



## **PUBLIC DISCLOSURE**

October 28, 2024

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

Country Club Bank  
RSSD# 625654

One Ward Parkway  
Kansas City, Missouri 64112

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 institution. 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: **Outstanding**

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

Performance Levels	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			
* The lending test is weighted more heavily than the investment and service tests in determining the overall rating.			

Major factors supporting the rating include:

### Lending Test

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

### Investment Test

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

Service Test

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

**DESCRIPTION OF INSTITUTION**

The bank is an interstate financial institution headquartered in Kansas City, Missouri. The bank's characteristics include:

- The bank is a wholly owned subsidiary of County Club Bank Financial Corporation.
- The bank has total assets of \$2.1 billion as of March 31, 2024.
- The bank's delineated AA includes 7 of the 14 counties that comprise the Kansas City Missouri-Kansas Metropolitan Statistical Area (Kansas City MSA).
- The bank operates 19 full- and 5 limited-service locations within the AA as of December 31, 2023. All but one of the full-service locations has an on-site full-service automated teller machine (ATM). The bank also maintains one stand-alone full-service ATM in the AA.
- Since the previous evaluation, the bank opened a branch in Lee's Summit, Missouri on May 10, 2021. The bank also consolidated a full-service location, including an ATM, with a nearby branch and closed a limited-service branch during 2023.
- The bank's primary business focus is commercial lending to small- and medium-sized businesses, followed by residential real estate lending.

**Table 1**

Composition of Loan Portfolio as of March 31, 2024		
Loan Type	\$(000)	%
Construction and Land Development	115,406	8.7
Farmland	8,082	0.6
1- to 4-Family Residential Real Estate	248,857	18.8
Multifamily Residential Real Estate	84,010	6.3
Nonfarm Nonresidential Real Estate	575,827	43.5
Agricultural	629	0.0
Commercial and Industrial	271,429	20.5
Consumer	7,191	0.5
Other	13,351	1.0
Gross Loans	<b>1,324,782</b>	<b>100.0</b>
Note: Percentages may not total 100.0 percent due to rounding.		

The bank was rated Outstanding under the Community Reinvestment Act (CRA) at its February 28, 2022 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.

## SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large 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. Performance was assessed within the bank's Kansas City Metropolitan AA using a full-scope review. The following data was reviewed:

- The bank's home purchase, home refinance, home improvement, and multi-family loans reported on the bank's 2021, 2022, and 2023 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- The bank's small business and small farm loans reported on the bank's 2021, 2022, and 2023 CRA LARs;
- CD loans originated from January 1, 2021 to December 31, 2023;
- Qualified investments that were made from January 1, 2021 to December 31, 2023, qualified investments made prior to but still outstanding during this period, and qualified grants, donations, or in-kind contributions of property made during this period; and,
- Retail banking services and CD services from January 1, 2021 to December 31, 2023.

Small business lending carried considerably more weight in the analysis based on the higher volume of loans by both number and dollar volume compared to the bank's home mortgage lending. Small farm lending performance generally carried the least weight in the conclusion of performance based on having low lending volume in comparison to the other two products.

In addition, more emphasis was placed on the bank's lending performance in comparison to aggregate lending data, as it is an indicator of credit demand and number of individuals served within the AA. Lending was also compared to demographic data to understand the level of available credit opportunities present throughout the bank's market but was given less weight when deriving the overall conclusions.

Aggregate lending data for 2022 was the most recent publicly available data for all of the bank's lending products at the time of this evaluation. As a result, the bank's 2022 lending performance is discussed in detail within the applicable sections that follow. The discussion of bank performance in 2021 and 2023 was limited, although both years provided support to the overall rating during the three-year evaluation period for each of the lending products reviewed.

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

The bank's Kansas City Metropolitan AA includes 7 of the 14 counties comprising the Kansas City MSA. The AA includes Johnson, Leavenworth and Wyandotte Counties in Kansas, and Cass, Clay, Jackson, and Platte Counties in Missouri. Platte County was added to the AA delineation following the prior evaluation based on increased loan demand in this county. Refer to Appendix B for a map of the AA and Appendix C for additional demographic data.

- In 2022 and 2023, the AA was comprised of 570 census tracts, including 58 low-, 138 moderate-, 198 middle-, 152 upper-, and 24 unknown-income tract(s) based on the most recent 2016-2020 American Community Survey (ACS) data.
- In 2021, the AA was comprised of 499 census tracts, including 79 low-, 109 moderate-, 159 middle-, and 133 upper-, and 19 unknown-income census tracts based on 2011-2015 ACS data.
- The bank operates 19 full- and 5 limited-service locations in the AA, including 2 offices in low-, 4 in moderate-, 7 in middle-, and 11 in upper-income census tracts.
- According to the June 30, 2023 Federal Deposit Insurance Corporation (FDIC) Summary of Deposits Market Share Report, the bank ranked 10<sup>th</sup> of 102 FDIC-insured depository institutions operating from 595 locations in the AA, with a total deposit market share of 2.0 percent.

- A community contact recently conducted as part of the CRA evaluation of a financial institution with branches in the AA was 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. The contact represented an affordable housing organization specializing in providing housing-related services to LMI individuals and families.

**Table 2**

<b>Population Change</b>			
<b>Assessment Area: Kansas City Metropolitan</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percent Change</b>
Kansas City Metropolitan	1,911,288	2,046,070	7.1
Johnson County, KS	566,814	609,863	7.6
Leavenworth County, KS	78,227	81,881	4.7
Wyandotte County, KS	160,806	169,245	5.2
Cass County, MO	100,781	107,824	7.0
Clay County, MO	230,361	253,335	10.0
Jackson County, MO	680,905	717,204	5.3
Platte County, MO	93,394	106,718	14.3
Kansas City, MO-KS MSA	2,055,675	2,192,035	6.6
Kansas	2,892,987	2,937,880	1.6
Missouri	6,045,448	6,154,913	1.8
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- A majority of the 2020 AA population resided within Jackson County, Missouri and Johnson County, Kansas, with a combined total of 1,327,067 residents, or 64.9 percent of the total AA population.
- The AA's population growth from 2015 to 2020 significantly outpaced figures for the states of Kansas and Missouri.

**Table 3**

Median Family Income Change Assessment Area: Kansas City Metropolitan			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Kansas City Metropolitan	80,161	86,677	8.1
Johnson County, KS	103,631	111,766	7.9
Leavenworth County, KS	83,668	89,588	7.1
Wyandotte County, KS	51,479	57,396	11.5
Cass County, MO	78,333	85,798	9.5
Clay County, MO	82,057	85,961	4.8
Jackson County, MO	66,730	74,470	11.6
Platte County, MO	92,114	100,420	9.0
Kansas City, MO-KS MSA	79,346	86,562	9.1
Kansas	72,535	77,620	7.0
Missouri	66,438	72,834	9.6
Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- Changes in median family income (MFI) reflected positive growth throughout all of the AA counties. The highest growth rates in the AA occurred in Wyandotte and Jackson Counties, although these two counties had the lowest MFI by dollar amount.
- Based on 2020 ACS data, the portion of AA families living below the poverty level was 6.8 percent, which was lower than figures for the states of Kansas and Missouri, at 7.6 percent and 8.9 percent, respectively. Families living below the poverty level in the seven AA counties ranged from a low of 3.0 percent in Platte County to a high of 14.8 percent in Wyandotte County.



