



PUBLIC DISCLOSURE

October 24, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

United Bank & Trust
RSSD# 990352

823 Broadway
Marysville, Kansas 66508

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

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

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

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

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

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

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. In addition, available aggregate data for the most recent three years (2019, 2020, and 2021) was referenced for additional perspective to gauge credit demand within the bank's AAs for business and farm lending. Performance was assessed within the bank's two AAs. The Northeast Kansas AA was assessed using a full scope review, and the Manhattan Metropolitan AA was assessed using a limited scope review. Examiners reviewed the following data:

- The bank's 13-quarter average NLTD ratio;
- A statistical sample of 150 small farm loans from a universe of 597 loans originated between January 1, 2021 and December 31, 2021, and a statistical sample of 111 small business loans from a universe of 247 loans originated over the same time period;

- The universe of 336 home mortgage loans reported on the bank's Home Mortgage Disclosure Act (HMDA) Loan/Application Register originated between January 1, 2020 and December 31, 2021; and
- CD loans, qualified investments, and CD services from June 24, 2019 to December 31, 2021.

More weight was placed on the bank's small farm lending performance in the overall evaluation, followed by small business and home mortgage lending. This was determined by the bank's strategic focus on agricultural lending noted within the loan portfolio composition.

DESCRIPTION OF INSTITUTION

United Bank & Trust is a community bank headquartered in Marysville, Kansas. The bank's characteristics include:

- The bank is a wholly owned subsidiary of UBT Bancshares, Inc., a shell holding company also located in Marysville.
- The bank has total assets of \$779.7 million as of March 31, 2022.
- In addition to its main office and a second branch location in Marysville, the bank has 12 additional offices located in the Kansas towns of Beattie, Clay Center (two locations), Concordia, Linn, Manhattan, Sabetha (three locations), Seneca (two locations), and Washington.
- There were no branch openings or closures during the evaluation period, although the bank closed one ATM in a middle-income tract in the Manhattan Metropolitan AA.
- Ten of the bank's branches have cash-dispensing automated teller machines (ATMs) at their locations, while two offer full-service ATMs (Seneca and Beattie). Additionally, the bank operates two independent cash-only ATMs in Marysville, including one in a convenience store and one at a stand-alone location.
- As shown in the table below, the bank's primary business focus is concentrated on agricultural lending, followed by commercial and residential real estate lending.

Table 1

Composition of Loan Portfolio as of March 31, 2022		
Loan Type	\$(000)	%
Construction and Land Development	6,541	1.3
Farmland	194,034	39.7
1-4 Family Residential Real Estate	56,480	11.6
Multifamily Residential Real Estate	6,887	1.4
Non-Farm Non-Residential Real Estate	66,738	13.7
Agricultural	72,279	14.8
Commercial and Industrial	58,610	12.0
Consumer	11,151	2.3
Other	15,908	3.3
Gross Loans	488,628	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its June 24, 2019 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA¹

This performance evaluation first discusses the bank's overall performance based on the NLTD ratio, level of lending within its delineated AAs, and CD activities, followed by an in-depth evaluation of the bank's lending test and CD performance in the Northeast Kansas AA (full scope review), and ends with a brief discussion of performance in the Manhattan Metropolitan AA (limited scope review).

LENDING TEST

The bank's overall lending test performance is Satisfactory. This rating is based on a more than reasonable NLTD ratio, a substantial majority of loans originated within the bank's AAs, and an overall reasonable geographic and borrower distribution of loans within the bank's Northeast Kansas AA. The bank's lending test rating is exclusively focused on performance in the Northeast Kansas AA, while the Manhattan Metropolitan AA received a cursory review for comparative purposes.

More consideration was given to the volume of loan originations than the dollar amount, as this represents the number of individuals or entities served. Additionally, for home mortgage lending, emphasis was placed on the bank's performance in comparison to

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

aggregate lending data (aggregate lending), rather than a comparison to respective demographic figures, as aggregate lending is considered representative of credit demand. Additionally, home mortgage lending, home purchase loans, and home refinance loans were each evaluated independently, while home improvement, multifamily, and other purpose closed/exempt loans were not evaluated due to lending volumes being too low to render meaningful analyses.

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 AAs, and in comparison to similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, and market share. The bank’s NLTD ratio is more than reasonable in light of performance that exceeded all of the similarly situated institutions, with ratios ranging from 60.4 percent to 74.5 percent.

Table 2

Comparative NLTD Ratios March 31, 2019 – March 31, 2022			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			13 Quarter Average
United Bank & Trust	Marysville, Kansas	779,651	86.5
Similarly Situated Institutions			
Peoples Bank	Pratt, Kansas	509,897	63.2
First State Bank	Norton, Kansas	473,686	60.4
Western State Bank	Garden City, Kansas	629,925	73.0
GNBank, N.A.	Girard, Kansas	954,220	74.5

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the bank’s two AAs. The bank originated a substantial majority of loans, by number and dollar, inside the AAs.

