



**Community Reinvestment Act
Public File**

Table of Contents

Branch Locations and Hours of Operations

Assessment Area Description and Assessment Area Maps

List of Services

HMDA Disclosure

2023 – 2024 CRA Strategic Plan

Written Comments

Most Recent CRA Performance Evaluation

**Branch Locations
and
Hours of Operation**



Current Bank Locations

Main Branch:	Leawood Branch 3510 W 95 th Street Leawood, KS 66206	Opened: 3/30/1999 Tract: 0516.00 (Upper) ATM Depository – Yes
Branch Office:	Mission Farms Branch 4040 Indian Creek Pkwy Overland Park, KS 66207	Opened: 2/21/2023 Tract: 0518.06 (Upper) ATM Depository - Yes
Branch Office:	Liberty Branch 9750 N. Ash Ave. Kansas City, MO 64157	Opened: 11/6/2000 Tract: 0218.08 (Upper) ATM Depository – Yes
Corporate Headquarters:	Kansas City Branch 8320 Ward Parkway Kansas City, MO 64114	Opened: 4/24/2017 Tract: 0093.00 (Middle) ATM Depository - Yes

Closed Bank Locations

Branch Office:	Overland Park Branch 10700 Nall Avenue Overland Park, KS 66211	Closed: 1/13/2023 Tract: 0518.05 (Middle) ATM Depository: Yes
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Branch Hours of Operation

Mission Farms Branch	Lobby Hours:	9:00am – 5:00pm Monday – Friday
Leawood Branch	Lobby Hours:	9:00am – 5:00pm Monday - Friday
	Drive Thru Hours:	9:00am – 5:00pm Monday - Friday
Liberty Branch	Lobby Hours:	9:00am – 5:00pm Monday - Friday
	Drive Thru Hours:	9:00am – 5:00pm Monday – Friday
Kansas City Branch	Lobby Hours:	8:00am – 5:00pm Monday – Friday

Customer Service Hours of Operation

Phone: Monday-Friday 7am-6pm CST
Live Chat: Monday-Friday 7am-6pm CST and Saturday 9am-1pm CST

All branches are closed on Saturdays and Sundays and all Federal Holidays.

**Assessment Area Description
and
Assessment Area Maps**



Assessment Area

nbc bank's CRA Assessment Area, as approved by the Board of Directors, consist of the following geographies:

- All of Clay County, Missouri,
- All of Jackson County, Missouri, and
- All of Johnson County, Kansas.

These three contiguous counties are combined to form one assessment area which consists of whole census tracts composing each county in its entirety.

nbc bank maintains branches in each of these counties. The addresses and geographies are listed below:

Johnson County – Mission Farms Branch – 4040 Indian Creek Parkway, Overland Park, KS 66207

Census Tract: 28140-20-091-0518.06 (Upper)

Johnson County – Leawood Branch – 3510 W 95th St. Leawood, KS 66206

Census Tract: 28140-20-091-0516.00 (Upper)

Clay County – Liberty Branch – 9750 N. Ash Ave. Kansas City, MO 64157

Census Tract: 28140-29-047-0218.08 (Upper)

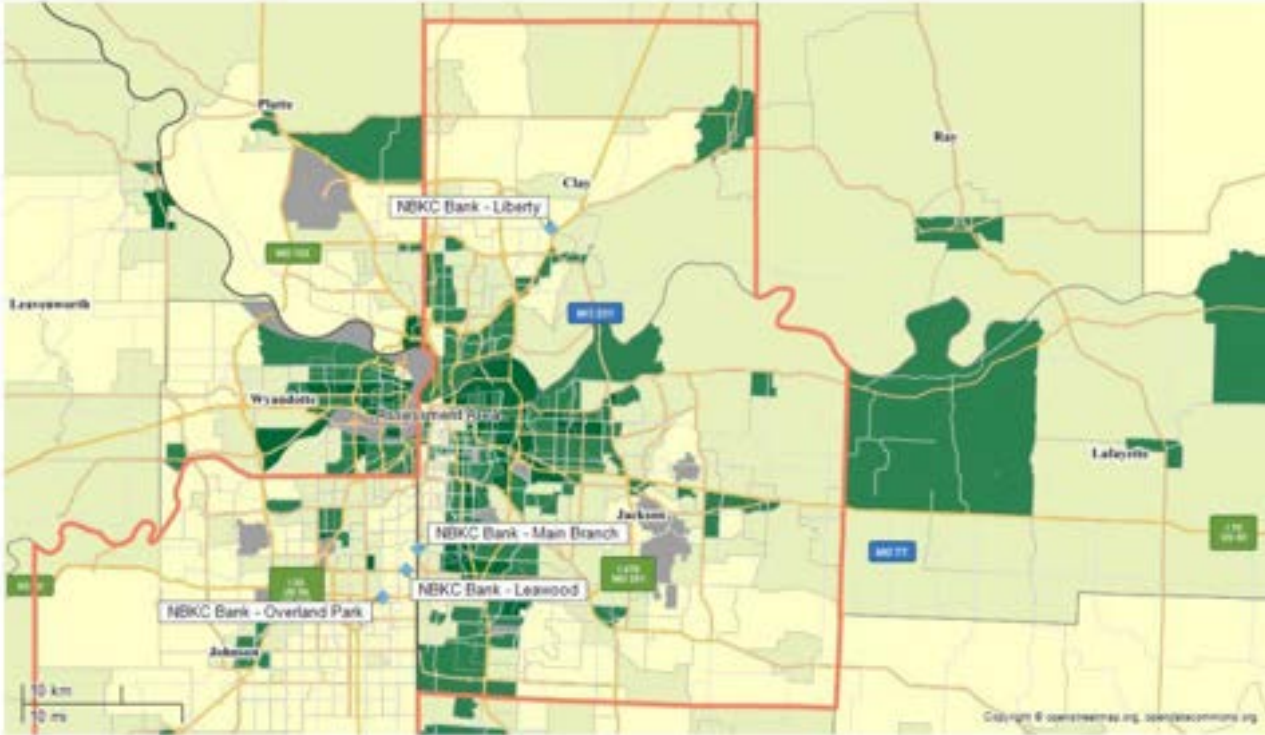
Jackson County – Ward Parkway Branch – 8320 Ward Parkway Kansas City, MO 64114

