
| **Farm Revenue** | $1 Million or Less | 98 | 88.3% | 77.4% | 9,398 | 92.8% | 86.0% | 98.6% |
| | Over $1 Million/ Unknown | 13 | 11.7% | 22.6% | 726 | 7.2% | 14.0% | 1.4% |
| | **TOTAL** | **111** | **100.0%** | **100.0%** | **10,124** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 82 | 73.9% | 84.2% | 2,438 | 24.1% | 37.1% | |
| | $100,001–$250,000 | 15 | 13.5% | 9.9% | 2,503 | 24.7% | 27.0% | |
| | $250,001–$500,000 | 14 | 12.6% | 5.9% | 5,183 | 51.2% | 35.9% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **111** | **100.0%** | **100.0%** | **10,124** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 71 | 72.4% | | 2,162 | 23.0% | | |
| | $100,001–$250,000 | 13 | 13.3% | | 2,053 | 21.8% | | |
| | $250,001–$1 Million | 14 | 14.3% | | 5,183 | 55.2% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **98** | **100.0%** | | **9,398** | **100.0%** | | |

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## Lawton MSA

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Home Purchase Loans** | | | | | | | |
| Low | 2 | 1.3% | 167 | 0.9% | 3.9% | 1.1% | 0.4% |
| Moderate | 27 | 17.3% | 2,120 | 11.7% | 15.6% | 11.0% | 7.5% |
| Middle | 61 | 39.1% | 5,347 | 29.4% | 43.2% | 39.3% | 32.1% |
| Upper | 66 | 42.3% | 10,563 | 58.0% | 37.2% | 48.6% | 59.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **156** | **100.0%** | **18,197** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 2 | 2.0% | 86 | 1.1% | 3.9% | 2.4% | 0.9% |
| Moderate | 15 | 15.3% | 864 | 11.5% | 15.6% | 10.5% | 6.2% |
| Middle | 52 | 53.1% | 3,409 | 45.6% | 43.2% | 42.4% | 33.0% |
| Upper | 29 | 29.6% | 3,125 | 41.8% | 37.2% | 44.6% | 59.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.3% |
| **TOTAL** | **98** | **100.0%** | **7,484** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 1 | 2.9% | 26 | 1.3% | 3.9% | 4.2% | 2.2% |
| Moderate | 7 | 20.0% | 177 | 9.2% | 15.6% | 12.6% | 9.9% |
| Middle | 13 | 37.1% | 612 | 31.8% | 43.2% | 47.4% | 40.0% |
| Upper | 14 | 40.0% | 1,112 | 57.7% | 37.2% | 35.8% | 47.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **35** | **100.0%** | **1,927** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 9.4% | 0.0% | 0.0% |
| Moderate | 1 | 33.3% | 249 | 32.4% | 35.0% | 46.2% | 18.2% |
| Middle | 2 | 66.7% | 520 | 67.6% | 40.4% | 38.5% | 26.8% |
| Upper | 0 | 0.0% | 0 | 0.0% | 15.2% | 15.4% | 55.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| **TOTAL** | **3** | **100.0%** | **769** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.9% | 0.0% | 0.0% |
| Moderate | 2 | 16.7% | 76 | 15.5% | 15.6% | 10.5% | 9.0% |
| Middle | 8 | 66.7% | 271 | 55.2% | 43.2% | 52.6% | 44.1% |
| Upper | 2 | 16.7% | 144 | 29.3% | 37.2% | 36.8% | 46.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **12** | **100.0%** | **491** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Table 8.1**
**Distribution of 2018 Home Mortgage Lending**
**By Income Level of Geography**

| Other Purpose Closed/Exempt | | | | | | |
|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 3.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.6% | 17.4% | 13.2% |
| Middle | 2 | 100.0% | 76 | 100.0% | 43.2% | 47.8% | 43.5% |
| Upper | 0 | 0.0% | 0 | 0.0% | 37.2% | 34.8% | 43.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **2** | **100.0%** | **76** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.9% | 2.0% | 0.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.6% | 20.4% | 13.4% |
| Middle | 0 | 0.0% | 0 | 0.0% | 43.2% | 48.0% | 45.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 37.2% | 29.6% | 40.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | |
| Low | 5 | 1.6% | 279 | 1.0% | 3.9% | 1.5% | 0.6% |
| Moderate | 52 | 17.0% | 3,486 | 12.0% | 15.6% | 11.7% | 7.8% |
| Middle | 138 | 45.1% | 10,235 | 35.4% | 43.2% | 41.0% | 32.8% |
| Upper | 111 | 36.3% | 14,944 | 51.6% | 37.2% | 45.8% | 58.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.1% |
| **TOTAL** | **306** | **100.0%** | **28,944** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 8.1 Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | |
|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | $ | $ % | | # % | $ % |
| Home Purchase Loans | | | | | | | |
| Low | 3 | 1.8% | 65 | 0.4% | 3.9% | 1.2% | 0.5% |
| Moderate | 25 | 15.3% | 1,442 | 7.9% | 15.6% | 10.3% | 6.6% |
| Middle | 71 | 43.6% | 5,581 | 30.6% | 43.2% | 39.9% | 32.2% |
| Upper | 64 | 39.3% | 11,179 | 61.2% | 37.2% | 48.6% | 60.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **163** | **100.0%** | **18,267** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.9% | 0.8% | 0.2% |
| Moderate | 14 | 15.4% | 1,143 | 13.1% | 15.6% | 9.3% | 5.6% |
| Middle | 43 | 47.3% | 3,105 | 35.6% | 43.2% | 40.3% | 32.2% |
| Upper | 34 | 37.4% | 4,462 | 51.2% | 37.2% | 49.5% | 61.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.2% |
| **TOTAL** | **91** | **100.0%** | **8,710** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Home Improvement | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 3.9% | 2.8% | 1.6% |
| Moderate | 6 | 23.1% | 162 | 16.1% | 15.6% | 13.2% | 11.8% |
| Middle | 11 | 42.3% | 436 | 43.3% | 43.2% | 44.3% | 41.4% |
| Upper | 9 | 34.6% | 410 | 40.7% | 37.2% | 39.6% | 45.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **26** | **100.0%** | **1,008** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | **% of Multifamily Units** | | |
| Low | 1 | 12.5% | 161 | 11.5% | 9.4% | 9.1% | 45.9% |
| Moderate | 3 | 37.5% | 320 | 22.9% | 35.0% | 40.9% | 21.3% |
| Middle | 4 | 50.0% | 918 | 65.6% | 40.4% | 45.5% | 16.8% |
| Upper | 0 | 0.0% | 0 | 0.0% | 15.2% | 4.5% | 16.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| **TOTAL** | **8** | **100.0%** | **1,399** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | **% of Owner-Occupied Units** | | |
| Low | 1 | 5.9% | 20 | 2.2% | 3.9% | 6.4% | 2.3% |
| Moderate | 2 | 11.8% | 51 | 5.6% | 15.6% | 6.4% | 5.1% |
| Middle | 8 | 47.1% | 429 | 47.3% | 43.2% | 38.3% | 33.5% |
| Upper | 6 | 35.3% | 407 | 44.9% | 37.2% | 48.9% | 59.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **17** | **100.0%** | **907** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.9% | 4.2% | 2.5% |
| Moderate | 1 | 100.0% | 20 | 100.0% | 15.6% | 12.5% | 17.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 43.2% | 37.5% | 30.6% |
| Upper | 0 | 0.0% | 0 | 0.0% | 37.2% | 45.8% | 49.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1** | **100.0%** | **20** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.9% | 5.8% | 2.7% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.6% | 14.0% | 9.2% |
| Middle | 0 | 0.0% | 0 | 0.0% | 43.2% | 47.1% | 45.3% |
| Upper | 0 | 0.0% | 0 | 0.0% | 37.2% | 33.1% | 42.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |

**Appendix C (continued)**

| Total Home Mortgage Loans | | | | | | |
|---|---|---|---|---|---|---|
| Low | 5 | 1.6% | 246 | 0.8% | 3.9% | 1.5% | 1.8% |
| Moderate | 51 | 16.7% | 3,138 | 10.4% | 15.6% | 10.4% | 6.9% |
| Middle | 137 | 44.8% | 10,469 | 34.5% | 43.2% | 40.5% | 32.2% |
| Upper | 113 | 36.9% | 16,458 | 54.3% | 37.2% | 47.6% | 59.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.1% |
| **TOTAL** | **306** | **100.0%** | **30,311** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9<br>Distribution of 2018 Small Business Lending<br>By Income Level of Geography | | | | | | |
|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 16 | 4.0% | $945 | 2.5% | 5.8% | 3.4% | 3.0% |
| Moderate | 148 | 37.2% | $17,400 | 46.3% | 35.2% | 31.9% | 45.7% |
| Middle | 90 | 22.6% | $8,072 | 21.5% | 34.4% | 32.0% | 23.8% |
| Upper | 144 | 36.2% | $11,184 | 29.7% | 24.5% | 30.9% | 27.1% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.1% | 1.8% | 0.4% |
| **TOTAL** | **398** | **100.0%** | **$37,601** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9<br>Distribution of 2019 Small Business Lending<br>By Income Level of Geography | | | | | | |
|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 15 | 4.1% | $1,447 | 4.5% | 5.8% | 3.0% | 2.9% |
| Moderate | 149 | 40.8% | $13,411 | 41.5% | 34.5% | 31.0% | 40.8% |
| Middle | 75 | 20.5% | $4,700 | 14.5% | 34.7% | 34.2% | 23.5% |
| Upper | 126 | 34.5% | $12,775 | 39.5% | 25.0% | 28.3% | 30.5% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.1% | 3.4% | 2.4% |
| **TOTAL** | **365** | **100.0%** | **$32,333** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10 — Distribution of 2018 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Farm Loans** | | | | **% of Farms** | **Aggregate of Peer Data** | |
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 2 | 3.0% | $75 | 1.7% | 1.2% | 1.6% | 0.7% |
| Moderate | 2 | 3.0% | $48 | 1.1% | 7.1% | 2.7% | 2.4% |
| Middle | 30 | 45.5% | $2,462 | 56.3% | 32.7% | 45.1% | 60.5% |
| Upper | 32 | 48.5% | $1,789 | 40.9% | 58.9% | 50.0% | 36.3% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.5% | 0.1% |
| **TOTAL** | **66** | **100.0%** | **$4,374** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10 — Distribution of 2019 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Farm Loans** | | | | **% of Farms** | **Aggregate of Peer Data** | |
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 2 | 2.4% | $137 | 3.1% | 1.7% | 1.0% | 1.1% |
| Moderate | 7 | 8.3% | $523 | 12.0% | 7.9% | 4.1% | 4.1% |
| Middle | 33 | 39.3% | $1,917 | 44.0% | 29.8% | 45.1% | 59.3% |
| Upper | 42 | 50.0% | $1,783 | 40.9% | 60.7% | 49.7% | 35.5% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **84** | **100.0%** | **$4,360** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 12.1** **Distribution of 2018 Home Mortgage Lending** **By Borrower Income Level** | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 7 | 4.5% | 557 | 3.1% | 22.6% | 4.3% | 2.2% |
| Moderate | 15 | 9.6% | 1,266 | 7.0% | 18.1% | 11.2% | 7.8% |
| Middle | 36 | 23.1% | 3,452 | 19.0% | 18.7% | 23.3% | 21.5% |
| Upper | 59 | 37.8% | 9,479 | 52.1% | 40.7% | 32.2% | 40.4% |
| Unknown | 39 | 25.0% | 3,443 | 18.9% | 0.0% | 29.0% | 28.2% |
| **TOTAL** | **156** | **100.0%** | **18,197** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 3 | 3.1% | 98 | 1.3% | 22.6% | 4.2% | 2.4% |
| Moderate | 16 | 16.3% | 895 | 12.0% | 18.1% | 11.1% | 7.5% |
| Middle | 27 | 27.6% | 1,633 | 21.8% | 18.7% | 19.2% | 15.1% |
| Upper | 40 | 40.8% | 3,926 | 52.5% | 40.7% | 41.9% | 46.9% |
| Unknown | 12 | 12.2% | 932 | 12.5% | 0.0% | 23.7% | 28.0% |
| **TOTAL** | **98** | **100.0%** | **7,484** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 2 | 5.7% | 88 | 4.6% | 22.6% | 7.4% | 5.1% |
| Moderate | 5 | 14.3% | 161 | 8.4% | 18.1% | 11.6% | 9.0% |
| Middle | 7 | 20.0% | 468 | 24.3% | 18.7% | 16.8% | 17.6% |
| Upper | 18 | 51.4% | 959 | 49.8% | 40.7% | 42.1% | 41.1% |
| Unknown | 3 | 8.6% | 251 | 13.0% | 0.0% | 22.1% | 27.2% |
| **TOTAL** | **35** | **100.0%** | **1,927** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.6% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.1% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.7% | 0.0% | 0.0% |
| Upper | 1 | 33.3% | 237 | 30.8% | 40.7% | 7.7% | 2.0% |
| Unknown | 2 | 66.7% | 532 | 69.2% | 0.0% | 92.3% | 98.0% |
| **TOTAL** | **3** | **100.0%** | **769** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.6% | 5.3% | 8.6% |
| Moderate | 2 | 16.7% | 83 | 16.9% | 18.1% | 10.5% | 9.9% |
| Middle | 6 | 50.0% | 181 | 36.9% | 18.7% | 36.8% | 27.5% |
| Upper | 4 | 33.3% | 227 | 46.2% | 40.7% | 47.4% | 54.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **12** | **100.0%** | **491** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 1 | 50.0% | 35 | 46.1% | 22.6% | 8.7% | 6.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.1% | 28.3% | 23.0% |
| Middle | 1 | 50.0% | 41 | 53.9% | 18.7% | 15.2% | 17.6% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.7% | 45.7% | 50.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 2.2% | 2.6% |
| **TOTAL** | **2** | **100.0%** | **76** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.6% | 0.7% | 0.6% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.1% | 0.7% | 0.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.7% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.7% | 2.0% | 4.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 96.7% | 94.6% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 13 | 4.2% | 778 | 2.7% | 22.6% | 4.3% | 2.2% |
| Moderate | 38 | 12.4% | 2,405 | 8.3% | 18.1% | 10.9% | 7.4% |
| Middle | 77 | 25.2% | 5,775 | 20.0% | 18.7% | 20.8% | 18.7% |
| Upper | 122 | 39.9% | 14,828 | 51.2% | 40.7% | 33.3% | 39.5% |
| Unknown | 56 | 18.3% | 5,158 | 17.8% | 0.0% | 30.7% | 32.3% |
| **TOTAL** | **306** | **100.0%** | **28,944** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1<br>Distribution of 2019 Home Mortgage Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Loans** | | | | **Families by Family Income %** | **Aggregate HMDA Data** | |
| | **#** | **# %** | **$** | **$ %** | | **# %** | **$ %** |
| Home Purchase Loans | | | | | | | |
| Low | 15 | 9.2% | 1,161 | 6.4% | 22.6% | 6.6% | 3.3% |
| Moderate | 31 | 19.0% | 2,347 | 12.8% | 18.1% | 17.0% | 12.6% |
| Middle | 22 | 13.5% | 2,878 | 15.8% | 18.7% | 25.6% | 26.7% |
| Upper | 44 | 27.0% | 7,734 | 42.3% | 40.7% | 30.5% | 40.7% |
| Unknown | 51 | 31.3% | 4,147 | 22.7% | 0.0% | 20.2% | 16.7% |
| **TOTAL** | **163** | **100.0%** | **18,267** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Refinance | | | | | | | |
| Low | 5 | 5.5% | 158 | 1.8% | 22.6% | 6.3% | 2.6% |
| Moderate | 15 | 16.5% | 704 | 8.1% | 18.1% | 11.1% | 7.5% |
| Middle | 20 | 22.0% | 1,576 | 18.1% | 18.7% | 17.0% | 12.9% |
| Upper | 34 | 37.4% | 4,105 | 47.1% | 40.7% | 29.6% | 32.5% |
| Unknown | 17 | 18.7% | 2,167 | 24.9% | 0.0% | 35.9% | 44.5% |
| **TOTAL** | **91** | **100.0%** | **8,710** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Home Improvement | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 1 | 3.8% | 60 | 6.0% | 22.6% | 3.8% | 2.9% |
| Moderate | 3 | 11.5% | 140 | 13.9% | 18.1% | 17.0% | 17.1% |
| Middle | 6 | 23.1% | 140 | 13.9% | 18.7% | 17.9% | 11.0% |
| Upper | 11 | 42.3% | 447 | 44.3% | 40.7% | 44.3% | 48.5% |
| Unknown | 5 | 19.2% | 221 | 21.9% | 0.0% | 17.0% | 20.5% |
| **TOTAL** | **26** | **100.0%** | **1,008** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.6% | 0.0% | 0.0% |
| Moderate | 1 | 12.5% | 486 | 34.7% | 18.1% | 4.5% | 3.6% |
| Middle | 1 | 12.5% | 45 | 3.2% | 18.7% | 9.1% | 0.9% |
| Upper | 3 | 37.5% | 481 | 34.4% | 40.7% | 22.7% | 4.4% |
| Unknown | 3 | 37.5% | 387 | 27.7% | 0.0% | 63.6% | 91.1% |
| **TOTAL** | **8** | **100.0%** | **1,399** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 2 | 11.8% | 55 | 6.1% | 22.6% | 10.6% | 5.7% |
| Moderate | 5 | 29.4% | 186 | 20.5% | 18.1% | 12.8% | 8.1% |
| Middle | 3 | 17.6% | 85 | 9.4% | 18.7% | 21.3% | 19.5% |
| Upper | 6 | 35.3% | 486 | 53.6% | 40.7% | 51.1% | 62.0% |
| Unknown | 1 | 5.9% | 95 | 10.5% | 0.0% | 4.3% | 4.8% |
| **TOTAL** | **17** | **100.0%** | **907** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.6% | 16.7% | 8.3% |
| Moderate | 1 | 100.0% | 20 | 100.0% | 18.1% | 20.8% | 19.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.7% | 16.7% | 28.6% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.7% | 33.3% | 25.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 12.5% | 18.9% |
| **TOTAL** | **1** | **100.0%** | **20** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.6% | 0.8% | 0.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.1% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.7% | 0.8% | 1.3% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.7% | 0.0% | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 98.3% | 98.3% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |

| Total Home Mortgage Loans | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 23 | 7.5% | 1,434 | 4.7% | 22.6% | 6.3% | 3.0% |
| Moderate | 56 | 18.3% | 3,883 | 12.8% | 18.1% | 14.5% | 10.4% |
| Middle | 52 | 17.0% | 4,724 | 15.6% | 18.7% | 21.6% | 20.8% |
| Upper | 98 | 32.0% | 13,253 | 43.7% | 40.7% | 29.8% | 36.1% |
| Unknown | 77 | 25.2% | 7,017 | 23.2% | 0.0% | 27.9% | 29.8% |
| **TOTAL** | **306** | **100.0%** | **30,311** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 13<br>Distribution of 2018 Small Business Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | **2018** | | | | | |
| | | **Count** | | **Dollars** | | | **Total Businesses** |
| **Business Revenue and Loan Size** | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| Business Revenue | $1 Million or Less | 318 | 79.9% | 55.8% | $26,231 | 69.8% | 63.4% | 91.3% |
| Business Revenue | Over $1 Million/ Unknown | 80 | 20.1% | 44.2% | $11,370 | 30.2% | 36.6% | 8.7% |
| | **TOTAL** | **398** | **100.0%** | **100.0%** | **$37,601** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 318 | 79.9% | 90.1% | $11,563 | 30.8% | 35.3% | |
| Loan Size | $100,001–$250,000 | 43 | 10.8% | 5.7% | $7,188 | 19.1% | 19.6% | |
| Loan Size | $250,001–$1 Million | 37 | 9.3% | 4.2% | $18,850 | 50.1% | 45.1% | |
| Loan Size | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **398** | **100.0%** | **100.0%** | **$37,601** | **100.0%** | **100.0%** | |
| Loan Size / Revenue $1 Million or Less | $100,000 or Less | 260 | 81.8% | | $9,354 | 35.7% | | |
| Loan Size / Revenue $1 Million or Less | $100,001–$250,000 | 33 | 10.4% | | $5,372 | 20.5% | | |
| Loan Size / Revenue $1 Million or Less | $250,001–$1 Million | 25 | 7.9% | | $11,505 | 43.9% | | |
| Loan Size / Revenue $1 Million or Less | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **318** | **100.0%** | | **$26,231** | **100.0%** | | |

| Table 13 Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Business Revenue and Loan Size** | | **2019** | | | | | |
| | | **Count** | | **Dollars** | | | **Total Businesses** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Business Revenue** | $1 Million or Less | 218 | 59.7% | 43.4% | $17,889 | 55.3% | 50.5% | 92.2% |
| | Over $1 Million/ Unknown | 147 | 40.3% | 56.6% | $14,444 | 44.7% | 49.5% | 7.8% |
| | **TOTAL** | **365** | **100.0%** | **100.0%** | **$32,333** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 294 | 80.5% | 91.8% | $11,537 | 35.7% | 41.7% | |
| | $100,001–$250,000 | 42 | 11.5% | 5.4% | $6,639 | 20.5% | 20.6% | |
| | $250,001–$1 Million | 29 | 7.9% | 2.9% | $14,157 | 43.8% | 37.7% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **365** | **100.0%** | **100.0%** | **$32,333** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 179 | 49.0% | | $6,508 | 20.1% | | |
| | $100,001–$250,000 | 23 | 6.3% | | $3,654 | 11.3% | | |
| | $250,001–$1 Million | 16 | 4.4% | | $7,727 | 23.9% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **218** | **59.7%** | | **$17,889** | **55.3%** | | |

| Table 14<br>Distribution of 2018 Small Farm Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Farm Revenue and Loan Size** | | **2018** | | | | | |
| | | **Count** | | **Dollars** | | **Farms** | |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Farm Revenue** | $1 Million or Less | 66 | 100.0% | 72.5% | 4,374 | 100.0% | 85.0% | 98.2% |
| | Over $1 Million/ Unknown | 0 | 0.0% | 27.5% | 0 | 0.0% | 15.0% | 1.8% |
| | **TOTAL** | **66** | **100.0%** | **100.0%** | **4,374** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 54 | 81.8% | 76.9% | 1,909 | 43.6% | 28.6% | |
| | $100,001–$250,000 | 10 | 15.2% | 16.5% | 1,839 | 42.0% | 39.4% | |
| | $250,001–$500,000 | 2 | 3.0% | 6.6% | 626 | 14.3% | 32.0% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **66** | **100.0%** | **100.0%** | **4,374** | **100.0%** | **100.0%** | |
| **Loan Size** **Revenue $1 Million or Less** | $100,000 or Less | 54 | 81.8% | | 1,909 | 43.6% | | |
| | $100,001–$250,000 | 10 | 15.2% | | 1,839 | 42.0% | | |
| | $250,001–$1 Million | 2 | 3.0% | | 626 | 14.3% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **66** | **100.0%** | | **4,374** | **100.0%** | | |

| Farm Revenue and Loan Size | | 2019 | | | | | |
|---|---|---|---|---|---|---|---|
| | | Count | | Dollars | | | Farms |
| | | Bank | Aggregate | Bank | | Aggregate | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| **Farm Revenue** | $1 Million or Less | 68 | 81.0% | 70.3% | 3,894 | 89.3% | 81.1% | 97.8% |
| | Over $1 Million/ Unknown | 16 | 19.0% | 29.7% | 466 | 10.7% | 18.9% | 2.2% |
| | **TOTAL** | **84** | **100.0%** | **100.0%** | **4,360** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 71 | 84.5% | 79.0% | 2,219 | 50.9% | 31.9% | |
| | $100,001–$250,000 | 13 | 15.5% | 16.4% | 2,141 | 49.1% | 41.5% | |
| | $250,001–$500,000 | 0 | 0.0% | 4.6% | 0 | 0.0% | 26.5% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **84** | **100.0%** | **100.0%** | **4,360** | **100.0%** | **100.0%** | |
| **Loan Size Revenue $1 Million or Less** | $100,000 or Less | 55 | 80.9% | | 1,753 | 45.0% | | |
| | $100,001–$250,000 | 13 | 19.1% | | 2,141 | 55.0% | | |
| | $250,001–$1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **68** | **100.0%** | | **3,894** | **100.0%** | | |