Table 3

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Home Purchase - Conventional	134	90.5	16,041	87.1	14	9.5	2,376	12.9
Home Improvement	7	100.0	377	100.0	0	0.0	0	0.0
Multi-Family Housing	9	75.0	4,961	33.1	3	25.0	10,047	66.9
Other Purpose Closed-End	7	100.0	752	100.0	0	0.0	0	0.0
Refinancing	143	88.3	20,428	86.7	19	11.7	3,123	13.3
Total HMDA related	300	89.3	42,559	73.2	36	10.7	15,546	26.8
Total Small Business related	95	85.6	11,024	82.4	16	14.4	2,349	17.6
Total Small Farm related	134	89.3	15,950	94.0	16	10.7	1,014	6.0
Total Loans	529	88.6	69,533	78.6	68	11.4	18,908	21.4

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

Geographic Distribution of Loans

This performance criterion evaluates the bank’s distribution of lending within its AAs by income level of census tracts, with consideration given to the dispersion of loans throughout the AAs. The bank’s overall geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AAs.

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

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

COMMUNITY DEVELOPMENT TEST

The CD test evaluates the bank’s responsiveness to CD needs of its AAs through CD loans, qualified investments, and CD services, considering the bank’s capacity and the need and availability of such opportunities in the bank’s AAs. The bank’s overall CD test performance is outstanding and demonstrates excellent responsiveness.

Table 4

Community Development Activity Assessment Area: All AAs									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	0	0	2	117	0	0	2	117	4
Community Services	0	0	0	0	10	23	10	23	6
Economic Development	16	2,610	0	0	3	52	3	52	8
Revitalization and Stabilization	331	6,858	3	5,930	0	0	3	5,930	3
Totals	347	9,468	5	6,047	13	75	18	6,122	21

In addition to the bank’s CD activities within its AAs, two Paycheck Protection Program (PPP) loans totalling \$24M and and two investments totalling \$1.6MM served to revitalize and stabilize moderate-income census tracts or distressed and underserved counties outside of the bank’s AAs in broader statewide areas of Kansas.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

**NORTHEAST KANSAS ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN NORTHEAST KANSAS AA

The bank's Northeast Kansas AA consists of Brown, Clay, Cloud, Marshall, Nemaha, and Washington Counties in their entirety. Refer to Appendix A for an AA map and Appendix B for additional demographic data.

- The AA delineation and tract designations remain unchanged since the 2019 performance evaluation.
- The AA tract composition includes one moderate-, 15-middle-, and two upper-income census tracts; there are no low-income tracts in the AA. The moderate-income tract is located in Cloud County and is comprised of the eastern portion of the town of Concordia. In addition, Washington County has been designated as both distressed and underserved during the evaluation period.
- According to the June 30, 2022 FDIC Summary of Deposits Market Share Report, the bank has a 20.2 percent deposit market share, ranking 1st of 25 FDIC-insured depository institutions operating from 64 offices in the AA
- Two interviews with community contacts that were recently conducted as part of the CRA evaluations of other financial institutions with offices in the AA were reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. Both contacts were affiliated with organizations primarily focused on economic development in two of the AA counties.

Table 5

Population Change			
Assessment Area: Northeast Kansas			
Area	2010 Population	2015 Population	Percent Change
Northeast Kansas	54,146	53,490	(1.2)
Brown County, KS	9,984	9,880	(1.0)
Clay County, KS	8,535	8,421	(1.3)
Cloud County, KS	9,533	9,339	(2.0)
Marshall County, KS	10,117	10,005	(1.1)
Nemaha County, KS	10,178	10,159	(0.2)
Washington County, KS	5,799	5,686	(1.9)
NonMSA Kansas	929,981	922,403	(0.8)
Kansas	2,853,118	2,892,987	1.4

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

- The declining population in the six AA counties is similar to the trend noted in statewide nonmetropolitan areas, while metropolitan areas in Kansas and the state of Kansas have experienced an overall increase in population.
- The AA is rural in nature and dominated by agricultural operations. According to 2015 Census Bureau data, the largest population center in the AA is located in the town of Concordia, the county seat of Cloud County, with a population of 5,289. Marysville, where the bank is headquartered, serves as the county seat of Marshall County and represents the third largest AA town, with a population of 3,301.

Table 6

Median Family Income Change			
Assessment Area: Northeast Kansas			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Northeast Kansas	56,618	57,652	1.8
Brown County, KS	50,795	52,701	3.8
Clay County, KS	61,140	62,665	2.5
Cloud County, KS	48,653	48,841	0.4
Marshall County, KS	61,265	59,926	(2.2)
Nemaha County, KS	62,161	67,649	8.8
Washington County, KS	56,269	56,228	(0.1)
NonMSA Kansas	57,322	57,229	(0.2)
Kansas	67,977	66,389	(2.3)
<i>Source: 2006 – 2010 U.S. Census Bureau: American Community Survey</i>			
<i>2011 – 2015 U.S. Census Bureau: American Community Survey</i>			
<i>Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.</i>			

- Median family income growth in the AA outpaced both rural areas statewide and the state of Kansas.
- The portion of LMI families to total families in the AA, at 37.1 percent, was similar to figures for rural areas statewide and the state of Kansas, at 37.9 percent and 36.5 percent, respectively.
- The percentage of AA families living below the poverty level, at 9.6 percent, was comparable to figures for rural areas statewide and the state of Kansas, at 10.2 percent and 9.1 percent, respectively.