Census Tract: 28140-29-095-0093.00 (Middle)

Assessment Area Maps

NBKC Bank
Jackson/Clay County

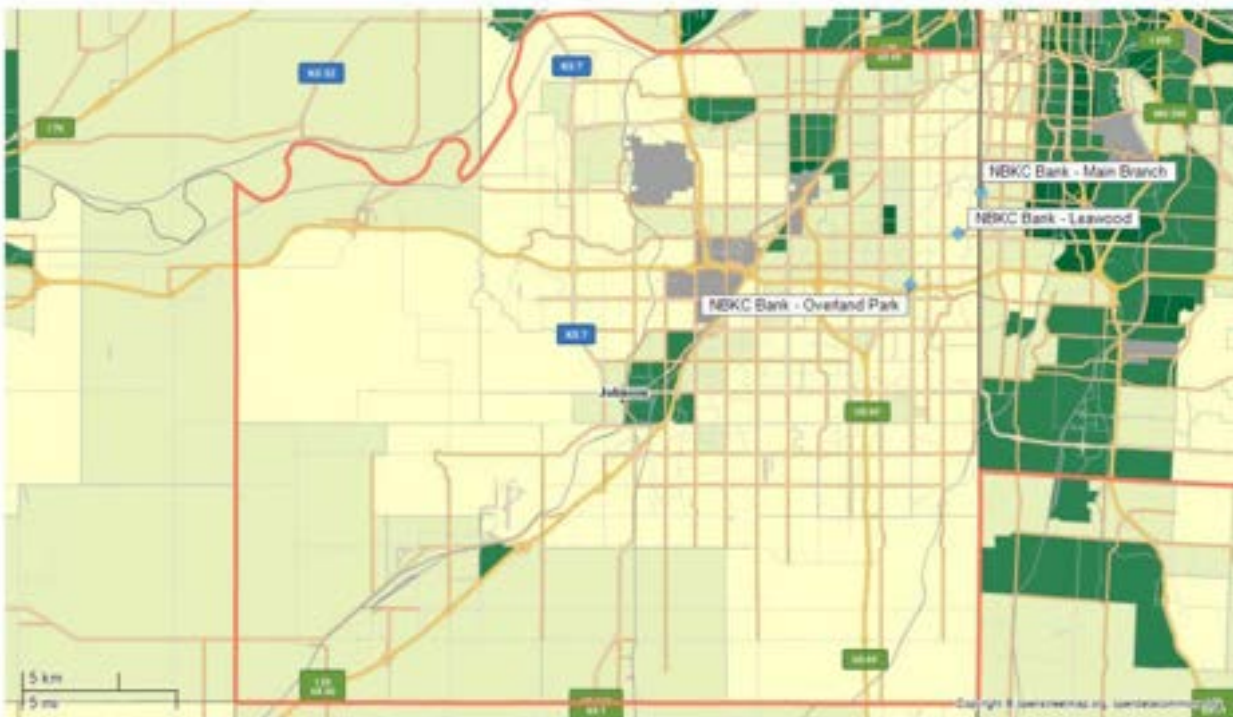
N CONTRACTS



- Map Legend**
- State
 - County
 - Census Tract
 - Zip Code
 - Analysis Area
 - ◆ Facilities
- Income Level**
- Low
 - Moderate
 - Middle
 - Upper
 - NA