**Table 14**
**Distribution of 2019 Small Farm Lending**
**By Borrower Income Level**

**NonMSA Oklahoma**

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 8.1 — Distribution of 2018 Home Mortgage Lending By Income Level of Geography** | | | | | | | |
| *Home Purchase Loans* | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.6% | 0.4% | 0.4% |
| Moderate | 109 | 16.2% | 10,578 | 12.1% | 15.8% | 14.4% | 10.9% |
| Middle | 399 | 59.3% | 50,803 | 57.9% | 64.9% | 60.4% | 59.7% |
| Upper | 165 | 24.5% | 26,313 | 30.0% | 18.8% | 24.7% | 29.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.0% |
| **TOTAL** | **673** | **100.0%** | **87,694** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| *Refinance* | | | | | | | |
| Low | 1 | 0.3% | 54 | 0.2% | 0.6% | 0.2% | 0.1% |
| Moderate | 50 | 12.7% | 3,082 | 9.9% | 15.8% | 13.0% | 10.4% |
| Middle | 243 | 61.8% | 19,748 | 63.1% | 64.9% | 64.2% | 64.3% |
| Upper | 99 | 25.2% | 8,394 | 26.8% | 18.8% | 22.6% | 25.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **393** | **100.0%** | **31,278** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| *Home Improvement* | | | | | | | |
| Low | 1 | 0.9% | 39 | 0.7% | 0.6% | 0.7% | 0.8% |
| Moderate | 24 | 21.6% | 887 | 16.9% | 15.8% | 15.2% | 11.2% |
| Middle | 61 | 55.0% | 2,946 | 56.1% | 64.9% | 59.0% | 59.3% |
| Upper | 25 | 22.5% | 1,382 | 26.3% | 18.8% | 25.1% | 28.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **111** | **100.0%** | **5,254** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| *Multifamily Loans* — % of Multifamily Units | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 9.8% | 11.7% | 49.6% |
| Moderate | 3 | 37.5% | 493 | 25.4% | 28.1% | 27.3% | 7.7% |
| Middle | 4 | 50.0% | 221 | 11.4% | 45.9% | 49.4% | 19.8% |
| Upper | 1 | 12.5% | 1,230 | 63.3% | 16.2% | 11.7% | 22.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **8** | **100.0%** | **1,944** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| *Other Purpose LOC* — % of Owner-Occupied Units | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.6% | 0.0% | 0.0% |
| Moderate | 4 | 10.0% | 227 | 15.5% | 15.8% | 8.3% | 5.3% |
| Middle | 22 | 55.0% | 744 | 50.6% | 64.9% | 57.7% | 62.8% |
| Upper | 14 | 35.0% | 498 | 33.9% | 18.8% | 34.0% | 32.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **40** | **100.0%** | **1,469** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.6% | 0.0% | 0.0% |
| Moderate | 5 | 15.2% | 215 | 12.5% | 15.8% | 13.1% | 10.5% |
| Middle | 19 | 57.6% | 950 | 55.1% | 64.9% | 60.7% | 62.3% |
| Upper | 9 | 27.3% | 560 | 32.5% | 18.8% | 26.2% | 27.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **33** | **100.0%** | **1,725** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.6% | 0.6% | 0.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.8% | 18.1% | 12.1% |
| Middle | 1 | 100.0% | 111 | 100.0% | 64.9% | 57.7% | 58.6% |
| Upper | 0 | 0.0% | 0 | 0.0% | 18.8% | 23.6% | 29.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1** | **100.0%** | **111** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 2 | 0.2% | 93 | 0.1% | 0.6% | 0.4% | 3.6% |
| Moderate | 195 | 15.5% | 15,482 | 12.0% | 15.8% | 14.2% | 10.6% |
| Middle | 749 | 59.5% | 75,523 | 58.3% | 64.9% | 61.1% | 58.2% |
| Upper | 313 | 24.9% | 38,377 | 29.6% | 18.8% | 24.2% | 27.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1,259** | **100.0%** | **129,475** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Table 8.1**
**Distribution of 2019 Home Mortgage Lending**
**By Income Level of Geography**

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Home Purchase Loans** | | | | | | | |
| Low | 4 | 0.5% | 257 | 0.3% | 0.6% | 0.4% | 0.3% |
| Moderate | 111 | 15.1% | 10,638 | 11.1% | 15.3% | 13.4% | 10.3% |
| Middle | 442 | 60.1% | 57,738 | 60.3% | 65.2% | 61.0% | 60.0% |
| Upper | 179 | 24.3% | 27,117 | 28.3% | 19.0% | 25.2% | 29.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **736** | **100.0%** | **95,750** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 1 | 0.2% | 52 | 0.1% | 0.6% | 0.3% | 0.2% |
| Moderate | 66 | 15.1% | 6,647 | 13.6% | 15.3% | 12.0% | 9.4% |
| Middle | 265 | 60.8% | 29,948 | 61.3% | 65.2% | 63.3% | 63.4% |
| Upper | 104 | 23.9% | 12,196 | 25.0% | 19.0% | 24.4% | 27.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **436** | **100.0%** | **48,843** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.6% | 0.3% | 0.1% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Moderate | 17 | 15.2% | 699 | 12.2% | 15.3% | 15.4% | 12.8% |
| Middle | 64 | 57.1% | 2,924 | 51.0% | 65.2% | 59.9% | 58.7% |
| Upper | 31 | 27.7% | 2,107 | 36.8% | 19.0% | 24.4% | 28.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **112** | **100.0%** | **5,730** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 9.5% | 7.5% | 34.1% |
| Moderate | 5 | 35.7% | 1,431 | 40.8% | 26.9% | 27.1% | 19.5% |
| Middle | 9 | 64.3% | 2,079 | 59.2% | 46.9% | 53.3% | 23.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 16.7% | 12.1% | 23.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **14** | **100.0%** | **3,510** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **% of Owner-Occupied Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.6% | 0.0% | 0.0% |
| Moderate | 9 | 17.0% | 304 | 13.4% | 15.3% | 12.3% | 8.2% |
| Middle | 34 | 64.2% | 1,710 | 75.1% | 65.2% | 59.3% | 61.4% |
| Upper | 10 | 18.9% | 263 | 11.6% | 19.0% | 28.4% | 30.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **53** | **100.0%** | **2,277** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 1 | 1.8% | 45 | 1.3% | 0.6% | 0.2% | 0.1% |
| Moderate | 7 | 12.7% | 274 | 7.7% | 15.3% | 13.5% | 7.8% |
| Middle | 39 | 70.9% | 2,550 | 71.8% | 65.2% | 65.3% | 70.7% |
| Upper | 8 | 14.5% | 682 | 19.2% | 19.0% | 21.0% | 21.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **55** | **100.0%** | **3,551** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.6% | 0.9% | 1.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.3% | 18.3% | 14.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 65.2% | 57.6% | 55.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 19.0% | 23.2% | 29.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 6 | 0.4% | 354 | 0.2% | 0.6% | 0.5% | 2.6% |
| Moderate | 215 | 15.3% | 19,993 | 12.5% | 15.3% | 13.3% | 10.8% |
| Middle | 853 | 60.7% | 96,949 | 60.7% | 65.2% | 61.4% | 58.3% |
| Upper | 332 | 23.6% | 42,365 | 26.5% | 19.0% | 24.7% | 28.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1,406** | **100.0%** | **159,661** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Table 9**
**Distribution of 2018 Small Business Lending**
**By Income Level of Geography**

| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ 000s | $ % | | % | $ % |
| Low | 34 | 3.5% | $3,137 | 4.1% | 4.2% | 3.0% | 3.5% |
| Moderate | 153 | 16.0% | $11,538 | 14.9% | 22.9% | 16.2% | 16.9% |
| Middle | 552 | 57.6% | $46,194 | 59.7% | 56.7% | 57.5% | 57.5% |
| Upper | 220 | 22.9% | $16,482 | 21.3% | 16.3% | 19.6% | 20.9% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 3.7% | 1.2% |
| **TOTAL** | **959** | **100.0%** | **$77,351** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Table 9**
**Distribution of 2019 Small Business Lending**
**By Income Level of Geography**

| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ 000s | $ % | | % | $ % |
| Low | 21 | 2.6% | $2,483 | 3.5% | 4.1% | 2.8% | 3.7% |
| Moderate | 104 | 12.7% | $8,773 | 12.4% | 21.2% | 15.1% | 16.0% |
| Middle | 484 | 59.1% | $41,606 | 58.7% | 57.7% | 57.3% | 54.7% |
| Upper | 210 | 25.6% | $18,065 | 25.5% | 17.1% | 20.8% | 24.5% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 4.0% | 1.2% |
| **TOTAL** | **819** | **100.0%** | **$70,927** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Table 10<br>Distribution of 2018 Small Farm Lending<br>By Income Level of Geography | | | | | | |
|---|---|---|---|---|---|---|---|
| | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 1 | 0.1% | $201 | 0.4% | 0.1% | 0.1% | 0.2% |
| Moderate | 178 | 17.7% | $8,108 | 15.3% | 10.9% | 10.8% | 9.7% |
| Middle | 657 | 65.2% | $37,372 | 70.3% | 68.5% | 70.6% | 73.2% |
| Upper | 171 | 17.0% | $7,485 | 14.1% | 20.5% | 18.0% | 16.8% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.5% | 0.1% |
| **TOTAL** | **1,007** | **100.0%** | **$53,166** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Table 10<br>Distribution of 2019 Small Farm Lending<br>By Income Level of Geography | | | | | | |
|---|---|---|---|---|---|---|---|
| | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 1 | 0.1% | $176 | 0.3% | 0.2% | 0.1% | 0.1% |
| Moderate | 199 | 18.4% | $7,063 | 12.7% | 10.6% | 11.7% | 9.5% |
| Middle | 707 | 65.5% | $41,410 | 74.4% | 69.0% | 67.7% | 73.4% |
| Upper | 173 | 16.0% | $7,012 | 12.6% | 20.1% | 19.9% | 16.8% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.6% | 0.1% |
| **TOTAL** | **1,080** | **100.0%** | **$55,661** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| **Table 12.1** **Distribution of 2018 Home Mortgage Lending** **By Borrower Income Level** | | | | | | | |
| | # | # % | $ | $ % | | # % | $ % |
| **Home Purchase Loans** | | | | | | | |
| Low | 44 | 6.5% | 2,714 | 3.1% | 22.6% | 4.7% | 2.4% |
| Moderate | 123 | 18.3% | 10,704 | 12.2% | 17.8% | 14.8% | 9.5% |
| Middle | 158 | 23.5% | 18,056 | 20.6% | 20.3% | 20.5% | 18.0% |
| Upper | 311 | 46.2% | 52,413 | 59.8% | 39.3% | 40.5% | 51.9% |
| Unknown | 37 | 5.5% | 3,807 | 4.3% | 0.0% | 19.5% | 18.2% |
| **TOTAL** | **673** | **100.0%** | **87,694** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 36 | 9.2% | 1,640 | 5.2% | 22.6% | 6.9% | 3.5% |
| Moderate | 62 | 15.8% | 3,537 | 11.3% | 17.8% | 12.8% | 8.2% |
| Middle | 86 | 21.9% | 5,615 | 18.0% | 20.3% | 20.3% | 16.9% |
| Upper | 176 | 44.8% | 18,123 | 57.9% | 39.3% | 46.2% | 55.6% |
| Unknown | 33 | 8.4% | 2,363 | 7.6% | 0.0% | 13.8% | 15.8% |
| **TOTAL** | **393** | **100.0%** | **31,278** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 6 | 5.4% | 147 | 2.8% | 22.6% | 6.0% | 3.6% |
| Moderate | 20 | 18.0% | 724 | 13.8% | 17.8% | 13.3% | 9.5% |
| Middle | 22 | 19.8% | 967 | 18.4% | 20.3% | 19.7% | 17.4% |
| Upper | 49 | 44.1% | 2,567 | 48.9% | 39.3% | 51.1% | 53.8% |
| Unknown | 14 | 12.6% | 849 | 16.2% | 0.0% | 9.9% | 15.7% |
| **TOTAL** | **111** | **100.0%** | **5,254** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.6% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.8% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.3% | 2.6% | 0.3% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.3% | 13.0% | 3.3% |
| Unknown | 8 | 100.0% | 1,944 | 100.0% | 0.0% | 84.4% | 96.4% |
| **TOTAL** | **8** | **100.0%** | **1,944** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 5 | 12.5% | 130 | 8.8% | 22.6% | 4.5% | 2.5% |
| Moderate | 4 | 10.0% | 125 | 8.5% | 17.8% | 10.3% | 6.4% |
| Middle | 8 | 20.0% | 253 | 17.2% | 20.3% | 21.2% | 17.4% |
| Upper | 20 | 50.0% | 884 | 60.2% | 39.3% | 59.6% | 69.9% |
| Unknown | 3 | 7.5% | 77 | 5.2% | 0.0% | 4.5% | 3.8% |
| **TOTAL** | **40** | **100.0%** | **1,469** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 2 | 6.1% | 60 | 3.5% | 22.6% | 8.1% | 4.3% |
| Moderate | 7 | 21.2% | 327 | 19.0% | 17.8% | 16.2% | 12.0% |
| Middle | 7 | 21.2% | 453 | 26.3% | 20.3% | 20.6% | 19.5% |
| Upper | 17 | 51.5% | 885 | 51.3% | 39.3% | 50.1% | 58.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 5.0% | 5.6% |
| **TOTAL** | **33** | **100.0%** | **1,725** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.6% | 1.0% | 0.7% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.8% | 3.2% | 3.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.3% | 5.8% | 8.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.3% | 13.7% | 27.6% |
| Unknown | 1 | 100.0% | 111 | 100.0% | 0.0% | 76.2% | 60.5% |
| **TOTAL** | **1** | **100.0%** | **111** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 93 | 7.4% | 4,691 | 3.6% | 22.6% | 5.2% | 2.5% |
| Moderate | 216 | 17.2% | 15,417 | 11.9% | 17.8% | 13.7% | 8.4% |
| Middle | 281 | 22.3% | 25,344 | 19.6% | 20.3% | 19.8% | 16.3% |
| Upper | 573 | 45.5% | 74,872 | 57.8% | 39.3% | 41.8% | 49.1% |
| Unknown | 96 | 7.6% | 9,151 | 7.1% | 0.0% | 19.5% | 23.6% |
| **TOTAL** | **1,259** | **100.0%** | **129,475** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1 Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | $ | $ % | | # % | $ % |
| Home Purchase Loans | | | | | | | |
| Low | 35 | 4.8% | 2,046 | 2.1% | 22.7% | 4.6% | 2.1% |
| Moderate | 147 | 20.0% | 13,255 | 13.8% | 17.8% | 15.1% | 9.7% |
| Middle | 168 | 22.8% | 18,851 | 19.7% | 20.3% | 19.5% | 16.4% |
| Upper | 344 | 46.7% | 56,345 | 58.8% | 39.2% | 41.8% | 53.9% |
| Unknown | 42 | 5.7% | 5,253 | 5.5% | 0.0% | 19.0% | 17.8% |
| **TOTAL** | **736** | **100.0%** | **95,750** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Refinance | | | | | | | |
| Low | 22 | 5.0% | 1,390 | 2.8% | 22.7% | 5.3% | 2.4% |
| Moderate | 59 | 13.5% | 4,277 | 8.8% | 17.8% | 11.8% | 7.1% |
| Middle | 92 | 21.1% | 8,790 | 18.0% | 20.3% | 18.3% | 14.5% |
| Upper | 212 | 48.6% | 27,761 | 56.8% | 39.2% | 47.3% | 55.5% |
| Unknown | 51 | 11.7% | 6,625 | 13.6% | 0.0% | 17.3% | 20.5% |
| **TOTAL** | **436** | **100.0%** | **48,843** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Home Improvement | | | | | | | |
| Low | 9 | 8.0% | 388 | 6.8% | 22.7% | 6.2% | 3.6% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Moderate | 11 | 9.8% | 350 | 6.1% | 17.8% | 11.1% | 8.0% |
| Middle | 16 | 14.3% | 613 | 10.7% | 20.3% | 18.1% | 14.9% |
| Upper | 61 | 54.5% | 3,466 | 60.5% | 39.2% | 54.7% | 63.1% |
| Unknown | 15 | 13.4% | 913 | 15.9% | 0.0% | 9.9% | 10.5% |
| **TOTAL** | **112** | **100.0%** | **5,730** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.7% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.8% | 0.0% | 0.0% |
| Middle | 1 | 7.1% | 101 | 2.9% | 20.3% | 1.9% | 0.2% |
| Upper | 1 | 7.1% | 250 | 7.1% | 39.2% | 13.1% | 1.9% |
| Unknown | 12 | 85.7% | 3,159 | 90.0% | 0.0% | 85.0% | 97.9% |
| **TOTAL** | **14** | **100.0%** | **3,510** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 1 | 1.9% | 28 | 1.2% | 22.7% | 4.5% | 2.8% |
| Moderate | 7 | 13.2% | 180 | 7.9% | 17.8% | 11.9% | 10.1% |
| Middle | 16 | 30.2% | 570 | 25.0% | 20.3% | 17.3% | 12.8% |
| Upper | 18 | 34.0% | 811 | 35.6% | 39.2% | 53.9% | 56.5% |
| Unknown | 11 | 20.8% | 688 | 30.2% | 0.0% | 12.3% | 17.8% |
| **TOTAL** | **53** | **100.0%** | **2,277** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 2 | 3.6% | 26 | 0.7% | 22.7% | 11.2% | 5.4% |
| Moderate | 11 | 20.0% | 502 | 14.1% | 17.8% | 18.3% | 13.2% |
| Middle | 13 | 23.6% | 686 | 19.3% | 20.3% | 20.3% | 13.8% |
| Upper | 28 | 50.9% | 2,297 | 64.7% | 39.2% | 47.3% | 64.1% |
| Unknown | 1 | 1.8% | 40 | 1.1% | 0.0% | 3.0% | 3.5% |
| **TOTAL** | **55** | **100.0%** | **3,551** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.7% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.8% | 0.7% | 0.4% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.3% | 0.7% | 1.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.2% | 1.6% | 3.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 97.0% | 94.5% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 69 | 4.9% | 3,878 | 2.4% | 22.7% | 4.8% | 2.0% |
| Moderate | 235 | 16.7% | 18,564 | 11.6% | 17.8% | 13.6% | 8.1% |
| Middle | 306 | 21.8% | 29,611 | 18.5% | 20.3% | 18.4% | 14.4% |
| Upper | 664 | 47.2% | 90,930 | 57.0% | 39.2% | 42.5% | 49.7% |
| Unknown | 132 | 9.4% | 16,678 | 10.4% | 0.0% | 20.7% | 25.8% |
| **TOTAL** | **1,406** | **100.0%** | **159,661** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 13 Distribution of 2018 Small Business Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | **2018** | | | | | |
| | | **Count** | | **Dollars** | | | **Total Businesses** |
| **Business Revenue and Loan Size** | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| **Business Revenue** | $1 Million or Less | 763 | 79.6% | 48.8% | $50,373 | 65.1% | 48.1% | 89.6% |
| | Over $1 Million/ Unknown | 196 | 20.4% | 51.2% | $26,978 | 34.9% | 51.9% | 10.4% |
| | **TOTAL** | **959** | **100.0%** | **100.0%** | **$77,351** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 767 | 80.0% | 91.4% | $25,081 | 32.4% | 37.0% | |
| | $100,001–$250,000 | 125 | 13.0% | 5.0% | $21,004 | 27.2% | 19.5% | |
| | $250,001–$1 Million | 67 | 7.0% | 3.6% | $31,266 | 40.4% | 43.5% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **959** | **100.0%** | **100.0%** | **$77,351** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 642 | 84.1% | | $20,197 | 40.1% | | |
| | $100,001–$250,000 | 83 | 10.9% | | $13,928 | 27.6% | | |
| | $250,001–$1 Million | 38 | 5.0% | | $16,248 | 32.3% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **763** | **100.0%** | | **$50,373** | **100.0%** | | |

| Business Revenue and Loan Size | | Table 13<br>Distribution of 2019 Small Business Lending<br>By Borrower Income Level | | | | | |
|---|---|---|---|---|---|---|---|
| | | 2019 | | | | | |
| | | Count | | Dollars | | | Total Businesses |
| | | Bank | Aggregate | Bank | | Aggregate | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| **Business Revenue** | $1 Million or Less | 560 | 68.4% | 49.3% | $34,392 | 48.5% | 46.5% | 90.2% |
| | Over $1 Million/ Unknown | 259 | 31.6% | 50.7% | $36,535 | 51.5% | 53.5% | 9.8% |
| | **TOTAL** | **819** | **100.0%** | **100.0%** | **$70,927** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 649 | 79.2% | 92.0% | $22,899 | 32.3% | 39.0% | |
| | $100,001–$250,000 | 105 | 12.8% | 4.8% | $17,383 | 24.5% | 20.4% | |
| | $250,001–$1 Million | 65 | 7.9% | 3.2% | $30,645 | 43.2% | 40.6% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **819** | **100.0%** | **100.0%** | **$70,927** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 484 | 59.1% | | $15,661 | 22.1% | | |
| | $100,001–$250,000 | 53 | 6.5% | | $8,530 | 12.0% | | |
| | $250,001–$1 Million | 23 | 2.8% | | $10,201 | 14.4% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **560** | **68.4%** | | **$34,392** | **48.5%** | | |

| Table 14<br>Distribution of 2018 Small Farm Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | **2018** | | | | | |
| | | **Count** | | | **Dollars** | | **Farms** |
| **Farm Revenue and Loan Size** | | **Bank** | | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Farm Revenue** | $1 Million or Less | 986 | 97.9% | 83.8% | 51,357 | 96.6% | 89.8% | 98.1% |
| | Over $1 Million/ Unknown | 21 | 2.1% | 16.2% | 1,809 | 3.4% | 10.2% | 1.9% |
| | **TOTAL** | **1007** | **100.0%** | **100.0%** | **53,166** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 872 | 86.6% | 89.0% | 23,285 | 43.8% | 47.7% | |
| | $100,001–$250,000 | 93 | 9.2% | 7.6% | 15,201 | 28.6% | 26.6% | |
| | $250,001–$500,000 | 42 | 4.2% | 3.4% | 14,680 | 27.6% | 25.7% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **1007** | **100.0%** | **100.0%** | **53,166** | **100.0%** | **100.0%** | |
| **Loan Size** **Revenue $1 Million or Less** | $100,000 or Less | 856 | 86.8% | | 22,708 | 44.2% | | |
| | $100,001–$250,000 | 90 | 9.1% | | 14,600 | 28.4% | | |
| | $250,001–$1 Million | 40 | 4.1% | | 14,049 | 27.4% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **986** | **100.0%** | | **51,357** | **100.0%** | | |

