



Office of the  
Comptroller of the Currency  
Washington, DC 20219

**SMALL BANK**

## **PUBLIC DISCLOSURE**

September 2, 2025

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

First National Bank in Cimarron  
Charter Number: 13329

121 N. Main Street  
Cimarron, KS 67835

Office of the Comptroller of the Currency

2959 N. Rock Road, Suite 510  
Wichita, KS 67226

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

**The Lending Test is rated: Satisfactory.**

The major factors that support this rating include:

- The Lending Test rating is based on Satisfactory performance in the State of Kansas.
- The bank exhibited a reasonable geographic distribution of small loans to farms and businesses in its assessment area (AA).
- The bank exhibited a reasonable distribution of loans to farms and businesses of different sizes.
- A majority of the bank's loans were made inside its AA.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the (AA), the bank's loan-to-deposit (LTD) ratio was reasonable. First National Bank in Cimarron's (FNB) average quarterly LTD ratio was 45.2 percent over the 16-quarter period ending June 30, 2025. Quarterly LTD ratios for the bank ranged from 35.4 percent to 55.3 percent and generally followed an increasing trend. Examiners compared FNB to ten similarly situated institutions within the bank's AA. The average LTD of the comparative banks during the same period was 50.2 percent and ranged from 13.9 percent to 87.2 percent.

### Lending in Assessment Area

A majority of the bank's loans were inside its AA for the 2022-2024 evaluation period.

Overall, the bank originated and purchased 67.5 percent of its total loans inside the bank's AA during the evaluation period covering 2022-2024. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

The bank originated and purchased 77.5 percent of its total loans inside the bank's AA during the evaluation period covering 2023-2024. A substantial majority of loans were inside the bank's AA in 2023-2024. The bank originated and purchased 57.5 percent of its total loans inside the bank's AA during the evaluation period covering 2022. A majority of the bank's loans were inside its AA in 2022.

Table 1: Lending Inside and Outside of the Assessment Area										2022-2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business 2022-2024	25	62.50	15	37.50	40	1,793	72.27	688	27.73	2,481
Small Farm 2022-2024	29	72.50	11	27.50	40	3,782	75.88	1,202	24.12	4,984
Total	54	67.50	26	32.50	80	5,575	74.68	1,890	25.32	7,465

Source: 1/1/2022 - 12/31/2024 Bank Data.

Due to rounding, totals may not equal 100.0%



Table 1: Lending Inside and Outside of the Assessment Area										2023-2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business 2023-2024	15	75.00	5	25.00	20	433	60.64	281	39.36	714
Small Farm 2023-2024	16	80.00	4	20.00	20	1,803	91.24	173	8.76	1,976
Total	31	77.50	9	22.50	40	2,236	83.12	454	16.88	2,690
Source: 1/1/2023 - 12/31/2024 Bank Data.										
Due to rounding, totals may not equal 100.0%										

Table 1: Lending Inside and Outside of the Assessment Area										2022
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business 2022	10	50.00	10	50.00	20	1,360	76.97	407	23.03	1,767
Small Farm 2022	13	65.00	7	35.00	20	1,979	65.79	1,029	34.21	3,007
Total	23	57.50	17	42.50	40	3,339	69.93	1,436	30.07	4,775
Source: 1/1/2022 - 12/31/2022 Bank Data.										
Due to rounding, totals may not equal 100.0%										

## Description of Institution

FNB is a \$142.5 million financial institution headquartered in Cimarron, Kansas. The bank is a single-state institution that is a wholly owned subsidiary of First National Agency, Inc. of Cimarron, Kansas, a single bank holding company. The holding company had \$7.3 million in assets as of June 30, 2025. There were no affiliates requiring consideration for CRA activities.

FNB is a full-service banking institution offering a variety of commercial, agricultural, and real estate lending products. The bank's primary lending activities focus on commercial and agricultural lending products. In addition to the main branch, FNB has a branch in Ingalls, Kansas. Both branches are located in Gray County, Kansas and each full-service location has a cash dispensing automated teller machine.

FNB's AA consists of two non-MSA Kansas counties, Gray County and Ford County. Due to the addition of Ford County to the bank's AA in June 2023, examiners reviewed two separate evaluation periods. For Calendar Year 2022, the evaluation included only Gray County, which contained one middle-income census tract (CT) and one upper-income CT; the AA did not contain any low- or moderate-income CTs. For Calendar Years 2023 through 2024, the evaluation included Gray and Ford counties, which included one moderate-income CT, seven middle-income CTs, and three upper-income CTs; the AA did not contain any low-income tracts. Gray County included a middle-income nonmetropolitan tract designated as underserved for each of the years in the evaluation period due to being a remote rural geography.