NBKC Bank
Johnson County

N CONTRACTS



- Map Legend**
- State
 - County
 - Census Tract
 - Zip Code
 - Analysis Area
 - ◆ Facilities
- Income Level**
- Low
 - Moderate
 - Middle
 - Upper
 - NA

List of Services



Branch Services

The following services are available at all branch locations:

Deposit Products

- Checking Accounts
- Money Market Savings Accounts
- Certificates of Deposits
- Individual Retirement Accounts (IRA)
- Business Deposit Accounts

Loan Products

- Consumer Loans, including:
 - Automobile Loans; Recreational Vehicle Loans; Boat Loans; Unsecured Loans; Consumer Construction Loans; CD Loans
- Real Estate Loans, including:
 - Commercial and Residential Construction Loans; SBA Guaranteed Loans; 1-4 Family Residential Real Estate Loans; Home Equity Loans and Home Equity Lines of Credit (HELOC)
- Business Loans, including:
 - Equipment Loans; Operating Capital Loans; Inventory Loans; Accounts Receivable Loans; Business Expansion Loans; SBA Guaranteed Loans; Commercial Real Estate Loans; Commercial Construction Loans

Online and Convenience Services

- Online Banking
- Mobile Banking
- Online Bill Pay
- Telephone Banking
- Text Banking
- ATM Money Pass Network
- Mobile Capture Deposit
- Remote Opening of Consumer and Business Accounts

HMDA Disclosure



Home Mortgage Disclosure Act

The Home Mortgage Disclosure Act (HMDA) data pertaining to NBKC Bank residential mortgage lending is available to review. HMDA data provides geographic distribution of loans and applications, ethnicity, race, sex, and income of applicants and borrowers. Additionally, HMDA data provides information about loan approvals and denials.

To inspect and/or receive a copy of the bank's HMDA data, this may be obtained on the Consumer Financial Protection Bureau's (Bureau's) website at www.consumerfinance.gov/hmda.

2023 – 2024
CRA Strategic Plan





**Community Reinvestment Act
Strategic Plan**

2023 - 2024

Table of Contents

I.	Introduction.....	3
A.	Bank Business Model.....	3
B.	Bank Strategic Direction	4
C.	Bank Financial Information.....	5
II.	The Community Reinvestment Act.....	5
A.	CRA Strategic Plan Regulatory Overview.....	6
B.	Development of the nbkc bank Strategic Plan	6
C.	CRA Strategic Plan Development Performance Context	6
D.	Impact of COVID-19.....	7
III.	nbkc bank’s Assessment Area	9
A.	Definition.....	9
B.	Assessment Area Description	9
C.	Economics and Demographics.....	10
D.	Competition.....	12
IV.	nbkc bank CRA Strategic Plan	13
A.	Overview	13
B.	Length and Term	13
C.	Performance Criteria.....	14
D.	Oversight	16
E.	Monitoring of Plan Performance.....	16
F.	Lending Test Goals	17
G.	Community Development Test Goals.....	18
H.	Services Test Goals.....	19
V.	Public Participation.....	20
A.	Public Comment Period.....	20
B.	Summary of Public Comment Letters Received	20
C.	Bank Response to the Public Comment Letters	20
VI.	Appendix and Supplemental Information	21
	Appendix A: Assessment Area Maps.....	21
	Appendix B: Assessment Area Census Tract Income Levels	24
	Appendix C: nbkc bank Community Reinvestment Act (CRA) Strategic Plan Public Notice	33
	Appendix D: Summary Balance Sheet	34

I. INTRODUCTION

nbkc bank is a Kansas state-chartered financial institution established in 1999 and is wholly owned by Ameri-National Corporation. The Bank is a full-service financial institution headquartered in Overland Park, Kansas offering retail and commercial banking services with a heavy emphasis on residential mortgage lending on a nationwide basis. nbkc bank operates four (4) full-service branch locations all located in the Kansas City Missouri-Kansas Metropolitan Statistical Area; two (2) located in Kansas and two (2) located in Missouri. The Kansas City MSA is part of a multi-state MSA that includes the States Missouri and Kansas.

nbkc bank offers traditional loan products including residential, commercial, and consumer loans. Agricultural loans are not offered. The Bank's primary focus is residential loans, followed by commercial loans. Mortgage products are offered nationwide through the Bank's Home Loans Division, the majority of which are sold on the secondary market. The Bank also offers government-guaranteed loans through the Small Business Administration (SBA), Veterans Administration (VA), Federal Home Loan Mortgage Corporation (FHLMC), Federal National Mortgage Association (FNMA) Government National Mortgage Association (GNMA), and Federal Housing Administration (FHA).