**Appendix C (continued)**

| Table 14 — Distribution of 2019 Small Farm Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | **2019** | | | | | |
| **Farm Revenue and Loan Size** | | **Count** | | **Dollars** | | | **Farms** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Farm Revenue** | $1 Million or Less | 949 | 87.9% | 83.7% | 47,933 | 86.1% | 88.7% | 98.2% |
| | Over $1 Million/ Unknown | 131 | 12.1% | 16.3% | 7,728 | 13.9% | 11.3% | 1.8% |
| | **TOTAL** | **1080** | **100.0%** | **100.0%** | **55,661** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 936 | 86.7% | 88.7% | 25,248 | 45.4% | 47.8% | |
| | $100,001–$250,000 | 105 | 9.7% | 8.6% | 16,931 | 30.4% | 31.3% | |
| | $250,001–$500,000 | 39 | 3.6% | 2.7% | 13,482 | 24.2% | 20.9% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **1080** | **100.0%** | **100.0%** | **55,661** | **100.0%** | **100.0%** | |
| **Loan Size / Revenue $1 Million or Less** | $100,000 or Less | 828 | 87.2% | | 22,949 | 47.9% | | |
| | $100,001–$250,000 | 90 | 9.5% | | 14,537 | 30.3% | | |
| | $250,001–$1 Million | 31 | 3.3% | | 10,447 | 21.8% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **949** | **100.0%** | | **47,933** | **100.0%** | | |

## MISSOURI

### Joplin MSA

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Home Purchase Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 52 | 18.4% | 4,803 | 12.8% | 10.7% | 13.0% | 9.3% |
| Middle | 173 | 61.1% | 22,384 | 59.4% | 71.0% | 64.3% | 64.7% |
| Upper | 58 | 20.5% | 10,466 | 27.8% | 18.3% | 22.6% | 26.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **283** | **100.0%** | **37,653** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 21 | 16.5% | 1,325 | 11.8% | 10.7% | 10.3% | 7.8% |
| Middle | 87 | 68.5% | 7,875 | 69.9% | 71.0% | 71.6% | 71.2% |
| Upper | 19 | 15.0% | 2,073 | 18.4% | 18.3% | 18.0% | 21.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **127** | **100.0%** | **11,273** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 2 | 6.5% | 37 | 3.1% | 10.7% | 11.7% | 11.2% |
| Middle | 20 | 64.5% | 650 | 53.8% | 71.0% | 67.8% | 63.3% |
| Upper | 9 | 29.0% | 522 | 43.2% | 18.3% | 20.5% | 25.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **31** | **100.0%** | **1,209** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 2 | 25.0% | 426 | 16.5% | 31.7% | 27.3% | 23.8% |
| Middle | 6 | 75.0% | 2,154 | 83.5% | 58.9% | 50.0% | 53.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 9.4% | 22.7% | 22.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **8** | **100.0%** | **2,580** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 10.7% | 7.8% | 5.9% |
| Middle | 11 | 61.1% | 616 | 57.0% | 71.0% | 67.5% | 68.3% |
| Upper | 7 | 38.9% | 464 | 43.0% | 18.3% | 24.7% | 25.7% |

Table 8.1
Distribution of 2018 Home Mortgage Lending
By Income Level of Geography

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **18** | **100.0%** | **1,080** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 8.3% | 26 | 3.5% | 10.7% | 9.1% | 6.0% |
| Middle | 8 | 66.7% | 319 | 43.3% | 71.0% | 63.6% | 51.1% |
| Upper | 3 | 25.0% | 391 | 53.1% | 18.3% | 27.3% | 42.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **12** | **100.0%** | **736** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 10.7% | 14.0% | 10.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 71.0% | 66.7% | 68.3% |
| Upper | 0 | 0.0% | 0 | 0.0% | 18.3% | 19.3% | 21.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 78 | 16.3% | 6,617 | 12.1% | 10.7% | 12.4% | 9.9% |
| Middle | 305 | 63.7% | 33,998 | 62.3% | 71.0% | 66.0% | 65.3% |
| Upper | 96 | 20.0% | 13,916 | 25.5% | 18.3% | 21.5% | 24.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **479** | **100.0%** | **54,531** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 8.1** **Distribution of 2019 Home Mortgage Lending** **By Income Level of Geography** | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 36 | 15.2% | 2,684 | 8.7% | 10.7% | 12.8% | 9.0% |
| Middle | 142 | 59.9% | 18,116 | 58.5% | 71.0% | 65.9% | 66.1% |
| Upper | 59 | 24.9% | 10,162 | 32.8% | 18.3% | 21.3% | 24.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **237** | **100.0%** | **30,962** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 13 | 8.3% | 1,157 | 6.7% | 10.7% | 8.5% | 5.8% |
| Middle | 100 | 64.1% | 10,344 | 59.5% | 71.0% | 68.5% | 68.4% |
| Upper | 43 | 27.6% | 5,879 | 33.8% | 18.3% | 23.1% | 25.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **156** | **100.0%** | **17,380** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 4 | 10.5% | 171 | 8.9% | 10.7% | 14.5% | 12.2% |
| Middle | 23 | 60.5% | 1,139 | 59.1% | 71.0% | 61.6% | 63.0% |
| Upper | 11 | 28.9% | 618 | 32.1% | 18.3% | 23.8% | 24.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **38** | **100.0%** | **1,928** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 3 | 42.9% | 3,661 | 79.0% | 31.7% | 35.7% | 34.9% |
| Middle | 3 | 42.9% | 650 | 14.0% | 58.9% | 51.8% | 44.8% |
| Upper | 1 | 14.3% | 323 | 7.0% | 9.4% | 12.5% | 20.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **7** | **100.0%** | **4,634** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **% of Owner-Occupied Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 10.7% | 6.3% | 4.4% |
| Middle | 11 | 61.1% | 651 | 69.6% | 71.0% | 66.3% | 71.1% |
| Upper | 7 | 38.9% | 284 | 30.4% | 18.3% | 27.5% | 24.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **18** | **100.0%** | **935** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 3 | 15.8% | 89 | 11.1% | 10.7% | 6.3% | 3.7% |
| Middle | 9 | 47.4% | 382 | 47.6% | 71.0% | 66.7% | 64.6% |
| Upper | 7 | 36.8% | 331 | 41.3% | 18.3% | 27.1% | 31.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **19** | **100.0%** | **802** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 10.7% | 13.3% | 10.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 71.0% | 72.2% | 73.5% |
| Upper | 0 | 0.0% | 0 | 0.0% | 18.3% | 14.4% | 15.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 59 | 12.4% | 7,762 | 13.7% | 10.7% | 11.7% | 9.4% |
| Middle | 288 | 60.6% | 31,282 | 55.2% | 71.0% | 66.4% | 65.7% |
| Upper | 128 | 26.9% | 17,597 | 31.1% | 18.3% | 21.9% | 24.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **475** | **100.0%** | **56,641** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9<br>Distribution of 2018 Small Business Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 39 | 14.6% | $3,331 | 11.1% | 18.8% | 17.0% | 15.1% |
| Middle | 174 | 65.2% | $17,373 | 57.8% | 67.9% | 68.0% | 68.0% |
| Upper | 54 | 20.2% | $9,329 | 31.1% | 13.2% | 14.0% | 16.6% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.9% | 0.3% |
| **TOTAL** | **267** | **100.0%** | **$30,033** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9<br>Distribution of 2019 Small Business Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 35 | 15.2% | $3,871 | 13.5% | 18.8% | 17.8% | 20.0% |
| Middle | 150 | 64.9% | $16,173 | 56.5% | 67.7% | 66.0% | 62.6% |
| Upper | 46 | 19.9% | $8,584 | 30.0% | 13.5% | 14.1% | 16.8% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 2.0% | 0.6% |
| **TOTAL** | **231** | **100.0%** | **$28,628** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Appendix C (continued)**

| Table 10<br>Distribution of 2018 Small Farm Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Farm Loans** | | | | **% of Farms** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **# %** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 1.0% | $500 | 4.6% | 2.4% | 1.4% | 5.4% |
| Middle | 100 | 99.0% | $10,479 | 95.4% | 92.8% | 95.2% | 94.0% |
| Upper | 0 | 0.0% | $0 | 0.0% | 4.8% | 3.4% | 0.6% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **101** | **100.0%** | **$10,979** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10<br>Distribution of 2019 Small Farm Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Farm Loans** | | | | **% of Farms** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **# %** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 1.5% | $500 | 8.7% | 2.4% | 2.3% | 7.3% |
| Middle | 66 | 98.5% | $5,239 | 91.3% | 92.8% | 93.1% | 87.3% |
| Upper | 0 | 0.0% | $0 | 0.0% | 4.8% | 4.1% | 5.2% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.5% | 0.2% |
| **TOTAL** | **67** | **100.0%** | **$5,739** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| **Table 12.1** **Distribution of 2018 Home Mortgage Lending** **By Borrower Income Level** | | | | | | | |
| | # | # % | $ | $ % | | # % | $ % |
| **Home Purchase Loans** | | | | | | | |
| Low | 43 | 15.2% | 2,421 | 6.4% | 19.9% | 7.5% | 4.0% |
| Moderate | 87 | 30.7% | 7,730 | 20.5% | 18.3% | 20.1% | 15.2% |
| Middle | 59 | 20.8% | 6,332 | 16.8% | 21.2% | 21.7% | 20.6% |
| Upper | 85 | 30.0% | 20,474 | 54.4% | 40.6% | 31.2% | 41.6% |
| Unknown | 9 | 3.2% | 696 | 1.8% | 0.0% | 19.5% | 18.6% |
| **TOTAL** | **283** | **100.0%** | **37,653** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 11 | 8.7% | 503 | 4.5% | 19.9% | 7.6% | 4.2% |
| Moderate | 15 | 11.8% | 1,088 | 9.7% | 18.3% | 16.8% | 13.2% |
| Middle | 23 | 18.1% | 1,975 | 17.5% | 21.2% | 20.4% | 18.0% |
| Upper | 70 | 55.1% | 6,785 | 60.2% | 40.6% | 37.9% | 46.6% |
| Unknown | 8 | 6.3% | 922 | 8.2% | 0.0% | 17.3% | 18.0% |
| **TOTAL** | **127** | **100.0%** | **11,273** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 3 | 9.7% | 52 | 4.3% | 19.9% | 9.9% | 6.1% |
| Moderate | 4 | 12.9% | 220 | 18.2% | 18.3% | 17.0% | 18.1% |
| Middle | 8 | 25.8% | 253 | 20.9% | 21.2% | 24.0% | 26.1% |
| Upper | 15 | 48.4% | 634 | 52.4% | 40.6% | 43.9% | 40.8% |
| Unknown | 1 | 3.2% | 50 | 4.1% | 0.0% | 5.3% | 8.9% |
| **TOTAL** | **31** | **100.0%** | **1,209** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 1.5% | 0.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.3% | 3.0% | 1.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.2% | 0.0% | 0.0% |
| Upper | 2 | 25.0% | 220 | 8.5% | 40.6% | 18.2% | 5.8% |
| Unknown | 6 | 75.0% | 2,360 | 91.5% | 0.0% | 77.3% | 92.8% |
| **TOTAL** | **8** | **100.0%** | **2,580** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 2 | 11.1% | 77 | 7.1% | 19.9% | 9.1% | 4.1% |
| Moderate | 1 | 5.6% | 19 | 1.8% | 18.3% | 20.8% | 13.3% |
| Middle | 4 | 22.2% | 166 | 15.4% | 21.2% | 16.9% | 15.4% |
| Upper | 9 | 50.0% | 518 | 48.0% | 40.6% | 48.1% | 60.3% |
| Unknown | 2 | 11.1% | 300 | 27.8% | 0.0% | 5.2% | 6.9% |
| **TOTAL** | **18** | **100.0%** | **1,080** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 1 | 8.3% | 21 | 2.9% | 19.9% | 6.5% | 3.1% |
| Moderate | 1 | 8.3% | 37 | 5.0% | 18.3% | 15.6% | 17.6% |
| Middle | 1 | 8.3% | 200 | 27.2% | 21.2% | 20.8% | 22.7% |
| Upper | 9 | 75.0% | 478 | 64.9% | 40.6% | 45.5% | 49.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 11.7% | 7.0% |
| **TOTAL** | **12** | **100.0%** | **736** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.3% | 2.6% | 1.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.2% | 2.6% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.6% | 0.9% | 1.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 93.9% | 97.5% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 60 | 12.5% | 3,074 | 5.6% | 19.9% | 7.3% | 3.8% |
| Moderate | 108 | 22.5% | 9,094 | 16.7% | 18.3% | 18.5% | 13.7% |
| Middle | 95 | 19.8% | 8,926 | 16.4% | 21.2% | 20.7% | 18.4% |
| Upper | 190 | 39.7% | 29,109 | 53.4% | 40.6% | 32.8% | 40.0% |
| Unknown | 26 | 5.4% | 4,328 | 7.9% | 0.0% | 20.7% | 24.1% |
| **TOTAL** | **479** | **100.0%** | **54,531** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1 Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | $ | $ % | | # % | $ % |
| Home Purchase Loans | | | | | | | |
| Low | 23 | 9.7% | 1,492 | 4.8% | 19.9% | 7.5% | 4.6% |
| Moderate | 57 | 24.1% | 5,835 | 18.8% | 18.3% | 22.5% | 18.0% |
| Middle | 45 | 19.0% | 5,171 | 16.7% | 21.2% | 21.4% | 20.9% |
| Upper | 87 | 36.7% | 15,914 | 51.4% | 40.6% | 30.5% | 40.0% |
| Unknown | 25 | 10.5% | 2,550 | 8.2% | 0.0% | 18.1% | 16.5% |
| **TOTAL** | **237** | **100.0%** | **30,962** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Refinance | | | | | | | |
| Low | 17 | 10.9% | 1,016 | 5.8% | 19.9% | 8.2% | 4.0% |
| Moderate | 26 | 16.7% | 2,039 | 11.7% | 18.3% | 13.4% | 9.3% |
| Middle | 23 | 14.7% | 2,941 | 16.9% | 21.2% | 17.5% | 16.1% |
| Upper | 73 | 46.8% | 9,780 | 56.3% | 40.6% | 41.4% | 49.8% |
| Unknown | 17 | 10.9% | 1,604 | 9.2% | 0.0% | 19.5% | 20.8% |
| **TOTAL** | **156** | **100.0%** | **17,380** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Home Improvement | | | | | | | |
| Low | 4 | 10.5% | 152 | 7.9% | 19.9% | 9.3% | 6.5% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Moderate | 2 | 5.3% | 35 | 1.8% | 18.3% | 17.4% | 13.5% |
| Middle | 3 | 7.9% | 65 | 3.4% | 21.2% | 15.1% | 13.9% |
| Upper | 26 | 68.4% | 1,579 | 81.9% | 40.6% | 49.4% | 59.1% |
| Unknown | 3 | 7.9% | 97 | 5.0% | 0.0% | 8.7% | 6.9% |
| **TOTAL** | **38** | **100.0%** | **1,928** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.3% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.2% | 1.8% | 0.4% |
| Upper | 2 | 28.6% | 526 | 11.4% | 40.6% | 23.2% | 7.4% |
| Unknown | 5 | 71.4% | 4,108 | 88.6% | 0.0% | 75.0% | 92.2% |
| **TOTAL** | **7** | **100.0%** | **4,634** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 1 | 5.6% | 48 | 5.1% | 19.9% | 6.3% | 3.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.3% | 10.0% | 6.4% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.2% | 23.8% | 21.7% |
| Upper | 14 | 77.8% | 820 | 87.7% | 40.6% | 53.8% | 66.4% |
| Unknown | 3 | 16.7% | 67 | 7.2% | 0.0% | 6.3% | 2.6% |
| **TOTAL** | **18** | **100.0%** | **935** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 2 | 10.5% | 124 | 15.5% | 19.9% | 18.8% | 15.4% |
| Moderate | 3 | 15.8% | 180 | 22.4% | 18.3% | 17.7% | 13.8% |
| Middle | 5 | 26.3% | 184 | 22.9% | 21.2% | 20.8% | 24.5% |
| Upper | 8 | 42.1% | 277 | 34.5% | 40.6% | 36.5% | 38.7% |
| Unknown | 1 | 5.3% | 37 | 4.6% | 0.0% | 6.3% | 7.5% |
| **TOTAL** | **19** | **100.0%** | **802** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.3% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.2% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.6% | 3.3% | 3.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 96.7% | 96.8% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 47 | 9.9% | 2,832 | 5.0% | 19.9% | 7.7% | 4.3% |
| Moderate | 88 | 18.5% | 8,089 | 14.3% | 18.3% | 19.1% | 14.5% |
| Middle | 76 | 16.0% | 8,361 | 14.8% | 21.2% | 19.7% | 18.4% |
| Upper | 210 | 44.2% | 28,896 | 51.0% | 40.6% | 33.9% | 41.0% |
| Unknown | 54 | 11.4% | 8,463 | 14.9% | 0.0% | 19.6% | 21.8% |
| **TOTAL** | **475** | **100.0%** | **56,641** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Business Revenue and Loan Size | | Table 13 Distribution of 2018 Small Business Lending By Borrower Income Level | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | 2018 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| Business Revenue | $1 Million or Less | 185 | 69.3% | 45.5% | $15,346 | 51.1% | 35.4% | 90.7% |
| | Over $1 Million/ Unknown | 82 | 30.7% | 54.5% | $14,687 | 48.9% | 64.6% | 9.3% |
| | **TOTAL** | **267** | **100.0%** | **100.0%** | **$30,033** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 194 | 72.7% | 91.1% | $6,842 | 22.8% | 30.0% | |
| | $100,001–$250,000 | 38 | 14.2% | 4.6% | $6,781 | 22.6% | 18.4% | |
| | $250,001–$1 Million | 35 | 13.1% | 4.3% | $16,410 | 54.6% | 51.6% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **267** | **100.0%** | **100.0%** | **$30,033** | **100.0%** | **100.0%** | |
| Loan Size / Revenue $1 Million or Less | $100,000 or Less | 147 | 79.5% | | $4,899 | 31.9% | | |
| | $100,001–$250,000 | 22 | 11.9% | | $3,673 | 23.9% | | |
| | $250,001–$1 Million | 16 | 8.6% | | $6,774 | 44.1% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **185** | **100.0%** | | **$15,346** | **100.0%** | | |

| Table 13 Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | 2019 | | | | | |
| **Business Revenue and Loan Size** | | Count | | Dollars | | | Total Businesses |
| | | Bank | Aggregate | Bank | | Aggregate | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| Business Revenue | $1 Million or Less | 153 | 66.2% | 39.9% | $10,706 | 37.4% | 34.5% | 91.0% |
| | Over $1 Million/ Unknown | 78 | 33.8% | 60.1% | $17,922 | 62.6% | 65.5% | 9.0% |
| | **TOTAL** | **231** | **100.0%** | **100.0%** | **$28,628** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 157 | 68.0% | 92.4% | $5,479 | 19.1% | 33.0% | |
| | $100,001–$250,000 | 39 | 16.9% | 4.1% | $6,334 | 22.1% | 18.0% | |
| | $250,001–$1 Million | 35 | 15.2% | 3.5% | $16,815 | 58.7% | 49.0% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **231** | **100.0%** | **100.0%** | **$28,628** | **100.0%** | **100.0%** | |
| Loan Size Revenue $1 Million or Less | $100,000 or Less | 127 | 55.0% | | $4,087 | 14.3% | | |
| | $100,001–$250,000 | 18 | 7.8% | | $3,030 | 10.6% | | |
| | $250,001–$1 Million | 8 | 3.5% | | $3,589 | 12.5% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **153** | **66.2%** | | **$10,706** | **37.4%** | | |

| Farm Revenue and Loan Size | | Table 14 Distribution of 2018 Small Farm Lending By Borrower Income Level | | | | | |
|---|---|---|---|---|---|---|---|
| | | **2018** | | | | | |
| | | **Count** | | | **Dollars** | | **Farms** |
| | | **Bank** | | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Farm Revenue** | $1 Million or Less | 98 | 97.0% | 72.1% | 10,532 | 95.9% | 81.7% | 98.8% |
| | Over $1 Million/ Unknown | 3 | 3.0% | 27.9% | 447 | 4.1% | 18.3% | 1.2% |
| | **TOTAL** | **101** | **100.0%** | **100.0%** | **10,979** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 64 | 63.4% | 77.9% | 2,212 | 20.1% | 27.4% | |
| | $100,001–$250,000 | 24 | 23.8% | 13.0% | 4,015 | 36.6% | 28.0% | |
| | $250,001–$500,000 | 13 | 12.9% | 9.1% | 4,752 | 43.3% | 44.6% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **101** | **100.0%** | **100.0%** | **10,979** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 62 | 63.3% | | 2,063 | 19.6% | | |
| | $100,001–$250,000 | 24 | 24.5% | | 4,015 | 38.1% | | |
| | $250,001–$1 Million | 12 | 12.2% | | 4,454 | 42.3% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **98** | **100.0%** | | **10,532** | **100.0%** | | |

| Table 14<br>Distribution of 2019 Small Farm Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | **2019** | | | | | |
| | | **Count** | | **Dollars** | | | **Farms** |
| **Farm Revenue and Loan Size** | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| Farm Revenue | $1 Million or Less | 60 | 89.6% | 71.1% | 5,133 | 89.4% | 84.7% | 99.2% |
| | Over $1 Million/ Unknown | 7 | 10.4% | 28.9% | 606 | 10.6% | 15.3% | 0.8% |
| | **TOTAL** | **67** | **100.0%** | **100.0%** | **5,739** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 51 | 76.1% | 84.4% | 1,725 | 30.1% | 34.1% | |
| | $100,001–$250,000 | 9 | 13.4% | 8.7% | 1,482 | 25.8% | 25.9% | |
| | $250,001–$500,000 | 7 | 10.4% | 6.9% | 2,532 | 44.1% | 40.0% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **67** | **100.0%** | **100.0%** | **5,739** | **100.0%** | **100.0%** | |
| Loan Size — Revenue $1 Million or Less | $100,000 or Less | 45 | 75.0% | | 1,548 | 30.2% | | |
| | $100,001–$250,000 | 9 | 15.0% | | 1,482 | 28.9% | | |
| | $250,001–$1 Million | 6 | 10.0% | | 2,103 | 41.0% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **60** | **100.0%** | | **5,133** | **100.0%** | | |

