



PUBLIC DISCLOSURE

DECEMBER 09, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**BANKWEST OF KANSAS
RSSD# 989758**

**924 MAIN STREET
GOODLAND, KANSAS 67735**

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

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

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

Bankwest of Kansas (the bank) is rated **Satisfactory**. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit (NLTD) ratio is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans are originated inside the AA.
- A reasonable geographic distribution of loans occurs throughout the bank's AA.
- Lending reflects a reasonable penetration among individuals of different income levels, including low- and moderate-income, and farms of different sizes.
- Neither the bank nor this Reserve Bank received any CRA-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* were utilized to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics and credit needs. Lending performance was assessed within the bank's Western Kansas AA. The following data was reviewed:

- The bank's 16-quarter average NLTD ratio;
- A statistical sample of 77 small farm loans was selected from a universe of 125 loans originated between January 1, 2018 through December 31, 2018; and a statistical sample of 58 motor vehicle-secured loans was selected from a universe of 81 loans originated between September 28, 2015 and December 31, 2018.

Small farm loans were given greater weight in the evaluation due to the bank's focus on agricultural lending.

DESCRIPTION OF INSTITUTION

The bank is a community bank headquartered in Goodland, Kansas. The bank's characteristics include:

- The bank is a wholly owned subsidiary of G.S. Bancshares, Inc., Goodland, Kansas.
- The bank had total assets of \$116.4 million as of June 30, 2019.
- In addition to its main office in Goodland, the bank has two additional branch offices located in Colby, Kansas, and St. Francis, Kansas.
- The bank operates three cash-only automated teller machines, one at each branch location.

- The bank’s primary business focus is agricultural lending.

Loan Type	\$(000)	%
Agricultural	69,043	77.1
Commercial	10,698	12.0
Residential Real Estate	3,910	4.4
Other	3,948	4.4
Consumer	1,931	2.2
Gross Loans	89,530	100.0

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

The bank was rated Satisfactory under the CRA at its September 28, 2015 performance evaluation. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its communities.

DESCRIPTION OF ASSESSMENT AREA

The bank’s Western Kansas AA is comprised of Sherman, Cheyenne, and Thomas Counties in their entireties (see Appendix A for an AA map).

- The AA is comprised of four middle-income census tracts and one upper-income census tract.
- According to the June 30, 2019 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank had a deposit market share of 15.8 percent, which ranked second out of nine FDIC-insured institutions operating in the AA.
- Two interviews with members of the community were conducted to augment the performance evaluation by providing insight into the economic conditions and credit needs within the AA. Both contacts were representatives of a local agricultural organization.

Area	2010 Population	2015 Population	Percent Change
Sherman County, Kansas	6,010	6,054	0.7
Cheyenne County, Kansas	2,726	2,682	(1.6)
Thomas County, Kansas	7,900	7,925	0.3
State of Kansas	2,853,118	2,892,987	1.4

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

- The AA’s total population has remained relatively stagnant, growing approximately 0.2 percent between 2010 and 2015.
- According to one community member, the lack of retail stores, healthcare facilities, skilled and higher paying jobs, and affordable housing options has contributed to the limited growth in the AA’s population.

TABLE 3 MEDIAN FAMILY INCOME CHANGE			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Sherman County, Kansas	49,135	50,467	2.7
Cheyenne County, Kansas	47,386	60,217	27.1
Thomas County, Kansas	64,462	68,432	6.2
State of Kansas	62,424	66,389	6.4

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

- A community member noted that many farmers supplement their incomes by leasing farmland for the installation of wind turbines, which likely contributed to the substantial increase in median family income in Cheyenne County.
- In addition, oil production is one of Cheyenne County’s largest industries. According to data from the Kansas Geological Survey, oil production in Cheyenne County increased by approximately 189.2 percent between 2010 and 2015.