Table 7

Housing Cost Burden						
Assessment Area: Northeast Kansas						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Northeast Kansas	65.0	16.0	29.1	55.5	20.1	14.5
Brown County, KS	61.8	27.8	31.8	48.4	36.2	14.5
Clay County, KS	89.8	20.0	34.7	64.4	23.0	16.9
Cloud County, KS	64.9	24.5	33.5	64.8	12.1	13.3
Marshall County, KS	68.7	6.1	25.9	50.9	24.2	17.7
Nemaha County, KS	57.5	5.0	25.8	58.3	9.8	11.2
Washington County, KS	48.5	5.3	17.6	43.6	14.0	12.5
NonMSA Kansas	67.5	29.3	34.1	56.8	24.9	15.6
Kansas	74.7	35.9	38.8	61.9	29.8	16.3

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

- The housing cost burden for LMI renters and homeowners was lower in the AA, when compared to rural areas statewide and the state of Kansas.
- The housing affordability ratio² in the AA, at 52.7 percent, is comparable to the ratio for rural areas statewide, at 51.0 percent, and significantly exceeds the state of Kansas ratio of 39.6 percent.
- A community contact discussed increasing housing prices in the area due to a low stock of inventory and few homes available for sale.

Table 8

Unemployment Rates					
Assessment Area: Northeast Kansas					
Area	2017	2018	2019	2020	2021
Northeast Kansas	3.1	2.8	2.9	3.4	2.2
Brown County, KS	3.2	3.0	3.1	4.3	2.7
Clay County, KS	3.7	3.1	3.1	4.3	2.6
Cloud County, KS	4.3	3.4	3.2	3.9	2.8
Marshall County, KS	2.8	2.5	2.8	2.9	1.9
Nemaha County, KS	2.4	2.3	2.7	2.7	1.8
Washington County, KS	3.0	2.6	2.6	2.3	1.7
NonMSA Kansas	3.5	3.1	3.0	4.4	2.7
Kansas	3.6	3.3	3.1	5.7	3.2

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

² The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

- The notable upsurge in 2020 unemployment rates resulting from the Coronavirus Disease 2019 pandemic had a lower impact in the AA, when compared to rural areas statewide and the state of Kansas.
- High employment in the area is supported by agricultural related jobs and a number of smaller manufacturing facilities, as well as a major transportation and shipping employer located in Marshall County.
- A community contact discussed the strong agricultural economy in the Marysville area that was bolstered by significant yields during the 2021 wheat and corn harvest.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTHEAST KANSAS AA

LENDING TEST

The bank's performance under the lending test in the Northeast Kansas AA is reasonable, which is consistent with the overall institution rating. Lending test ratings for HMDA, small business and small farm lending were reasonable for the evaluation of geographic and borrower distribution tests, with the exception of the small farm lending by income level of geography, which was excellent.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA. More weight was placed on the bank's small farm lending performance in the overall evaluation, followed by small business and home mortgage lending, in line with the bank's strategic focus on agricultural lending. Home improvement, multifamily, and other purpose closed/exempt loans were not evaluated by individual product in the AA due to lending levels being too low to render meaningful analyses.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. There are no low-income census tracts in the AA, and lending in the moderate-income census tract was comparable to aggregate lending data by number, below by dollar volume, and comparable to the the demographic figure.

The bank's lending performance for 2020 was below 2021 performance levels, although this did not impact the overall conclusion. The bank's loan dispersion among geographies of different income levels revealed no gaps or lapses.

Home Purchase Loans

The geographic distribution of home purchase loans is reasonable. The bank's 2021 home purchase originations in the AA's moderate-income census tract were comparable to aggregate lending data by number, below by dollar volume, and comparable to the demographic figure.

Performance in 2020 was below the 2021 distribution, although this did not impact the overall conclusion. When loan dispersion within the AA was evaluated, the bank's loan dispersion among geographies of different income levels revealed no gaps or lapses.

Home Refinance Loans

The geographic distribution of home refinance loans is poor. The bank did not originate any home refinance loans in the AA's moderate-income census tract during 2021. While the demographic figure was low, aggregate lenders originated 8 loans in the AA's moderate-income tract during 2021 and 11 loans during 2020.

Performance in 2020 was consistent with the 2021 distribution based on one loan origination. When loan dispersion within the AA was evaluated, gaps and lapses were noted, although they did not impact the analysis.