## Springfield MSA

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Home Purchase Loans** | | | | | | | |
| Low | 15 | 4.0% | 1,014 | 1.7% | 2.2% | 2.0% | 1.0% |
| Moderate | 49 | 13.1% | 3,758 | 6.2% | 14.7% | 12.7% | 7.9% |
| Middle | 229 | 61.2% | 37,588 | 62.3% | 62.4% | 65.3% | 64.3% |
| Upper | 81 | 21.7% | 18,003 | 29.8% | 20.7% | 19.9% | 26.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **374** | **100.0%** | **60,363** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 2 | 1.6% | 48 | 0.3% | 2.2% | 2.3% | 1.2% |
| Moderate | 27 | 21.8% | 2,248 | 14.4% | 14.7% | 13.7% | 8.9% |
| Middle | 66 | 53.2% | 8,661 | 55.5% | 62.4% | 63.5% | 62.6% |
| Upper | 28 | 22.6% | 4,592 | 29.4% | 20.7% | 20.4% | 27.3% |
| Unknown | 1 | 0.8% | 63 | 0.4% | 0.0% | 0.1% | 0.0% |
| **TOTAL** | **124** | **100.0%** | **15,612** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 2.0% | 2.2% |
| Moderate | 2 | 5.7% | 30 | 1.3% | 14.7% | 11.6% | 10.5% |
| Middle | 20 | 57.1% | 1,006 | 43.7% | 62.4% | 61.2% | 56.0% |
| Upper | 13 | 37.1% | 1,264 | 55.0% | 20.7% | 25.2% | 31.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **35** | **100.0%** | **2,300** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 8.2% | 5.9% | 5.0% |
| Moderate | 2 | 50.0% | 1,918 | 20.1% | 40.0% | 22.4% | 25.6% |
| Middle | 2 | 50.0% | 7,624 | 79.9% | 42.4% | 60.6% | 41.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 7.2% | 8.8% | 15.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 2.3% | 2.4% | 13.4% |
| **TOTAL** | **4** | **100.0%** | **9,542** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **% of Owner-Occupied Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 1.7% | 1.0% |
| Moderate | 3 | 11.1% | 160 | 8.8% | 14.7% | 8.1% | 6.1% |
| Middle | 18 | 66.7% | 972 | 53.3% | 62.4% | 58.2% | 51.4% |
| Upper | 6 | 22.2% | 691 | 37.9% | 20.7% | 31.9% | 41.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **TOTAL** | **27** | **100.0%** | **1,823** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 2.6% | 1.1% |
| Moderate | 3 | 21.4% | 150 | 14.6% | 14.7% | 13.7% | 8.6% |
| Middle | 8 | 57.1% | 659 | 64.0% | 62.4% | 57.9% | 50.6% |
| Upper | 3 | 21.4% | 221 | 21.5% | 20.7% | 25.8% | 39.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **14** | **100.0%** | **1,030** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 5.2% | 2.8% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.7% | 17.9% | 12.2% |
| Middle | 0 | 0.0% | 0 | 0.0% | 62.4% | 64.5% | 66.8% |
| Upper | 0 | 0.0% | 0 | 0.0% | 20.7% | 12.4% | 18.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 17 | 2.9% | 1,062 | 1.2% | 2.2% | 2.2% | 1.5% |
| Moderate | 86 | 14.9% | 8,264 | 9.1% | 14.7% | 13.0% | 10.3% |
| Middle | 343 | 59.3% | 56,510 | 62.3% | 62.4% | 64.5% | 60.9% |
| Upper | 131 | 22.7% | 24,771 | 27.3% | 20.7% | 20.3% | 25.7% |
| Unknown | 1 | 0.2% | 63 | 0.1% | 0.0% | 0.1% | 1.7% |
| **TOTAL** | **578** | **100.0%** | **90,670** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 8.1 — Distribution of 2019 Home Mortgage Lending By Income Level of Geography** | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 6 | 1.6% | 423 | 0.7% | 2.2% | 2.4% | 1.1% |
| Moderate | 46 | 12.6% | 3,622 | 5.9% | 14.7% | 12.8% | 8.0% |
| Middle | 231 | 63.5% | 37,740 | 61.0% | 62.4% | 65.7% | 65.7% |
| Upper | 81 | 22.3% | 20,083 | 32.5% | 20.7% | 19.2% | 25.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **364** | **100.0%** | **61,868** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 1.4% | 0.7% |
| Moderate | 15 | 7.5% | 1,316 | 4.3% | 14.7% | 9.5% | 5.7% |
| Middle | 132 | 65.7% | 19,236 | 62.8% | 62.4% | 65.1% | 62.7% |
| Upper | 54 | 26.9% | 10,100 | 33.0% | 20.7% | 23.9% | 30.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **201** | **100.0%** | **30,652** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 1 | 2.1% | 15 | 0.7% | 2.2% | 2.3% | 4.0% |
| Moderate | 5 | 10.6% | 197 | 8.9% | 14.7% | 13.1% | 8.8% |
| Middle | 31 | 66.0% | 1,403 | 63.7% | 62.4% | 63.8% | 59.4% |
| Upper | 10 | 21.3% | 587 | 26.7% | 20.7% | 20.8% | 27.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **47** | **100.0%** | **2,202** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 8.2% | 12.7% | 8.2% |
| Moderate | 7 | 77.8% | 4,803 | 89.1% | 40.0% | 25.3% | 37.9% |
| Middle | 2 | 22.2% | 590 | 10.9% | 42.4% | 52.0% | 40.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 7.2% | 8.0% | 10.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 2.3% | 2.0% | 4.0% |
| **TOTAL** | **9** | **100.0%** | **5,393** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 0.0% | 0.0% |
| Moderate | 2 | 5.3% | 97 | 5.3% | 14.7% | 6.7% | 4.1% |
| Middle | 19 | 50.0% | 761 | 41.2% | 62.4% | 60.2% | 55.4% |
| Upper | 17 | 44.7% | 987 | 53.5% | 20.7% | 33.1% | 40.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **38** | **100.0%** | **1,845** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 1.5% | 1.7% |
| Moderate | 2 | 13.3% | 100 | 10.1% | 14.7% | 14.6% | 11.7% |
| Middle | 12 | 80.0% | 683 | 69.1% | 62.4% | 63.2% | 60.3% |
| Upper | 1 | 6.7% | 205 | 20.7% | 20.7% | 20.7% | 26.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **15** | **100.0%** | **988** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 4.7% | 3.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.7% | 17.7% | 12.4% |
| Middle | 0 | 0.0% | 0 | 0.0% | 62.4% | 65.9% | 71.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 20.7% | 11.6% | 13.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 7 | 1.0% | 438 | 0.4% | 2.2% | 2.1% | 1.4% |
| Moderate | 77 | 11.4% | 10,135 | 9.8% | 14.7% | 11.8% | 9.1% |
| Middle | 427 | 63.4% | 60,413 | 58.7% | 62.4% | 65.2% | 63.1% |
| Upper | 163 | 24.2% | 31,962 | 31.0% | 20.7% | 20.8% | 26.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.2% |
| **TOTAL** | **674** | **100.0%** | **102,948** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9<br>Distribution of 2018 Small Business Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 5 | 2.1% | $365 | 1.1% | 2.2% | 1.8% | 2.0% |
| Moderate | 74 | 30.7% | $11,009 | 33.0% | 24.2% | 23.9% | 31.9% |
| Middle | 122 | 50.6% | $16,502 | 49.5% | 57.1% | 55.5% | 49.5% |
| Upper | 40 | 16.6% | $5,459 | 16.4% | 16.2% | 17.6% | 16.0% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.3% | 1.2% | 0.6% |
| **TOTAL** | **241** | **100.0%** | **$33,335** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9<br>Distribution of 2019 Small Business Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 3 | 1.5% | $173 | 0.6% | 2.2% | 1.6% | 2.0% |
| Moderate | 62 | 30.1% | $12,712 | 43.8% | 24.4% | 23.6% | 32.5% |
| Middle | 112 | 54.4% | $11,136 | 38.4% | 56.8% | 55.3% | 47.7% |
| Upper | 29 | 14.1% | $4,999 | 17.2% | 16.3% | 18.2% | 17.5% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.3% | 1.4% | 0.4% |
| **TOTAL** | **206** | **100.0%** | **$29,020** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10<br>Distribution of 2018 Small Farm Lending<br>By Income Level of Geography | | | | | | | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Census Tract Income Level** | **Bank Small Farm Loans** | | | | **% of Farms** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **# %** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 0.2% | 0.2% | 0.0% |
| Moderate | 3 | 6.5% | $80 | 1.8% | 16.5% | 16.5% | 13.9% |
| Middle | 42 | 91.3% | $3,931 | 89.1% | 74.2% | 78.9% | 78.5% |
| Upper | 1 | 2.2% | $400 | 9.1% | 9.2% | 4.3% | 7.5% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.1% | 0.0% |
| **TOTAL** | **46** | **100.0%** | **$4,411** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10<br>Distribution of 2019 Small Farm Lending<br>By Income Level of Geography | | | | | | | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Census Tract Income Level** | **Bank Small Farm Loans** | | | | **% of Farms** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **# %** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 0.4% | 0.2% | 0.0% |
| Moderate | 4 | 16.7% | $287 | 11.4% | 16.4% | 17.2% | 14.8% |
| Middle | 16 | 66.7% | $1,624 | 64.4% | 73.6% | 77.6% | 76.1% |
| Upper | 4 | 16.7% | $609 | 24.2% | 9.7% | 4.9% | 8.9% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.1% | 0.1% |
| **TOTAL** | **24** | **100.0%** | **$2,520** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 12.1** Distribution of 2018 Home Mortgage Lending By Borrower Income Level | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 28 | 7.5% | 2,042 | 3.4% | 20.3% | 6.8% | 3.7% |
| Moderate | 91 | 24.3% | 10,227 | 16.9% | 18.7% | 18.0% | 13.3% |
| Middle | 92 | 24.6% | 13,337 | 22.1% | 21.1% | 21.1% | 19.8% |
| Upper | 142 | 38.0% | 32,827 | 54.4% | 39.8% | 32.3% | 42.5% |
| Unknown | 21 | 5.6% | 1,930 | 3.2% | 0.0% | 21.8% | 20.7% |
| **TOTAL** | **374** | **100.0%** | **60,363** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 6 | 4.8% | 505 | 3.2% | 20.3% | 8.8% | 4.8% |
| Moderate | 22 | 17.7% | 1,565 | 10.0% | 18.7% | 16.9% | 11.7% |
| Middle | 19 | 15.3% | 1,807 | 11.6% | 21.1% | 19.1% | 15.9% |
| Upper | 45 | 36.3% | 7,966 | 51.0% | 39.8% | 34.3% | 44.7% |
| Unknown | 32 | 25.8% | 3,769 | 24.1% | 0.0% | 21.0% | 23.0% |
| **TOTAL** | **124** | **100.0%** | **15,612** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 1 | 2.9% | 50 | 2.2% | 20.3% | 8.0% | 4.9% |
| Moderate | 4 | 11.4% | 301 | 13.1% | 18.7% | 15.4% | 12.7% |
| Middle | 5 | 14.3% | 225 | 9.8% | 21.1% | 19.4% | 17.0% |
| Upper | 22 | 62.9% | 1,585 | 68.9% | 39.8% | 46.7% | 53.8% |
| Unknown | 3 | 8.6% | 139 | 6.0% | 0.0% | 10.5% | 11.6% |
| **TOTAL** | **35** | **100.0%** | **2,300** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.3% | 0.6% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.7% | 0.6% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.1% | 1.2% | 0.6% |
| Upper | 1 | 25.0% | 168 | 1.8% | 39.8% | 4.1% | 1.1% |
| Unknown | 3 | 75.0% | 9,374 | 98.2% | 0.0% | 93.5% | 98.3% |
| **TOTAL** | **4** | **100.0%** | **9,542** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 1 | 3.7% | 10 | 0.5% | 20.3% | 6.4% | 5.3% |
| Moderate | 4 | 14.8% | 125 | 6.9% | 18.7% | 16.0% | 9.6% |
| Middle | 5 | 18.5% | 253 | 13.9% | 21.1% | 19.9% | 14.4% |
| Upper | 15 | 55.6% | 1,140 | 62.5% | 39.8% | 53.1% | 66.4% |
| Unknown | 2 | 7.4% | 295 | 16.2% | 0.0% | 4.7% | 4.3% |
| **TOTAL** | **27** | **100.0%** | **1,823** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 2 | 14.3% | 142 | 13.8% | 20.3% | 10.5% | 7.7% |
| Moderate | 1 | 7.1% | 104 | 10.1% | 18.7% | 19.5% | 13.6% |
| Middle | 4 | 28.6% | 173 | 16.8% | 21.1% | 20.0% | 15.6% |
| Upper | 7 | 50.0% | 611 | 59.3% | 39.8% | 44.7% | 56.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 5.3% | 6.7% |
| **TOTAL** | **14** | **100.0%** | **1,030** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.3% | 1.3% | 0.7% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.7% | 0.7% | 1.2% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.1% | 3.3% | 3.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.8% | 1.3% | 0.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 93.5% | 93.9% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 38 | 6.6% | 2,749 | 3.0% | 20.3% | 7.2% | 3.5% |
| Moderate | 122 | 21.1% | 12,322 | 13.6% | 18.7% | 17.1% | 11.2% |
| Middle | 125 | 21.6% | 15,795 | 17.4% | 21.1% | 20.0% | 16.4% |
| Upper | 232 | 40.1% | 44,297 | 48.9% | 39.8% | 33.0% | 37.8% |
| Unknown | 61 | 10.6% | 15,507 | 17.1% | 0.0% | 22.8% | 31.1% |
| **TOTAL** | **578** | **100.0%** | **90,670** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1 Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Loans** | | | | **Families by Family Income %** | **Aggregate HMDA Data** | |
| | **#** | **# %** | **$** | **$ %** | | **# %** | **$ %** |
| Home Purchase Loans | | | | | | | |
| Low | 27 | 7.4% | 2,000 | 3.2% | 20.3% | 6.5% | 3.6% |
| Moderate | 82 | 22.5% | 9,307 | 15.0% | 18.7% | 19.7% | 14.6% |
| Middle | 101 | 27.7% | 15,159 | 24.5% | 21.1% | 21.8% | 20.4% |
| Upper | 134 | 36.8% | 32,954 | 53.3% | 39.8% | 32.6% | 43.1% |
| Unknown | 20 | 5.5% | 2,448 | 4.0% | 0.0% | 19.5% | 18.4% |
| **TOTAL** | **364** | **100.0%** | **61,868** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Refinance | | | | | | | |
| Low | 13 | 6.5% | 902 | 2.9% | 20.3% | 6.2% | 3.1% |
| Moderate | 28 | 13.9% | 2,817 | 9.2% | 18.7% | 14.2% | 8.9% |
| Middle | 39 | 19.4% | 4,413 | 14.4% | 21.1% | 17.9% | 14.2% |
| Upper | 83 | 41.3% | 16,929 | 55.2% | 39.8% | 39.1% | 49.6% |
| Unknown | 38 | 18.9% | 5,591 | 18.2% | 0.0% | 22.5% | 24.3% |
| **TOTAL** | **201** | **100.0%** | **30,652** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Home Improvement | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 20.3% | 7.2% | 3.9% |
| Moderate | 10 | 21.3% | 343 | 15.6% | 18.7% | 14.9% | 11.7% |
| Middle | 11 | 23.4% | 535 | 24.3% | 21.1% | 23.2% | 19.5% |
| Upper | 20 | 42.6% | 1,186 | 53.9% | 39.8% | 47.2% | 59.8% |
| Unknown | 6 | 12.8% | 138 | 6.3% | 0.0% | 7.6% | 5.1% |
| **TOTAL** | **47** | **100.0%** | **2,202** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | **% of Multifamily Units** | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.3% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.7% | 0.7% | 0.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.1% | 1.3% | 0.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.8% | 9.3% | 1.9% |
| Unknown | 9 | 100.0% | 5,393 | 100.0% | 0.0% | 88.7% | 97.8% |
| **TOTAL** | **9** | **100.0%** | **5,393** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | **Families by Family Income %** | | | |
| Low | 3 | 7.9% | 56 | 3.0% | 20.3% | 4.9% | 2.2% |
| Moderate | 7 | 18.4% | 264 | 14.3% | 18.7% | 12.7% | 9.0% |
| Middle | 5 | 13.2% | 168 | 9.1% | 21.1% | 22.2% | 20.7% |
| Upper | 17 | 44.7% | 889 | 48.2% | 39.8% | 54.0% | 63.4% |
| Unknown | 6 | 15.8% | 468 | 25.4% | 0.0% | 6.2% | 4.7% |
| **TOTAL** | **38** | **100.0%** | **1,845** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 1 | 6.7% | 115 | 11.6% | 20.3% | 5.4% | 3.4% |
| Moderate | 3 | 20.0% | 168 | 17.0% | 18.7% | 16.1% | 13.8% |
| Middle | 4 | 26.7% | 304 | 30.8% | 21.1% | 26.1% | 19.5% |
| Upper | 7 | 46.7% | 401 | 40.6% | 39.8% | 39.5% | 47.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 13.0% | 15.4% |
| **TOTAL** | **15** | **100.0%** | **988** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.3% | 0.4% | 0.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.7% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.1% | 2.2% | 2.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.8% | 0.0% | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 97.4% | 97.6% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |

| Total Home Mortgage Loans | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 44 | 6.5% | 3,073 | 3.0% | 20.3% | 6.2% | 3.2% |
| Moderate | 130 | 19.3% | 12,899 | 12.5% | 18.7% | 17.3% | 11.8% |
| Middle | 160 | 23.7% | 20,579 | 20.0% | 21.1% | 20.3% | 17.2% |
| Upper | 261 | 38.7% | 52,359 | 50.9% | 39.8% | 34.9% | 42.7% |
| Unknown | 79 | 11.7% | 14,038 | 13.6% | 0.0% | 21.3% | 25.1% |
| **TOTAL** | **674** | **100.0%** | **102,948** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 13 Distribution of 2018 Small Business Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | **2018** | | | | | |
| | | **Count** | | **Dollars** | | | **Total Businesses** |
| **Business Revenue and Loan Size** | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| Business Revenue | $1 Million or Less | 134 | 55.6% | 47.9% | $15,890 | 47.7% | 42.4% | 90.3% |
| | Over $1 Million/ Unknown | 107 | 44.4% | 52.1% | $17,445 | 52.3% | 57.6% | 9.7% |
| | **TOTAL** | **241** | **100.0%** | **100.0%** | **$33,335** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 160 | 66.4% | 87.2% | $5,665 | 17.0% | 24.5% | |
| | $100,001–$250,000 | 39 | 16.2% | 6.9% | $6,559 | 19.7% | 21.0% | |
| | $250,001–$1 Million | 42 | 17.4% | 5.8% | $21,111 | 63.3% | 54.4% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **241** | **100.0%** | **100.0%** | **$33,335** | **100.0%** | **100.0%** | |
| Loan Size — Revenue $1 Million or Less | $100,000 or Less | 98 | 73.1% | | $2,938 | 18.5% | | |
| | $100,001–$250,000 | 17 | 12.7% | | $2,769 | 17.4% | | |
| | $250,001–$1 Million | 19 | 14.2% | | $10,183 | 64.1% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **134** | **100.0%** | | **$15,890** | **100.0%** | | |

| Table 13 — Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Business Revenue and Loan Size** | | **2019** | | | | | **Total Businesses** |
| | | **Count** | | **Dollars** | | | |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| Business Revenue | $1 Million or Less | 123 | 59.7% | 47.4% | $14,962 | 51.6% | 39.4% | 90.9% |
| | Over $1 Million/ Unknown | 83 | 40.3% | 52.6% | $14,058 | 48.4% | 60.6% | 9.1% |
| | **TOTAL** | **206** | **100.0%** | **100.0%** | **$29,020** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 133 | 64.6% | 88.4% | $4,675 | 16.1% | 26.9% | |
| | $100,001–$250,000 | 39 | 18.9% | 6.3% | $7,158 | 24.7% | 20.0% | |
| | $250,001–$1 Million | 34 | 16.5% | 5.4% | $17,187 | 59.2% | 53.1% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **206** | **100.0%** | **100.0%** | **$29,020** | **100.0%** | **100.0%** | |
| Loan Size / Revenue $1 Million or Less | $100,000 or Less | 90 | 43.7% | | $2,751 | 9.5% | | |
| | $100,001–$250,000 | 15 | 7.3% | | $2,797 | 9.6% | | |
| | $250,001–$1 Million | 18 | 8.7% | | $9,414 | 32.4% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **123** | **59.7%** | | **$14,962** | **51.6%** | | |

| Table 14 Distribution of 2018 Small Farm Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | 2018 | | | | | |
| | | Count | | | Dollars | | Farms |
| **Farm Revenue and Loan Size** | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| **Farm Revenue** | $1 Million or Less | 41 | 89.1% | 81.6% | 4,297 | 97.4% | 86.2% | 98.8% |
| | Over $1 Million/ Unknown | 5 | 10.9% | 18.4% | 114 | 2.6% | 13.8% | 1.2% |
| | **TOTAL** | **46** | **100.0%** | **100.0%** | **4,411** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 32 | 69.6% | 80.2% | 957 | 21.7% | 36.3% | |
| | $100,001–$250,000 | 8 | 17.4% | 14.9% | 1,278 | 29.0% | 37.1% | |
| | $250,001–$500,000 | 6 | 13.0% | 4.8% | 2,176 | 49.3% | 26.6% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **46** | **100.0%** | **100.0%** | **4,411** | **100.0%** | **100.0%** | |
| **Loan Size** **Revenue $1 Million or Less** | $100,000 or Less | 27 | 65.9% | | 843 | 19.6% | | |
| | $100,001–$250,000 | 8 | 19.5% | | 1,278 | 29.7% | | |
| | $250,001–$1 Million | 6 | 14.6% | | 2,176 | 50.6% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **41** | **100.0%** | | **4,297** | **100.0%** | | |

| Table 14<br>Distribution of 2019 Small Farm Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | **2019** | | | | | | |
| **Farm Revenue and Loan Size** | **Count** | | | **Dollars** | | | **Farms** |
| | **Bank** | | **Aggregate** | **Bank** | | **Aggregate** | |
| | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| Farm Revenue — $1 Million or Less | 21 | 87.5% | 80.2% | 2,465 | 97.8% | 88.6% | 98.9% |
| Farm Revenue — Over $1 Million/ Unknown | 3 | 12.5% | 19.8% | 55 | 2.2% | 11.4% | 1.1% |
| **TOTAL** | **24** | **100.0%** | **100.0%** | **2,520** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size — $100,000 or Less | 16 | 66.7% | 82.8% | 668 | 26.5% | 40.7% | |
| Loan Size — $100,001–$250,000 | 6 | 25.0% | 13.3% | 1,042 | 41.3% | 35.6% | |
| Loan Size — $250,001–$500,000 | 2 | 8.3% | 3.8% | 810 | 32.1% | 23.7% | |
| Loan Size — Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| **TOTAL** | **24** | **100.0%** | **100.0%** | **2,520** | **100.0%** | **100.0%** | |
| Loan Size / Revenue $1 Million or Less — $100,000 or Less | 13 | 61.9% | | 613 | 24.9% | | |
| Loan Size / Revenue $1 Million or Less — $100,001–$250,000 | 6 | 28.6% | | 1,042 | 42.3% | | |
| Loan Size / Revenue $1 Million or Less — $250,001–$1 Million | 2 | 9.5% | | 810 | 32.9% | | |
| Loan Size / Revenue $1 Million or Less — Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| **TOTAL** | **21** | **100.0%** | | **2,465** | **100.0%** | | |