**Table 4**

Housing Cost Burden Assessment Area: Kansas City Metropolitan						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Kansas City Metropolitan	75.5	31.6	40.0	59.6	26.7	16.0
Johnson County, KS	82.4	42.5	36.3	69.6	37.3	14.3
Leavenworth County, KS	67.4	29.5	34.1	52.9	28.5	14.4
Wyandotte County, KS	70.5	17.9	43.7	54.6	16.6	20.6
Cass County, MO	78.0	27.2	40.4	58.1	27.9	15.7
Clay County, MO	79.7	32.5	40.7	62.8	22.7	14.7
Jackson County, MO	73.8	27.8	42.6	55.9	23.9	17.6
Platte County, MO	76.0	28.9	31.3	74.3	30.0	15.4
Kansas City, MO-KS MSA	74.6	30.8	39.7	59.2	26.2	16.1
Kansas	73.6	27.8	38.2	57.4	24.8	15.4
Missouri	72.9	27.2	39.2	57.0	25.3	16.1
Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy						
Note: Cost Burden is housing cost that equals 30 percent or more of household income.						

- The cost burden for both LMI renters and homeowners in the AA was generally comparable with figures for the states of Kansas and Missouri, with the greatest burden among LMI renters in Johnson County.
- The AA housing affordability ratio<sup>1</sup> of 34.8 percent was generally consistent with figures for Kansas and Missouri, at 38.8 percent and 35.0 percent, respectively. Affordability ratios within the seven AA counties ranged from 33.0 percent in Johnson County to 45.0 percent in Wyandotte County.
- Median housing values in the seven AA counties were consistent with affordability ratios and ranged from \$107,000 in Wyandotte County to a high of \$277,500 in Johnson County, compared to \$199,578 for the overall AA.
- A community contact discussed the need for affordable housing production and development in one of the AA counties.

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

**Table 5**

<b>Unemployment Rates</b>					
<b>Assessment Area: Kansas City Metropolitan</b>					
<b>Area</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Kansas City Metropolitan	3.4	3.3	6.2	4.0	2.6
Johnson County, KS	2.9	2.9	5.0	2.7	2.3
Leavenworth County, KS	3.7	3.6	5.8	3.4	2.9
Wyandotte County, KS	4.9	4.5	7.9	4.7	3.5
Cass County, MO	3.1	3.0	5.4	3.7	2.4
Clay County, MO	2.9	2.8	6.1	4.6	2.5
Jackson County, MO	3.8	3.7	7.3	5.1	2.9
Platte County, MO	2.6	2.6	5.4	3.8	2.2
Kansas City, MO-KS MSA	3.4	3.3	6.2	4.1	2.6
Kansas	3.4	3.3	5.8	3.3	2.7
Missouri	3.2	3.2	6.1	4.1	2.5
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i>					

- Unemployment rates in the AA were aligned with the figures for Kansas and Missouri between 2018 and 2022. As illustrated in the table above, unemployment rates increased in 2020 throughout all the geographic areas due to the onset of the Coronavirus Disease 2019 pandemic (pandemic) before decreasing in 2022 to levels lower than the pre-pandemic rates.
- Major employers in the AA include the federal government (20,846 employees), Children's Mercy Hospital (8,382), Cerner Corporation (6,879), T-Mobile (6,000), Garmin International (5,005), Honeywell (5,000), Burns & McDonnell (5,000), and Saint Luke's Health System (4,638).

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

Conclusions with respect to lending performance were evaluated for all three years with 2022 and 2023 lending tables reflected in the body of this report, while the bank's 2021 lending may be found in Appendix D. Additionally, an evaluation of home improvement and multifamily loans was not conducted based on lending volumes too low to conduct meaningful analyses. While these home mortgage lending products were not evaluated based on limited origination volumes, this data is included in the lending tables and totals within the evaluation.

## **LENDING TEST**

The bank's performance under the lending test in the Kansas City Metropolitan AA is High Satisfactory. Overall, the primary drivers for the rating were based on the bank's geographic and borrower distribution performance, as well as the bank's CD

performance. The bank's geographic distribution and lending to LMI borrowers and to small businesses and small farms is adequate. In addition, the bank is a leader in providing CD loans, which bolstered the bank's overall lending test rating.

### **Lending Activity**

This performance criterion evaluates the bank's lending volume considering the bank's resources and business strategy and other information derived from performance context within the AA. The bank's lending activities reflect good responsiveness to AA credit needs.

**Table 6**

<b>Summary of Lending Activity Reviewed</b>				
<b>Loan Type</b>	<b>2021 – 2023</b>			
	<b>#</b>	<b>\$(000)</b>	<b>#%</b>	<b>\$%</b>
Home Improvement	34	5,302	1.1	0.6
Home Purchase	430	159,067	13.4	18.4
Multi-Family Housing	41	73,157	1.3	8.5
Refinancing	298	104,850	9.3	12.1
Other Purpose Closed-End	19	7,125	0.6	0.8
<b>Total HMDA related</b>	<b>822</b>	<b>349,501</b>	<b>25.6</b>	<b>40.5</b>
Small Business	2,324	509,358	72.4	59.0
Small Farm	64	4,809	2.0	0.6
<b>TOTAL LOANS</b>	<b>3,210</b>	<b>863,668</b>	<b>100.0</b>	<b>100.0</b>

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The bank did not engage in any lending that was considered particularly innovative during the evaluation period, although the bank participated in several industry-recognized government-guaranteed lending programs that benefit its market area. These programs include seven Federal Housing Administration loans totaling \$1.8 million (MM) and nine Veterans Administration loans totaling \$2.8MM during the three-year evaluation period.

Other programs offered by the bank include a longstanding debt restructuring lending program in conjunction with a local charitable organization. The bank provides a consumer debt restructuring program to individuals who obtained financing from nontraditional lending sources that typically offer short-term loans with elevated interest rates and finance charges. Based on the loan terms and fees associated with these high-cost loans, recipients often encounter financial challenges in meeting repayment obligations. Through this program, the bank provides financial education and debt restructuring to facilitate more manageable loan terms, resulting in substantial financial relief for program participants. The bank originated 36 loans totaling \$44,533 under this program during the CRA evaluation period.

The bank also participates in the Small Business Administration's (SBA) 504 and 7(a) Loan Programs. The SBA 504 program is a financing instrument that provides small businesses with long-term, fixed-rate financing to acquire fixed assets for expansion or modernization. The SBA 7(a) program is designed for start-up and existing small businesses to help satisfy capital needs. This program provides small businesses with access to capital with more flexible terms than conventional commercial financing. The bank made 3 SBA 504 loans totaling \$2.9MM and 43 SBA 7(a) loans totaling \$14.0MM during the CRA evaluation period.

The bank also participated in the SBA's Paycheck Protection Program (PPP) during 2020 and 2021. The second phase of PPP lending was initiated during the current CRA evaluation period in 2021 when the bank originated 654 PPP loans totaling \$79.2MM. This program was designed to address the financial burden placed primarily on small businesses and small farms during the height of the nationwide pandemic, and these loans were considered particularly responsive to CD needs.

### **Assessment Area Concentration**

This performance criterion evaluates the percentage of lending extended inside and outside of the bank's AA. The bank originated a substantial majority of loans, by number and dollar volume, inside its AA.