TABLE 4 HOUSING COSTS CHANGE						
Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Sherman County, Kansas	79,300	77,000	(2.9)	598	643	7.5
Cheyenne County, Kansas	67,100	82,800	23.4	507	564	11.2
Thomas County, Kansas	83,900	105,100	25.3	448	463	3.3
State of Kansas	122,600	132,000	7.7	671	757	12.8

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

- Median housing values in Cheyenne and Thomas Counties significantly increased in recent years. A community member stated that AA housing values often fluctuate based on changes in temporary employment availability related to the energy production industries. Increased employment opportunities in the AA have increased the demand for housing, resulting in rising housing values and gross rents.

**TABLE 5
UNEMPLOYMENT RATES**

Region	2014	2015	2016	2017	2018
Sherman County, Kansas	3.2	2.9	3.5	2.9	2.8
Cheyenne County, Kansas	3.1	2.7	2.9	2.6	2.4
Thomas County, Kansas	2.9	2.7	2.9	2.6	2.6
State of Kansas	4.5	4.2	4.2	3.7	3.4

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- A community member stated that the local economy has been gradually improving over recent years, as evidenced by unemployment rates for each county within the AA continuing to be lower than the rate for the state of Kansas.
- Major industries in the AA include farming and agricultural-related services. Local school districts and colleges also employ many AA residents.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank’s average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, portfolio composition, market share, and the area where they are located. Overall, the bank’s NLTD ratio is reasonable as it is within the range of NLTD ratios of other similarly situated institutions.

**TABLE 6
COMPARATIVE NLTD RATIOS**

Institution	Location	Asset Size (\$000s)	NLTD Ratio (%)
			16-Quarter Average
Bankwest of Kansas	Goodland, Kansas	116,361	79.5
Farmers State Bank of Oakley	Oakley, Kansas	143,939	91.8
FNB Bank	Goodland, Kansas	187,875	70.2
Farmers Bank & Trust Company	Atwood, Kansas	99,627	39.9

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. A majority of the bank’s loans, by number and dollar volume, are originated inside the AA. However, the concentration of small farm lending is noticeably lower than the concentration of motor vehicle-secured lending within the AA. The discrepancy is attributed to a recently hired loan officer that brought pre-existing agricultural lending relationships with farmers in Colorado to the bank. The bank is not actively seeking new business in Colorado, as its existing branch locations are not in close proximity to any Colorado markets.

TABLE 7 LENDING INSIDE AND OUTSIDE THE AA								
Loan Type	Inside				Outside			
	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Motor Vehicle Loans	49	609	84.5	82.2	9	132	15.5	17.8
Small Farm Loans	53	3,129	68.8	56.5	24	2,410	31.2	43.5
Total Loans	102	3,738	75.6	59.5	33	2,542	24.4	40.5

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

Geographic Distribution of Loans

This performance criterion evaluates the bank’s distribution of lending within its AA by income level of census tracts. The bank’s geographic distribution of loans reflects reasonable dispersion among census tracts within the AA.

Small Farm Lending

The geographic distribution of small farm lending is reasonable. In addition, an evaluation of the bank’s dispersion of small farm lending revealed no significant gaps or lapses throughout the AA. Lending performance in middle-income census tracts exceeds the demographic figure by both number and dollar volume, while lending within the bank’s upper-income census tract is below the demographic figure by number and dollar volume.

**TABLE 8
DISTRIBUTION OF 2018 SMALL FARM LENDING
BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Small Farm Loans				% of Farms
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	50	2,951	94.3	94.3	80.3
Upper	3	178	5.7	5.7	19.7
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

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

Motor Vehicle-Secured Lending

The geographic distribution of motor vehicle-secured lending is reasonable. In addition, an evaluation of the bank’s dispersion of motor vehicle-secured lending revealed no significant gaps or lapses throughout the AA. The bank’s lending performance within middle- and upper-income census tracts is comparable to the demographic figure by both number and dollar volume.