## NonMSA Missouri

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 8.1** **Distribution of 2018 Home Mortgage Lending** **By Income Level of Geography** | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 25 | 8.9% | 2,121 | 6.6% | 14.0% | 12.4% | 10.8% |
| Middle | 237 | 84.6% | 27,821 | 86.6% | 81.2% | 79.8% | 80.4% |
| Upper | 18 | 6.4% | 2,184 | 6.8% | 4.8% | 7.7% | 8.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.2% |
| **TOTAL** | **280** | **100.0%** | **32,126** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 16 | 9.6% | 1,129 | 7.2% | 14.0% | 11.6% | 9.0% |
| Middle | 139 | 83.2% | 13,219 | 84.1% | 81.2% | 83.2% | 82.3% |
| Upper | 12 | 7.2% | 1,369 | 8.7% | 4.8% | 5.2% | 8.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.1% |
| **TOTAL** | **167** | **100.0%** | **15,717** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 3 | 6.4% | 259 | 10.2% | 14.0% | 11.1% | 11.2% |
| Middle | 40 | 85.1% | 2,147 | 84.5% | 81.2% | 81.8% | 79.3% |
| Upper | 4 | 8.5% | 135 | 5.3% | 4.8% | 7.1% | 9.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **47** | **100.0%** | **2,541** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 10.0% | 243 | 5.8% | 13.7% | 20.8% | 23.6% |
| Middle | 9 | 90.0% | 3,926 | 94.2% | 79.6% | 67.9% | 70.5% |
| Upper | 0 | 0.0% | 0 | 0.0% | 6.7% | 11.3% | 5.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **10** | **100.0%** | **4,169** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **% of Owner-Occupied Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 2 | 7.1% | 110 | 7.5% | 14.0% | 11.6% | 12.0% |
| Middle | 25 | 89.3% | 1,300 | 89.0% | 81.2% | 82.9% | 80.0% |
| Upper | 1 | 3.6% | 50 | 3.4% | 4.8% | 5.5% | 8.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **TOTAL** | **28** | **100.0%** | **1,460** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 6.7% | 41 | 6.9% | 14.0% | 7.3% | 4.2% |
| Middle | 13 | 86.7% | 520 | 87.8% | 81.2% | 87.8% | 89.5% |
| Upper | 1 | 6.7% | 31 | 5.2% | 4.8% | 4.9% | 6.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **15** | **100.0%** | **592** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.0% | 13.9% | 30.6% |
| Middle | 0 | 0.0% | 0 | 0.0% | 81.2% | 82.3% | 67.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 4.8% | 3.8% | 2.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 48 | 8.8% | 3,903 | 6.9% | 14.0% | 12.1% | 11.2% |
| Middle | 463 | 84.6% | 48,933 | 86.4% | 81.2% | 81.0% | 80.2% |
| Upper | 36 | 6.6% | 3,769 | 6.7% | 4.8% | 6.8% | 8.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.1% |
| **TOTAL** | **547** | **100.0%** | **56,605** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | **#** | **# %** | **$** | **$ %** | | **# %** | **$ %** |
| **Table 8.1 Distribution of 2019 Home Mortgage Lending By Income Level of Geography** | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 33 | 10.9% | 2,782 | 7.3% | 13.1% | 11.9% | 9.6% |
| Middle | 249 | 81.9% | 32,420 | 85.4% | 82.4% | 82.0% | 83.0% |
| Upper | 22 | 7.2% | 2,780 | 7.3% | 4.5% | 6.1% | 7.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.0% |
| **TOTAL** | **304** | **100.0%** | **37,982** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 13 | 6.3% | 1,057 | 4.8% | 13.1% | 9.5% | 7.3% |
| Middle | 179 | 87.3% | 18,870 | 85.9% | 82.4% | 84.0% | 85.8% |
| Upper | 13 | 6.3% | 2,041 | 9.3% | 4.5% | 6.5% | 6.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.1% |
| **TOTAL** | **205** | **100.0%** | **21,968** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 2.3% | 43 | 2.4% | 13.1% | 7.7% | 6.6% |
| Middle | 40 | 93.0% | 1,626 | 90.7% | 82.4% | 87.7% | 88.5% |
| Upper | 2 | 4.7% | 124 | 6.9% | 4.5% | 4.2% | 3.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.4% | 1.1% |
| **TOTAL** | **43** | **100.0%** | **1,793** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 13.4% | 21.2% | 12.6% |
| Middle | 1 | 100.0% | 133 | 100.0% | 80.0% | 69.2% | 73.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 6.5% | 9.6% | 14.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1** | **100.0%** | **133** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **% of Owner-Occupied Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 2 | 6.1% | 125 | 8.4% | 13.1% | 8.6% | 8.1% |
| Middle | 30 | 90.9% | 1,265 | 84.9% | 82.4% | 87.7% | 89.0% |
| Upper | 1 | 3.0% | 100 | 6.7% | 4.5% | 3.7% | 2.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **33** | **100.0%** | **1,490** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 5.3% | 100 | 10.5% | 13.1% | 10.5% | 11.8% |
| Middle | 18 | 94.7% | 851 | 89.5% | 82.4% | 84.8% | 82.3% |
| Upper | 0 | 0.0% | 0 | 0.0% | 4.5% | 3.5% | 5.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 1.2% | 0.9% |
| **TOTAL** | **19** | **100.0%** | **951** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 13.1% | 14.5% | 11.6% |
| Middle | 0 | 0.0% | 0 | 0.0% | 82.4% | 79.8% | 81.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 4.5% | 5.6% | 7.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 50 | 8.3% | 4,107 | 6.4% | 13.1% | 11.0% | 8.9% |
| Middle | 517 | 85.5% | 55,165 | 85.8% | 82.4% | 82.9% | 83.7% |
| Upper | 38 | 6.3% | 5,045 | 7.8% | 4.5% | 6.1% | 7.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.1% |
| **TOTAL** | **605** | **100.0%** | **64,317** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Appendix C (continued)**

| Table 9 Distribution of 2018 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 19 | 6.8% | $1,840 | 6.4% | 13.2% | 10.9% | 10.6% |
| Middle | 246 | 88.5% | $26,295 | 91.4% | 81.9% | 80.9% | 82.1% |
| Upper | 13 | 4.7% | $644 | 2.2% | 4.9% | 5.6% | 6.4% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 2.5% | 0.9% |
| **TOTAL** | **278** | **100.0%** | **$28,779** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9 Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 18 | 7.1% | $1,276 | 5.7% | 12.7% | 10.6% | 9.9% |
| Middle | 227 | 89.7% | $20,172 | 89.9% | 82.6% | 81.2% | 83.3% |
| Upper | 8 | 3.2% | $979 | 4.4% | 4.7% | 5.0% | 5.8% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 3.1% | 1.0% |
| **TOTAL** | **253** | **100.0%** | **$22,427** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Appendix C (continued)**

| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 11 | 3.1% | $1,884 | 6.7% | 9.8% | 8.1% | 8.4% |
| Middle | 333 | 94.3% | $25,407 | 90.8% | 86.8% | 89.3% | 89.8% |
| Upper | 9 | 2.5% | $688 | 2.5% | 3.4% | 2.1% | 1.7% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.5% | 0.1% |
| **TOTAL** | **353** | **100.0%** | **$27,979** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

Table 10
Distribution of 2018 Small Farm Lending
By Income Level of Geography

| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 15 | 3.3% | $1,503 | 4.2% | 9.5% | 8.8% | 8.7% |
| Middle | 433 | 95.4% | $33,631 | 93.4% | 87.0% | 89.1% | 89.1% |
| Upper | 6 | 1.3% | $883 | 2.5% | 3.5% | 1.7% | 2.1% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.4% | 0.1% |
| **TOTAL** | **454** | **100.0%** | **$36,017** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

Table 10
Distribution of 2019 Small Farm Lending
By Income Level of Geography

| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 12.1** **Distribution of 2018 Home Mortgage Lending** **By Borrower Income Level** | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 24 | 8.6% | 1,166 | 3.6% | 22.0% | 6.0% | 3.1% |
| Moderate | 50 | 17.9% | 4,452 | 13.9% | 19.5% | 18.6% | 13.0% |
| Middle | 76 | 27.1% | 8,566 | 26.7% | 21.9% | 21.9% | 20.2% |
| Upper | 114 | 40.7% | 16,438 | 51.2% | 36.6% | 36.0% | 47.1% |
| Unknown | 16 | 5.7% | 1,504 | 4.7% | 0.0% | 17.5% | 16.6% |
| **TOTAL** | **280** | **100.0%** | **32,126** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 10 | 6.0% | 507 | 3.2% | 22.0% | 8.5% | 4.4% |
| Moderate | 28 | 16.8% | 1,771 | 11.3% | 19.5% | 16.0% | 10.4% |
| Middle | 38 | 22.8% | 3,218 | 20.5% | 21.9% | 21.8% | 18.4% |
| Upper | 79 | 47.3% | 8,840 | 56.2% | 36.6% | 39.9% | 49.5% |
| Unknown | 12 | 7.2% | 1,381 | 8.8% | 0.0% | 13.8% | 17.3% |
| **TOTAL** | **167** | **100.0%** | **15,717** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 3 | 6.4% | 71 | 2.8% | 22.0% | 10.8% | 8.0% |
| Moderate | 9 | 19.1% | 380 | 15.0% | 19.5% | 16.6% | 11.7% |
| Middle | 9 | 19.1% | 365 | 14.4% | 21.9% | 24.3% | 24.8% |
| Upper | 21 | 44.7% | 1,523 | 59.9% | 36.6% | 43.6% | 50.3% |
| Unknown | 5 | 10.6% | 202 | 7.9% | 0.0% | 4.7% | 5.1% |
| **TOTAL** | **47** | **100.0%** | **2,541** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.5% | 3.8% | 0.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.9% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 36.6% | 5.7% | 1.0% |
| Unknown | 10 | 100.0% | 4,169 | 100.0% | 0.0% | 90.6% | 98.5% |
| **TOTAL** | **10** | **100.0%** | **4,169** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 1 | 3.6% | 21 | 1.4% | 22.0% | 9.4% | 5.3% |
| Moderate | 5 | 17.9% | 183 | 12.5% | 19.5% | 21.5% | 17.8% |
| Middle | 4 | 14.3% | 196 | 13.4% | 21.9% | 16.0% | 12.9% |
| Upper | 14 | 50.0% | 675 | 46.2% | 36.6% | 44.8% | 55.3% |
| Unknown | 4 | 14.3% | 385 | 26.4% | 0.0% | 8.3% | 8.7% |
| **TOTAL** | **28** | **100.0%** | **1,460** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | |
|---|---|---|---|---|---|---|
| Low | 2 | 13.3% | 52 | 8.8% | 22.0% | 13.0% | 6.3% |
| Moderate | 3 | 20.0% | 73 | 12.3% | 19.5% | 17.9% | 12.0% |
| Middle | 2 | 13.3% | 54 | 9.1% | 21.9% | 22.0% | 14.7% |
| Upper | 8 | 53.3% | 413 | 69.8% | 36.6% | 39.8% | 54.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 7.3% | 12.9% |
| **TOTAL** | **15** | **100.0%** | **592** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.0% | 1.9% | 0.7% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.5% | 1.9% | 0.9% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.9% | 1.9% | 0.5% |
| Upper | 0 | 0.0% | 0 | 0.0% | 36.6% | 3.8% | 0.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 90.5% | 97.3% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | |
| Low | 40 | 7.3% | 1,817 | 3.2% | 22.0% | 6.9% | 3.4% |
| Moderate | 95 | 17.4% | 6,859 | 12.1% | 19.5% | 17.4% | 11.5% |
| Middle | 129 | 23.6% | 12,399 | 21.9% | 21.9% | 21.3% | 18.3% |
| Upper | 236 | 43.1% | 27,889 | 49.3% | 36.6% | 36.8% | 44.8% |
| Unknown | 47 | 8.6% | 7,641 | 13.5% | 0.0% | 17.6% | 21.9% |
| **TOTAL** | **547** | **100.0%** | **56,605** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1 Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | |
|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | $ | $ % | | # % | $ % |
| Home Purchase Loans | | | | | | | |
| Low | 21 | 6.9% | 1,470 | 3.9% | 21.8% | 5.3% | 2.7% |
| Moderate | 64 | 21.1% | 6,018 | 15.8% | 19.5% | 17.1% | 11.6% |
| Middle | 71 | 23.4% | 8,066 | 21.2% | 21.9% | 20.1% | 17.9% |
| Upper | 130 | 42.8% | 20,620 | 54.3% | 36.8% | 39.0% | 50.0% |
| Unknown | 18 | 5.9% | 1,808 | 4.8% | 0.0% | 18.4% | 17.8% |
| **TOTAL** | **304** | **100.0%** | **37,982** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Refinance | | | | | | | |
| Low | 17 | 8.3% | 703 | 3.2% | 21.8% | 7.3% | 3.3% |
| Moderate | 30 | 14.6% | 2,515 | 11.4% | 19.5% | 12.8% | 8.4% |
| Middle | 49 | 23.9% | 4,633 | 21.1% | 21.9% | 19.5% | 15.9% |
| Upper | 87 | 42.4% | 11,964 | 54.5% | 36.8% | 41.2% | 50.3% |
| Unknown | 22 | 10.7% | 2,153 | 9.8% | 0.0% | 19.1% | 22.1% |
| **TOTAL** | **205** | **100.0%** | **21,968** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Home Improvement | | | | | | | |
| Low | 3 | 7.0% | 55 | 3.1% | 21.8% | 8.1% | 4.6% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Moderate | 5 | 11.6% | 353 | 19.7% | 19.5% | 15.4% | 11.2% |
| Middle | 9 | 20.9% | 243 | 13.6% | 21.9% | 22.8% | 23.3% |
| Upper | 21 | 48.8% | 776 | 43.3% | 36.8% | 46.7% | 53.5% |
| Unknown | 5 | 11.6% | 366 | 20.4% | 0.0% | 7.0% | 7.4% |
| **TOTAL** | **43** | **100.0%** | **1,793** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.8% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.5% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.9% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 36.8% | 19.2% | 13.9% |
| Unknown | 1 | 100.0% | 133 | 100.0% | 0.0% | 80.8% | 86.1% |
| **TOTAL** | **1** | **100.0%** | **133** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 1 | 3.0% | 15 | 1.0% | 21.8% | 9.9% | 5.3% |
| Moderate | 5 | 15.2% | 172 | 11.5% | 19.5% | 15.4% | 8.2% |
| Middle | 7 | 21.2% | 180 | 12.1% | 21.9% | 21.6% | 19.3% |
| Upper | 17 | 51.5% | 971 | 65.2% | 36.8% | 46.9% | 62.3% |
| Unknown | 3 | 9.1% | 152 | 10.2% | 0.0% | 6.2% | 5.0% |
| **TOTAL** | **33** | **100.0%** | **1,490** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 1 | 5.3% | 30 | 3.2% | 21.8% | 6.4% | 4.5% |
| Moderate | 5 | 26.3% | 222 | 23.3% | 19.5% | 17.0% | 11.0% |
| Middle | 5 | 26.3% | 222 | 23.3% | 21.9% | 28.1% | 22.8% |
| Upper | 8 | 42.1% | 477 | 50.2% | 36.8% | 40.9% | 51.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 7.6% | 10.0% |
| **TOTAL** | **19** | **100.0%** | **951** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.8% | 0.8% | 0.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.5% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.9% | 0.8% | 1.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 36.8% | 1.6% | 3.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 96.8% | 94.4% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 43 | 7.1% | 2,273 | 3.5% | 21.8% | 6.0% | 2.9% |
| Moderate | 109 | 18.0% | 9,280 | 14.4% | 19.5% | 15.4% | 10.1% |
| Middle | 141 | 23.3% | 13,344 | 20.7% | 21.9% | 19.8% | 16.7% |
| Upper | 263 | 43.5% | 34,808 | 54.1% | 36.8% | 39.5% | 48.7% |
| Unknown | 49 | 8.1% | 4,612 | 7.2% | 0.0% | 19.3% | 21.7% |
| **TOTAL** | **605** | **100.0%** | **64,317** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 13 Distribution of 2018 Small Business Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Business Revenue and Loan Size** | | **2018** | | | | | |
| | | **Count** | | **Dollars** | | | **Total Businesses** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Business Revenue** | $1 Million or Less | 199 | 71.6% | 52.2% | $12,176 | 42.3% | 48.9% | 91.2% |
| | Over $1 Million/ Unknown | 79 | 28.4% | 47.8% | $16,603 | 57.7% | 51.1% | 8.8% |
| | **TOTAL** | **278** | **100.0%** | **100.0%** | **$28,779** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 223 | 80.2% | 91.4% | $7,382 | 25.7% | 36.2% | |
| | $100,001–$250,000 | 26 | 9.4% | 5.0% | $4,633 | 16.1% | 19.7% | |
| | $250,001–$1 Million | 29 | 10.4% | 3.6% | $16,764 | 58.3% | 44.1% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **278** | **100.0%** | **100.0%** | **$28,779** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 175 | 87.9% | | $5,361 | 44.0% | | |
| | $100,001–$250,000 | 17 | 8.5% | | $3,085 | 25.3% | | |
| | $250,001–$1 Million | 7 | 3.5% | | $3,730 | 30.6% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **199** | **100.0%** | | **$12,176** | **100.0%** | | |

| | | | 2019 | | | | |
|---|---|---|---|---|---|---|---|
| **Business Revenue and Loan Size** | | **Count** | | **Dollars** | | | **Total Businesses** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| **Business Revenue** | $1 Million or Less | 199 | 78.7% | 50.8% | $13,348 | 59.5% | 49.1% | 91.8% |
| | Over $1 Million/ Unknown | 54 | 21.3% | 49.2% | $9,079 | 40.5% | 50.9% | 8.2% |
| | **TOTAL** | **253** | **100.0%** | **100.0%** | **$22,427** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 206 | 81.4% | 92.4% | $6,679 | 29.8% | 37.5% | |
| | $100,001–$250,000 | 25 | 9.9% | 4.4% | $3,982 | 17.8% | 18.6% | |
| | $250,001–$1 Million | 22 | 8.7% | 3.2% | $11,766 | 52.5% | 43.9% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **253** | **100.0%** | **100.0%** | **$22,427** | **100.0%** | **100.0%** | |
| **Loan Size** **Revenue $1 Million or Less** | $100,000 or Less | 175 | 69.2% | | $5,410 | 24.1% | | |
| | $100,001–$250,000 | 12 | 4.7% | | $1,730 | 7.7% | | |
| | $250,001–$1 Million | 12 | 4.7% | | $6,208 | 27.7% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **199** | **78.7%** | | **$13,348** | **59.5%** | | |

Table 13
Distribution of 2019 Small Business Lending
By Borrower Income Level

| Table 14<br>Distribution of 2018 Small Farm Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Farm Revenue and Loan Size** | | **2018** | | | | | |
| | | **Count** | | **Dollars** | | | **Farms** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Farm Revenue** | $1 Million or Less | 328 | 92.9% | 82.7% | 25,447 | 91.0% | 87.5% | 98.3% |
| | Over $1 Million/ Unknown | 25 | 7.1% | 17.3% | 2532 | 9.0% | 12.5% | 1.7% |
| | **TOTAL** | **353** | **100.0%** | **100.0%** | **27,979** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 265 | 75.1% | 82.5% | 7,704 | 27.5% | 38.1% | |
| | $100,001–$250,000 | 59 | 16.7% | 13.1% | 10,336 | 36.9% | 37.2% | |
| | $250,001–$500,000 | 29 | 8.2% | 4.4% | 9,939 | 35.5% | 24.6% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **353** | **100.0%** | **100.0%** | **27,979** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 249 | 75.9% | | 7,532 | 29.6% | | |
| | $100,001–$250,000 | 54 | 16.5% | | 9,369 | 36.8% | | |
| | $250,001–$1 Million | 25 | 7.6% | | 8,546 | 33.6% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **328** | **100.0%** | | **25,447** | **100.0%** | | |

| Table 14<br>Distribution of 2019 Small Farm Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | 2019 | | | | | |
| | | Count | | | Dollars | | Farms |
| Farm Revenue and Loan Size | | Bank | Aggregate | | Bank | Aggregate | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| Farm Revenue | $1 Million or Less | 395 | 87.0% | 80.0% | 32,614 | 90.6% | 87.8% | 98.7% |
| Farm Revenue | Over $1 Million/ Unknown | 59 | 13.0% | 20.0% | 3,403 | 9.4% | 12.2% | 1.3% |
| | **TOTAL** | **454** | **100.0%** | **100.0%** | **36,017** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 349 | 76.9% | 82.5% | 10,878 | 30.2% | 36.6% | |
| Loan Size | $100,001–$250,000 | 67 | 14.8% | 12.6% | 11,113 | 30.9% | 34.9% | |
| Loan Size | $250,001–$500,000 | 38 | 8.4% | 4.8% | 14,026 | 38.9% | 28.5% | |
| Loan Size | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **454** | **100.0%** | **100.0%** | **36,017** | **100.0%** | **100.0%** | |
| Loan Size / Revenue $1 Million or Less | $100,000 or Less | 302 | 76.5% | | 9,728 | 29.8% | | |
| Loan Size / Revenue $1 Million or Less | $100,001–$250,000 | 56 | 14.2% | | 9,360 | 28.7% | | |
| Loan Size / Revenue $1 Million or Less | $250,001–$1 Million | 37 | 9.4% | | 13,526 | 41.5% | | |
| Loan Size / Revenue $1 Million or Less | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **395** | **100.0%** | | **32,614** | **100.0%** | | |