The competitive environment among financial institutions in the AA is strong. Based on the FDIC Deposit Market Share report as of June 30, 2024, FNB ranks fourth in deposit market share with \$126.9 million, or 11.5 percent of deposits in the AA. The market share report considers all fourteen institutions with a presence in the market, with the top competitor securing 17.2 percent of deposits in the AA.

As of December 31, 2024, net loans and leases represented 50.2 percent of the bank's total assets. FNB's \$76.1 million loan portfolio consisted of 41.2 percent agricultural loans, 34.9 percent commercial loans, 17.1 percent residential real estate loans, 5.9 percent individual loans, and 0.5 percent other loans. Tier 1 capital totaled \$12.1 million.



There are no legal, financial, or other factors impeding FNB's ability to help meet the credit needs of its AA. The Office of the Comptroller of the Currency (OCC) last evaluated the bank's CRA performance on August 16, 2021, with the bank receiving a Satisfactory rating.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

This evaluation assessed the bank's performance using the small bank CRA examination procedures. The review included a lending test, which evaluated FNB's record of meeting the credit needs of the AA through lending activities. Examiners evaluated lending performance based on the bank's primary lending products. Commercial and agricultural loans were the primary lending products both by the number and dollar volume of originations since the 2021 CRA examination. Due to a change in the AA during June 2023, examiners reviewed a sample of commercial and agricultural loans for two separate evaluation periods (January 1, 2022 through December 31, 2022 and January 1, 2023 through December 31, 2024) to assess lending performance.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

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## State Rating

### State of Kansas

**CRA rating for the State of Kansas<sup>1</sup>: Satisfactory**

**The Lending Test is rated: Satisfactory**

The major factors that support this rating include:

- The bank exhibited a reasonable geographic distribution of loans to farms and businesses of different sizes in its AA for each evaluation period.
- The bank exhibited a reasonable distribution of loans to farms and businesses of different sizes in each evaluation period.

### Description of Institution's Operations in Kansas

FNB designated Gray County, Kansas as its AA for the 2022 evaluation period. The AA is in a nonmetropolitan statistical area. The AA contains two CTs: one middle-income and one upper-income. The 2022 AA is reasonable, complies with the regulation, and does not arbitrarily exclude low- or moderate-income tracts.

In June 2023, FNB modified their AA to add Ford County, Kansas. For the 2023-2024 evaluation period, FNB's AA included Gray County and Ford County, Kansas. The AA is in a nonmetropolitan statistical area. The AA consists of eleven CTs: one moderate-income, seven middle-income, and three upper-income. The AA is reasonable, complies with the regulation, and does not arbitrarily exclude low- or moderate-income tracts.

### Gray and Ford County 2023-2024 AA

The following table provides a summary of the demographic profile of the Gray County and Ford County 2023-2024 AA by categorizing the AA characteristics into their respective CTs based on income level for the evaluation period.

Assessment Area – Gray County and Ford County 2023-2024						
						2023-2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.00	9.09	63.64	27.27	0.00
Population by Geography	39,940	0.00	11.43	65.49	23.08	0.00
Housing Units by Geography	14,732	0.00	8.95	64.46	26.59	0.00
Owner-Occupied Housing by Geography	8,833	0.00	6.62	61.76	31.62	0.00
Occupied Rental Units by Geography	4,554	0.00	13.48	68.34	18.18	0.00
Vacant Units by Geography	1,345	0.00	8.92	69.07	22.01	0.00
Businesses by Geography	1,013	0.00	19.74	56.56	23.69	0.00

<sup>1</sup> MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.



Assessment Area — Gray County and Ford County 2023-2024						
2023-2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Farms by Geography	179	0.00	0.56	63.69	35.75	0.00
Family Distribution by Income Level	9,468	17.27	18.48	22.81	41.43	0.00
Household Distribution by Income Level	13,387	15.08	19.32	18.56	47.04	0.00
Unemployment rate (%)	4.29	0.00	9.62	4.12	2.78	0.00
Households Below Poverty Level (%)	8.44	0.00	20.18	8.66	4.03	0.00
Median Family Income (Gray and Ford County, Kansas, Non-MSA)	\$65,183		Median Housing Value			\$123,000
Median Family Income (Kansas - Non-MSA) for 2024	\$80,900		Median Gross Rent			\$708
			Families Below Poverty Level			7.27
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

The Census data for 2024 shows the AA population of 39,940 persons, 9,468 families, and 13,387 households. The AA's Median Family Income is \$65,183 and the Kansas-Non MSA Median Family Income is \$80,900. Family distribution by income level was 17.3 percent low-income, 18.5 percent moderate-income, 22.8 percent middle-income, and 41.4 percent upper-income. Thirty-three percent of civilians are not in the work force and 8.4 percent of households are below the poverty level.

