



## **PUBLIC DISCLOSURE**

August 18, 2025

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

West Plains Bank  
RSSD# 967952

200 North Main Street  
Ainsworth, Nebraska 69210

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**

West Plains Bank (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans are originated inside the AA.
- The bank's performance under the geographic distribution of loans was not assessed because the AA is only comprised of middle-income census tracts. Therefore, a meaningful analysis could not be completed.
- Lending reflects a reasonable distribution among businesses and farms of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

## **SCOPE OF EXAMINATION**

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for 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 (2021, 2022, and 2023) was referenced for additional perspective to gauge credit demand within the bank's AA. Lending performance was assessed within the bank's single AA. Examiners reviewed the following data:

- The bank's 17-quarter average NLTD ratio,
- Statistical samples of small business and small farm loans originated between January 1, 2024 and December 31, 2024, including 50 small business loans selected from a universe of 66 loans and 60 small farm loans selected from a universe of 89 loans.
- Both products were weighted equally for this evaluation.

## **DESCRIPTION OF INSTITUTION**

West Plains Bank is a community bank headquartered in Ainsworth, Nebraska. The bank's characteristics include:

- The bank is a wholly owned subsidiary of Commercial Investment Company, which is a one-bank holding company.
- There are no affiliates associated with the holding company.
- The bank has total assets of \$125.4 million as of March 31, 2025.
- In addition to its main office in Ainsworth, the bank has one additional office located in Springview, Nebraska.
- The bank's sole cash-only automated teller machine was taken out of service in October 2021.
- As shown in the table below, the bank's primary business focus is agricultural and commercial lending.

**Table 1**

Composition of Loan Portfolio as of March 31, 2025		
Loan Type	\$(000)	%
Construction and Land Development	1,382	1.9
Farmland	20,233	28.0
1-4 Family Residential Real Estate	675	0.9
Multifamily Residential Real Estate	1,248	1.7
Non-Farm Non-Residential Real Estate	3,634	5.0
Agricultural	30,608	42.3
Commercial and Industrial	12,525	17.3
Consumer	1,742	2.4
Other	282	0.4
<b>Gross Loans</b>	<b>72,329</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its May 17, 2021 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

## DESCRIPTION OF ASSESSMENT AREA

The bank's North Central Nebraska AA consists of the entirety of Brown, Keya Paha, and Rock counties. Refer to Appendix A for an AA map and Appendix B for additional demographic data.

- The delineated AA is comprised of three middle-income census tracts. This represents a change from the prior performance evaluation where the AA was comprised of two moderate- and one middle-income census tracts.
- According to the June 30, 2024 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank reported a 38.5 percent deposit market share, ranking first out of five FDIC-insured depository institutions operating in the AA.

- One interview with a community member was conducted to ascertain the credit needs of the communities within the bank's AA, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The contact is affiliated with the AA in a civic capacity.

**Table 2**

<b>Population Change</b>			
<b>Assessment Area: North Central Nebraska</b>			
Area	2015 Population	2020 Population	Percent Change
North Central Nebraska	5,190	4,934	(4.9)
Brown County, NE	3,078	2,903	(5.7)
Keya Paha County, NE	711	769	8.2
Rock County, NE	1,401	1,262	(9.9)
NonMSA Nebraska	685,197	677,796	(1.1)
Nebraska	1,869,365	1,961,504	4.9
Source: 2020 U.S. Census Bureau: Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- The city of Ainsworth is the county seat for Brown County and is the largest city in the county, with a population of 1,632 as of 2023.
- Area demographics reflect a significant elderly population. Individuals aged 65 and older comprise 27.3 percent of the AA's total population, compared to the statewide figure of 15.4 and nonmetropolitan Nebraska figure of 19.6 percent.

**Table 3**

<b>Median Family Income Change</b>			
<b>Assessment Area: North Central Nebraska</b>			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
North Central Nebraska	54,141	60,314	11.4
Brown County, NE	50,218	62,500	24.5
Keya Paha County, NE	52,049	58,203	11.8
Rock County, NE	65,733	64,219	(2.3)
NonMSA Nebraska	67,144	70,804	5.5
Nebraska	73,448	80,125	9.1
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.			