nbkc bank provides a variety of deposit services including checking, savings, money market deposit accounts, and certificates of deposit. Alternative banking services include internet and mobile banking, electronic bill pay, prepaid cards, remote deposit capture, interactive teller machines (ITMs), and Bank-owned automated teller machines (ATMs). The Bank also has also partnered with a number of Financial Technology (Fintech) companies to offer a suite of banking products and services to consumers on a nationwide basis.

nbkc bank is regulated at the federal level by the Federal Deposit Insurance Corporation (FDIC) in the Kansas City region and regulated at the state level by the State Bank Commissioner of Kansas (Kansas OSBC). As a federally insured depository institution, nbkc bank is subject to the Community Reinvestment Act (CRA) which requires banks to help meet the credit needs of the assessment area, including low- and moderate-income neighborhoods. Due to the Bank's nationwide home loans and deposits business model, the Bank has elected to be evaluated under the Strategic Plan option as provided in 12 C.F.R. § 345.27. This renewal of the CRA Strategic Plan has been prepared for the 2023-2024 plan year. The CRA Strategic Plan will begin on January 1st, 2023 and end on December 31st, 2024 unless a request for an extension is submitted to, and approved by, the FDIC. The prior CRA Strategic Plan began on January 1st, 2021 and expires on December 31st, 2022.

The Bank is requesting approval of this CRA Strategic Plan by the Federal Deposit Insurance Corporation (FDIC).

A. Bank Business Model

i. Home Loans

nbkc bank offers mortgages; home purchase, refinance, and home improvement, in all 50 states. Loan types include Conventional, VA, and FHA loans as well as specific loan products not typically offered by other financial institutions. The vast majority of the mortgage loans made by the Bank are outside of the Bank's physical footprint. The Bank has numerous nationwide partnerships with lead generation sources to provide qualified applicants who are actively looking for mortgage solutions. The Bank prides itself on

providing an exceptional experience from start to finish during the loan process and has been recognized by multiple organizations for customer service.

ii. Commercial and Small Business Credit Products

nbkc bank offers traditional lending products to small, medium, and large size businesses. Traditional commercial loans are offered to businesses and are typically based on the size and needs of the business. Loan products include commercial real estate (including multi-family residential properties), commercial leases, business term loans, business lines of credit, and equipment financing. The Bank is also approved to offer small business loans through the Small Business Administration (SBA). The vast majority of the commercial and small business loans made by the Bank are within the Bank's physical footprint in the Kansas City Metropolitan area.

iii. Deposits

nbkc bank offers a full range of deposit products, including interest-bearing checking accounts, savings accounts, certificates of deposit, and money market accounts inside and outside the Bank's assessment area. In the deposit channel, the Bank focuses on three acquisition channels. First, the Bank offers deposit services inside the Bank's Assessment Area at four retail bank branches. Second, the Bank has a nationwide direct-to-consumer offering through the Bank's website offering traditional consumer and small business deposit-related products. Third, through the Bank's strategic partnerships with nationwide Fintech companies, the newest addition to the customer acquisition strategy.

B. Bank Strategic Direction

As mentioned previously, nbkc bank is focused on the three main lines of business for future growth: Home Loans, Deposits, and Commercial and Small Business Lending. nbkc bank's guiding vision is to provide banking that is **simple**, **transparent** and actually **helpful**. The Bank is committed providing products and services that are important to our customers and the strategic direction reflects that commitment.

Since inception, nbkc bank has been a leader in the online home loan space and the Bank's future strategic direction continues to push for expanding this key business area. Future plans include continuing to increase the number of originated loans through the existing nationwide platform. The Bank is committed to providing not only competitive pricing, but first and foremost an unrivaled experience for our customers and is at forefront of the strategic direction in the home loans area. The Bank will continue offering a wide array of home loan products, which enables the Bank to offer home loans that fit all borrower profiles, a diverse geographic footprint, and wide-ranging income levels. The Bank also plans to use emerging technology in new and innovate ways with the goal of reaching individuals and communities across the country that would otherwise not be offered the same level of service or types of products.

The Bank has a long tradition of serving the Kansas City community by connecting with local businesses of all sizes. Future plans include continuing to offer the same products and services for the foreseeable future to remain at the top of the list of banks in the competitive local market. The Bank plans to expand the connections with existing customers as well as grow through new connections. The Bank also recognizes the challenges that come with a competitive and saturated environment and therefore has committed to advancing the commercial and small business lending area to diversify with additional small business lending products and services to supplement the Bank's experienced real estate lending

platform. This commitment includes upgrading the product offerings, enhancing internal processes for a more streamlined experience, and exploring strategic partnerships to expand the footprint.

The Bank's deposit division will continue its commitment to providing a full range of low-cost banking products to consumers, enabling easy accessibility to the products and services for all consumer income levels, including to the low-to-moderate income community. In 2017 the Bank continued its commitment to providing accessibility at no-or-low costs to customers by removing all minimum deposit requirements, monthly maintenance fees, and transaction fees while at the same time offering a top interest rate on checking, savings, and CD products. When compared to other banks in nbkc bank's Assessment Area, nbkc leads the way in providing no-or-low cost accounts. In the Bank's local market, plans are being made for the future vision of the Bank's retail branches, using innovation and technology to provide a better customer experience, continue to offer low-cost products to local consumers, and increase local commercial and small business lending.