**Fort Smith Multistate MSA**

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 8.1** **Distribution of 2018 Home Mortgage Lending** **By Income Level of Geography** | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 60 | 16.8% | 4,811 | 9.5% | 15.3% | 14.0% | 9.5% |
| Middle | 168 | 46.9% | 23,565 | 46.7% | 60.1% | 58.2% | 56.9% |
| Upper | 130 | 36.3% | 22,066 | 43.7% | 24.6% | 27.9% | 33.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **358** | **100.0%** | **50,442** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 23 | 12.1% | 1,068 | 6.4% | 15.3% | 12.7% | 8.4% |
| Middle | 98 | 51.6% | 7,083 | 42.5% | 60.1% | 59.8% | 60.5% |
| Upper | 69 | 36.3% | 8,516 | 51.1% | 24.6% | 27.5% | 31.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **190** | **100.0%** | **16,667** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 6 | 14.0% | 204 | 7.3% | 15.3% | 13.4% | 11.3% |
| Middle | 20 | 46.5% | 1,065 | 38.2% | 60.1% | 55.3% | 51.9% |
| Upper | 17 | 39.5% | 1,517 | 54.5% | 24.6% | 31.3% | 36.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **43** | **100.0%** | **2,786** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 5 | 55.6% | 1,762 | 43.9% | 36.8% | 47.9% | 27.1% |
| Middle | 3 | 33.3% | 1,707 | 42.5% | 35.6% | 39.5% | 63.5% |
| Upper | 1 | 11.1% | 543 | 13.5% | 27.6% | 12.6% | 9.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **9** | **100.0%** | **4,012** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 6.7% | 150 | 18.6% | 15.3% | 10.3% | 8.3% |
| Middle | 10 | 66.7% | 452 | 55.9% | 60.1% | 49.7% | 45.9% |
| Upper | 4 | 26.7% | 206 | 25.5% | 24.6% | 40.0% | 45.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **TOTAL** | **15** | **100.0%** | **808** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 7 | 23.3% | 272 | 20.9% | 15.3% | 14.3% | 7.8% |
| Middle | 18 | 60.0% | 797 | 61.2% | 60.1% | 61.0% | 59.2% |
| Upper | 5 | 16.7% | 233 | 17.9% | 24.6% | 24.8% | 33.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **30** | **100.0%** | **1,302** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.3% | 25.1% | 20.8% |
| Middle | 0 | 0.0% | 0 | 0.0% | 60.1% | 55.0% | 55.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 24.6% | 19.9% | 23.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 102 | 15.8% | 8,267 | 10.9% | 15.3% | 14.6% | 12.3% |
| Middle | 317 | 49.1% | 34,669 | 45.6% | 60.1% | 57.8% | 58.5% |
| Upper | 226 | 35.0% | 33,081 | 43.5% | 24.6% | 27.6% | 29.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **645** | **100.0%** | **76,017** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 8.1 Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Loans** | | | | **% of Owner-Occupied Units** | **Aggregate HMDA Data** | |
| | **#** | **# %** | **$** | **$ %** | | **# %** | **$ %** |
| **Home Purchase Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 65 | 16.7% | 5,396 | 9.4% | 14.2% | 13.0% | 8.5% |
| Middle | 192 | 49.4% | 27,968 | 48.6% | 63.1% | 59.9% | 58.8% |
| Upper | 132 | 33.9% | 24,184 | 42.0% | 22.8% | 27.0% | 32.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.1% |
| **TOTAL** | **389** | **100.0%** | **57,548** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 38 | 13.4% | 1,999 | 6.3% | 14.2% | 11.0% | 7.6% |
| Middle | 143 | 50.5% | 16,449 | 51.8% | 63.1% | 61.3% | 60.6% |
| Upper | 102 | 36.0% | 13,280 | 41.9% | 22.8% | 27.6% | 31.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.1% |
| **TOTAL** | **283** | **100.0%** | **31,728** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 9 | 17.6% | 342 | 14.4% | 14.2% | 10.0% | 8.8% |
| Middle | 27 | 52.9% | 1,270 | 53.5% | 63.1% | 56.3% | 52.7% |
| Upper | 15 | 29.4% | 760 | 32.0% | 22.8% | 33.7% | 38.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **51** | **100.0%** | **2,372** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 7 | 63.6% | 1,713 | 51.7% | 36.4% | 44.2% | 31.9% |
| Middle | 1 | 9.1% | 477 | 14.4% | 36.3% | 45.3% | 50.2% |
| Upper | 3 | 27.3% | 1,122 | 33.9% | 27.3% | 10.5% | 17.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **11** | **100.0%** | **3,312** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **% of Owner-Occupied Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 5.6% | 98 | 8.6% | 14.2% | 7.6% | 7.8% |
| Middle | 8 | 44.4% | 375 | 32.8% | 63.1% | 61.8% | 57.7% |
| Upper | 9 | 50.0% | 670 | 58.6% | 22.8% | 30.6% | 34.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **18** | **100.0%** | **1,143** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 16 | 37.2% | 653 | 30.8% | 14.2% | 18.4% | 10.9% |
| Middle | 18 | 41.9% | 1,019 | 48.1% | 63.1% | 56.3% | 64.2% |
| Upper | 9 | 20.9% | 447 | 21.1% | 22.8% | 24.7% | 24.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.6% | 0.0% |
| **TOTAL** | **43** | **100.0%** | **2,119** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.2% | 20.1% | 12.8% |
| Middle | 0 | 0.0% | 0 | 0.0% | 63.1% | 56.5% | 57.6% |
| Upper | 0 | 0.0% | 0 | 0.0% | 22.8% | 23.4% | 29.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 136 | 17.1% | 10,201 | 10.4% | 14.2% | 13.0% | 10.1% |
| Middle | 389 | 48.9% | 47,558 | 48.4% | 63.1% | 59.8% | 58.6% |
| Upper | 270 | 34.0% | 40,463 | 41.2% | 22.8% | 27.1% | 31.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.1% |
| **TOTAL** | **795** | **100.0%** | **98,222** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9<br>Distribution of 2018 Small Business Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 101 | 30.7% | $5,751 | 23.8% | 27.8% | 26.7% | 27.8% |
| Middle | 156 | 47.4% | $11,697 | 48.4% | 45.9% | 46.2% | 44.1% |
| Upper | 72 | 21.9% | $6,737 | 27.9% | 26.3% | 24.4% | 27.0% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 2.7% | 1.2% |
| **TOTAL** | **329** | **100.0%** | **$24,185** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9<br>Distribution of 2019 Small Business Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 65 | 23.0% | $6,234 | 23.7% | 26.4% | 23.8% | 25.6% |
| Middle | 147 | 52.1% | $13,797 | 52.4% | 48.9% | 50.2% | 52.3% |
| Upper | 70 | 24.8% | $6,313 | 24.0% | 24.7% | 23.4% | 21.3% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 2.6% | 0.8% |
| **TOTAL** | **282** | **100.0%** | **$26,344** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10<br>Distribution of 2018 Small Farm Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | $0 | 0.0% | 8.6% | 4.8% | 6.5% |
| Middle | 31 | 72.1% | $2,062 | 60.8% | 61.7% | 77.7% | 71.0% |
| Upper | 12 | 27.9% | $1,328 | 39.2% | 29.7% | 17.0% | 22.4% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.4% | 0.0% |
| **TOTAL** | **43** | **100.0%** | **$3,390** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10<br>Distribution of 2019 Small Farm Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | # % | $ % |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | $0 | 0.0% | 5.6% | 4.3% | 5.7% |
| Middle | 35 | 74.5% | $2,717 | 71.4% | 69.8% | 85.9% | 84.5% |
| Upper | 12 | 25.5% | $1,087 | 28.6% | 24.7% | 9.0% | 9.6% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.9% | 0.1% |
| **TOTAL** | **47** | **100.0%** | **$3,804** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1<br>Distribution of 2018 Home Mortgage Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | $ | $ % | | # % | $ % |
| **Home Purchase Loans** | | | | | | | |
| Low | 22 | 6.1% | 1,660 | 3.3% | 22.3% | 5.1% | 2.7% |
| Moderate | 60 | 16.8% | 4,655 | 9.2% | 17.6% | 15.5% | 10.3% |
| Middle | 81 | 22.6% | 9,501 | 18.8% | 18.8% | 22.3% | 19.8% |
| Upper | 167 | 46.6% | 31,738 | 62.9% | 41.3% | 37.2% | 48.3% |
| Unknown | 28 | 7.8% | 2,888 | 5.7% | 0.0% | 19.9% | 18.9% |
| **TOTAL** | **358** | **100.0%** | **50,442** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 13 | 6.8% | 525 | 3.1% | 22.3% | 7.0% | 3.6% |
| Moderate | 19 | 10.0% | 1,333 | 8.0% | 17.6% | 13.3% | 8.7% |
| Middle | 40 | 21.1% | 2,521 | 15.1% | 18.8% | 20.0% | 16.8% |
| Upper | 99 | 52.1% | 9,854 | 59.1% | 41.3% | 44.0% | 51.5% |
| Unknown | 19 | 10.0% | 2,434 | 14.6% | 0.0% | 15.8% | 19.3% |
| **TOTAL** | **190** | **100.0%** | **16,667** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 1 | 2.3% | 20 | 0.7% | 22.3% | 5.1% | 3.3% |
| Moderate | 4 | 9.3% | 150 | 5.4% | 17.6% | 11.1% | 9.0% |
| Middle | 10 | 23.3% | 700 | 25.1% | 18.8% | 19.8% | 16.7% |
| Upper | 25 | 58.1% | 1,705 | 61.2% | 41.3% | 53.0% | 58.8% |
| Unknown | 3 | 7.0% | 211 | 7.6% | 0.0% | 11.1% | 12.3% |
| **TOTAL** | **43** | **100.0%** | **2,786** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.3% | 0.8% | 0.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.6% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.8% | 0.0% | 0.0% |
| Upper | 2 | 22.2% | 490 | 12.2% | 41.3% | 9.2% | 2.1% |
| Unknown | 7 | 77.8% | 3,522 | 87.8% | 0.0% | 89.9% | 97.8% |
| **TOTAL** | **9** | **100.0%** | **4,012** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | Families by Family Income % | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.3% | 4.1% | 2.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.6% | 13.1% | 7.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.8% | 14.5% | 10.3% |
| Upper | 15 | 100.0% | 808 | 100.0% | 41.3% | 66.2% | 71.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 2.1% | 8.8% |
| **TOTAL** | **15** | **100.0%** | **808** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 1 | 3.3% | 31 | 2.4% | 22.3% | 2.9% | 1.8% |
| Moderate | 5 | 16.7% | 127 | 9.8% | 17.6% | 17.1% | 9.4% |
| Middle | 5 | 16.7% | 242 | 18.6% | 18.8% | 15.2% | 10.2% |
| Upper | 18 | 60.0% | 874 | 67.1% | 41.3% | 58.1% | 65.4% |
| Unknown | 1 | 3.3% | 28 | 2.2% | 0.0% | 6.7% | 13.2% |
| **TOTAL** | **30** | **100.0%** | **1,302** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.3% | 0.5% | 0.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.6% | 0.5% | 0.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.8% | 5.2% | 5.6% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.3% | 7.1% | 13.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 86.7% | 80.5% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 37 | 5.7% | 2,236 | 2.9% | 22.3% | 5.2% | 2.4% |
| Moderate | 88 | 13.6% | 6,265 | 8.2% | 17.6% | 13.9% | 8.1% |
| Middle | 136 | 21.1% | 12,964 | 17.1% | 18.8% | 20.3% | 15.5% |
| Upper | 326 | 50.5% | 45,469 | 59.8% | 41.3% | 38.9% | 41.5% |
| Unknown | 58 | 9.0% | 9,083 | 11.9% | 0.0% | 21.7% | 32.5% |
| **TOTAL** | **645** | **100.0%** | **76,017** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1<br>Distribution of 2019 Home Mortgage Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Loans** | | | | **Families by Family Income %** | **Aggregate HMDA Data** | |
| | **#** | **# %** | **$** | **$ %** | | **# %** | **$ %** |
| Home Purchase Loans | | | | | | | |
| Low | 19 | 4.9% | 1,144 | 2.0% | 22.4% | 5.0% | 2.5% |
| Moderate | 62 | 15.9% | 5,770 | 10.0% | 17.7% | 15.9% | 10.7% |
| Middle | 79 | 20.3% | 9,229 | 16.0% | 18.9% | 22.4% | 19.6% |
| Upper | 194 | 49.9% | 37,446 | 65.1% | 41.0% | 39.6% | 50.5% |
| Unknown | 35 | 9.0% | 3,959 | 6.9% | 0.0% | 17.1% | 16.8% |
| **TOTAL** | **389** | **100.0%** | **57,548** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Refinance | | | | | | | |
| Low | 17 | 6.0% | 843 | 2.7% | 22.4% | 4.9% | 2.0% |
| Moderate | 33 | 11.7% | 2,567 | 8.1% | 17.7% | 10.8% | 6.3% |
| Middle | 54 | 19.1% | 4,783 | 15.1% | 18.9% | 19.4% | 15.1% |
| Upper | 136 | 48.1% | 17,732 | 55.9% | 41.0% | 44.0% | 53.1% |
| Unknown | 43 | 15.2% | 5,803 | 18.3% | 0.0% | 20.9% | 23.5% |
| **TOTAL** | **283** | **100.0%** | **31,728** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Home Improvement | | | | | | | |
| Low | 2 | 3.9% | 40 | 1.7% | 22.4% | 5.2% | 2.9% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Moderate | 4 | 7.8% | 151 | 6.4% | 17.7% | 10.7% | 8.2% |
| Middle | 6 | 11.8% | 220 | 9.3% | 18.9% | 18.9% | 16.2% |
| Upper | 30 | 58.8% | 1,433 | 60.4% | 41.0% | 57.0% | 63.7% |
| Unknown | 9 | 17.6% | 528 | 22.3% | 0.0% | 8.1% | 9.0% |
| **TOTAL** | **51** | **100.0%** | **2,372** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.4% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.7% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.9% | 2.3% | 0.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.0% | 7.0% | 2.9% |
| Unknown | 11 | 100.0% | 3,312 | 100.0% | 0.0% | 90.7% | 96.6% |
| **TOTAL** | **11** | **100.0%** | **3,312** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.4% | 3.2% | 2.4% |
| Moderate | 2 | 11.1% | 118 | 10.3% | 17.7% | 13.4% | 10.9% |
| Middle | 2 | 11.1% | 95 | 8.3% | 18.9% | 18.5% | 12.6% |
| Upper | 12 | 66.7% | 522 | 45.7% | 41.0% | 61.1% | 67.2% |
| Unknown | 2 | 11.1% | 408 | 35.7% | 0.0% | 3.8% | 7.0% |
| **TOTAL** | **18** | **100.0%** | **1,143** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 5 | 11.6% | 159 | 7.5% | 22.4% | 7.6% | 3.1% |
| Moderate | 10 | 23.3% | 536 | 25.3% | 17.7% | 19.6% | 16.3% |
| Middle | 11 | 25.6% | 504 | 23.8% | 18.9% | 20.3% | 19.4% |
| Upper | 17 | 39.5% | 920 | 43.4% | 41.0% | 48.7% | 54.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.8% | 6.6% |
| **TOTAL** | **43** | **100.0%** | **2,119** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.4% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.7% | 0.4% | 0.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.9% | 0.4% | 0.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.0% | 0.0% | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 99.3% | 99.1% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 43 | 5.4% | 2,186 | 2.2% | 22.4% | 4.7% | 2.1% |
| Moderate | 111 | 14.0% | 9,142 | 9.3% | 17.7% | 13.5% | 8.4% |
| Middle | 152 | 19.1% | 14,831 | 15.1% | 18.9% | 20.2% | 16.3% |
| Upper | 389 | 48.9% | 58,053 | 59.1% | 41.0% | 40.2% | 46.8% |
| Unknown | 100 | 12.6% | 14,010 | 14.3% | 0.0% | 21.5% | 26.4% |
| **TOTAL** | **795** | **100.0%** | **98,222** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 13 Distribution of 2018 Small Business Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Business Revenue and Loan Size** | | **2018** | | | | | |
| | | **Count** | | **Dollars** | | | **Total Businesses** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Business Revenue** | $1 Million or Less | 214 | 65.0% | 40.4% | $15,940 | 65.9% | 37.6% | 87.7% |
| | Over $1 Million/ Unknown | 115 | 35.0% | 59.6% | $8,245 | 34.1% | 62.4% | 12.3% |
| | **TOTAL** | **329** | **100.0%** | **100.0%** | **$24,185** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 264 | 80.2% | 88.2% | $8,938 | 37.0% | 31.4% | |
| | $100,001–$250,000 | 44 | 13.4% | 6.8% | $7,322 | 30.3% | 22.3% | |
| | $250,001–$1 Million | 21 | 6.4% | 4.9% | $7,925 | 32.8% | 46.3% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **329** | **100.0%** | **100.0%** | **$24,185** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 171 | 79.9% | | $6,088 | 38.2% | | |
| | $100,001–$250,000 | 31 | 14.5% | | $5,003 | 31.4% | | |
| | $250,001–$1 Million | 12 | 5.6% | | $4,849 | 30.4% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **214** | **100.0%** | | **$15,940** | **100.0%** | | |

| Table 13 Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Business Revenue and Loan Size** | | **2019** | | | | | |
| | | **Count** | | **Dollars** | | | **Total Businesses** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Business Revenue** | $1 Million or Less | 185 | 65.6% | 39.7% | $14,668 | 55.7% | 36.4% | 88.4% |
| | Over $1 Million/ Unknown | 97 | 34.4% | 60.3% | $11,676 | 44.3% | 63.6% | 11.6% |
| | **TOTAL** | **282** | **100.0%** | **100.0%** | **$26,344** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 220 | 78.0% | 89.9% | $8,151 | 30.9% | 33.5% | |
| | $100,001–$250,000 | 36 | 12.8% | 5.6% | $6,306 | 23.9% | 19.8% | |
| | $250,001–$1 Million | 26 | 9.2% | 4.5% | $11,887 | 45.1% | 46.6% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **282** | **100.0%** | **100.0%** | **$26,344** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 151 | 53.5% | | $4,998 | 19.0% | | |
| | $100,001–$250,000 | 20 | 7.1% | | $3,625 | 13.8% | | |
| | $250,001–$1 Million | 14 | 5.0% | | $6,045 | 22.9% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **185** | **65.6%** | | **$14,668** | **55.7%** | | |

| Table 14<br>Distribution of 2018 Small Farm Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | 2018 | | | | | |
| | | Count | | | Dollars | | Farms |
| Farm Revenue and Loan Size | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| **Farm Revenue** | $1 Million or Less | 41 | 95.3% | 65.9% | 3,021 | 89.1% | 82.8% | 96.1% |
| | Over $1 Million/ Unknown | 2 | 4.7% | 34.1% | 369 | 10.9% | 17.2% | 3.9% |
| | **TOTAL** | **43** | **100.0%** | **100.0%** | **3,390** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 32 | 74.4% | 85.6% | 763 | 22.5% | 39.5% | |
| | $100,001–$250,000 | 8 | 18.6% | 11.8% | 1,173 | 34.6% | 38.2% | |
| | $250,001–$500,000 | 3 | 7.0% | 2.6% | 1,454 | 42.9% | 22.3% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **43** | **100.0%** | **100.0%** | **3,390** | **100.0%** | **100.0%** | |
| **Loan Size** **Revenue $1 Million or Less** | $100,000 or Less | 32 | 78.0% | | 763 | 25.3% | | |
| | $100,001–$250,000 | 6 | 14.6% | | 804 | 26.6% | | |
| | $250,001–$1 Million | 3 | 7.3% | | 1,454 | 48.1% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **41** | **100.0%** | | **3,021** | **100.0%** | | |

**Appendix C (continued)**

| Farm Revenue and Loan Size | | | 2019 | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | Count | | Dollars | | | Farms | |
| | | | Bank | | Aggregate | Bank | | Aggregate | |
| | | | # | % | % | $ (000s) | $ % | $ % | % |
| **Farm Revenue** | | $1 Million or Less | 40 | 85.1% | 67.9% | 2,948 | 77.5% | 71.0% | 96.3% |
| | | Over $1 Million/ Unknown | 7 | 14.9% | 32.1% | 856 | 22.5% | 29.0% | 3.7% |
| | | **TOTAL** | **47** | **100.0%** | **100.0%** | **3,804** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | | $100,000 or Less | 37 | 78.7% | 86.3% | 1,159 | 30.5% | 43.6% | |
| | | $100,001–$250,000 | 6 | 12.8% | 9.0% | 937 | 24.6% | 25.7% | |
| | | $250,001–$500,000 | 4 | 8.5% | 4.7% | 1,708 | 44.9% | 30.7% | |
| | | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | | **TOTAL** | **47** | **100.0%** | **100.0%** | **3,804** | **100.0%** | **100.0%** | |
| **Loan Size** | **Revenue $1 Million or Less** | $100,000 or Less | 32 | 80.0% | | 931 | 31.6% | | |
| | | $100,001–$250,000 | 5 | 12.5% | | 809 | 27.4% | | |
| | | $250,001–$1 Million | 3 | 7.5% | | 1,208 | 41.0% | | |
| | | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | | **TOTAL** | **40** | **100.0%** | | **2,948** | **100.0%** | | |

Table 14
Distribution of 2019 Small Farm Lending
By Borrower Income Level

## Kansas City Multistate MSA

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 8.1 — Distribution of 2018 Home Mortgage Lending By Income Level of Geography** | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 27 | 4.0% | 2,699 | 1.7% | 6.1% | 3.0% | 1.4% |
| Moderate | 125 | 18.7% | 14,236 | 9.0% | 17.6% | 16.8% | 10.2% |
| Middle | 231 | 34.5% | 42,864 | 27.1% | 38.7% | 39.0% | 34.1% |
| Upper | 285 | 42.6% | 97,846 | 61.9% | 37.5% | 41.1% | 54.1% |
| Unknown | 1 | 0.1% | 400 | 0.3% | 0.2% | 0.1% | 0.1% |
| **TOTAL** | **669** | **100.0%** | **158,045** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 3 | 1.3% | 210 | 0.4% | 6.1% | 2.8% | 1.5% |
| Moderate | 26 | 10.9% | 2,633 | 5.3% | 17.6% | 14.9% | 9.2% |
| Middle | 83 | 34.9% | 12,268 | 24.7% | 38.7% | 39.9% | 35.2% |
| Upper | 126 | 52.9% | 34,643 | 69.6% | 37.5% | 42.2% | 53.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.2% |
| **TOTAL** | **238** | **100.0%** | **49,754** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 4 | 4.8% | 132 | 1.9% | 6.1% | 2.5% | 2.2% |
| Moderate | 11 | 13.3% | 820 | 11.5% | 17.6% | 10.0% | 7.4% |
| Middle | 24 | 28.9% | 2,629 | 37.0% | 38.7% | 34.3% | 32.0% |
| Upper | 44 | 53.0% | 3,526 | 49.6% | 37.5% | 53.0% | 58.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.2% |
| **TOTAL** | **83** | **100.0%** | **7,107** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** — % of Multifamily Units | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 14.6% | 21.2% | 10.3% |
| Moderate | 2 | 28.6% | 1,973 | 47.6% | 26.3% | 28.1% | 20.5% |
| Middle | 2 | 28.6% | 1,344 | 32.4% | 37.0% | 32.5% | 37.2% |
| Upper | 3 | 42.9% | 827 | 20.0% | 20.5% | 15.8% | 26.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1.6% | 2.4% | 5.1% |
| **TOTAL** | **7** | **100.0%** | **4,144** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** — % of Owner-Occupied Units | | | | | | | |
| Low | 1 | 2.3% | 13 | 0.6% | 6.1% | 1.2% | 1.0% |
| Moderate | 8 | 18.2% | 239 | 11.3% | 17.6% | 9.7% | 6.7% |
| Middle | 16 | 36.4% | 533 | 25.1% | 38.7% | 33.7% | 28.4% |
| Upper | 19 | 43.2% | 1,336 | 63.0% | 37.5% | 55.3% | 63.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.1% |