**Table 7**

<b>Lending Inside and Outside the Assessment Area</b>								
<b>Loan Type</b>	<b>Inside</b>				<b>Outside</b>			
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>
Home Improvement	32	94.1	5,034	94.9	2	5.9	268	5.1
Home Purchase - Conventional	369	88.9	135,527	87.6	46	11.1	19,108	12.4
Home Purchase - FHA	3	42.9	834	46.2	4	57.1	971	53.8
Home Purchase - VA	7	87.5	2,192	83.4	1	12.5	435	16.6
Multi-Family Housing	37	90.2	60,790	83.1	4	9.8	12,367	16.9
Other Purpose Closed-End	16	84.2	4,719	66.2	3	15.8	2,406	33.8
Refinancing	267	89.6	83,386	79.5	31	10.4	21,464	20.5
<b>Total HMDA related</b>	<b>731</b>	<b>88.9</b>	<b>292,482</b>	<b>83.7</b>	<b>91</b>	<b>11.1</b>	<b>57,019</b>	<b>16.3</b>
Small Business	2,203	94.8	489,248	96.1	121	5.2	20,110	3.9
Small Farm	52	81.3	2,705	56.2	12	18.8	2,104	43.8
<b>TOTAL LOANS</b>	<b>2,986</b>	<b>93.0</b>	<b>784,435</b>	<b>90.8</b>	<b>224</b>	<b>7.0</b>	<b>79,233</b>	<b>9.2</b>

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

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

## **Geographic Distribution of Loans**

The bank's geographic distribution of loans reflects adequate distribution among the different census tracts and dispersion throughout the AA. The bank's home mortgage and small business lending reflect adequate penetration among geographies of different income levels, while small farm lending reflects excellent penetration.

### Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The distribution of 2022 home mortgage loans among low-income census tracts was below the aggregate lending data by number, comparable by dollar, and below the demographic figure, which represents the percentage of owner-occupied housing units in each census tract income level. Lending in moderate-income tracts was comparable to the aggregate lending data by number, below by dollar, and comparable to the demographic figure.

The geographic distribution of home mortgage lending in 2021 and 2023 was consistent with 2022 lending patterns.

An analysis of the dispersion of loans revealed several conspicuous lending gaps and lapses, including LMI census tracts; however, these gaps did not impact the overall conclusion based on the limited levels of home mortgage lending relative to the number of census tracts in the AA. Moreover, the bank faces significant competition from other financial institutions in this market.

### Home Purchase Loans

The geographic distribution of home purchase lending is adequate. The bank's 2022 home purchase lending in low-income tracts was significantly below the aggregate lending data by both number and dollar, as well as the demographic figure. Lending among moderate-income tracts was comparable to the aggregate lending data by number, below by dollar, and comparable to the demographic figure.

The geographic distribution of home purchase lending in 2021 and 2023 reflected performance consistent with 2022 lending patterns.

Home Refinance Loans

The geographic distribution of home refinance lending is poor. The bank's 2022 home refinance lending in both LMI census tracts was comparable to the aggregate lending data by number and to the respective demographic figures. However, lending by dollar volume in LMI census tracts was below aggregate lending data.

Lending levels in 2023 were too low to conduct meaningful analyses, while the distribution of home refinance lending in 2021 was below the performance level in 2022 and contributed to the overall rating based on significantly higher lending volume in 2021.

**Table 8**

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: Kansas City Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	1	0.9	4.6	75	0.2	2.4	11	9.0	5.3	1,488	3.0	2.9	4.6
Moderate	18	16.7	21.1	2,923	6.6	13.1	21	17.2	22.1	4,272	8.7	14.5	19.6
Middle	41	38.0	38.7	10,238	23.0	35.1	35	28.7	39.4	11,423	23.3	36.4	40.4
Upper	47	43.5	35.2	30,921	69.6	49.1	54	44.3	32.7	31,626	64.6	46.0	35.0
Unknown	1	0.9	0.5	268	0.6	0.3	1	0.8	0.4	123	0.3	0.3	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	108	100.0	100.0	44,425	100.0	100.0	122	100.0	100.0	48,932	100.0	100.0	100.0
Refinance Loans													
Low	2	3.9	3.5	100	0.5	2.1	1	5.9	4.8	143	2.4	3.2	4.6
Moderate	9	17.6	19.7	1,777	8.5	13.0	3	17.6	21.9	156	2.7	16.0	19.6
Middle	16	31.4	42.3	3,896	18.7	38.1	5	29.4	39.7	1,948	33.2	38.6	40.4
Upper	24	47.1	34.2	15,015	72.2	46.6	8	47.1	33.1	3,619	61.7	42.1	35.0
Unknown	0	0.0	0.3	0	0.0	0.2	0	0.0	0.4	0	0.0	0.2	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	51	100.0	100.0	20,788	100.0	100.0	17	100.0	100.0	5,866	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.3	0	0.0	1.9	1	12.5	2.9	90	6.0	2.0	4.6
Moderate	6	42.9	12.9	474	24.1	9.2	4	50.0	14.1	388	25.9	10.0	19.6
Middle	6	42.9	37.1	672	34.2	30.9	1	12.5	37.9	750	50.1	33.4	40.4
Upper	2	14.3	47.4	818	41.6	57.8	2	25.0	44.8	270	18.0	54.5	35.0
Unknown	0	0.0	0.3	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	1,964	100.0	100.0	8	100.0	100.0	1,498	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	2	18.2	14.6	1,628	6.4	6.9	1	11.1	11.9	6,000	37.8	10.7	11.5
Moderate	2	18.2	34.1	3,250	12.7	19.6	5	55.6	37.2	2,745	17.3	35.6	27.9
Middle	4	36.4	31.7	10,154	39.7	21.5	2	22.2	32.6	7,013	44.2	26.7	34.0
Upper	3	27.3	17.6	10,525	41.2	51.2	1	11.1	18.0	100	0.6	26.5	23.6
Unknown	0	0.0	1.9	0	0.0	0.8	0	0.0	0.4	0	0.0	0.5	3.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	25,557	100.0	100.0	9	100.0	100.0	15,858	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	5	2.6	4.1	1,803	1.9	2.8	14	8.9	4.8	7,721	10.7	3.9	4.6
Moderate	35	18.4	19.8	8,424	8.9	13.6	33	20.9	21.0	7,561	10.4	17.2	19.6
Middle	68	35.8	39.5	25,510	26.9	34.1	45	28.5	39.3	21,443	29.6	35.2	40.4
Upper	81	42.6	36.2	58,774	62.0	49.2	65	41.1	34.5	35,615	49.1	43.5	35.0
Unknown	1	0.5	0.4	268	0.3	0.3	1	0.6	0.4	123	0.2	0.3	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	190	100.0	100.0	94,779	100.0	100.0	158	100.0	100.0	72,463	100.0	100.0	100.0
Source: 2023 FFIEC Census Data 2016-2020 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 adequate. The distribution of small business lending in 2022 among low-income census tracts was significantly above aggregate lending data by number, above by dollar, and above the demographic figure. Lending among moderate-income tracts was comparable to the aggregate lending data by both number and dollar and the demographic figure.

The geographic distribution of small business lending in 2021 and 2023 reflected performance consistent with 2022 lending patterns.

The bank's small business loan dispersion by income level of AA geographies revealed gaps and lapses that included LMI tracts. However, these gaps were partially the result of concentrated lending in proximity to the bank's branches. Several AA LMI tracts also are located a considerable distance from any of the bank's locations. In addition, the bank faces considerable competition within the AA. Based on these factors, the gaps and lapses did not impact the overall conclusion.

**Table 9**

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography Assessment Area: Kansas City Metropolitan											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
Low	45	8.4	5.5	14,155	10.1	6.8	32	6.6	9,005	6.3	6.2
Moderate	101	18.9	18.6	24,533	17.6	18.5	93	19.3	24,490	17.2	20.6
Middle	152	28.5	33.2	32,681	23.4	28.3	120	24.9	31,206	22.0	34.8
Upper	202	37.8	39.7	53,922	38.6	39.5	204	42.3	65,055	45.8	35.7
Unknown	34	6.4	2.6	14,285	10.2	6.7	33	6.8	12,392	8.7	2.8
Tract-Unk	0	0.0	0.4	0	0.0	0.1	0	0.0	0	0.0	0.0
Total	534	100.0	100.0	139,576	100.0	100.0	482	100.0	142,148	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

### Small Farm Lending

The geographic distribution of small farm lending is excellent. There was insufficient lending volume in 2022 and 2023 to conduct meaningful analyses with only 22 combined originations over both years.