Table 9

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Northeast Kansas													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	3.3	4.9	57	0.8	3.3	2	2.8	3.9	68	0.8	2.8	3.8
Middle	45	73.8	74.4	5,483	77.4	71.4	54	76.1	79.6	6,621	78.6	77.0	82.6
Upper	14	23.0	20.7	1,542	21.8	25.3	15	21.1	16.5	1,740	20.6	20.2	13.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	61	100.0	100.0	7,082	100.0	100.0	71	100.0	100.0	8,429	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	1.4	2.4	93	1.0	1.4	0	0.0	1.5	0	0.0	1.5	3.8
Middle	54	78.3	74.1	7,016	74.3	73.9	59	84.3	74.4	7,774	76.3	70.0	82.6
Upper	14	20.3	23.3	2,340	24.8	24.2	11	15.7	24.1	2,414	23.7	28.5	13.6
Unknown	0	0.0	0.2	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	69	100.0	100.0	9,449	100.0	100.0	70	100.0	100.0	10,188	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	3.8
Middle	3	75.0	63.6	121	94.5	65.4	3	100.0	91.7	249	100.0	98.7	82.6
Upper	1	25.0	36.4	7	5.5	34.6	0	0.0	8.3	0	0.0	1.3	13.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	128	100.0	100.0	3	100.0	100.0	249	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	20.0	0	0.0	11.8	2	50.0	30.0	93	9.9	8.7	10.1
Middle	2	66.7	40.0	144	28.0	19.7	2	50.0	60.0	846	90.1	78.2	74.9
Upper	1	33.3	40.0	370	72.0	68.5	0	0.0	10.0	0	0.0	13.1	14.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	514	100.0	100.0	4	100.0	100.0	939	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	2.2	3.6	150	0.9	2.3	4	2.6	2.9	161	0.8	2.3	3.8
Middle	106	76.3	73.8	13,049	74.7	72.3	122	79.7	77.2	15,872	78.3	73.7	82.6
Upper	30	21.6	22.5	4,259	24.4	25.1	27	17.6	19.9	4,239	20.9	24.1	13.6
Unknown	0	0.0	0.1	0	0.0	0.3	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	139	100.0	100.0	17,458	100.0	100.0	153	100.0	100.0	20,272	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table

Small Business Lending

The geographic distribution of small business lending is reasonable. Although the bank’s performance is below the demographic figure, the demographic figure is relatively low and the bank had one loan origination in the AA’s moderate-income census tract.

When loan dispersion within the AA was evaluated, there were no gaps that would impact the analysis.

Table 10

Distribution of 2021 Small Business Lending By Income Level of Geography					
Assessment Area: Northeast Kansas					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	1	1.1	140	1.3	2.7
Middle	72	78.3	8,579	79.0	86.3
Upper	19	20.7	2,137	19.7	11.0
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	92	100.0	10,856	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

Small Farm Lending

The geographic distribution of small farm lending is excellent. The bank’s small farm originations were above the demographic figure, which represents the number of farms located in the AA’s moderate-income tract. A review of 2021 Dun & Bradstreet data indicates there are eight farming operations located in the moderate-income tract, and the bank originated five small farm loans from the sample within this tract.

When loan dispersion within the AA was evaluated, there were no gaps that would impact the analysis.

Table 11

Distribution of 2021 Small Farm Lending By Income Level of Geography					
Assessment Area: Northeast Kansas					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	5	3.8	566	3.7	0.9
Middle	107	81.7	11,773	76.4	83.8
Upper	19	14.5	3,066	19.9	15.3
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	131	100.0	15,405	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

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

The bank’s lending has a reasonable distribution among individuals of different income levels and businesses and farms of different sizes. More weight was placed on the bank’s small farm lending performance in the overall evaluation, followed by small business and home mortgage lending, in line with the bank’s strategic focus on agricultural lending. Home improvement, multifamily, and other purpose closed/exempt loans were not evaluated by individual product in the AA due to lending levels being too low to render meaningful analyses.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The distribution of 2021 home mortgage originations to low-income borrowers was below the aggregate lending data by number and dollar volume, and below the demographic figure. Lending among moderate-income borrowers was comparable to aggregate lending data by number and dollar volume and to the demographic figure.

The distribution of home mortgage loans in 2020 was consistent with the level noted in 2021.

Home Purchase Loans

The borrower distribution of home purchase loans is reasonable. The distribution of 2021 home purchase originations to low-income borrowers was below the aggregate lending data by number and dollar volume, and below the demographic figure. Lending among

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

The distribution of home purchase loans in 2020 was comparable to the level noted in 2021.

Home Refinance Loans

The borrower distribution of home refinance loans is reasonable. The distribution of 2021 home purchase originations to low-income borrowers was above the aggregate lending data by number and dollar volume, and below the demographic figure. Lending among moderate-income borrowers was below to the aggregate lending data by number and dollar volume and below the demographic figure.

The distribution of home refinance loans in 2020 was below the level noted in 2021, although this did not impact the overall conclusion.