The Bank is further committed to providing an exceptional customer experience throughout the deposit and loan process. Future plans include leveraging the latest technology to allow the Bank to offer a wide range of products and services on a nationwide basis. In the home loans area specifically, we provide customers with one point of contact through a qualified loan officer who can assist customers throughout the entire home buying or refinance process. This is coupled with highly competitive home loan rates and fees. Customers with small business or commercial loans are provided direct access to local commercial lenders and a qualified support staff.

C. Bank Financial Information

As of the June 30th, 2022 Reports of Condition and Income (Call Report), nbkc bank reported total assets of \$1.093 billion; total loans of \$542 million; total deposits of \$866 million; and total securities of \$92 million. The largest categories of loans by dollar volume include residential loans (44.6 percent), commercial real estate (30.3 percent), and construction land development, and other land loans (14.9 percent). As of the most recent FDIC exam, the Bank was well capitalized, and the Bank has increased total assets from \$833 million on December 31st, 2019 to \$1.093 billion on June 30th, 2022, an increase of 31.2%. The Bank's summary balance sheet has been included in Appendix D for reference.

II. THE COMMUNITY REINVESTMENT ACT

The Community Reinvestment Act encourages banks to help meet the credit needs of the communities in their assessment areas, which include the communities in which they operate deposit-taking full-service branches. The CRA regulations allow banks to elect to be assessed under a CRA Strategic Plan. Compliance with CRA through a Strategic Plan allows a bank an opportunity to design a program that is appropriate to its own capabilities, business strategies, and organizational framework, as well as to the communities it serves.

The Bank acknowledges its important obligation to serve the needs of the communities from which it draws its deposits and in which it operates. Consistent with this obligation and safe and sound banking practices, the Bank is committed to a robust CRA program which includes home mortgage, small business lending, community development loans and investments, and community development service activity to assist in meeting the needs of the Bank's self-defined assessment area. The Bank strives to maintain contact with community leaders, non-profit organizations, and other interested parties to determine

critical needs in the community and for assistance in implementation of the CRA program and this Strategic Plan.

A. CRA Strategic Plan Regulatory Overview

The Community Reinvestment Act regulations provide that a financial institution can elect to have its CRA performance evaluated under the Strategic Plan option. The Strategic Plan enables the institution to tailor its CRA goals and objectives to address the needs of its community consistent with its business strategy, operational focus, and capacity and constraints.

The CRA requires a bank formulating a Strategic Plan to establish measurable goals for helping meet the credit needs of each assessment area covered by the plan, particularly the needs of low- and moderate-income geographies and individuals, through lending, investments, and services. This plan is made available to the public for comments and citizen participation prior to the Strategic Plan being approved to ensure the needs of the community are being met.

B. Development of the nbkc bank Strategic Plan

The Bank operates in a highly competitive environment in all three key areas (Home Loans, Small Business and Commercial Lending, and Deposits) both locally and nationally. The Bank has determined the financial needs in the Bank's Assessment Area to be primarily: affordable housing, small business loan availability, and access to low-cost banking products and services. In developing the CRA Strategic Plan, the Bank took the following steps:

- Evaluated the current business model, current financial position, business strategy, existing Bank partnerships, historical CRA performance and local competition;
- Evaluated the Bank's current product and service offering and its ability to meet the needs of the consumers in the assessment area;
- Considered demographic information and current economic conditions within the Bank's assessment area;
- Assessed the community development, affordable housing, and credit needs of the consumers in the assessment area based on information obtained from publications, local community organizations, and governmental agency initiative goals; and
- Developed goals based on the needs of the assessment area for lending, investment, and service activities.

C. CRA Strategic Plan Development Performance Context

The Kansas City MSA has a relatively small population size compared to other metropolitan statistical areas. In addition, the Kansas City MSA has a disproportionately large number of banks that operate in the area which has caused saturation and a highly competitive market. Many of the financial institutions that nbkc bank competes with are well-entrenched in the area, with long and established records of competing for affordable housing, economic development, qualified community development investments and community development services. Banks in the area are competing for the same pool of consumers for home mortgage loans and businesses for commercial loans which has resulted in significant competition on interest rates and loan terms, including the offering significantly discounted rates in certain geographic areas.