In 2021, the bank did not originate any small farm lending in the AA's low-income tracts, which was comparable to the aggregate lending data by both number and dollar and the demographic figure; the percentage of farms in these tracts was limited. However, the



bank's lending in the AA's moderate-income tracts was significantly above the aggregate lending data by number, comparable by dollar, and above the demographic figure.

The bank's dispersion of small farm lending by income level of AA geographies revealed gaps and lapses that included LMI tracts. However, this did not impact the overall conclusion as many farms are located in outlying rural areas beyond the concentration of LMI census tracts in the AA's highly populated metropolitan areas. Moreover, the bank only originated 30 small farm loans among the AA's 499 census tracts in 2021.

**Table 10**

Distribution of 2022 and 2023 Small Farm Lending By Income Level of Geography											
Assessment Area: Kansas City Metropolitan											
Geographic Income Level	Bank And Aggregate Loans By Year									Total Farms %	
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)		%
Low	0	0.0	1.6	0	0.0	1.6	0	0.0	0	0.0	1.6
Moderate	1	7.1	7.9	10	1.0	6.4	0	0.0	0	0.0	9.1
Middle	13	92.9	56.4	978	99.0	57.2	8	100.0	314	100.0	51.6
Upper	0	0.0	32.5	0	0.0	33.7	0	0.0	0	0.0	37.4
Unknown	0	0.0	0.5	0	0.0	1.0	0	0.0	0	0.0	0.3
Tract-Unk	0	0.0	1.2	0	0.0	0.2	0	0.0	0	0.0	0.0
Total	14	100.0	100.0	988	100.0	100.0	8	100.0	314	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

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

The bank's lending has an adequate distribution among individuals of different income levels and businesses and farms of different sizes. The bank's distribution of home mortgage lending reflects poor performance, followed by adequate performance for small business lending and excellent performance for small farm lending.

### Home Mortgage Lending

The borrower distribution of home mortgage lending is poor. The distribution of 2022 loans to low-income borrowers was below the aggregate lending data by number, and significantly below by dollar and the demographic figure, which represents the distribution of families in the AA by income level. Lending to moderate-income borrowers was below the aggregate lending data by number and dollar and the demographic figure.

The borrower distribution of home mortgage lending in 2021 and 2023 was consistent with the bank's 2022 lending patterns.

#### Home Purchase Loans

The borrower distribution of home purchase lending is poor. The distribution of 2022 home purchase loans to low-income borrowers was below the aggregate lending data by both number and dollar and significantly below the demographic figure. Lending to moderate-income borrowers was below the aggregate lending data by both number and dollar, as well as the demographic figure.

The borrower distribution of home purchase lending in 2021 and 2023 reflected consistent performance with the 2022 lending levels.

#### Home Refinance Loans

The borrower distribution of home refinance lending is adequate. The distribution of 2022 home refinance loans to low-income borrowers was significantly below the aggregate lending data by both number and dollar and the demographic figure. Lending to moderate-income borrowers was below the aggregate lending data by number, significantly below by dollar, and comparable to the demographic figure.

The volume of home refinance lending in 2023 was too low to conduct a meaningful analysis, while 2021 performance exceeded performance in 2022 and contributed to the overall rating based on significantly higher lending volume in 2021.

**Table 11**

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level Assessment Area: Kansas City Metropolitan													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	­%	­%	\$(000)	­%	­%	#	­%	­%	\$(000)	­%	­%	
Home Purchase Loans													
Low	5	4.6	8.7	773	1.7	4.3	8	6.6	8.6	1,506	3.1	4.2	20.1
Moderate	11	10.2	19.7	2,299	5.2	14.1	8	6.6	20.5	1,738	3.6	14.3	17.4
Middle	12	11.1	20.4	3,704	8.3	19.2	12	9.8	19.8	3,094	6.3	18.4	21.7
Upper	47	43.5	31.7	30,833	69.4	44.9	54	44.3	30.6	33,712	68.9	43.9	40.8
Unknown	33	30.6	19.4	6,816	15.3	17.5	40	32.8	20.5	8,882	18.2	19.2	0.0
Total	108	100.0	100.0	44,425	100.0	100.0	122	100.0	100.0	48,932	100.0	100.0	100.0
Refinance Loans													
Low	2	3.9	12.4	323	1.6	7.1	2	11.8	11.8	140	2.4	6.8	20.1
Moderate	6	11.8	22.1	1,110	5.3	17.1	1	5.9	20.6	146	2.5	16.5	17.4
Middle	10	19.6	21.7	2,999	14.4	21.0	1	5.9	20.4	550	9.4	19.1	21.7
Upper	21	41.2	28.1	14,441	69.5	38.7	9	52.9	30.1	4,595	78.3	38.6	40.8
Unknown	12	23.5	15.6	1,915	9.2	16.1	4	23.5	17.1	435	7.4	19.1	0.0
Total	51	100.0	100.0	20,788	100.0	100.0	17	100.0	100.0	5,866	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.6	0	0.0	4.0	0	0.0	8.0	0	0.0	4.8	20.1
Moderate	1	7.1	14.4	45	2.3	10.0	0	0.0	16.7	0	0.0	11.5	17.4
Middle	1	7.1	22.9	488	24.8	18.0	1	12.5	23.3	750	50.1	18.2	21.7
Upper	5	35.7	50.6	299	15.2	61.0	2	25.0	46.4	285	19.0	59.4	40.8
Unknown	7	50.0	5.5	1,132	57.6	7.1	5	62.5	5.6	463	30.9	6.1	0.0
Total	14	100.0	100.0	1,964	100.0	100.0	8	100.0	100.0	1,498	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	7	3.9	9.5	1,096	1.6	5.0	10	6.7	9.0	1,646	2.9	4.6	20.1
Moderate	18	10.1	19.7	3,454	5.0	14.6	9	6.0	19.9	1,884	3.3	14.4	17.4
Middle	26	14.5	20.9	7,761	11.2	19.5	16	10.7	20.6	4,703	8.3	18.5	21.7
Upper	76	42.5	32.8	47,048	68.0	44.1	65	43.6	32.8	38,592	68.2	43.9	40.8
Unknown	52	29.1	17.1	9,863	14.2	16.9	49	32.9	17.7	9,780	17.3	18.6	0.0
Total	179	100.0	100.0	69,222	100.0	100.0	149	100.0	100.0	56,605	100.0	100.0	100.0
Source: 2023 FFIEC Census Data 2016-2020 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. 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 borrower distribution of small business lending is adequate. The bank's 2022 distribution of lending to small businesses was comparable to the aggregate lending data by number and dollar and below the demographic figure, which represents the percentage of small businesses in the AA based on Dun & Bradstreet (D&B) data.

The distribution of 2021 and 2023 small business loans was consistent with 2022 lending patterns.