**Appendix C (continued)**

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **TOTAL** | **44** | **100.0%** | **2,121** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 4 | 15.4% | 257 | 10.6% | 6.1% | 3.5% | 2.0% |
| Moderate | 4 | 15.4% | 190 | 7.8% | 17.6% | 16.7% | 10.7% |
| Middle | 7 | 26.9% | 439 | 18.1% | 38.7% | 38.6% | 31.8% |
| Upper | 11 | 42.3% | 1,543 | 63.5% | 37.5% | 41.0% | 55.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.2% |
| **TOTAL** | **26** | **100.0%** | **2,429** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 6.1% | 4.7% | 2.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.6% | 24.7% | 16.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 38.7% | 39.0% | 36.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 37.5% | 31.2% | 43.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.3% | 0.4% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 39 | 3.7% | 3,311 | 1.5% | 6.1% | 3.0% | 2.3% |
| Moderate | 176 | 16.5% | 20,091 | 9.0% | 17.6% | 15.9% | 10.9% |
| Middle | 363 | 34.0% | 60,077 | 26.9% | 38.7% | 38.8% | 34.5% |
| Upper | 488 | 45.7% | 139,721 | 62.5% | 37.5% | 42.2% | 51.7% |
| Unknown | 1 | 0.1% | 400 | 0.2% | 0.2% | 0.1% | 0.6% |
| **TOTAL** | **1,067** | **100.0%** | **223,600** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 8.1** **Distribution of 2019 Home Mortgage Lending** **By Income Level of Geography** | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 30 | 4.3% | 2,182 | 1.2% | 6.1% | 3.4% | 1.7% |
| Moderate | 127 | 18.2% | 15,544 | 8.8% | 17.6% | 17.0% | 10.4% |
| Middle | 207 | 29.6% | 39,432 | 22.2% | 38.7% | 39.3% | 34.5% |
| Upper | 333 | 47.6% | 119,398 | 67.3% | 37.5% | 40.2% | 53.3% |
| Unknown | 2 | 0.3% | 784 | 0.4% | 0.2% | 0.1% | 0.1% |
| **TOTAL** | **699** | **100.0%** | **177,340** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 10 | 2.4% | 972 | 0.8% | 6.1% | 1.8% | 1.0% |
| Moderate | 49 | 11.9% | 7,084 | 6.1% | 17.6% | 11.3% | 6.8% |
| Middle | 115 | 27.8% | 25,018 | 21.5% | 38.7% | 37.3% | 31.5% |
| Upper | 239 | 57.9% | 83,215 | 71.6% | 37.5% | 49.5% | 60.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.2% |
| **TOTAL** | **413** | **100.0%** | **116,289** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 5 | 5.9% | 234 | 3.1% | 6.1% | 2.8% | 1.9% |
| Moderate | 7 | 8.2% | 324 | 4.3% | 17.6% | 10.8% | 7.9% |
| Middle | 21 | 24.7% | 1,300 | 17.2% | 38.7% | 34.4% | 30.0% |
| Upper | 51 | 60.0% | 5,706 | 75.3% | 37.5% | 51.9% | 60.1% |
| Unknown | 1 | 1.2% | 10 | 0.1% | 0.2% | 0.2% | 0.1% |
| **TOTAL** | **85** | **100.0%** | **7,574** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 14.6% | 17.6% | 9.0% |
| Moderate | 4 | 44.4% | 2,866 | 14.0% | 26.3% | 33.4% | 20.6% |
| Middle | 4 | 44.4% | 17,374 | 84.7% | 37.0% | 33.1% | 45.4% |
| Upper | 1 | 11.1% | 278 | 1.4% | 20.5% | 14.7% | 24.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1.6% | 1.2% | 0.2% |
| **TOTAL** | **9** | **100.0%** | **20,518** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **% of Owner-Occupied Units** | | |
| Low | 1 | 2.3% | 75 | 1.9% | 6.1% | 1.4% | 1.1% |
| Moderate | 3 | 7.0% | 96 | 2.4% | 17.6% | 9.8% | 5.8% |
| Middle | 16 | 37.2% | 747 | 19.0% | 38.7% | 33.5% | 27.7% |
| Upper | 23 | 53.5% | 3,017 | 76.7% | 37.5% | 55.3% | 65.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.1% |
| **TOTAL** | **43** | **100.0%** | **3,935** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 6.1% | 3.9% | 2.4% |
| Moderate | 13 | 41.9% | 926 | 29.2% | 17.6% | 17.0% | 10.2% |
| Middle | 7 | 22.6% | 623 | 19.6% | 38.7% | 36.9% | 30.4% |
| Upper | 11 | 35.5% | 1,622 | 51.2% | 37.5% | 42.3% | 56.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| **TOTAL** | **31** | **100.0%** | **3,171** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 6.1% | 6.7% | 3.6% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.6% | 25.0% | 16.9% |
| Middle | 0 | 0.0% | 0 | 0.0% | 38.7% | 45.3% | 45.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 37.5% | 23.0% | 34.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 46 | 3.6% | 3,463 | 1.1% | 6.1% | 2.8% | 2.0% |
| Moderate | 203 | 15.9% | 26,840 | 8.2% | 17.6% | 14.6% | 9.9% |
| Middle | 370 | 28.9% | 84,494 | 25.7% | 38.7% | 38.1% | 34.2% |
| Upper | 658 | 51.4% | 213,236 | 64.8% | 37.5% | 44.3% | 53.7% |
| Unknown | 3 | 0.2% | 794 | 0.2% | 0.2% | 0.1% | 0.2% |
| **TOTAL** | **1,280** | **100.0%** | **328,827** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

**Appendix C (continued)**

| Table 9 Distribution of 2018 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | % | $ % |
| Low | 29 | 10.3% | $4,219 | 10.9% | 7.0% | 6.7% | 8.9% |
| Moderate | 53 | 18.8% | $6,020 | 15.6% | 19.1% | 16.9% | 17.0% |
| Middle | 82 | 29.1% | $10,760 | 27.8% | 35.0% | 32.0% | 30.2% |
| Upper | 110 | 39.0% | $16,168 | 41.8% | 37.0% | 40.9% | 37.8% |
| Unknown | 8 | 2.8% | $1,513 | 3.9% | 1.9% | 3.5% | 6.1% |
| **TOTAL** | **282** | **100.0%** | **$38,680** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9 Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | $ 000s | $ % | | % | $ % |
| Low | 22 | 7.7% | $3,058 | 8.0% | 7.2% | 6.8% | 9.0% |
| Moderate | 71 | 24.7% | $9,035 | 23.5% | 19.3% | 17.2% | 18.5% |
| Middle | 86 | 30.0% | $10,224 | 26.6% | 34.9% | 31.5% | 28.6% |
| Upper | 104 | 36.2% | $15,469 | 40.3% | 36.7% | 41.0% | 37.5% |
| Unknown | 4 | 1.4% | $620 | 1.6% | 1.9% | 3.5% | 6.4% |
| **TOTAL** | **287** | **100.0%** | **$38,406** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10<br>Distribution of 2018 Small Farm Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Farm Loans** | | | | **% of Farms** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **# %** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 1.8% | 0.7% | 0.5% |
| Moderate | 0 | 0.0% | $0 | 0.0% | 8.1% | 4.8% | 4.0% |
| Middle | 0 | 0.0% | $0 | 0.0% | 52.9% | 66.8% | 72.9% |
| Upper | 0 | 0.0% | $0 | 0.0% | 37.1% | 26.7% | 22.4% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.2% | 1.1% | 0.2% |
| **TOTAL** | **0** | **0.0%** | **$0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10<br>Distribution of 2019 Small Farm Lending<br>By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Farm Loans** | | | | **% of Farms** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **# %** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 2.0% | 1.8% | 0.3% |
| Moderate | 0 | 0.0% | $0 | 0.0% | 8.1% | 6.1% | 4.5% |
| Middle | 2 | 100.0% | $695 | 100.0% | 53.3% | 61.9% | 61.7% |
| Upper | 0 | 0.0% | $0 | 0.0% | 36.5% | 29.8% | 33.3% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.1% | 0.4% | 0.1% |
| **TOTAL** | **2** | **100.0%** | **$695** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1 Distribution of 2018 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | $ | $ % | | # % | $ % |
| **Home Purchase Loans** | | | | | | | |
| Low | 57 | 8.5% | 5,022 | 3.2% | 21.3% | 8.5% | 4.3% |
| Moderate | 143 | 21.4% | 21,353 | 13.5% | 17.4% | 21.5% | 15.6% |
| Middle | 148 | 22.1% | 28,007 | 17.7% | 20.3% | 22.4% | 20.9% |
| Upper | 303 | 45.3% | 99,360 | 62.9% | 41.1% | 33.7% | 46.0% |
| Unknown | 18 | 2.7% | 4,303 | 2.7% | 0.0% | 14.0% | 13.2% |
| **TOTAL** | **669** | **100.0%** | **158,045** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 20 | 8.4% | 1,973 | 4.0% | 21.3% | 9.3% | 5.3% |
| Moderate | 36 | 15.1% | 4,263 | 8.6% | 17.4% | 19.8% | 14.9% |
| Middle | 42 | 17.6% | 5,769 | 11.6% | 20.3% | 22.4% | 20.6% |
| Upper | 126 | 52.9% | 35,293 | 70.9% | 41.1% | 34.7% | 46.0% |
| Unknown | 14 | 5.9% | 2,456 | 4.9% | 0.0% | 13.9% | 13.1% |
| **TOTAL** | **238** | **100.0%** | **49,754** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 2 | 2.4% | 50 | 0.7% | 21.3% | 5.4% | 3.7% |
| Moderate | 9 | 10.8% | 629 | 8.9% | 17.4% | 13.2% | 9.5% |
| Middle | 10 | 12.0% | 599 | 8.4% | 20.3% | 21.6% | 18.5% |
| Upper | 55 | 66.3% | 4,714 | 66.3% | 41.1% | 53.3% | 57.8% |
| Unknown | 7 | 8.4% | 1,115 | 15.7% | 0.0% | 6.5% | 10.6% |
| **TOTAL** | **83** | **100.0%** | **7,107** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.4% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.3% | 0.9% | 0.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.1% | 5.4% | 0.5% |
| Unknown | 7 | 100.0% | 4,144 | 100.0% | 0.0% | 93.7% | 99.5% |
| **TOTAL** | **7** | **100.0%** | **4,144** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | Families by Family Income % | | |
| Low | 3 | 6.8% | 37 | 1.7% | 21.3% | 5.5% | 4.1% |
| Moderate | 5 | 11.4% | 131 | 6.2% | 17.4% | 14.8% | 11.1% |
| Middle | 13 | 29.5% | 817 | 38.5% | 20.3% | 22.9% | 18.7% |
| Upper | 18 | 40.9% | 853 | 40.2% | 41.1% | 55.3% | 64.6% |
| Unknown | 5 | 11.4% | 283 | 13.3% | 0.0% | 1.5% | 1.6% |
| **TOTAL** | **44** | **100.0%** | **2,121** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 1 | 3.8% | 94 | 3.9% | 21.3% | 9.2% | 6.0% |
| Moderate | 7 | 26.9% | 393 | 16.2% | 17.4% | 17.1% | 12.2% |
| Middle | 6 | 23.1% | 324 | 13.3% | 20.3% | 21.2% | 14.6% |
| Upper | 11 | 42.3% | 1,563 | 64.3% | 41.1% | 45.9% | 57.1% |
| Unknown | 1 | 3.8% | 55 | 2.3% | 0.0% | 6.6% | 10.2% |
| **TOTAL** | **26** | **100.0%** | **2,429** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 1.0% | 0.6% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.4% | 1.8% | 1.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.3% | 2.0% | 0.8% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.1% | 2.5% | 1.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 92.8% | 96.4% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 83 | 7.8% | 7,176 | 3.2% | 21.3% | 8.2% | 4.1% |
| Moderate | 200 | 18.7% | 26,769 | 12.0% | 17.4% | 19.7% | 13.6% |
| Middle | 219 | 20.5% | 35,516 | 15.9% | 20.3% | 21.8% | 18.6% |
| Upper | 513 | 48.1% | 141,783 | 63.4% | 41.1% | 35.1% | 41.9% |
| Unknown | 52 | 4.9% | 12,356 | 5.5% | 0.0% | 15.2% | 21.9% |
| **TOTAL** | **1,067** | **100.0%** | **223,600** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| **Table 12.1** — Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
| | # | # % | $ | $ % | | # % | $ % |
| **Home Purchase Loans** | | | | | | | |
| Low | 65 | 9.3% | 6,232 | 3.5% | 21.3% | 9.6% | 4.9% |
| Moderate | 143 | 20.5% | 24,552 | 13.8% | 17.4% | 21.8% | 16.0% |
| Middle | 138 | 19.7% | 28,031 | 15.8% | 20.3% | 23.0% | 21.6% |
| Upper | 328 | 46.9% | 113,490 | 64.0% | 41.1% | 34.1% | 46.6% |
| Unknown | 25 | 3.6% | 5,035 | 2.8% | 0.0% | 11.6% | 10.9% |
| **TOTAL** | **699** | **100.0%** | **177,340** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 26 | 6.3% | 2,432 | 2.1% | 21.3% | 6.6% | 3.4% |
| Moderate | 49 | 11.9% | 7,540 | 6.5% | 17.4% | 15.3% | 10.4% |
| Middle | 68 | 16.5% | 13,253 | 11.4% | 20.3% | 21.1% | 18.3% |
| Upper | 220 | 53.3% | 81,640 | 70.2% | 41.1% | 38.8% | 49.9% |
| Unknown | 50 | 12.1% | 11,424 | 9.8% | 0.0% | 18.1% | 18.1% |
| **TOTAL** | **413** | **100.0%** | **116,289** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Home Improvement | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 3 | 3.5% | 83 | 1.1% | 21.3% | 6.2% | 4.2% |
| Moderate | 10 | 11.8% | 317 | 4.2% | 17.4% | 13.2% | 10.5% |
| Middle | 10 | 11.8% | 602 | 7.9% | 20.3% | 20.9% | 17.9% |
| Upper | 50 | 58.8% | 5,456 | 72.0% | 41.1% | 54.5% | 60.2% |
| Unknown | 12 | 14.1% | 1,116 | 14.7% | 0.0% | 5.2% | 7.2% |
| **TOTAL** | **85** | **100.0%** | **7,574** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | **% of Multifamily Units** | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.4% | 0.6% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.3% | 0.9% | 0.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.1% | 3.5% | 1.0% |
| Unknown | 9 | 100.0% | 20,518 | 100.0% | 0.0% | 95.1% | 98.8% |
| **TOTAL** | **9** | **100.0%** | **20,518** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | **Families by Family Income %** | | | |
| Low | 1 | 2.3% | 20 | 0.5% | 21.3% | 4.8% | 2.9% |
| Moderate | 4 | 9.3% | 153 | 3.9% | 17.4% | 13.4% | 8.9% |
| Middle | 12 | 27.9% | 681 | 17.3% | 20.3% | 22.2% | 16.1% |
| Upper | 19 | 44.2% | 1,498 | 38.1% | 41.1% | 56.7% | 68.9% |
| Unknown | 7 | 16.3% | 1,583 | 40.2% | 0.0% | 2.9% | 3.2% |
| **TOTAL** | **43** | **100.0%** | **3,935** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 1 | 3.2% | 28 | 0.9% | 21.3% | 10.5% | 7.5% |
| Moderate | 4 | 12.9% | 397 | 12.5% | 17.4% | 17.0% | 11.3% |
| Middle | 8 | 25.8% | 561 | 17.7% | 20.3% | 22.0% | 17.1% |
| Upper | 16 | 51.6% | 2,111 | 66.6% | 41.1% | 44.6% | 55.7% |
| Unknown | 2 | 6.5% | 74 | 2.3% | 0.0% | 6.0% | 8.4% |
| **TOTAL** | **31** | **100.0%** | **3,171** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 0.5% | 0.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.4% | 0.9% | 0.9% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.3% | 0.7% | 1.3% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.1% | 1.2% | 3.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 96.7% | 94.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |

| Total Home Mortgage Loans | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 96 | 7.5% | 8,795 | 2.7% | 21.3% | 8.0% | 3.9% |
| Moderate | 210 | 16.4% | 32,959 | 10.0% | 17.4% | 18.3% | 12.4% |
| Middle | 236 | 18.4% | 43,128 | 13.1% | 20.3% | 21.8% | 18.5% |
| Upper | 633 | 49.5% | 204,195 | 62.1% | 41.1% | 37.1% | 44.4% |
| Unknown | 105 | 8.2% | 39,750 | 12.1% | 0.0% | 14.8% | 20.8% |
| **TOTAL** | **1,280** | **100.0%** | **328,827** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 13 Distribution of 2018 Small Business Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | **2018** | | | | | |
| | | **Count** | | **Dollars** | | | **Total Businesses** |
| **Business Revenue and Loan Size** | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| **Business Revenue** | $1 Million or Less | 144 | 51.1% | 43.2% | $15,616 | 40.4% | 28.7% | 89.7% |
| | Over $1 Million/ Unknown | 138 | 48.9% | 56.8% | $23,064 | 59.6% | 71.3% | 10.3% |
| | **TOTAL** | **282** | **100.0%** | **100.0%** | **$38,680** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 183 | 64.9% | 91.2% | $6,322 | 16.3% | 27.0% | |
| | $100,001–$250,000 | 52 | 18.4% | 3.9% | $9,310 | 24.1% | 14.2% | |
| | $250,001–$1 Million | 47 | 16.7% | 4.9% | $23,048 | 59.6% | 58.8% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **282** | **100.0%** | **100.0%** | **$38,680** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 106 | 73.6% | | $3,860 | 24.7% | | |
| | $100,001–$250,000 | 19 | 13.2% | | $3,332 | 21.3% | | |
| | $250,001–$1 Million | 19 | 13.2% | | $8,424 | 53.9% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **144** | **100.0%** | | **$15,616** | **100.0%** | | |

| Table 13<br>Distribution of 2019 Small Business Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Business Revenue and Loan Size** | | **2019** | | | | | |
| | | **Count** | | **Dollars** | | | **Total Businesses** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |

| **Business Revenue and Loan Size** | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
|---|---|---|---|---|---|---|---|---|
| **Business Revenue** | $1 Million or Less | 132 | 46.0% | 46.0% | $8,916 | 23.2% | 31.3% | 90.1% |
| | Over $1 Million/ Unknown | 155 | 54.0% | 54.0% | $29,490 | 76.8% | 68.7% | 9.9% |
| | **TOTAL** | **287** | **100.0%** | **100.0%** | **$38,406** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 195 | 67.9% | 91.3% | $7,277 | 18.9% | 28.6% | |
| | $100,001–$250,000 | 47 | 16.4% | 3.9% | $8,631 | 22.5% | 14.6% | |
| | $250,001–$1 Million | 45 | 15.7% | 4.8% | $22,498 | 58.6% | 56.8% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **287** | **100.0%** | **100.0%** | **$38,406** | **100.0%** | **100.0%** | |
| **Loan Size Revenue $1 Million or Less** | $100,000 or Less | 116 | 40.4% | | $3,628 | 9.4% | | |
| | $100,001–$250,000 | 8 | 2.8% | | $1,342 | 3.5% | | |
| | $250,001–$1 Million | 8 | 2.8% | | $3,946 | 10.3% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **132** | **46.0%** | | **$8,916** | **23.2%** | | |

| Table 14<br>Distribution of 2018 Small Farm Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | 2018 | | | | | |
| | | Count | | | Dollars | | Farms |
| Farm Revenue and Loan Size | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| **Farm Revenue** | $1 Million or Less | 0 | 0.0% | 54.2% | 0 | 0.0% | 66.7% | 97.4% |
| | Over $1 Million/ Unknown | 0 | 0.0% | 45.8% | 0 | 0.0% | 33.3% | 2.6% |
| | **TOTAL** | **0** | **0.0%** | **100.0%** | **0** | **0.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 0 | 0.0% | 82.0% | 0 | 0.0% | 29.9% | |
| | $100,001–$250,000 | 0 | 0.0% | 11.3% | 0 | 0.0% | 31.4% | |
| | $250,001–$500,000 | 0 | 0.0% | 6.7% | 0 | 0.0% | 38.7% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **0** | **0.0%** | **100.0%** | **0** | **0.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 0 | 0.0% | | 0 | 0.0% | | |
| | $100,001–$250,000 | 0 | 0.0% | | 0 | 0.0% | | |
| | $250,001–$1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **0** | **0.0%** | | **0** | **0.0%** | | |

| Table 14<br>Distribution of 2019 Small Farm Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | 2019 | | | | | |
| | | Count | | | Dollars | | Farms |
| Farm Revenue and Loan Size | | Bank | Aggregate | Bank | | Aggregate | |
| | | # | % | % | $<br>(000s) | $ % | $ % | % |
| Farm Revenue | $1 Million or Less | 1 | 50.0% | 62.3% | 485 | 69.8% | 77.4% | 97.4% |
| | Over $1 Million/ Unknown | 1 | 50.0% | 37.7% | 210 | 30.2% | 22.6% | 2.6% |
| | TOTAL | 2 | 100.0% | 100.0% | 695 | 100.0% | 100.0% | 100.0% |
| Loan Size | $100,000 or Less | 0 | 0.0% | 83.4% | 0 | 0.0% | 31.2% | |
| | $100,001–$250,000 | 1 | 50.0% | 10.3% | 210 | 30.2% | 30.8% | |
| | $250,001–$500,000 | 1 | 50.0% | 6.3% | 485 | 69.8% | 38.0% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | TOTAL | 2 | 100.0% | 100.0% | 695 | 100.0% | 100.0% | |
| Loan Size / Revenue $1 Million or Less | $100,000 or Less | 0 | 0.0% | | 0 | 0.0% | | |
| | $100,001–$250,000 | 0 | 0.0% | | 0 | 0.0% | | |
| | $250,001–$1 Million | 1 | 100.0% | | 485 | 100.0% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | TOTAL | 1 | 100.0% | | 485 | 100.0% | | |