There are 14,732 housing units by geography and 8,833 are owner-occupied; 4,554 are occupied rental units; and there are 1,345 vacant units. The median housing value is \$123,000 and median gross rent is \$708.

The 2024 unemployment rate for the AA was 4.29 percent. The Gray County, Kansas, not seasonally adjusted unemployment rate as of December 31, 2023, and 2024, was 2.2 percent and 2.5 percent, respectively. The Ford County, Kansas, not seasonally adjusted unemployment rate as of December 31, 2023, and 2024, was 2.4 percent and 2.8 percent, respectively. The state unemployment rate was 2.9 percent in 2023 and 3.6 percent in 2024. Gray County and Ford County have historically been below state and national unemployment figures. Agriculture is the primary employment driver for the AA with an estimated 2,163 employees in 2024 according to the Kansas Department of Agriculture's Estimated Economic Impact of Agriculture, Food, and Food Processing Sectors Report. Within agriculture, beef cattle ranching and farming is the largest employer with 460 employees, grain farming at 264 employees, dairy cattle and milk production 225 employees, and support activities for agriculture has 199 employees. Aside from farming, other primary employers in the AA include energy companies, school districts, and the county.

Examiners utilized two existing community contacts to assess the credit needs of the area and opportunities for financial institutions in the area to address those needs. The contacts shared that the lending needs of the AA present opportunities for agricultural lending due to strong competition from non-bank lenders and opportunities for banks to use the Farm Service Agency's guaranteed loan program. An additional lending opportunity is for home mortgage loans as some local banks no longer offer mortgage loans. The contacts noted that local financial institutions are engaged with the local communities and are responsive to the credit needs of the area.



## Gray County 2022 AA

The following table provides a summary of the demographic profile of the Gray County 2022 AA by categorizing the AA characteristics into their respective CTs based on income level for the evaluation period.

Assessment Area – Gray County 2022						
						2022
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2	0.00	0.00	50.00	50.00	0.00
Population by Geography	5,653	0.00	0.00	51.02	48.98	0.00
Housing Units by Geography	2,447	0.00	0.00	47.04	52.96	0.00
Owner-Occupied Housing by Geography	1,740	0.00	0.00	47.82	52.18	0.00
Occupied Rental Units by Geography	410	0.00	0.00	40.98	59.02	0.00
Vacant Units by Geography	297	0.00	0.00	50.84	49.16	0.00
Businesses by Geography	218	0.00	0.00	50.46	49.54	0.00
Farms by Geography	78	0.00	0.00	66.67	33.33	0.00
Family Distribution by Income Level	1,626	9.35	15.31	22.14	53.20	0.00
Household Distribution by Income Level	2,150	8.88	15.77	16.51	58.84	0.00
Unemployment rate (%)	2.32	0.00	0.00	1.05	3.36	0.00
Households Below Poverty Level (%)	4.09	0.00	0.00	4.70	3.57	0.00
Median Family Income (Gray County, Kansas, Non-MSA)	\$65,467	Median Housing Value				\$136,850
Median Family Income (Gray County, Kansas, Non-MSA) for 2022	\$73,400	Median Gross Rent				\$674
		Families Below Poverty Level				4.00
FFIEC File - 2020 Census						
2022 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

The Census data for 2020 shows the AA population of 5,653 persons, 1,626 families, and 2,150 households. The AA's Median Family Income was \$65,467 and the Kansas non-MSA Median Family Income was \$73,400. Family distribution by income level was 9.4 percent low-income, 15.3 percent moderate-income, 22.1 percent middle-income, and 53.2 percent upper-income. Thirty-three percent of civilians are not in the work force and 4.1 percent of households are below the poverty level.

There are 2,447 housing units by geography. 1,740 are owner-occupied; 410 are occupied rental units; and there are 297 vacant units. The median housing value is \$136,850 and median gross rent is \$674.

The 2022 unemployment rate for the AA was 2.3 percent. The state unemployment rate was 2.7 percent. Gray County has historically been below state and national unemployment figures. Agriculture is the primary employment driver for the AA. Aside from farming, other primary employers in the AA include energy companies, school districts, and the county.

## Scope of Evaluation in Kansas

Examiners completed a full-scope review of the bank's respective AA for 2022 and 2023-2024, evaluating the lending performance of commercial and agricultural loans during the evaluation periods. The evaluation periods were separate due to the bank adding Ford County to the AA in June 2023.