**TABLE 9
DISTRIBUTION OF 2015 – 2018 MOTOR VEHICLE-SECURED LENDING
BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				% of Households
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	34	436	69.4	71.7	66.3
Upper	15	172	30.6	28.3	33.7
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

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

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

This performance criterion evaluates the bank’s lending to borrowers of different income levels and to farms of different revenue sizes. The bank’s lending has a reasonable penetration among individuals of different income levels and farms of different sizes.

Small Farm Lending

The borrower distribution of small farm lending is reasonable. Lending to small farms with gross annual revenues of \$1 million or less is below the demographic figure by both number and dollar volume. An analysis of CRA peer reports, which aggregate small business and small farm lending volumes of financial institutions that are required to report CRA data, indicate that other financial institutions operating in the AA are lending at 20.7 percent by number and 40.6 percent by dollar to small farms with gross annual revenues of \$1 million or less. While aggregate CRA lending data is not a direct comparison, as the bank is not a CRA reporter, aggregate lending volumes are reflective of the overall demand for small farm credit within the AA. When compared to aggregate data, the bank's lending to small farms with gross annual revenues of \$1 million or less outperformed aggregate lending by both number and dollar volume. Additionally, 98.1 percent of the bank's small farm loans were originated in dollar amounts of \$250,000 or less, demonstrating the bank's willingness to meet the smaller credit needs of small farms.

**TABLE 10
DISTRIBUTION OF 2018 SMALL FARM LENDING
BY REVENUE SIZE OF FARMS**

	Bank Loans				Total Farms
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	46	2,219	86.8	70.9	97.1
Over \$1 Million	7	909	13.2	29.1	2.9
Not Known	0	0	0.0	0.0	0.0
Total	53	3,129	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	43	1,303	81.1	41.6	
\$100,001 – \$250,000	9	1,376	17.0	44.0	
\$250,001 – \$500,000	1	450	1.9	14.4	
Total	53	3,129	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	39	1,138	84.8	51.3	
\$100,001 – \$250,000	7	1,081	15.2	48.7	
\$250,001 – \$500,000	0	0	0.0	0.0	
Total	46	2,219	100.0	100.0	
<i>Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011 – 2015 U.S. Census Bureau: American Community Survey</i>					
<i>NOTE: Percentages may not add up to 100.0 percent due to rounding.</i>					

Motor Vehicle–Secured Lending

The borrower distribution of motor vehicle-secured lending is reasonable. The bank's lending to low-income borrowers is comparable to the demographic figure by number volume, but below the demographic figure by dollar volume. More emphasis is placed on a bank's lending performance by number volume, as low-income borrowers typically do not have the capacity to borrow large amounts. The bank's lending to moderate-income borrowers exceeds the

demographic figure both by number and dollar volume, while the bank’s lending to middle-income borrowers is comparable to the demographic figure by number volume and exceeds the demographic figure by dollar volume. Lastly, the bank’s lending to upper-income borrowers is below the demographic figure by number volume and is comparable to the demographic figure by dollar volume.

**TABLE 11
DISTRIBUTION OF 2015 – 2018 MOTOR VEHICLE-SECURED LENDING
BY BORROWER INCOME LEVEL**

Borrower Income Level	Bank Loans				% of Households
	#	\$(000)	#%	\$%	
Low	13	85	26.5	14.0	25.2
Moderate	15	141	30.6	23.2	16.6
Middle	9	153	18.4	25.1	19.2
Upper	12	230	24.5	37.8	38.9
Unknown	0	0	0.0	0.0	0.0