Table 12

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Northeast Kansas													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	3	4.9	9.8	145	2.0	4.9	0	0.0	8.9	0	0.0	5.0	18.3
Moderate	16	26.2	27.4	883	12.5	20.0	17	23.9	24.4	1,531	18.2	19.6	18.8
Middle	15	24.6	23.5	1,780	25.1	23.3	17	23.9	22.8	1,577	18.7	22.1	23.2
Upper	21	34.4	28.6	3,640	51.4	42.3	33	46.5	27.5	4,973	59.0	38.2	39.8
Unknown	6	9.8	10.7	634	9.0	9.5	4	5.6	16.3	348	4.1	15.1	0.0
Total	61	100.0	100.0	7,082	100.0	100.0	71	100.0	100.0	8,429	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.8	0	0.0	0.9	5	7.1	3.0	260	2.6	1.2	18.3
Moderate	4	5.8	8.4	345	3.7	4.7	4	5.7	11.2	275	2.7	7.2	18.8
Middle	13	18.8	18.1	1,265	13.4	15.2	13	18.6	21.3	1,177	11.6	16.9	23.2
Upper	43	62.3	49.7	6,304	66.7	57.6	38	54.3	42.9	7,311	71.8	53.5	39.8
Unknown	9	13.0	21.0	1,535	16.2	21.5	10	14.3	21.6	1,165	11.4	21.2	0.0
Total	69	100.0	100.0	9,449	100.0	100.0	70	100.0	100.0	10,188	100.0	100.0	100.0
Home Improvement Loans													
Low	1	25.0	9.1	20	15.6	3.6	0	0.0	8.3	0	0.0	4.2	18.3
Moderate	1	25.0	9.1	1	0.8	0.2	1	33.3	33.3	60	24.1	19.1	18.8
Middle	0	0.0	27.3	0	0.0	33.7	0	0.0	25.0	0	0.0	38.7	23.2
Upper	2	50.0	45.5	107	83.6	51.0	2	66.7	33.3	189	75.9	38.0	39.8
Unknown	0	0.0	9.1	0	0.0	11.5	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	128	100.0	100.0	3	100.0	100.0	249	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	4	2.9	6.0	165	1.0	2.5	5	3.4	6.1	260	1.3	3.0	18.3
Moderate	21	15.4	17.0	1,229	7.3	10.8	24	16.1	18.1	1,970	10.2	13.2	18.8
Middle	28	20.6	20.5	3,045	18.0	18.4	30	20.1	21.6	2,754	14.2	19.3	23.2
Upper	68	50.0	39.2	10,336	61.0	50.9	76	51.0	34.9	12,836	66.4	46.0	39.8
Unknown	15	11.0	17.3	2,169	12.8	17.4	14	9.4	19.3	1,513	7.8	18.5	0.0
Total	136	100.0	100.0	16,944	100.0	100.0	149	100.0	100.0	19,333	100.0	100.0	100.0
<p>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table</p>													

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank's lending is comparable to the percentage of small businesses in the AA. Furthermore, a review of aggregate lending data submitted by CRA reporters with loan originations in the bank's

AA noted a three-year average aggregate loan distribution of 44.4 percent by number to small businesses.

Based on loan size, 85.2 percent of the bank's loans to small businesses were originated in amounts of \$100,000 or less, which is considered beneficial to smaller business entities operating in the AA. This demonstrates the bank's support of small businesses that may not have the financial capacity or financial need to borrow larger loan amounts.

Table 13

Distribution of 2021 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Northeast Kansas					
	Bank Loans				Total Businesses
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	61	66.3	2,817	25.9	87.1
Over \$1 Million	21	22.8	7,381	68.0	9.0
Revenue Unknown	10	10.9	658	6.1	4.0
Total	92	100.0	10,856	100.0	100.0
By Loan Size					
\$100,000 or Less	64	69.6	2,004	18.5	
\$100,001 - \$250,000	19	20.7	3,212	29.6	
\$250,001 - \$1 Million	9	9.8	5,640	52.0	
Total	92	100.0	10,856	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	52	85.2	1,396	49.6	
\$100,001 - \$250,000	9	14.8	1,421	50.4	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	61	100.0	2,817	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Small Farm Lending

The borrower distribution of small farm lending is reasonable. The bank's lending to farms with revenues of \$1MM or less by number volume was comparable to the percent of small farms in the AA. A review of aggregate lending data submitted by CRA reporters in the bank's AA indicated a three-year average aggregate lending distribution of 38.1 percent by number to small farms. Aggregate lending data was referenced for context in measuring the actual credit demand of area farms based on revenue size.

Table 14

Distribution of 2021 Small Farm Lending By Revenue Size of Farms					
Assessment Area: Northeast Kansas					
	Bank Loans				Total Farms
	#	#%	\$(000)	\$%	%
By Revenue					
\$1 Million or Less	104	79.4	9,764	63.4	98.3
Over \$1 Million	22	16.8	5,412	35.1	1.6
Revenue Unknown	5	3.8	229	1.5	0.1
Total	131	100.0	15,405	100.0	100.0
By Loan Size					
\$100,000 or Less	79	60.3	2,987	19.4	
\$100,001 - \$250,000	34	26.0	5,722	37.1	
\$250,001 - \$500,000	18	13.7	6,696	43.5	
Total	131	100.0	15,405	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	71	68.3	2,631	26.9	
\$100,001 - \$250,000	24	23.1	4,039	41.4	
\$250,001 - \$500,000	9	8.7	3,094	31.7	
Total	104	100.0	9,764	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

COMMUNITY DEVELOPMENT TEST

The CD test evaluates the bank’s responsiveness to the CD needs of its AA through CD loans, qualified investments, and CD services, considering the bank’s capacity and the need and availability of such opportunities in the bank’s AA. The bank’s CD performance demonstrates excellent responsiveness. Table 15 outlines the bank’s CD activities. All of the bank’s CD loan originations related to revitalization and stabilization were PPP loans.