## LENDING TEST

The bank's performance under the Lending Test in Kansas is rated Satisfactory.



## **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's overall performance in the Gray and Ford County was reasonable.

## **Distribution of Loans by Income Level of the Geography**

The bank exhibited reasonable geographic distribution of loans in the State.

### ***Small Loans to Businesses***

Refer to Table 9 in the state of Kansas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank had reasonable geographic distribution of small loans to businesses.

Based on a sample of 20 loans originated in 2023-2024, the bank's percentage of small loans to businesses in moderate-income geographies was slightly below the percentage of businesses and the aggregate percent in moderate-income geographies. FNB's lending opportunities are limited, as the only moderate-income tract comprises 2.9 square miles by the Dodge City Municipal Airport and the bank does not have a branch location in Dodge City. The Cimarron branch is FNB's nearest lending facility at 23 miles away. There were no low-income CTs in the AA in 2023-2024.

Our review did not include an analysis of the geographic distribution of loans in 2022 as Ford County was not part of the bank's AA at that time and there were no low- or moderate-income CTs during that year. Therefore, an analysis of geographic distribution of loans originated in the AA for that period would not be meaningful.

### ***Small Loans to Farms***

Refer to Table 11 in the state of Kansas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the bank had reasonable geographic distribution of small loans to farms.

Based on a sample of 20 loans originated in 2023-2024, the bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in moderate-income geographies and below the aggregate distribution of small loans to farms in moderate-income geographies by all lenders. We consider this reasonable geographic distribution since the percentage of farms in moderate-income geographies and the aggregate distribution of small loans to farms in moderate-income geographies by all lenders are both less than 1 percent. Additionally, the only moderate-income tract comprises 2.9 square miles by the Dodge City Municipal Airport and FNB's nearest lending facility is 23 miles away. There were no low-income CTs in the AA.

Our review did not include an analysis of the geographic distribution of loans in 2022. The AA did not contain any low- or moderate-income CTs during this year, therefore an analysis of geographic distribution of loans originated in the AA for that period would not be meaningful.



## **Distribution of Loans by Income Level of the Borrower**

The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

### ***Small Loans to Businesses***

Refer to Table 10 in the Kansas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The bank had reasonable borrower distribution of small loans to businesses in the AA.

During both the 2022 and 2023-2024 evaluation periods and based on businesses with known revenues, the bank's percentage of small loans to business with gross annual revenue of \$1 million or less slightly exceeded the percentage of businesses in the AA with gross annual revenue of \$1 million or less. The bank's performance significantly exceeded the aggregate distribution of small loans to businesses with gross annual business revenue of \$1 million or less by all lenders. The majority of small business customers are long-time customers of the bank.

### ***Small Loans to Farms***

Refer to Table 12 in the Kansas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The bank had reasonable borrower distribution of small loans to farms in the AA.

During both the 2022 and 2023-2024 evaluation periods and based on farms with known revenues, the bank's percentage of small loans to farms with gross annual revenue of \$1 million or less was below the percentage of farms in the AA. However, FNB significantly exceeded the aggregate distribution of small farms with gross annual revenue of \$1 million or less by all lenders. FNB did not collect or consider the gross annual revenue in the underwriting of the small loans to farms for 20 percent and 25 percent in the 2022 and 2023-2024 periods, respectively. FNB's lending opportunities are limited, as they do not have a branch location in Dodge City. The bank's Cimarron branch is FNB's nearest lending facility at 23 miles away. The majority of small farm customers are long-time customers of the bank.

## **Responses to Complaints**

FNB did not receive any CRA related complaints during the evaluation period.

## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	01/01/2023 to 12/31/2024	
<b>Bank Products Reviewed:</b>	Small business and small farm loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA	NA	NA
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Kansas</b>		
Gray and Ford County 2023-2024 AA	Full-Scope	Counties of Gray and Ford

<b>Time Period Reviewed:</b>	01/01/2022 to 12/31/2022	
<b>Bank Products Reviewed:</b>	Small business and small farm loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA	NA	NA
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Kansas</b>		
Gray County 2022 AA	Full-Scope	Gray County

## Appendix B: Summary of MMSA and State Ratings

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RATINGS	
Overall Bank:	Lending Test Rating
First National Bank in Cimarron	Satisfactory
STATE:	
Kansas	Satisfactory



## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/AA.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** 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 Small Business Administration Development Company or Small Business Investment Company programs' size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including low- and moderate-income areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** 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 non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a 'male householder' and no wife present) or 'female householder' (a family with a 'female householder' and no husband present).