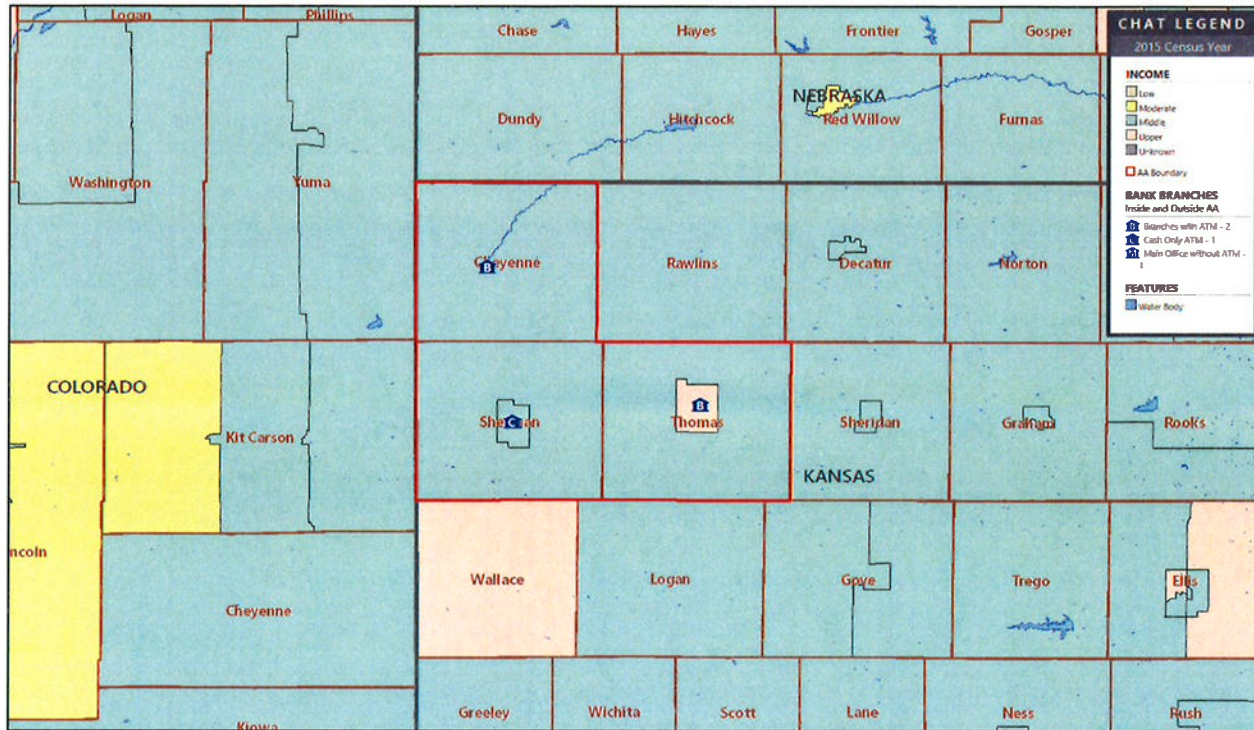
*Source: 2018 FFIEC Census Data
2011 – 2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 percent due to rounding.*

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

APPENDIX A – MAP OF THE ASSESSMENT AREA

2018 Western Kansas AA



APPENDIX B – DEMOGRAPHIC INFORMATION

TABLE B-1 2018 WESTERN KANSAS AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	746	16.9
Moderate	0	0.0	0	0.0	0	0.0	718	16.3
Middle	4	80.0	2,908	65.9	238	8.2	1,184	26.8
Upper	1	20.0	1,506	34.1	44	2.9	1,766	40.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5	100.0	4,414	100.0	282	6.4	4,414	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	5,462	3,199	66.1	58.6	1,591	29.1	672	12.3
Upper	2,697	1,641	33.9	60.8	791	29.3	265	9.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	8,159	4,840	100.0	59.3	2,382	29.2	937	11.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	572	59.2	536	59.8	26	47.3	10	66.7
Upper	395	40.8	361	40.2	29	52.7	5	33.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	967	100.0	897	100.0	55	100.0	15	100.0
Percentage of Total Businesses:			92.8		5.7		1.6	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	249	80.3	240	79.7	9	100.0	0	0.0
Upper	61	19.7	61	20.3	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	310	100.0	301	100.0	9	100.0	0	0.0
Percentage of Total Farms:			97.1		2.9		0.0	
<i>Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011 – 2015 U.S. Census Bureau: American Community Survey</i>								
<i>NOTE: Percentages may not add up to 100.0 percent due to rounding.</i>								