- The portion of low- and moderate-income (LMI) families in the AA, at 45.8 percent, is above the figures for the statewide figure and nonmetropolitan figure of 37.0 percent each.

- The 2020 ACS data indicates the percentage of AA families below the poverty level, at 7.2 percent, is comparable to the statewide figure of 6.6 percent and nonmetropolitan figure of 7.0 percent.

**Table 4**

<b>Housing Cost Burden</b>						
<b>Assessment Area: North Central Nebraska</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
North Central Nebraska	54.4	20.0	27.0	43.8	24.0	16.0
Brown County, NE	73.7	41.7	41.3	47.2	28.8	18.7
Keya Paha County, NE	57.1	0.0	12.7	41.8	11.4	14.7
Rock County, NE	16.3	0.0	6.8	37.6	15.4	11.2
NonMSA Nebraska	64.7	16.6	31.1	57.4	21.6	15.6
Nebraska	73.1	27.0	37.0	61.7	28.6	16.1

*Cost Burden is housing cost that equals 30 percent or more of household income.*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy*

- The median housing value in the AA at \$85,586, was well below the median housing value in the state of Nebraska at \$164,000 and the nonmetropolitan figure of \$125,795. The community member emphasized that affordable housing and the condition of housing is the biggest need in the AA. Many structures are in dire need of rehabilitation, along with abandoned houses needing to be demolished.

**Table 5**

<b>Unemployment Rates</b>					
<b>Assessment Area: North Central Nebraska</b>					
<b>Area</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
North Central Nebraska	2.5	2.1	2.2	2.2	2.4
Brown County, NE	2.3	2.0	2.0	2.1	2.2
Keya Paha County, NE	3.3	2.7	3.4	3.4	3.3
Rock County, NE	2.6	1.9	2.2	2.1	2.4
NonMSA Nebraska	3.6	2.4	2.1	2.2	2.6
Nebraska	4.3	2.6	2.2	2.3	2.8

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

- The unemployment rate in the AA remains low and stable, with it fluctuating between 2.5 percent to 2.1 percent over the past five years. This is slightly lower than both the nonmetropolitan and statewide figures.
- The AA's primary labor and economic markets are driven by local and state government, along with agriculture in both cattle and crop production.
- The primary employers are Brown County Hospital and local school districts.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

The bank's overall lending test performance is Satisfactory. This conclusion was based on a reasonable NLTD ratio, a majority of loans originated within the bank's AA, as well as a reasonable borrower distribution.

### Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison, to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, area of operations, and market share.

The bank's NLTD ratio is reasonable. The bank's 17-quarter average NLTD ratio was in line with the three similarly situated institutions, with ratios ranging from 73.7 to 81.3 percent. Although the bank's ratio is lower than the three similarly situated institutions, it is noted that the NLTD ratio remains reasonable based on economic and competitive factors in the bank's AA.

**Table 6**

Comparative NLTD Ratios March 31, 2021 – March 31, 2025			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			17 Quarter Average
West Plains Bank	Ainsworth, Nebraska	125,444	68.9
<b>Similarly Situated Institutions</b>			
Homestead Bank	Cozad, Nebraska	515,742	81.3
The Tri-County Bank	Stuard, Nebraska	216,823	73.7
Sandhills State Bank	Chadron, Nebraska	355,225	81.3

### Assessment Area Concentration

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

**Table 7**

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Small Business	37	74.0	5,152	66.8	13	26.0	2,565	33.2
Small Farm	43	71.7	4,285	64.3	17	28.3	2,382	35.7
<b>Total Loans</b>	<b>80</b>	<b>72.7</b>	<b>9,437</b>	<b>65.6</b>	<b>30</b>	<b>27.3</b>	<b>4,947</b>	<b>34.4</b>

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 AA by income level of census tracts, with consideration given to the dispersion of loans throughout the AA. However, because the bank's AA consists only of middle-income census tracts, a meaningful analysis of geographic distribution cannot be conducted, as there are no low-, moderate-, or upper-income census tracts in the AA for comparative purposes.