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct 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 applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**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 under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of CD loans and qualified investments, branch distribution, and CD services).

**Low-Income:** Individual income that is at 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 state/AA.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.



**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a Core Based Statistical Area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**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.

**Multistate Metropolitan Statistical Area (MMSA):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

**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.

**Prior Period Investments:** Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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

**Rating Area:** A rated area is a state or multistate metropolitan statistical 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 statistical area, the institution will receive a rating for the multistate metropolitan statistical area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have



original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Unfunded Commitments:** Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's AA.
- Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: (1) the percentage distribution of businesses with revenues of greater than \$1 million; and, (2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table 11. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of farms (regardless of revenue size)

throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

- Table 12. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: (1) the percentage distribution of farms with revenues of greater than \$1 million; and, (2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table 13. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table 14. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.



## State of Kansas

**Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography**

Assessment Area:	2023-2024											
	Total Loans to Small Businesses				Low-Income Tracts				Moderate-Income Tracts			
	#	\$	% of Total	Overall Market	%	% Bank Loans	% Aggregate Businesses	% Aggregate Loans	%	% Bank Loans	% Aggregate Businesses	% Aggregate Loans
Gray and Ford County 2023-2024	20	870	100.00	451	--	--	19.74	15.00	16.63	56.56	63.64	40.00
Total	20	870	100.00	451	--	--	19.74	15.00	16.63	56.56	63.64	40.00

Source: FFIEC File - 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography**

Assessment Area:	2022											
	Total Loans to Small Businesses				Low-Income Tracts				Moderate-Income Tracts			
	#	\$	% of Total	Overall Market	%	% Bank Loans	% Aggregate Businesses	% Aggregate Loans	%	% Bank Loans	% Aggregate Businesses	% Aggregate Loans
Gray County 2022	20	1,787	100.00	120	--	--	--	--	--	50.46	74.17	55.00
Total	20	1,787	100.00	120	--	--	--	--	--	50.46	74.17	55.00

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues**

Assessment Area:	2023-2024											
	Total Loans to Small Businesses				Businesses with Revenues <= 1MM				Businesses with Revenues > 1MM			
	#	\$	% of Total	Overall Market	% Bank Loans	% Aggregate	% Aggregate Businesses	% Aggregate Loans	% Bank Loans	% Bank Loans	% Bank Loans	% Bank Loans
Gray and Ford County 2023-2024	20	870	100.00	451	69.79	70.00	42.13	13.13	15.00	17.08	15.00	15.00
Total	20	870	100.00	451	69.79	70.00	42.13	13.13	15.00	17.08	15.00	15.00

Source: FFIEC File - 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues**

Assessment Area:	2022											
	Total Loans to Small Businesses				Businesses with Revenues <= 1MM				Businesses with Revenues > 1MM			
	#	\$	% of Total	Overall Market	% Bank Loans	% Aggregate	% Aggregate Businesses	% Aggregate Loans	% Bank Loans	% Bank Loans	% Bank Loans	% Bank Loans
Gray County 2022	20	1,787	100.00	120	66.51	75.00	50.00	17.43	15.00	16.06	10.00	10.00
Total	20	1,787	100.00	120	66.51	75.00	50.00	17.43	15.00	16.06	10.00	10.00

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography**

Assessment Area:	2023-2024									
	Total Loans to Farm					Moderate-Income Tracts				
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Gray and Ford County 2023-2024	20	2,005	100.00	114	--	--	0.36	63.69	40.00	64.91
Total	20	2,005	100.00	114	--	--	0.36	63.69	40.00	64.91

Source: FFIEC File - 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

**Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography**

Assessment Area:	2022									
	Total Loans to Farm					Moderate-Income Tracts				
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Gray County 2022	20	2,688	100.00	79	--	--	--	66.67	20.00	74.68
Total	20	2,688	100.00	79	--	--	--	66.67	20.00	74.68

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

**Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue**

Assessment Area:	2023-2024									
	Total Loans to Farms					Farms with Revenues <= 1MM				
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Gray and Ford County 2023-2024	20	2,005	100.00	114	76.54	60.00	21.05	21.79	15.00	15.00
Total	20	2,005	100.00	114	76.54	60.00	21.05	21.79	15.00	15.00

Source: FFIEC File - 2024 Census; 1/1/2023 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

**Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue**

Assessment Area:	2022									
	Total Loans to Farms					Farms with Revenues <= 1MM				
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Gray County 2022	20	2,688	100.00	79	69.23	40.00	27.85	28.21	40.00	20.00
Total	20	2,688	100.00	79	69.23	40.00	27.85	28.21	40.00	20.00

Source: FFIEC File - 2022 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