Table 15

Community Development Activity Assessment Area: Northeast Kansas									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	0	0	1	11	0	0	1	11	4
Community Services	0	0	0	0	7	10	7	10	6
Economic Development	14	2,570	0	0	3	52	3	52	8
Revitalization and Stabilization	331	6,858	2	455	0	0	2	455	3
Totals	345	9,428	3	466	10	62	13	528	21

**MANHATTAN METROPOLITAN ASSESSMENT AREA
METROPOLITAN AREA
(Limited Scope Review)**

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

The bank's delineated AA is comprised of Riley County in its entirety, which is one of three counties that combine to form the Manhattan, Kansas Metropolitan Statistical Area (MSA). Refer to Appendix C for an AA map.

- The number of census tracts within the AA remains unchanged since the prior evaluation; however, census tract designations has changed. Currently, the AA is comprised of 14 census tracts, including 2 moderate-, 6 middle-, 4 upper-, and 2 unknown-income census tracts. There are no low-income census tracts in the AA. The prior AA census tract designations included 3 moderate-, 7 middle-, 2 upper-, and 2- unknown-income census tracts.
- Of the bank's 14 full-service locations, this AA includes 1 branch located in a moderate-income census tract that offers lobby services and two ATMs. The bank eliminated one ATM in a middle-income tract during the evaluation period.
- According to the 2015 American Community Survey data, the population of the AA is 75,022.
- Based on the June 30, 2022 FDIC Summary of Deposits Market Share Report, the bank has 0.5 percent market share, ranking 13th out of 15 FDIC-insured depository institutions operating from 26 offices in the AA.

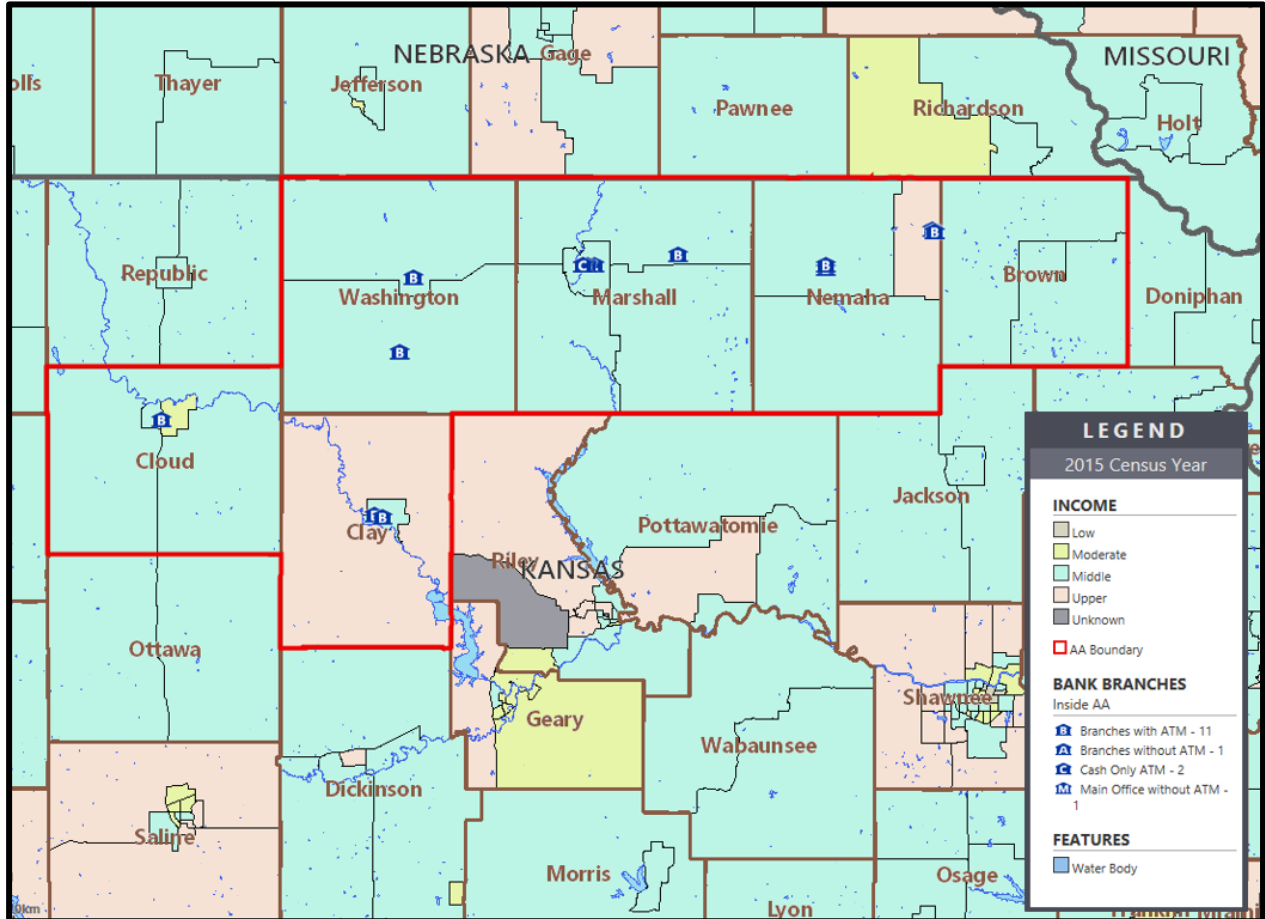
**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MANHATTAN
METROPOLITAN AA**

Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance in this area do not change the rating for the institution.