## Lending to Businesses and Farms of Different Sizes

This performance criterion evaluates the bank's lending to businesses and farms of different revenue sizes. The bank's lending has a reasonable distribution among businesses and farms of different sizes.

### Small Business Lending

The borrower distribution of small business lending is reasonable. The bank's lending to businesses with revenues of \$1 million or less was comparable to the percentage of businesses in the AA with revenues of \$1 million or less.

**Table 8**

Distribution of 2024 Small Business Lending By Revenue Size of Businesses					
Assessment Area: North Central Nebraska					
	Bank Loans				Total Businesses
	#	%	\$(000)	%	
By Revenue					
\$1 Million or Less	31	83.8	2,791	54.2	89.6
Over \$1 Million	6	16.2	2,360	45.8	6.9
Revenue Unknown	0	0.0	0	0.0	3.5
Total	37	100.0	5,152	100.0	100.0
By Loan Size					
\$100,000 or Less	23	62.2	966	18.8	
\$100,001 - \$250,000	10	27.0	1,747	33.9	
\$250,001 - \$1 Million	4	10.8	2,438	47.3	
Total	37	100.0	5,152	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	23	74.2	966	34.6	
\$100,001 - \$250,000	7	22.6	1,087	38.9	
\$250,001 - \$1 Million	1	3.2	738	26.4	
Total	31	100.0	2,791	100.0	
Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					



Small Farm Lending

The borrower distribution of small farm lending is reasonable. The bank's lending to farms with revenues of \$1 million or less was comparable to the percentage of farms in the AA with revenues of \$1 million or less.