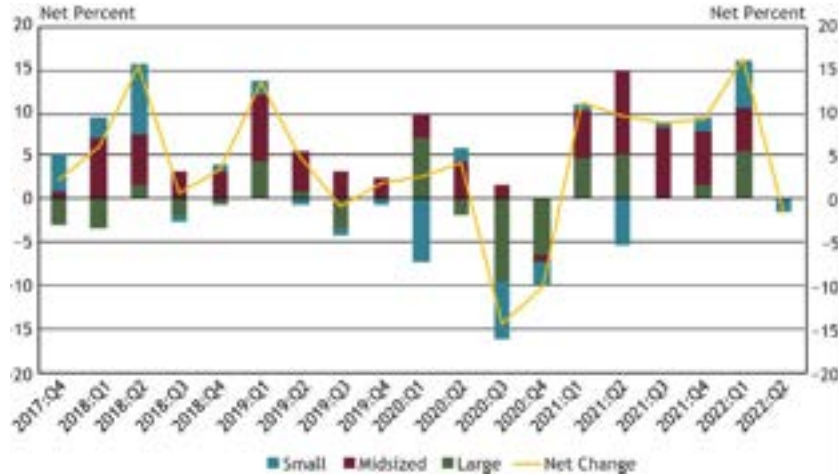
The bank, which has become primarily an online bank, operates four retail branches located only in the Kansas City MSA and has a low deposit share when compared to competing banks. Because of this, the bank does not have a traditional retail lending program, with on location retail loan officers, that would be typical of a bank only operating locally or a larger bank in the area. Since its inception, the bank has garnered home mortgage lending opportunities (“leads”) through the use of online lead provider networks, such as LendingTree, Nerdwallet, Redfin, and Zillow. This means the bank is reliant on the leads coming through the networks to reach potential borrowers throughout the nation. In addition, the vast majority of lead provider networks do not allow the bank to target populations of potential borrowers based on geographic attributes such as zip code, city, or geolocation. Therefore, targeting borrowers, specifically low-to-moderate income individuals, essentially impossible.

Goals for the 2023-2024 plan are intended to remain the same year over year to account for a variety of factors. The bank’s CRA Strategic Plan is short in duration (only two years), with the ability to increase (or decrease) the goal amounts every two years thereafter. The bank’s headcount in number of commercial lenders and home loan officers is intended to remain consistent. Specific to 2023-2024 plan years, the current interest rate and economic environment will lead to a reduction in the total volume of home mortgage loans and non-home mortgage loans. Whereas in 2022 volumes consisted of both purchase and refinance home mortgage loans, the reduced volumes expected for 2023 will likely consist of mainly purchase home mortgage loans with very little if any refinance home mortgage loans. Accordingly the bank’s budget for calendar year 2023 to be approved by its Board of Directors projects an approximately 20% reduction in the number of originated home mortgage loans from 2022.

D. Impact of COVID-19

In the development of this Strategic Plan, the Bank considered the short term and long-term impact of COVID-19 on the Bank, local and nationwide consumers, and small businesses. All of these facts were considered, and adjustments were made to the goal benchmarks. In addition, the Bank also acknowledges that long-term lending is extremely uncertain and goal benchmarks may need to be adjusted. While the health pandemic has impacted consumers and businesses, the Bank remains in a strong position to provide credit needs across all areas and desires to provide credit while understanding the economic environment and maintaining a strong financial balance sheet. The Bank’s analysis and financial planning expects home loan refinance volume to cease, home loan purchase volume to be low compared to historical volumes, and commercial and small business lending to be steady. Data provided by the Federal Reserve in October 2022 indicates a difficult lending environment; there is a decrease in demand for commercial loans, credit quality deterioration represents a new challenge in providing access to credit while maintaining sufficient credit quality loans, interest rates have risen significantly making credit less affordable, and banks are tightening credit standards due to the recessionary environment.

Table 1: Bank-Reported Commercial Loan Demand



Source: FR 2028D Kansas City Federal Reserve, Published, Small Business Lending Survey, 10/4/2022