**NonMSA Kansas**

| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
|---|---|---|---|---|---|---|---|
| | # | # % | $ | $ % | | # % | $ % |
| **Table 8.1** **Distribution of 2018 Home Mortgage Lending** **By Income Level of Geography** | | | | | | | |
| **Home Purchase Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 10 | 20.8% | 652 | 14.5% | 17.8% | 17.6% | 12.7% |
| Middle | 26 | 54.2% | 2,210 | 49.2% | 70.1% | 63.8% | 61.6% |
| Upper | 12 | 25.0% | 1,626 | 36.2% | 12.1% | 18.5% | 25.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.1% |
| **TOTAL** | **48** | **100.0%** | **4,488** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 4 | 14.3% | 166 | 6.2% | 17.8% | 14.6% | 11.4% |
| Middle | 15 | 53.6% | 1,370 | 51.0% | 70.1% | 61.7% | 59.7% |
| Upper | 9 | 32.1% | 1,150 | 42.8% | 12.1% | 23.5% | 28.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.2% | 0.1% |
| **TOTAL** | **28** | **100.0%** | **2,686** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.8% | 7.1% | 7.2% |
| Middle | 2 | 66.7% | 65 | 52.0% | 70.1% | 69.7% | 67.5% |
| Upper | 1 | 33.3% | 60 | 48.0% | 12.1% | 23.2% | 25.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **3** | **100.0%** | **125** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 21.6% | 24.4% | 34.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 54.8% | 51.2% | 37.8% |
| Upper | 1 | 100.0% | 141 | 100.0% | 23.6% | 24.4% | 28.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1** | **100.0%** | **141** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **% Of Owner-Occupied Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.8% | 7.0% | 3.4% |
| Middle | 0 | 0.0% | 0 | 0.0% | 70.1% | 60.5% | 65.9% |
| Upper | 1 | 100.0% | 25 | 100.0% | 12.1% | 32.6% | 30.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **1** | **100.0%** | **25** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 14.3% | 33 | 8.1% | 17.8% | 12.5% | 8.2% |
| Middle | 6 | 85.7% | 372 | 91.9% | 70.1% | 68.8% | 74.3% |
| Upper | 0 | 0.0% | 0 | 0.0% | 12.1% | 18.8% | 17.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **7** | **100.0%** | **405** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.8% | 20.0% | 16.8% |
| Middle | 0 | 0.0% | 0 | 0.0% | 70.1% | 69.3% | 68.8% |
| Upper | 0 | 0.0% | 0 | 0.0% | 12.1% | 10.7% | 14.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 15 | 17.0% | 851 | 10.8% | 17.8% | 16.4% | 13.5% |
| Middle | 49 | 55.7% | 4,017 | 51.0% | 70.1% | 63.5% | 60.3% |
| Upper | 24 | 27.3% | 3,002 | 38.1% | 12.1% | 20.0% | 26.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.1% |
| **TOTAL** | **88** | **100.0%** | **7,870** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| **Table 8.1**<br>**Distribution of 2019 Home Mortgage Lending**<br>**By Income Level of Geography** | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Loans** | | | | **% of Owner-Occupied Units** | **Aggregate HMDA Data** | |
| | **#** | **# %** | **$** | **$ %** | | **# %** | **$ %** |
| **Home Purchase Loans** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 15 | 27.3% | 1,546 | 19.3% | 19.6% | 17.5% | 12.8% |
| Middle | 33 | 60.0% | 4,360 | 54.5% | 73.8% | 70.4% | 71.7% |
| Upper | 7 | 12.7% | 2,093 | 26.2% | 6.6% | 12.0% | 15.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.0% |
| **TOTAL** | **55** | **100.0%** | **7,999** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 2 | 7.7% | 140 | 4.1% | 19.6% | 14.2% | 11.5% |
| Middle | 21 | 80.8% | 2,599 | 76.9% | 73.8% | 75.2% | 75.9% |
| Upper | 3 | 11.5% | 640 | 18.9% | 6.6% | 10.7% | 12.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **26** | **100.0%** | **3,379** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Home Improvement | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 2 | 33.3% | 80 | 25.3% | 19.6% | 20.4% | 18.9% |
| Middle | 2 | 33.3% | 165 | 52.2% | 73.8% | 70.9% | 72.8% |
| Upper | 2 | 33.3% | 71 | 22.5% | 6.6% | 8.7% | 8.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **6** | **100.0%** | **316** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Multifamily Loans | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 22.6% | 34.2% | 24.8% |
| Middle | 2 | 100.0% | 2,080 | 100.0% | 55.6% | 55.3% | 60.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 21.9% | 10.5% | 15.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **2** | **100.0%** | **2,080** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Other Purpose LOC | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 25.0% | 50 | 38.2% | 19.6% | 11.5% | 7.3% |
| Middle | 2 | 50.0% | 41 | 31.3% | 73.8% | 73.1% | 71.1% |
| Upper | 1 | 25.0% | 40 | 30.5% | 6.6% | 15.4% | 21.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **4** | **100.0%** | **131** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 50.0% | 130 | 49.8% | 19.6% | 16.1% | 21.0% |
| Middle | 1 | 50.0% | 131 | 50.2% | 73.8% | 75.0% | 72.6% |
| Upper | 0 | 0.0% | 0 | 0.0% | 6.6% | 8.9% | 6.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **2** | **100.0%** | **261** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.6% | 24.2% | 17.6% |
| Middle | 0 | 0.0% | 0 | 0.0% | 73.8% | 71.0% | 77.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 6.6% | 4.8% | 5.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |

| Total Home Mortgage Loans | | | | | | |
|---|---|---|---|---|---|---|
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 21 | 22.1% | 1,946 | 13.7% | 19.6% | 17.1% | 13.1% |
| Middle | 61 | 64.2% | 9,376 | 66.2% | 73.8% | 71.6% | 72.6% |
| Upper | 13 | 13.7% | 2,844 | 20.1% | 6.6% | 11.3% | 14.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **95** | **100.0%** | **14,166** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9<br>Distribution of 2018 Small Business Lending<br>By Income Level of Geography | | | | | | |
|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 34 | 38.6% | $8,587 | 55.5% | 28.7% | 24.3% | 38.3% |
| Middle | 44 | 50.0% | $5,237 | 33.8% | 59.8% | 58.6% | 51.8% |
| Upper | 10 | 11.4% | $1,661 | 10.7% | 11.5% | 14.8% | 9.1% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 2.3% | 0.8% |
| **TOTAL** | **88** | **100.0%** | **$15,485** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 9<br>Distribution of 2019 Small Business Lending<br>By Income Level of Geography | | | | | | |
|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Business Loans** | | | | **% of Businesses** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **%** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 25 | 43.9% | $3,210 | 31.2% | 30.3% | 23.8% | 31.0% |
| Middle | 21 | 36.8% | $3,436 | 33.4% | 62.3% | 64.6% | 56.6% |
| Upper | 11 | 19.3% | $3,628 | 35.3% | 7.4% | 8.0% | 11.5% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 3.5% | 0.9% |
| **TOTAL** | **57** | **100.0%** | **$10,274** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10 Distribution of 2018 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Farm Loans** | | | | **% of Farms** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **# %** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 3 | 7.3% | $31 | 1.7% | 4.5% | 4.4% | 2.5% |
| Middle | 36 | 87.8% | $1,246 | 66.4% | 83.1% | 87.6% | 86.2% |
| Upper | 2 | 4.9% | $599 | 31.9% | 12.5% | 7.6% | 11.2% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.4% | 0.1% |
| **TOTAL** | **41** | **100.0%** | **$1,876** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 10 Distribution of 2019 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Small Farm Loans** | | | | **% of Farms** | **Aggregate of Peer Data** | |
| | **#** | **# %** | **$ 000s** | **$ %** | | **# %** | **$ %** |
| Low | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 3 | 9.4% | $95 | 5.9% | 4.7% | 4.8% | 4.8% |
| Middle | 29 | 90.6% | $1,505 | 94.1% | 93.0% | 90.4% | 94.4% |
| Upper | 0 | 0.0% | $0 | 0.0% | 2.3% | 4.4% | 0.7% |
| Unknown | 0 | 0.0% | $0 | 0.0% | 0.0% | 0.4% | 0.1% |
| **TOTAL** | **32** | **100.0%** | **$1,600** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1 Distribution of 2018 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Census Tract Income Level** | **Bank Loans** | | | | **Families by Family Income %** | **Aggregate HMDA Data** | |
| | **#** | **# %** | **$** | **$ %** | | **# %** | **$ %** |
| **Home Purchase Loans** | | | | | | | |
| Low | 3 | 6.3% | 196 | 4.4% | 21.0% | 8.7% | 4.8% |
| Moderate | 19 | 39.6% | 1,468 | 32.7% | 19.7% | 21.7% | 16.3% |
| Middle | 7 | 14.6% | 719 | 16.0% | 22.6% | 20.3% | 20.2% |
| Upper | 16 | 33.3% | 1,908 | 42.5% | 36.7% | 28.2% | 40.2% |
| Unknown | 3 | 6.3% | 197 | 4.4% | 0.0% | 21.1% | 18.5% |
| **TOTAL** | **48** | **100.0%** | **4,488** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Refinance** | | | | | | | |
| Low | 3 | 10.7% | 89 | 3.3% | 21.0% | 9.5% | 5.8% |
| Moderate | 2 | 7.1% | 96 | 3.6% | 19.7% | 14.1% | 9.4% |
| Middle | 4 | 14.3% | 550 | 20.5% | 22.6% | 21.7% | 19.9% |
| Upper | 14 | 50.0% | 1,365 | 50.8% | 36.7% | 38.7% | 45.9% |
| Unknown | 5 | 17.9% | 586 | 21.8% | 0.0% | 15.9% | 19.0% |
| **TOTAL** | **28** | **100.0%** | **2,686** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Home Improvement** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.0% | 9.1% | 6.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.7% | 17.2% | 18.4% |
| Middle | 0 | 0.0% | 0 | 0.0% | 22.6% | 22.2% | 17.6% |
| Upper | 2 | 66.7% | 110 | 88.0% | 36.7% | 43.4% | 48.2% |
| Unknown | 1 | 33.3% | 15 | 12.0% | 0.0% | 8.1% | 9.3% |
| **TOTAL** | **3** | **100.0%** | **125** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.0% | 2.4% | 0.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.7% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 22.6% | 7.3% | 2.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 36.7% | 12.2% | 6.5% |
| Unknown | 1 | 100.0% | 141 | 100.0% | 0.0% | 78.0% | 91.1% |
| **TOTAL** | **1** | **100.0%** | **141** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.0% | 14.0% | 16.2% |
| Moderate | 1 | 100.0% | 25 | 100.0% | 19.7% | 16.3% | 9.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 22.6% | 23.3% | 14.7% |
| Upper | 0 | 0.0% | 0 | 0.0% | 36.7% | 44.2% | 57.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 2.3% | 2.2% |
| **TOTAL** | **1** | **100.0%** | **25** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Other Purpose Closed/Exempt | | | | | | | |
|---|---|---|---|---|---|---|---|
| Low | 2 | 28.6% | 48 | 11.9% | 21.0% | 12.5% | 5.9% |
| Moderate | 1 | 14.3% | 36 | 8.9% | 19.7% | 14.6% | 9.5% |
| Middle | 1 | 14.3% | 182 | 44.9% | 22.6% | 27.1% | 32.1% |
| Upper | 3 | 42.9% | 139 | 34.3% | 36.7% | 33.3% | 40.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 12.5% | 12.3% |
| **TOTAL** | **7** | **100.0%** | **405** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Purpose Not Applicable | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.0% | 1.3% | 0.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.7% | 1.3% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 22.6% | 1.3% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 36.7% | 0.0% | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 96.0% | 99.8% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| Total Home Mortgage Loans | | | | | | | |
| Low | 8 | 9.1% | 333 | 4.2% | 21.0% | 8.7% | 4.8% |
| Moderate | 23 | 26.1% | 1,625 | 20.6% | 19.7% | 18.6% | 13.4% |
| Middle | 12 | 13.6% | 1,451 | 18.4% | 22.6% | 20.1% | 18.8% |
| Upper | 35 | 39.8% | 3,522 | 44.8% | 36.7% | 30.6% | 39.2% |
| Unknown | 10 | 11.4% | 939 | 11.9% | 0.0% | 22.0% | 23.8% |
| **TOTAL** | **88** | **100.0%** | **7,870** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 12.1 Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | $ | $ % | | # % | $ % |
| Home Purchase Loans | | | | | | | |
| Low | 6 | 10.9% | 432 | 5.4% | 21.2% | 10.2% | 5.8% |
| Moderate | 10 | 18.2% | 944 | 11.8% | 19.8% | 21.4% | 16.5% |
| Middle | 18 | 32.7% | 2,355 | 29.4% | 22.7% | 21.0% | 21.6% |
| Upper | 18 | 32.7% | 4,029 | 50.4% | 36.3% | 28.3% | 39.7% |
| Unknown | 3 | 5.5% | 239 | 3.0% | 0.0% | 19.1% | 16.3% |
| **TOTAL** | **55** | **100.0%** | **7,999** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Refinance | | | | | | | |
| Low | 3 | 11.5% | 177 | 5.2% | 21.2% | 6.9% | 3.4% |
| Moderate | 6 | 23.1% | 527 | 15.6% | 19.8% | 13.7% | 8.5% |
| Middle | 3 | 11.5% | 304 | 9.0% | 22.7% | 19.0% | 15.7% |
| Upper | 13 | 50.0% | 2,307 | 68.3% | 36.3% | 40.3% | 49.1% |
| Unknown | 1 | 3.8% | 64 | 1.9% | 0.0% | 20.1% | 23.2% |
| **TOTAL** | **26** | **100.0%** | **3,379** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.2% | 11.7% | 9.3% |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.8% | 9.7% | 7.3% |
| Middle | 3 | 50.0% | 180 | 57.0% | 22.7% | 19.4% | 20.8% |
| Upper | 3 | 50.0% | 136 | 43.0% | 36.3% | 53.4% | 57.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 5.8% | 4.8% |
| **TOTAL** | **6** | **100.0%** | **316** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Multifamily Loans** | | | | | **% of Multifamily Units** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.2% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.8% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 22.7% | 10.5% | 5.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 36.3% | 13.2% | 21.5% |
| Unknown | 2 | 100.0% | 2,080 | 100.0% | 0.0% | 76.3% | 73.4% |
| **TOTAL** | **2** | **100.0%** | **2,080** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose LOC** | | | | | **Families by Family Income %** | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.2% | 3.8% | 1.3% |
| Moderate | 1 | 25.0% | 50 | 38.2% | 19.8% | 7.7% | 5.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 22.7% | 30.8% | 33.4% |
| Upper | 3 | 75.0% | 81 | 61.8% | 36.3% | 57.7% | 60.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| **TOTAL** | **4** | **100.0%** | **131** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Other Purpose Closed/Exempt** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.2% | 12.5% | 6.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.8% | 12.5% | 12.6% |
| Middle | 2 | 100.0% | 261 | 100.0% | 22.7% | 30.4% | 33.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 36.3% | 41.1% | 44.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.6% | 3.1% |
| **TOTAL** | **2** | **100.0%** | **261** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Purpose Not Applicable** | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.2% | 1.6% | 1.8% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.8% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 22.7% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 36.3% | 0.0% | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 98.4% | 98.2% |
| **TOTAL** | **0** | **0.0%** | **0** | **0.0%** | **100.0%** | **100.0%** | **100.0%** |
| **Total Home Mortgage Loans** | | | | | | | |
| Low | 9 | 9.5% | 609 | 4.3% | 21.2% | 9.1% | 4.9% |
| Moderate | 17 | 17.9% | 1,521 | 10.7% | 19.8% | 17.9% | 13.2% |
| Middle | 26 | 27.4% | 3,100 | 21.9% | 22.7% | 20.1% | 19.2% |
| Upper | 37 | 38.9% | 6,553 | 46.3% | 36.3% | 32.0% | 41.5% |
| Unknown | 6 | 6.3% | 2,383 | 16.8% | 0.0% | 21.0% | 21.2% |
| **TOTAL** | **95** | **100.0%** | **14,166** | **100.0%** | **100.0%** | **100.0%** | **100.0%** |

| Table 13 Distribution of 2018 Small Business Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | 2018 | | | | | |
| | | Count | | Dollars | | | Total Businesses |
| Business Revenue and Loan Size | | Bank | Aggregate | Bank | | Aggregate | |
| | | # | % | % | $ (000s) | $ % | $ % | % |
| Business Revenue | $1 Million or Less | 57 | 64.8% | 44.7% | $6,883 | 44.4% | 31.5% | 88.4% |
| | Over $1 Million/ Unknown | 31 | 35.2% | 55.3% | $8,602 | 55.6% | 68.5% | 11.6% |
| | TOTAL | 88 | 100.0% | 100.0% | $15,485 | 100.0% | 100.0% | 100.0% |
| Loan Size | $100,000 or Less | 49 | 55.7% | 90.8% | $1,875 | 12.1% | 29.5% | |
| | $100,001–$250,000 | 18 | 20.5% | 4.7% | $3,095 | 20.0% | 18.9% | |
| | $250,001–$1 Million | 21 | 23.9% | 4.5% | $10,515 | 67.9% | 51.7% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | TOTAL | 88 | 100.0% | 100.0% | $15,485 | 100.0% | 100.0% | |
| Loan Size — Revenue $1 Million or Less | $100,000 or Less | 38 | 66.7% | | $1,238 | 18.0% | | |
| | $100,001–$250,000 | 12 | 21.1% | | $1,938 | 28.2% | | |
| | $250,001–$1 Million | 7 | 12.3% | | $3,707 | 53.9% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | TOTAL | 57 | 100.0% | | $6,883 | 100.0% | | |

| Table 13<br>Distribution of 2019 Small Business Lending<br>By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Business Revenue and Loan Size** | | **2019** | | | | | |
| | | **Count** | | **Dollars** | | | **Total Businesses** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$<br>(000s)** | **$ %** | **$ %** | **%** |
| **Business Revenue** | $1 Million or Less | 42 | 73.7% | 45.0% | $5,706 | 55.5% | 37.7% | 88.6% |
| | Over $1 Million/<br>Unknown | 15 | 26.3% | 55.0% | $4,568 | 44.5% | 62.3% | 11.4% |
| | **TOTAL** | **57** | **100.0%** | **100.0%** | **$10,274** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 30 | 52.6% | 91.7% | $791 | 7.7% | 30.9% | |
| | $100,001–$250,000 | 12 | 21.1% | 3.8% | $2,293 | 22.3% | 16.3% | |
| | $250,001–$1 Million | 15 | 26.3% | 4.5% | $7,190 | 70.0% | 52.9% | |
| | Over $1 Million | 0 | 0.0% | 0.0% | $0 | 0.0% | 0.0% | |
| | **TOTAL** | **57** | **100.0%** | **100.0%** | **$10,274** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 28 | 49.1% | | $756 | 7.4% | | |
| | $100,001–$250,000 | 4 | 7.0% | | $839 | 8.2% | | |
| | $250,001–$1 Million | 10 | 17.5% | | $4,111 | 40.0% | | |
| | Over $1 Million | 0 | 0.0% | | $0 | 0.0% | | |
| | **TOTAL** | **42** | **73.7%** | | **$5,706** | **55.5%** | | |

| | | 2018 | | | | | |
|---|---|---|---|---|---|---|---|
| | | Count | | Dollars | | | Farms |
| **Farm Revenue and Loan Size** | | Bank | Aggregate | Bank | | Aggregate | |
| | | # | % | % | $ (000s) | $ % | $ % | % |

**Table 14**
**Distribution of 2018 Small Farm Lending**
**By Borrower Income Level**

| | | # | % | % | $ (000s) | $ % | $ % | % |
|---|---|---|---|---|---|---|---|---|
| Farm Revenue | $1 Million or Less | 40 | 97.6% | 58.2% | 1,576 | 84.0% | 77.9% | 98.7% |
| | Over $1 Million/ Unknown | 1 | 2.4% | 41.8% | 300 | 16.0% | 22.1% | 1.3% |
| | **TOTAL** | **41** | **100.0%** | **100.0%** | **1,876** | **100.0%** | **100.0%** | **100.0%** |
| Loan Size | $100,000 or Less | 37 | 90.2% | 89.3% | 827 | 44.1% | 47.9% | |
| | $100,001–$250,000 | 1 | 2.4% | 6.7% | 150 | 8.0% | 22.2% | |
| | $250,001–$500,000 | 3 | 7.3% | 4.0% | 899 | 47.9% | 29.9% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **41** | **100.0%** | **100.0%** | **1,876** | **100.0%** | **100.0%** | |
| Loan Size / Revenue $1 Million or Less | $100,000 or Less | 37 | 92.5% | | 827 | 52.5% | | |
| | $100,001–$250,000 | 1 | 2.5% | | 150 | 9.5% | | |
| | $250,001–$1 Million | 2 | 5.0% | | 599 | 38.0% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **40** | **100.0%** | | **1,576** | **100.0%** | | |

| Table 14 Distribution of 2019 Small Farm Lending By Borrower Income Level | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Farm Revenue and Loan Size** | | **2019** | | | | | |
| | | **Count** | | **Dollars** | | | **Farms** |
| | | **Bank** | **Aggregate** | **Bank** | | **Aggregate** | |
| | | **#** | **%** | **%** | **$ (000s)** | **$ %** | **$ %** | **%** |
| **Farm Revenue** | $1 Million or Less | 31 | 96.9% | 56.1% | 1,592 | 99.5% | 73.6% | 98.6% |
| | Over $1 Million/ Unknown | 1 | 3.1% | 43.9% | 8 | 0.5% | 26.4% | 1.4% |
| | **TOTAL** | **32** | **100.0%** | **100.0%** | **1,600** | **100.0%** | **100.0%** | **100.0%** |
| **Loan Size** | $100,000 or Less | 28 | 87.5% | 87.7% | 729 | 45.6% | 38.5% | |
| | $100,001–$250,000 | 2 | 6.3% | 7.0% | 221 | 13.8% | 24.1% | |
| | $250,001–$500,000 | 2 | 6.3% | 5.3% | 650 | 40.6% | 37.3% | |
| | Over $500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | **TOTAL** | **32** | **100.0%** | **100.0%** | **1,600** | **100.0%** | **100.0%** | |
| **Loan Size** / **Revenue $1 Million or Less** | $100,000 or Less | 27 | 87.1% | | 721 | 45.3% | | |
| | $100,001–$250,000 | 2 | 6.5% | | 221 | 13.9% | | |
| | $250,001–$1 Million | 2 | 6.5% | | 650 | 40.8% | | |
| | Over $1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | **TOTAL** | **31** | **100.0%** | | **1,592** | **100.0%** | | |

# 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.

**Assessment area**: One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

**Census tract**: A small subdivision of metropolitan and nonmetropolitan 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 on 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 contact**: Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

**Community development**: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) 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; (4) activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and 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.

**Demographics**: The statistical characteristics of human populations (e.g., age, race, sex, and income) used especially to identify markets.

**Distressed nonmetropolitan middle-income geography**: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

**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 under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 income of applicants; the amount of loan requested; and the disposition of the application (e.g., 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**: One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

**Housing affordability ratio**: Calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

**Limited-scope review**: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., 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.

**Median family income**: The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

**Metropolitan area (MA)**: A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An 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. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

**Nonmetropolitan statistical area (nonMSA)**: Not part of a metropolitan area. (See metropolitan area.)

**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.

**Performance context**: The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

**Performance criteria**: These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

**Performance evaluation (PE)**: A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

**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 businesses/small farms**: A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were $1 million or less.

**Small loan(s) to business(es)**: That is, "small business loans" are included in "loans to small businesses" as defined in the Consolidated Reports of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of $1 million or less and typically are secured either 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)**: That is, "small farm loans" are included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Reports of Condition and Income (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.

**Underserved middle-income geography**: A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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