**Table 12**

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Kansas City Metropolitan											
	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	210	39.3	51.7	32,111	23.0	31.3	184	38.2	35,338	24.9	90.9
Over \$1 Million	314	58.8		106,845	76.5		297	61.6	106,800	75.1	8.3
Revenue Unknown	10	1.9		620	0.4		1	0.2	10	0.0	0.8
Total	534	100.0		139,576	100.0		482	100.0	142,148	100.0	100.0
By Loan Size											
\$100,000 or Less	219	41.0	92.3	12,541	9.0	30.4	176	36.5	9,479	6.7	
\$100,001 - \$250,000	134	25.1	3.6	24,400	17.5	14.5	126	26.1	24,119	17.0	
\$250,001 - \$1 Million	181	33.9	4.1	102,635	73.5	55.1	180	37.3	108,550	76.4	
Total	534	100.0	100.0	139,576	100.0	100.0	482	100.0	142,148	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	127	60.5		6,484	20.2		97	52.7	4,300	12.2	
\$100,001 - \$250,000	47	22.4		8,218	25.6		47	25.5	8,617	24.4	
\$250,001 - \$1 Million	36	17.1		17,409	54.2		40	21.7	22,421	63.4	
Total	210	100.0		32,111	100.0		184	100.0	35,338	100.0	
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

### Small Farm Lending

The borrower distribution of small farm lending is excellent. The bank's volume of small farm lending in 2022 and 2023 was too low to render meaningful analyses.

The distribution of small farm lending in 2021 was significantly above the aggregate lending data by number, above by dollar, and comparable to the demographic figure, which represents the percentage of small farms in the AA based on D&B data. All of the bank's small farm loans in 2021 were to agricultural operations with less than \$1MM in gross annual revenue.

**Table 13**

Distribution of 2022 and 2023 Small Farm Lending By Revenue Size of Farms											
Assessment Area: Kansas City Metropolitan											
	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	11	78.6	59.5	766	77.5	70.0	7	87.5	214	68.2	97.4
Over \$1 Million	3	21.4		222	22.5		1	12.5	100	31.8	2.3
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	
Total	14	100.0		988	100.0		8	100.0	314	100.0	100.0
By Loan Size											
\$100,000 or Less	12	85.7	82.7	473	47.9	29.1	8	100.0	314	100.0	
\$100,001 - \$250,000	1	7.1	9.4	115	11.6	25.1	0	0.0	0	0.0	
\$250,001 - \$500,000	1	7.1	7.9	400	40.5	45.7	0	0.0	0	0.0	
Total	14	100.0	100.0	988	100.0	100.0	8	100.0	314	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	9	81.8		251	32.8		7	100.0	214	100.0	
\$100,001 - \$250,000	1	9.1		115	15.0		0	0.0	0	0.0	
\$250,001 - \$500,000	1	9.1		400	52.2		0	0.0	0	0.0	
Total	11	100.0		766	100.0		7	100.0	214	100.0	
Source: 2023 FFIEC Census Data											
2023 Dun & Bradstreet Data											
2016-2020 U.S. Census Bureau: American Community Survey											
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.											

## Community Development Lending

The bank is a leader in originating CD loans. The bank originated 94 CD loans totaling \$320.0MM during the evaluation period. The bank's CD lending was primarily focused on the economic development needs within the AA, followed by lending that revitalized and stabilized certain geographic areas in response to community needs. Examples of the bank's CD lending activities that were considered responsive to AA credit needs include:

- A \$1.5MM loan was originated to purchase a 72-unit apartment complex in support of affordable housing for LMI individuals and families.
- The bank originated three economic development loans totaling \$27.0MM to a business located in a low-income census tract within an enhanced enterprise zone.
- A \$31.3MM revitalization and stabilization loan was originated to construct a facility located in a moderate-income census tract as part of a city revitalization zone in a blighted area.

**Table 14**

<b>Community Development Loans – Kansas City Metropolitan AA</b>		
<b>Community Development Purpose</b>	<b>#</b>	<b>\$(000)</b>
Affordable Housing	3	3,006
Community Services	6	11,525
Economic Development	51	156,672
Revitalization and Stabilization	19	43,108
<b>Outside Activities</b>	<b>15</b>	<b>105,671</b>
<b>Total Loans</b>	<b>94</b>	<b>319,982</b>

## **INVESTMENT TEST**

This performance criterion evaluates the bank's level of qualified grants, donations, or in-kind contributions of property made since the last CRA evaluation that have a primary purpose of community development, as well as qualified investments made prior to, but still outstanding, during this evaluation period. The bank's performance under the investment test in the Kansas City Metropolitan AA is Outstanding. The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes occasional use of innovative and/or complex investments and exhibits good responsiveness to the credit and CD needs of its AA.

The bank's investment strategy continues to focus on purchasing CD investments that are exclusively comprised of mortgage-backed securities (MBS) collateralized by residential mortgages originated to LMI borrowers. These securities meet the definition of affordable housing for CD purposes and were beneficial to numerous individuals and families residing in the AA. In addition to reported investment activities, the bank also made 138 impactful donations totaling \$1.8MM during the evaluation period. These donations primarily focused on community service organizations that provide tangible benefits to area LMI households and families. Examples of investment and donation activities in the AA include:

- The bank purchased an investment for \$7.4MM and securitized by a 128-unit multifamily structure that provides affordable rental housing to LMI individuals and families in the AA.
- Three community service donations totaling \$710.0 thousand (M) were made to an organization that provides educational scholarships to students living in poverty.
- Three community service donations totaling \$232.0M were made to an organization with a primary focus on serving women in search of gainful employment.

**Table 15**

Investments, Grants, and Donations – Kansas City Metropolitan AA								
Community Development Purpose	Prior Period Investments <sup>1</sup>		Current Investments <sup>2</sup>		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	11	10,038	1	7,350	6	25	18	15,413
Community Services	0	0	0	0	130	1,785	130	1,785
Economic Development	0	0	0	0	2	6	2	6
Revitalization and Stabilization	1	2,000	0	0	0	0	1	2,000
<b>Total</b>	12	10,038	1	7,350	138	1,816	151	19,204
<sup>1.</sup> Book Value of Investment								
<sup>2.</sup> Original Market Value of Investment								

## SERVICE TEST

Under this test, CD services comprised the most weight in determining the overall rating. The bank's performance under the service test in the Kansas City Metropolitan AA is Outstanding.

## Retail Banking Services

This performance criterion evaluates the bank's level of service-delivery systems provided in each geographic classification. The table below illustrates the distribution of bank offices and full-service ATMs by income level of geographies, as well as the number of branch openings/closings, and the volume of CD services provided during the evaluation period.

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates 24 locations in the AA, including 19 full-service locations, as well as 5 limited-service locations that primarily serve retirement centers. Full-service ATMs are available at all but one of the full-service branches, and the bank also maintains a full-service standalone ATM in the AA. Overall, the distribution of branches is generally proportional to the percent of tracts by income level.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank consolidated a full-service branch in an unknown-income census tract with another nearby location, and closed a limited-service branch in an upper-income tract. The bank also opened one full-service branch with an ATM in a moderate-income tract on May 10, 2021.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals.

**Table 16**

Retail Banking and Community Development Services – Kansas City Metropolitan AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	8.3	16.7	29.2	45.8	0.0	100.0	10.2	24.2	34.7	26.7	4.2	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	5.0	20.0	25.0	50.0	0.0	100.0	7.6	24.1	38.8	28.8	0.7	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	24		1		2		0	1	0	(1)	(1)	(1)
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	11		97		19		3		130		29	
<sup>1.</sup> Based on 2023 FFIEC census tract definitions.												
<sup>2.</sup> Branch information as of December 31, 2023.												
Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

## Community Development Services

This performance criterion evaluates the bank's level of CD services. The bank is a leader in providing CD services. As illustrated in the table above, bank employees supported 36 organizations in the community and provided 130 services. Services provided by employees include the provision of financial and technical expertise by serving on boards of directors (boards) of affordable housing organizations, non-profit entities that primarily serve LMI individuals and families, economic development organizations that primarily focus on attracting and retaining small businesses, and local organizations that serve to revitalize and stabilize economically blighted areas. Examples of services performed by bank employees include:

- Thirteen bank employees provided 55 CD services to a nonprofit agency's financial literacy program for local schools where a majority of students qualified for the free and reduced lunch program.
- A bank employee served on the board of an organization that provides financial support to families with a child experiencing a life-threatening medical condition.
- A bank employee served on the board of an organization that aids LMI families by providing safe, affordable, and quality housing.