Table 2: Credit Quality Data

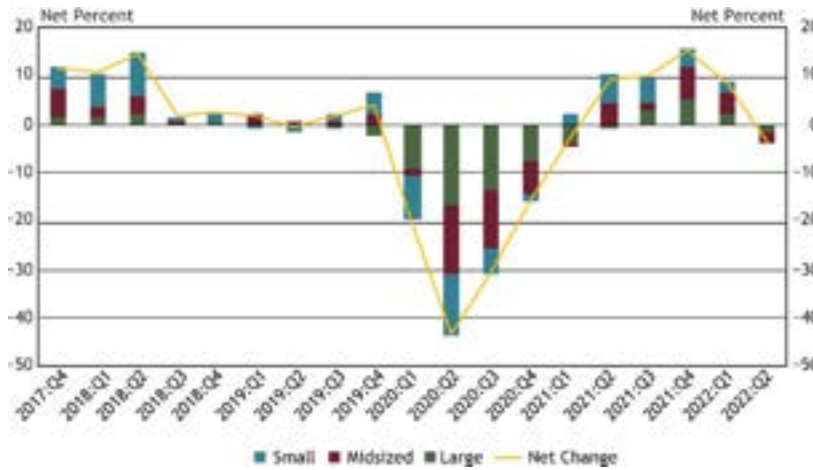


Table 3: New Small Business C&I Term Loans Increase Year-Over-Year

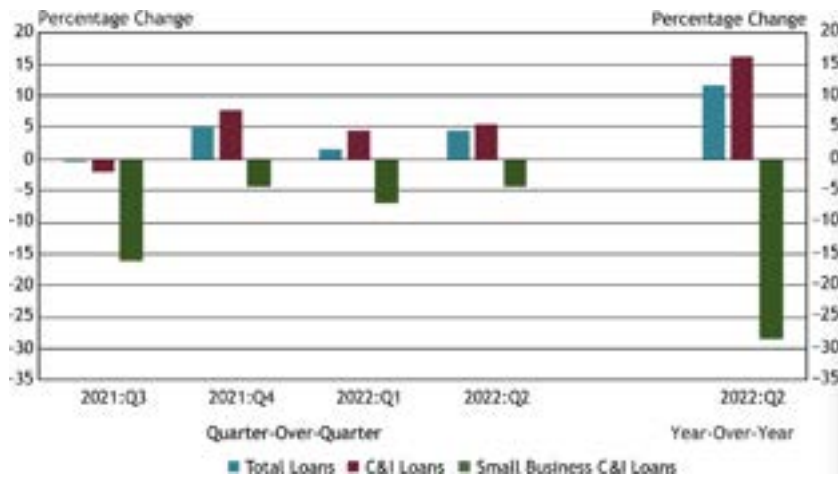
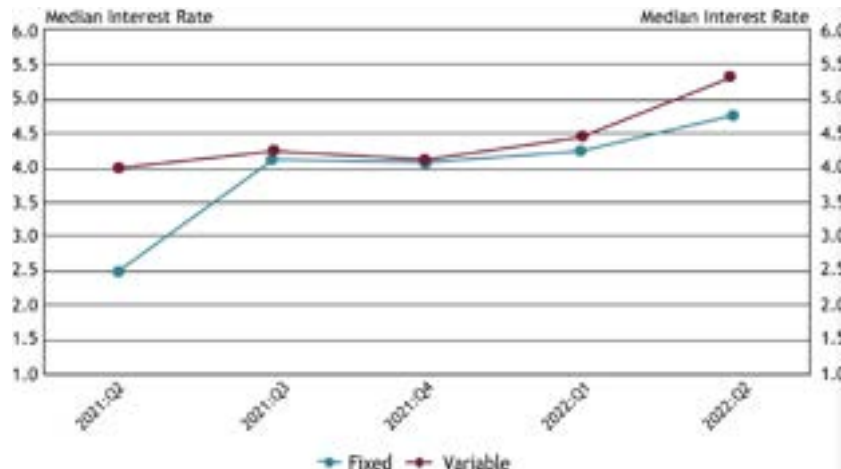


Table 4: Business Loan Interest Rates Year-Over-Year (Term Loans)



III. NBKC BANK'S ASSESSMENT AREA

A. Definition

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. The assessment area(s) for a bank must:

- (1) Consist generally of one or more MSAs or metropolitan divisions (using the MSA or metropolitan division boundaries that were in effect as of January 1 of the calendar year in which the delineation is made) OR one or more contiguous political subdivisions, such as counties, cities, or towns; and
- (2) Include the geographies in which the bank has its main office, its branches, and its deposit-taking ATMs, as well as the surrounding geographies in which the bank has originated or purchased a substantial portion of its loans (including home mortgage loans, small business and small farm loans, and any other loans the bank chooses, such as those consumer loans on which the bank elects to have its performance assessed).

Requirements of the CRA place the following limitations on the Bank's defined Assessment Area:

- (1) Must consist only of whole geographies;
- (2) May not reflect illegal discrimination;
- (3) May not arbitrarily exclude low- or moderate-income geographies, taking into account the bank's size and financial condition; and
- (4) May not extend substantially beyond an MSA boundary or beyond a state boundary unless the assessment area is located in a multistate MSA. If a bank serves a geographic area that extends substantially beyond a state boundary, the bank shall delineate separate assessment areas for the areas in each state. If a bank serves a geographic area that extends substantially beyond an MSA boundary, the bank shall delineate separate assessment areas for the areas inside and outside the MSA.

B. Assessment Area Description

nbkc bank has designated one assessment area (Kansas City Assessment Area) comprised of three contiguous counties which are located entirely within the central portion of the multistate Kansas City MSA. The counties that comprise the assessment area include Jackson and Clay counties in Missouri and

Johnson County in Kansas. The Bank’s CRA assessment area is based on various factors, including the Bank’s size, condition, branch locations, lending expertise and competition. The delineation of the assessment area complies with the regulation and will not arbitrarily exclude any low or moderate-income areas.