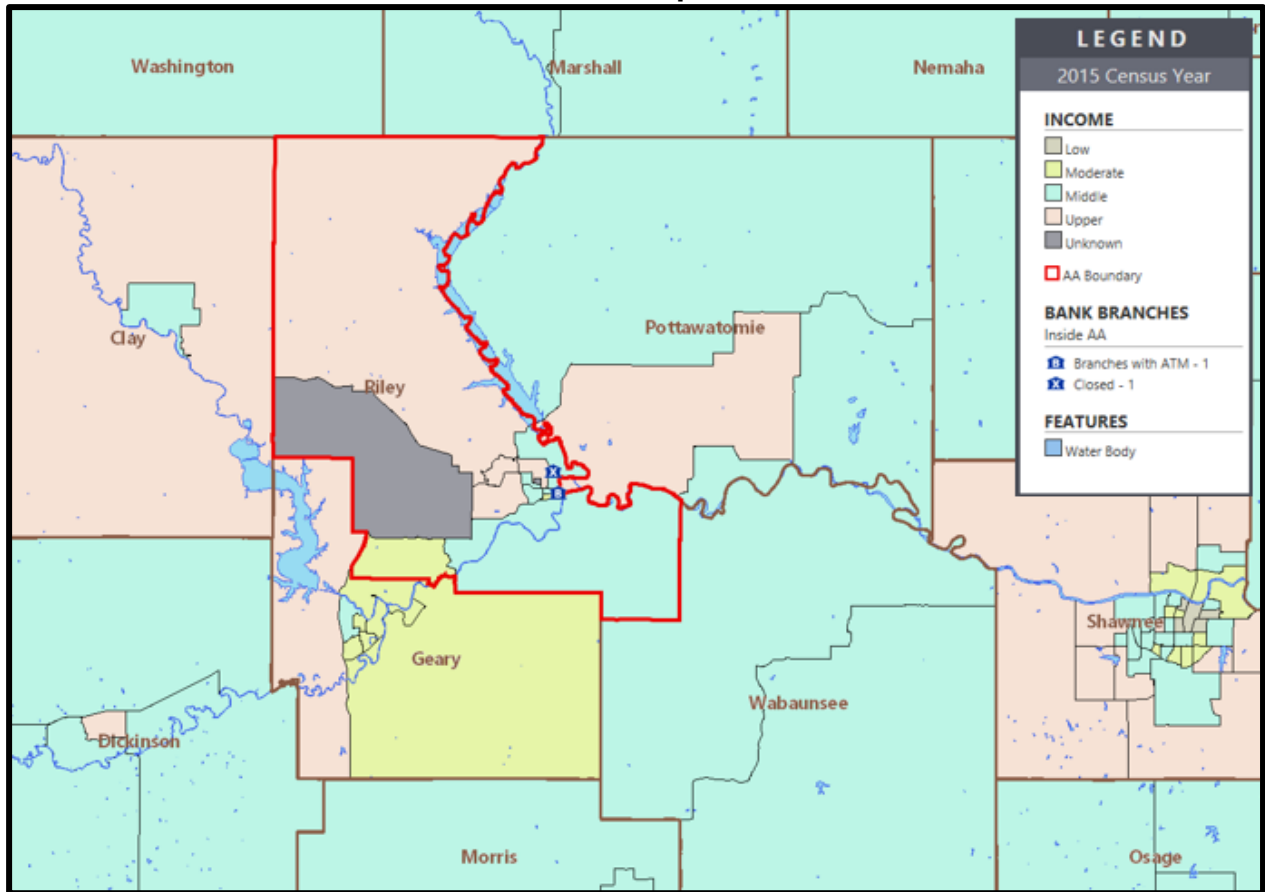
The institution's lending and CD performance in this AA area is consistent with the institution's overall performance for both criteria.

APPENDIX A – MAP OF THE ASSESSMENT AREAS

Northeast Kansas AA



Manhattan Metropolitan AA



**APPENDIX B – DEMOGRAPHIC INFORMATION
Table B-1**

2021 Northeast 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	2,710	18.3
Moderate	1	5.6	641	4.3	156	24.3	2,781	18.8
Middle	15	83.3	12,110	81.8	1,130	9.3	3,428	23.2
Upper	2	11.1	2,053	13.9	137	6.7	5,885	39.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	18	100.0	14,804	100.0	1,423	9.6	14,804	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	1,171	636	3.8	54.3	379	32.4	156	13.3
Middle	21,408	13,899	82.6	64.9	4,554	21.3	2,955	13.8
Upper	3,287	2,287	13.6	69.6	691	21.0	309	9.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	25,866	16,822	100.0	65.0	5,624	21.7	3,420	13.2
	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	77	2.7	65	2.6	12	4.7	0	0.0
Middle	2,467	86.3	2,145	86.2	219	85.5	103	91.2
Upper	314	11.0	279	11.2	25	9.8	10	8.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2,858	100.0	2,489	100.0	256	100.0	113	100.0
Percentage of Total Businesses:				87.1		9.0		4.0
	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	8	0.9	8	0.9	0	0.0	0	0.0
Middle	773	83.8	761	84.0	11	73.3	1	100.0
Upper	141	15.3	137	15.1	4	26.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	922	100.0	906	100.0	15	100.0	1	100.0
Percentage of Total Farms:				98.3		1.6		0.1
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**APPENDIX C – LIMITED SCOPE REVIEW ASSESSMENT AREA TABLES
Table C-1**