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

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

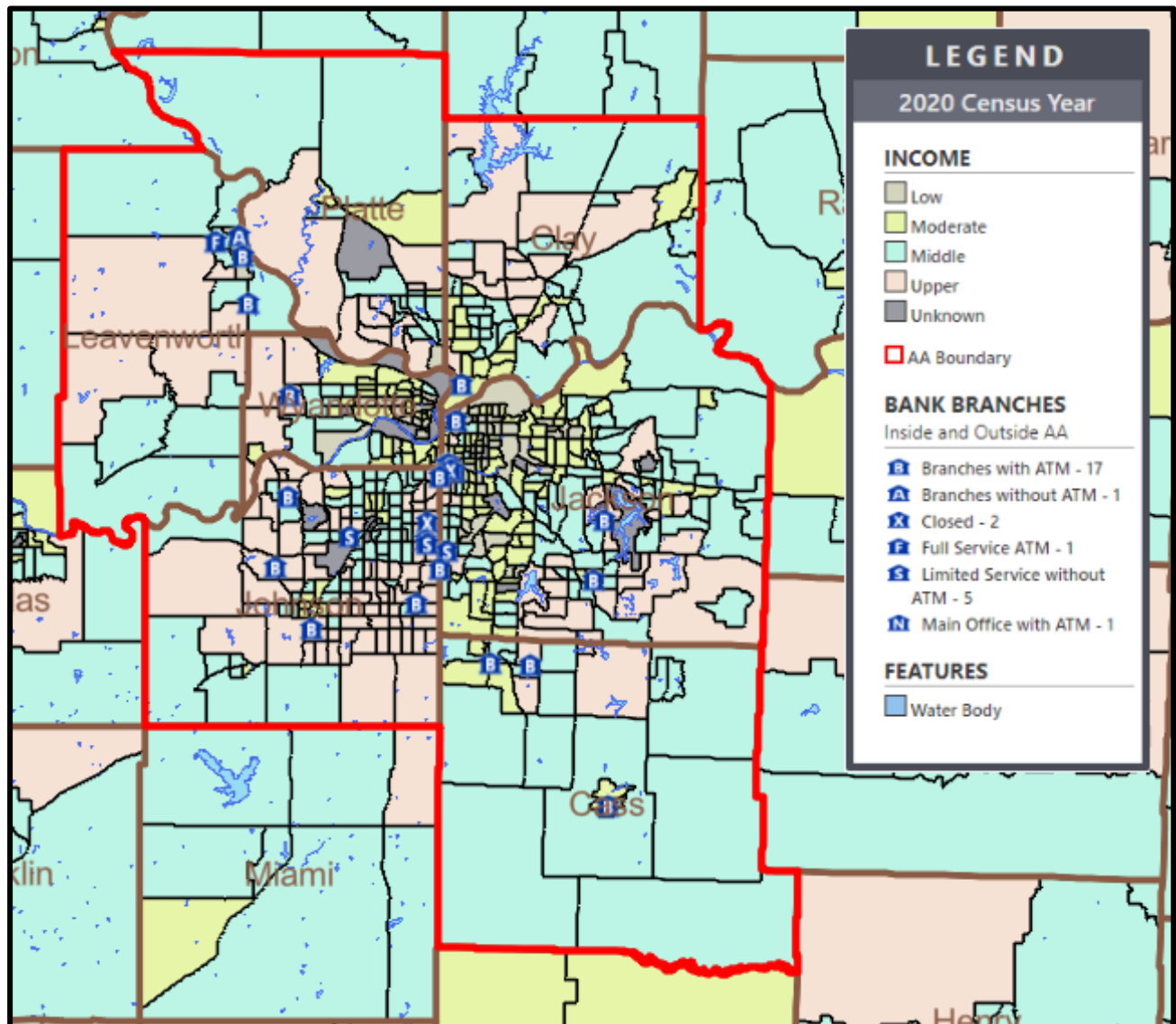
**APPENDIX A – SCOPE OF EXAMINATION**

**Table A-1**

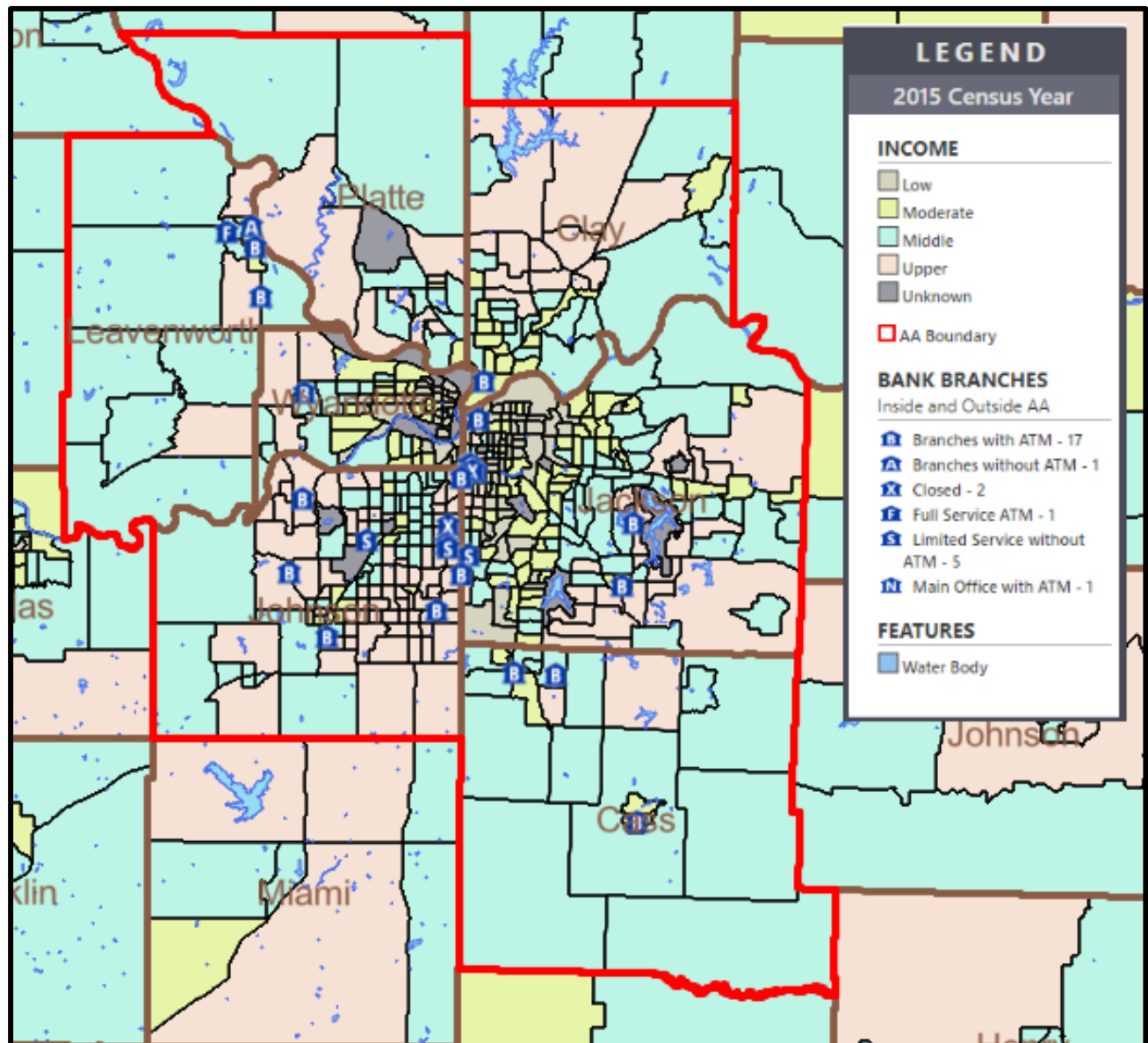
Scope of Examination			
<u>Financial Institution</u>  Country Club Bank Kansas City, Missouri		<u>Products/Services Reviewed</u>  <div><div>• Home Purchase Loans</div><div>• Home Refinance Loans</div><div>• Home Improvement Loans</div><div>• Multifamily Loans</div></div> <div><div>• Small Business (SB) Loans</div><div>• Small Farm (SF) Loans</div><div>• CD Loans</div><div>• Qualified Investments and Donations</div><div>• CD Services</div></div>	
<u>Time Period</u>  HMDA LAR and CRA SB and SF Loans:                    January 1, 2021 to December 31, 2023  Community Development Activities:                    January 1, 2021 to December 31, 2023			
List of Affiliates Considered in this Evaluation			
Affiliates		Affiliate Relationship	Products Reviewed
None		NA	None
List of Assessment Areas and Type of Examination			
Assessment Area	Type of Exam	Branches Visited	Community Contacts
Multistate MSA MSA 28140 Kansas City Metropolitan	Full Review	1 Ward Parkway, Kansas City, Missouri	1 prior