**Table 9**

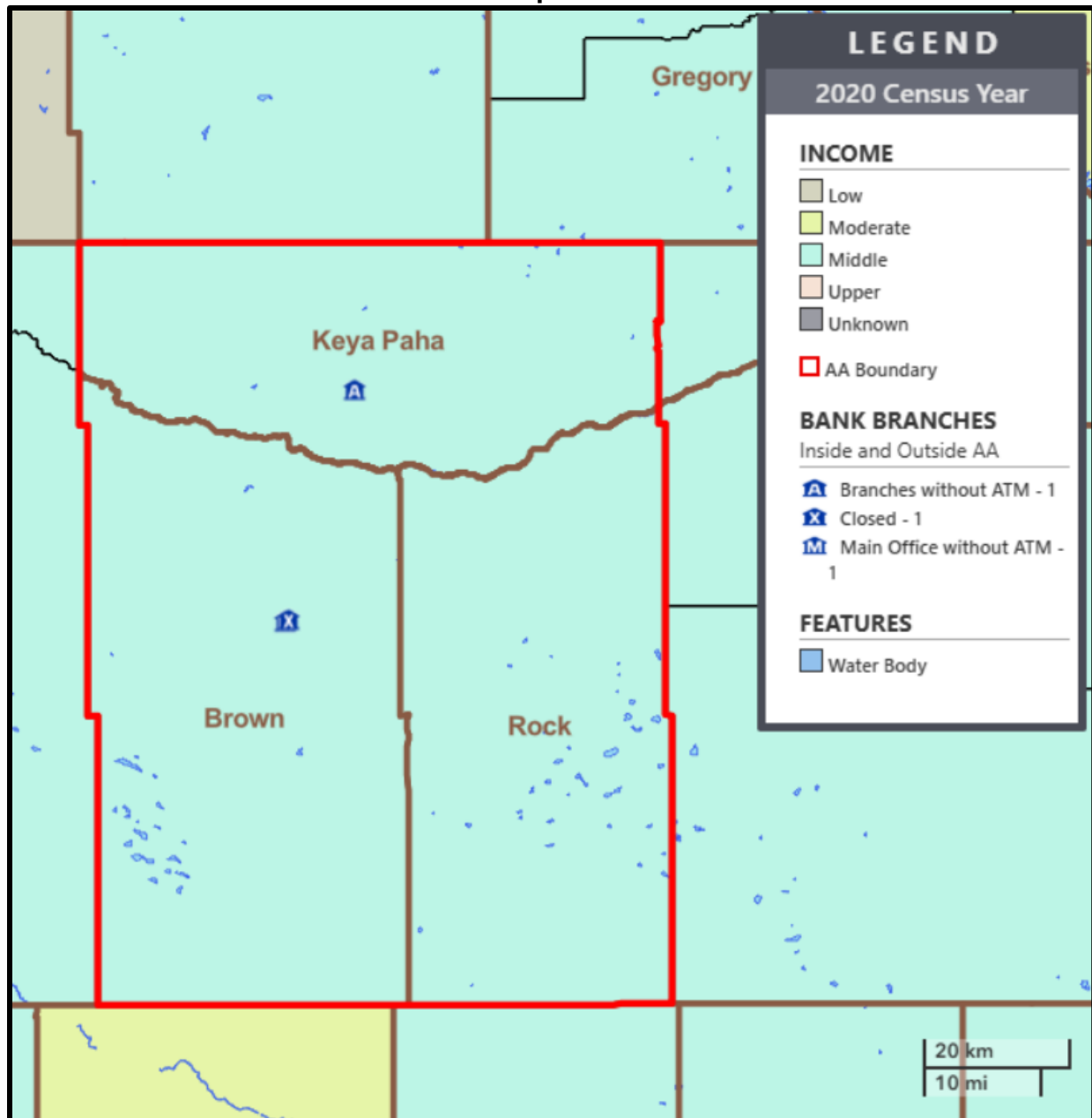
Distribution of 2024 Small Farm Lending By Revenue Size of Farms					
Assessment Area: North Central Nebraska					
	Bank Loans				Total Farms
	#	#%	\$(000)	%	%
By Revenue					
\$1 Million or Less	40	93.0	3,940	91.9	98.5
Over \$1 Million	0	0.0	0	0.0	1.5
Revenue Unknown	3	7.0	345	8.1	0.0
Total	43	100.0	4,285	100.0	100.0
By Loan Size					
\$100,000 or Less	31	72.1	1,145	26.7	
\$100,001 - \$250,000	6	14.0	1,110	25.9	
\$250,001 - \$500,000	6	14.0	2,030	47.4	
Total	43	100.0	4,285	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	30	75.0	1,120	28.4	
\$100,001 - \$250,000	4	10.0	790	20.1	
\$250,001 - \$500,000	6	15.0	2,030	51.5	
Total	40	100.0	3,940	100.0	
Source: 2024 FFIEC Census Data					
2024 Dun & Bradstreet Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

**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 – MAP OF THE ASSESSMENT AREA

Map A-1



**APPENDIX B – DEMOGRAPHIC INFORMATION**

**Table B-1**

2024 North Central Nebraska 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	281	20.0
Moderate	0	0.0	0	0.0	0	0.0	363	25.8
Middle	3	100.0	1,406	100.0	101	7.2	320	22.8
Upper	0	0.0	0	0.0	0	0.0	442	31.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3</b>	<b>100.0</b>	<b>1,406</b>	<b>100.0</b>	<b>101</b>	<b>7.2</b>	<b>1,406</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	3,312	1,769	100.0	53.4	530	16.0	1,013	30.6
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,312</b>	<b>1,769</b>	<b>100.0</b>	<b>53.4</b>	<b>530</b>	<b>16.0</b>	<b>1,013</b>	<b>30.6</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	376	100.0	337	100.0	26	100.0	13	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>376</b>	<b>100.0</b>	<b>337</b>	<b>100.0</b>	<b>26</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>
Percentage of Total Businesses:				89.6		6.9		3.5
	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	137	100.0	135	100.0	2	100.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>137</b>	<b>100.0</b>	<b>135</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				98.5		1.5		0.0
Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

## **APPENDIX C – GLOSSARY**

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

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

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

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