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Manhattan Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.9	0	0.0	2.2	0	0.0	2.8	0	0.0	2.0	3.5
Middle	2	66.7	45.5	629	22.6	35.1	2	40.0	46.8	1,393	68.0	41.4	48.4
Upper	0	0.0	50.9	0	0.0	61.8	3	60.0	49.5	657	32.0	55.2	47.5
Unknown	1	33.3	0.7	2,150	77.4	0.9	0	0.0	0.9	0	0.0	1.4	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	2,779	100.0	100.0	5	100.0	100.0	2,050	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table C-2

Distribution of 2021 Small Business Lending By Income Level of Geography Assessment Area: Manhattan Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	1	33.3	66	39.5	15.0
Middle	0	0.0	0	0.0	46.3
Upper	2	66.7	102	61.1	37.4
Unknown	0	0.0	0	0.0	1.3
Tract-Unk	0	0.0	0	0.0	
Total	3	100.0	167	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table C-3

Distribution of 2021 Small Farm Lending By Income Level of Geography Assessment Area: Manhattan Metropolitan					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	0	0.0	0	0.0	23.5
Upper	3	100.0	545	100.0	76.5
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	3	100.0	545	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

Table C-4

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Manhattan Metropolitan													
Borrower Income Level	Bank And Aggregate Loans By Year											Families by Family Income %	
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%		%
Low	0	0.0	2.9	0	0.0	1.3	0	0.0	3.7	0	0.0	1.8	18.8
Moderate	0	0.0	12.5	0	0.0	8.6	1	25.0	13.6	127	18.4	9.4	18.5
Middle	0	0.0	17.1	0	0.0	15.0	1	25.0	18.9	230	33.2	16.8	17.6
Upper	1	50.0	41.1	520	82.7	49.2	1	25.0	36.2	300	43.4	43.5	45.2
Unknown	1	50.0	26.4	109	17.3	25.8	1	25.0	27.6	35	5.1	28.4	0.0
Total	2	100.0	100.0	629	100.0	100.0	4	100.0	100.0	692	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table C-5

Distribution of 2021 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Manhattan Metropolitan					
	Bank Loans				Total Businesses
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	2	66.7	144	86.2	90.0
Over \$1 Million	1	33.3	23	13.8	8.8
Revenue Unknown	0	0.0	0	0.0	1.3
Total	3	100.0	167	100.0	100.0
By Loan Size					
\$100,000 or Less	3	100.0	167	100.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	3	100.0	167	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	2	100.0	144	100.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	2	100.0	144	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Table C-6

Distribution of 2021 Small Farm Lending By Revenue Size of Farms					
Assessment Area: Manhattan Metropolitan					
	Bank Loans				Total Farms %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	2	66.7	445	81.7	97.6
Over \$1 Million	0	0.0	0	0.0	2.4
Revenue Unknown	1	33.3	100	18.3	0.0
Total	3	100.0	545	100.0	100.0
By Loan Size					
\$100,000 or Less	1	33.3	100	18.3	
\$100,001 - \$250,000	1	33.3	150	27.5	
\$250,001 - \$500,000	1	33.3	295	54.1	
Total	3	100.0	545	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	0	0.0	0	0.0	
\$100,001 - \$250,000	1	50.0	150	33.7	
\$250,001 - \$500,000	1	50.0	295	66.3	
Total	2	100.0	445	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

Table C-7

2021 Manhattan Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,657	18.8
Moderate	2	14.3	1,826	12.9	182	10.0	2,615	18.5
Middle	6	42.9	6,345	44.8	555	8.7	2,487	17.6
Upper	4	28.6	5,843	41.2	214	3.7	6,411	45.2
Unknown	2	14.3	156	1.1	37	23.7	0	0.0
Total AA	14	100.0	14,170	100.0	988	7.0	14,170	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	3,021	389	3.5	12.9	2,240	74.1	392	13.0
Middle	15,415	5,343	48.4	34.7	8,631	56.0	1,441	9.3
Upper	10,601	5,245	47.5	49.5	4,145	39.1	1,211	11.4
Unknown	520	73	0.7	14.0	401	77.1	46	8.8
Total AA	29,557	11,050	100.0	37.4	15,417	52.2	3,090	10.5
	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	320	15.0	275	14.3	41	21.9	4	14.8
Middle	988	46.3	889	46.3	91	48.7	8	29.6
Upper	799	37.4	732	38.1	53	28.3	14	51.9
Unknown	27	1.3	24	1.3	2	1.1	1	3.7
Total AA	2,134	100.0	1,920	100.0	187	100.0	27	100.0
Percentage of Total Businesses:				90.0		8.8		1.3
	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	20	23.5	19	22.9	1	50.0	0	0.0
Upper	65	76.5	64	77.1	1	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	85	100.0	83	100.0	2	100.0	0	0.0
Percentage of Total Farms:				97.6		2.4		0.0

Source: 2021 FFIEC Census Data
2021 Data & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX D – GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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