APPENDIX B – MAPS OF THE ASSESSMENT AREAS

Map B-1  
2022 – 2023



Map B-2  
2021



**APPENDIX C – DEMOGRAPHIC INFORMATION**

**Table C-1**

2023 Kansas City Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	58	10.2	32,365	6.4	8,775	27.1	101,256	20.1
Moderate	138	24.2	108,452	21.6	13,462	12.4	87,287	17.4
Middle	198	34.7	196,292	39.0	8,820	4.5	108,967	21.7
Upper	152	26.7	163,349	32.5	2,660	1.6	205,194	40.8
Unknown	24	4.2	2,246	0.4	564	25.1	0	0.0
Total AA	570	100.0	502,704	100.0	34,281	6.8	502,704	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	70,987	23,318	4.6	32.8	36,527	51.5	11,142	15.7
Moderate	212,748	99,157	19.6	46.6	90,087	42.3	23,504	11.0
Middle	323,947	204,582	40.4	63.2	100,494	31.0	18,871	5.8
Upper	237,247	177,104	35.0	74.6	48,941	20.6	11,202	4.7
Unknown	7,265	2,008	0.4	27.6	3,787	52.1	1,470	20.2
Total AA	852,194	506,169	100.0	59.4	279,836	32.8	66,189	7.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5,505	6.2	4,856	6.0	607	8.2	42	6.0
Moderate	18,317	20.6	16,719	20.7	1,491	20.2	107	15.4
Middle	30,855	34.8	28,711	35.6	1,899	25.7	245	35.3
Upper	31,653	35.7	28,671	35.5	2,712	36.7	270	38.8
Unknown	2,450	2.8	1,730	2.1	689	9.3	31	4.5
Total AA	88,780	100.0	80,687	100.0	7,398	100.0	695	100.0
Percentage of Total Businesses:				90.9		8.3		0.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	17	1.6	16	1.5	1	4.2	0	0.0
Moderate	97	9.1	93	9.0	4	16.7	0	0.0
Middle	549	51.6	537	51.8	10	41.7	2	50.0
Upper	398	37.4	388	37.5	8	33.3	2	50.0
Unknown	3	0.3	2	0.2	1	4.2	0	0.0
Total AA	1,064	100.0	1,036	100.0	24	100.0	4	100.0
Percentage of Total Farms:				97.4		2.3		0.4
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table C-2**

2022 Kansas City Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	58	10.2	32,365	6.4	8,775	27.1	101,256	20.1
Moderate	138	24.2	108,452	21.6	13,462	12.4	87,287	17.4
Middle	198	34.7	196,292	39.0	8,820	4.5	108,967	21.7
Upper	152	26.7	163,349	32.5	2,660	1.6	205,194	40.8
Unknown	24	4.2	2,246	0.4	564	25.1	0	0.0
Total AA	570	100.0	502,704	100.0	34,281	6.8	502,704	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	70,987	23,318	4.6	32.8	36,527	51.5	11,142	15.7
Moderate	212,748	99,157	19.6	46.6	90,087	42.3	23,504	11.0
Middle	323,947	204,582	40.4	63.2	100,494	31.0	18,871	5.8
Upper	237,247	177,104	35.0	74.6	48,941	20.6	11,202	4.7
Unknown	7,265	2,008	0.4	27.6	3,787	52.1	1,470	20.2
Total AA	852,194	506,169	100.0	59.4	279,836	32.8	66,189	7.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5,552	6.2	4,878	6.0	631	8.4	43	5.9
Moderate	18,263	20.5	16,632	20.5	1,516	20.2	115	15.8
Middle	30,966	34.7	28,783	35.5	1,929	25.8	254	34.8
Upper	31,931	35.8	28,925	35.7	2,719	36.3	287	39.4
Unknown	2,498	2.8	1,772	2.2	696	9.3	30	4.1
Total AA	89,210	100.0	80,990	100.0	7,491	100.0	729	100.0
Percentage of Total Businesses:				90.8		8.4		0.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	15	1.4	14	1.4	1	3.8	0	0.0
Moderate	96	9.2	92	9.0	4	15.4	0	0.0
Middle	533	50.9	521	51.2	10	38.5	2	50.0
Upper	400	38.2	388	38.2	10	38.5	2	50.0
Unknown	3	0.3	2	0.2	1	3.8	0	0.0
Total AA	1,047	100.0	1,017	100.0	26	100.0	4	100.0
Percentage of Total Farms:				97.1		2.5		0.4
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table C-3**

2021 Kansas City Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	79	15.8	39,180	8.1	13,683	34.9	101,444	21.1
Moderate	109	21.8	93,123	19.4	14,581	15.7	83,159	17.3
Middle	159	31.9	182,295	37.9	11,475	6.3	97,651	20.3
Upper	133	26.7	165,209	34.4	3,601	2.2	198,541	41.3
Unknown	19	3.8	988	0.2	451	45.6	0	0.0
Total AA	499	100.0	480,795	100.0	43,791	9.1	480,795	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	92,203	28,833	6.0	31.3	43,560	47.2	19,810	21.5
Moderate	181,286	82,906	17.2	45.7	77,741	42.9	20,639	11.4
Middle	304,565	189,530	39.3	62.2	93,751	30.8	21,284	7.0
Upper	233,914	179,979	37.3	76.9	44,071	18.8	9,864	4.2
Unknown	4,019	863	0.2	21.5	1,780	44.3	1,376	34.2
Total AA	815,987	482,111	100.0	59.1	260,903	32.0	72,973	8.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	6,773	7.7	5,928	7.4	801	10.6	44	6.3
Moderate	17,112	19.4	15,509	19.4	1,495	19.7	108	15.4
Middle	30,636	34.8	27,998	35.1	2,380	31.4	258	36.9
Upper	31,819	36.1	29,195	36.6	2,347	31.0	277	39.6
Unknown	1,692	1.9	1,126	1.4	553	7.3	13	1.9
Total AA	88,032	100.0	79,756	100.0	7,576	100.0	700	100.0
Percentage of Total Businesses:				90.6		8.6		0.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	21	2.0	19	1.9	2	7.1	0	0.0
Moderate	78	7.4	77	7.5	1	3.6	0	0.0
Middle	564	53.4	549	53.6	13	46.4	2	50.0
Upper	392	37.1	379	37.0	11	39.3	2	50.0
Unknown	2	0.2	1	0.1	1	3.6	0	0.0
Total AA	1,057	100.0	1,025	100.0	28	100.0	4	100.0
Percentage of Total Farms:				97.0		2.6		0.4
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 D – ADDITIONAL FULL SCOPE REVIEW ASSESSMENT AREA TABLES**