**TABLE B-2
2017 WESTERN KANSAS AA DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	746	16.9
Moderate	0	0.0	0	0.0	0	0.0	718	16.3
Middle	4	80.0	2,908	65.9	238	8.2	1,184	26.8
Upper	1	20.0	1,506	34.1	44	2.9	1,766	40.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5	100.0	4,414	100.0	282	6.4	4,414	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	5,462	3,199	66.1	58.6	1,591	29.1	672	12.3
Upper	2,697	1,641	33.9	60.8	791	29.3	265	9.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	8,159	4,840	100.0	59.3	2,382	29.2	937	11.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	544	60.6	510	61.4	26	48.1	8	61.5
Upper	353	39.4	320	38.6	28	51.9	5	38.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	897	100.0	830	100.0	54	100.0	13	100.0
Percentage of Total Businesses:			92.5		6.0		1.4	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	261	81.6	254	81.4	7	87.5	0	0.0
Upper	59	18.4	58	18.6	1	12.5	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	320	100.0	312	100.0	8	100.0	0	0.0
Percentage of Total Farms:			97.5		2.5		0.0	

Source: 2017 FFIEC Census Data
2017 Dun & Bradstreet Data
2011 – 2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 percent due to rounding.

**TABLE B-3
2016 WESTERN KANSAS AA DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	718	16.8
Moderate	0	0.0	0	0.0	0	0.0	828	19.4
Middle	4	80.0	2,978	69.9	311	10.4	940	22.1
Upper	1	20.0	1,285	30.1	34	2.6	1,777	41.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5	100.0	4,263	100.0	345	8.1	4,263	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	5,601	3,387	70.8	60.5	1,173	20.9	1,041	18.6
Upper	2,672	1,394	29.2	52.2	921	34.5	357	13.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	8,273	4,781	100.0	57.8	2,094	25.3	1,398	16.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	592	60.6	555	61.3	26	47.3	11	68.8
Upper	385	39.4	351	38.7	29	52.7	5	31.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	977	100.0	906	100.0	55	100.0	16	100.0
Percentage of Total Businesses:			92.7		5.6		1.6	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	289	80.3	281	79.8	8	100.0	0	0.0
Upper	71	19.7	71	20.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	360	100.0	352	100.0	8	100.0	0	0.0
Percentage of Total Farms:			97.8		2.2		0.0	

Source: 2016 FFIEC Census Data
 2016 Dun & Bradstreet Data
 2006 - 2010 U.S. Census Bureau: American Community Survey
 NOTE: Percentages may not add up to 100.0 percent due to rounding.

**TABLE B-4
2015 WESTERN KANSAS AA DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	718	16.8
Moderate	0	0.0	0	0.0	0	0.0	828	19.4
Middle	4	80.0	2,978	69.9	311	10.4	940	22.1
Upper	1	20.0	1,285	30.1	34	2.6	1,777	41.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5	100.0	4,263	100.0	345	8.1	4,263	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	5,601	3,387	70.8	60.5	1,173	20.9	1,041	18.6
Upper	2,672	1,394	29.2	52.2	921	34.5	357	13.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	8,273	4,781	100.0	57.8	2,094	25.3	1,398	16.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	651	60.6	611	60.9	28	50.9	12	70.6
Upper	424	39.4	392	39.1	27	49.1	5	29.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,075	100.0	1,003	100.0	55	100.0	17	100.0
Percentage of Total Businesses:			92.7		5.6		1.6	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	331	80.9	323	80.5	8	100.0	0	0.0
Upper	78	19.1	78	19.5	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	409	100.0	401	100.0	8	100.0	0	0.0
Percentage of Total Farms:			98.0		2.0		0.0	

Source: 2015 FFIEC Census Data
2015 Dun & Bradstreet Data
2006 - 2010 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 percent due to rounding.

APPENDIX C – GLOSSARY

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

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

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

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

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

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary

reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

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

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

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

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

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

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

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

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

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

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

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

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

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

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report 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.

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