**Table D-1**

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Kansas City Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	##	##	\$(000)	%	%	
Home Purchase Loans							
Low	5	3.4	4.4	1,137	2.5	2.3	6.0
Moderate	18	12.1	17.6	2,355	5.2	11.1	17.2
Middle	45	30.2	38.7	8,841	19.6	34.6	39.3
Upper	81	54.4	39.1	32,863	72.7	51.8	37.3
Unknown	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	149	100.0	100.0	45,196	100.0	100.0	100.0
Refinance Loans							
Low	4	2.0	1.9	706	1.2	1.1	6.0
Moderate	7	3.5	12.0	835	1.5	7.4	17.2
Middle	75	37.7	38.4	15,231	26.8	33.1	39.3
Upper	113	56.8	47.5	39,960	70.4	58.2	37.3
Unknown	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	199	100.0	100.0	56,732	100.0	100.0	100.0
Home Improvement Loans							
Low	1	10.0	3.5	100	6.4	2.4	6.0
Moderate	4	40.0	11.0	529	33.7	7.8	17.2
Middle	2	20.0	33.1	248	15.8	30.2	39.3
Upper	3	30.0	52.1	695	44.2	59.4	37.3
Unknown	0	0.0	0.3	0	0.0	0.3	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	1,572	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	3	17.6	19.1	786	4.1	9.1	
Moderate	7	41.2	36.9	6,553	33.8	22.4	26.1
Middle	3	17.6	32.8	7,662	39.5	28.3	36.9
Upper	3	17.6	9.2	2,874	14.8	35.3	20.7
Unknown	1	5.9	2.0	1,500	7.7	4.9	1.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	17	100.0	100.0	19,375	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	13	3.4	3.0	2,729	2.2	2.0	
Moderate	38	9.9	14.4	10,515	8.4	9.8	17.2
Middle	127	33.2	38.3	32,614	26.0	33.4	39.3
Upper	204	53.3	44.1	77,882	62.2	54.4	37.3
Unknown	1	0.3	0.2	1,500	1.2	0.4	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	383	100.0	100.0	125,240	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.							



**Table D-2**

<b>Distribution of 2021 Small Business Lending By Income Level of Geography</b> <b>Assessment Area: Kansas City Metropolitan</b>							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	109	9.2	7.0	22,704	10.9	8.8	7.7
Moderate	202	17.0	18.1	32,031	15.4	19.3	19.4
Middle	405	34.1	32.4	68,450	33.0	29.2	34.8
Upper	447	37.7	40.1	77,555	37.4	37.4	36.1
Unknown	24	2.0	2.1	6,784	3.3	5.2	1.9
Tract-Unk	0	0.0	0.3	0	0.0	0.1	
Total	1,187	100.0	100.0	207,524	100.0	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 D-3**

<b>Distribution of 2021 Small Farm Lending By Income Level of Geography</b> <b>Assessment Area: Kansas City Metropolitan</b>							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	1.2	0	0.0	0.4	2.0
Moderate	3	10.0	3.8	47	3.3	3.5	7.4
Middle	22	73.3	66.9	1,157	82.5	64.6	53.4
Upper	5	16.7	27.3	199	14.2	31.4	37.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.8	0	0.0	0.1	
Total	30	100.0	100.0	1,403	100.0	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 D-4**

Distribution of 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Kansas City Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	6	4.0	9.0	786	1.7	4.7	21.1
Moderate	15	10.1	20.0	2,514	5.6	14.7	17.3
Middle	17	11.4	20.3	4,941	10.9	19.4	20.3
Upper	64	43.0	32.1	28,556	63.2	43.7	41.3
Unknown	47	31.5	18.7	8,399	18.6	17.6	0.0
Total	149	100.0	100.0	45,196	100.0	100.0	100.0
Refinance Loans							
Low	4	2.0	6.5	332	0.6	3.5	21.1
Moderate	29	14.6	16.6	4,240	7.5	11.8	17.3
Middle	37	18.6	20.6	7,654	13.5	18.3	20.3
Upper	103	51.8	34.9	39,098	68.9	44.6	41.3
Unknown	26	13.1	21.3	5,408	9.5	21.9	0.0
Total	199	100.0	100.0	56,732	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	6.2	0	0.0	3.3	21.1
Moderate	0	0.0	13.7	0	0.0	10.3	17.3
Middle	0	0.0	19.6	0	0.0	15.1	20.3
Upper	3	30.0	55.1	217	13.8	63.2	41.3
Unknown	7	70.0	5.5	1,355	86.2	8.1	0.0
Total	10	100.0	100.0	1,572	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	10	2.7	7.4	1,118	1.1	4.0	21.1
Moderate	45	12.3	17.7	6,862	6.5	13.0	17.3
Middle	55	15.0	20.3	12,837	12.1	18.6	20.3
Upper	176	48.1	34.6	69,886	66.0	44.5	41.3
Unknown	80	21.9	20.0	15,162	14.3	19.8	0.0
Total	366	100.0	100.0	105,865	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. 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.							

**Table D-5**

Distribution of 2021 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Kansas City Metropolitan							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
By Revenue							
\$1 Million or Less	609	51.3	47.4	48,967	23.6	28.4	90.6
Over \$1 Million	570	48.0		157,891	76.1		8.6
Revenue Unknown	8	0.7		666	0.3		0.8
Total	1,187	100.0		207,524	100.0		100.0
By Loan Size							
\$100,000 or Less	670	56.4	89.1	26,609	12.8	27.5	
\$100,001 - \$250,000	256	21.6	5.4	43,855	21.1	17.0	
\$250,001 - \$1 Million	261	22.0	5.5	137,060	66.0	55.5	
Total	1,187	100.0	100.0	207,524	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	488	80.1		15,495	31.6		
\$100,001 - \$250,000	72	11.8		12,126	24.8		
\$250,001 - \$1 Million	49	8.0		21,346	43.6		
Total	609	100.0		48,967	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 D-6**

Distribution of 2021 Small Farm Lending By Revenue Size of Farms							
Assessment Area: Kansas City Metropolitan							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	30	100.0	61.8	1,403	100.0	72.8	97.0
Over \$1 Million	0	0.0		0	0.0		2.6
Revenue Unknown	0	0.0		0	0.0		0.4
Total	30	100.0		1,403	100.0		100.0
By Loan Size							
\$100,000 or Less	26	86.7	85.3	651	46.4	32.3	
\$100,001 - \$250,000	3	10.0	9.6	428	30.5	33.3	
\$250,001 - \$500,000	1	3.3	5.1	324	23.1	34.3	
Total	30	100.0	100.0	1,403	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	26	86.7		651	46.4		
\$100,001 - \$250,000	3	10.0		428	30.5		
\$250,001 - \$500,000	1	3.3		324	23.1		
Total	30	100.0		1,403	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.							

## APPENDIX E – 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 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.

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

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

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