The Kansas City MSA, including the Bank’s assessment area, is diversified; its geographically central location and well-developed transportation infrastructure are key advantages for the local economy. The largest industry sectors in the MSA include governments, professional and business services, educational and health services and retail trade.

The following sections discuss demographic and economic information for the assessment area.

C. Economics and Demographics

The Bank’s assessment area includes all 373 census tracts in the three counties listed above, which are comprised of the income designations listed below: 51 low-income, 80 moderate-income, 114 middle-income, and 118 upper-income tracts. The local economic conditions deteriorated significantly in 2020 due to COVID-19 but have rebounded however the long-term impacts on employment and economic development remain uncertain. The tables below illustrate the demographic characteristics and economic data for the assessment area.

Table 5: Demographic Information of the Assessment Area

Demographic Information of the Assessment Area						
Assessment Area: NBKC						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	373	13.7	21.4	30.6	31.6	2.7
Population by Geography	1,478,080	8.3	21.0	33.3	37.1	0.3
Housing Units by Geography	639,577	10.3	22.5	33.8	32.9	0.5
Owner-Occupied Units by Geography	376,837	5.2	17.1	34.5	43.1	0.2
Occupied Rental Units by Geography	205,059	15.0	30.6	34.5	19.1	0.8
Vacant Units by Geography	57,681	26.4	28.8	27.5	15.4	1.9
Businesses by Geography	141,581	6.5	18.4	30.7	42.6	1.7
Farms by Geography	3,408	5.4	16.5	33.7	44.1	0.3
Family Distribution by Income Level	371,398	20.0	16.9	20.0	43.1	0.0
Household Distribution by Income Level	581,896	22.8	16.4	17.4	43.4	0.0
Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$72,623	Median Housing Value			\$170,061

	Median Gross Rent	\$868
	Families Below Poverty Level	8.5%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(* The NA category consists of geographies that have not been assigned an income classification.</i>		

Table 6: Unemployment Rate Kansas City MSA (January 2012 – January 2022)



Source: U.S. Bureau of Labor Statistics

The low, moderate, middle, and upper income categories for the Kansas City MSA are presented in the table below.

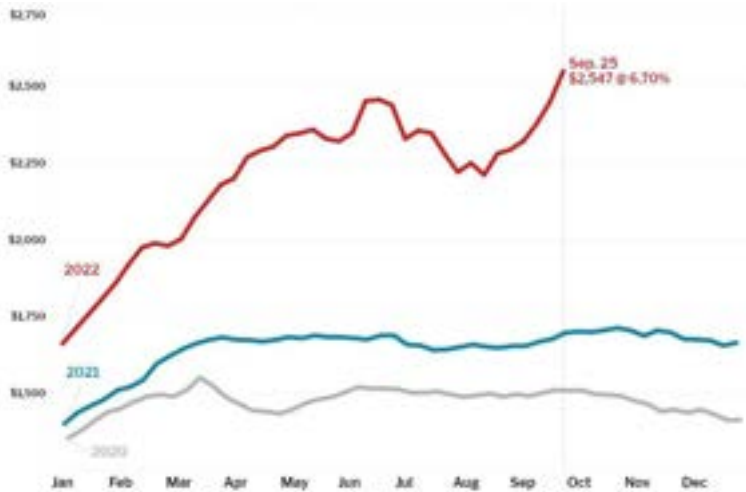
Table 7: Median Family Income Ranges for the Kansas City MSA

Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2021 (\$86,300)	<\$43,150	\$43,150 to <\$69,040	\$69,040 to <\$103,560	≥\$103,560

Source FFIEC

In early 2022 the Federal Reserve began raising interest rates, in an attempted to curb inflation, which has played a major role in the slowdown in home mortgage loans. Refinance volume has been minimal and home purchases has slowed considerably. The rising interest rate environment has made a particularly negative impact on low- and moderate-income borrowers, as home affordability has dropped to its lowest level in decades. Home purchase prices remain extremely elevated due to inflation. Homeowner mortgage payment amounts have increase 50.2% in the last 12 months, and even more when compared to 2020 amounts (Redfin Freddie Mac Primary Mortgage Market Survey September 2022). Therefore, the total number of originated home loans, specifically low- and moderate-income borrowers will be significantly lower in 2023 and 2024.

Chart: Home Mortgage Payment Amounts 2020 to 2022



D. Competition

Within the Kansas City Metropolitan area, nbkc bank operates in a highly competitive environment in all three areas including Home Loans, Commercial and Small Business Lending, and Deposits. As of June 30th, 2021, the Kansas City MSA comprised of 125 banks¹. The Kansas City area also includes a number of non-depository institutions offering home loan mortgages including Primelending, Truhome Solutions LLC, and Quicken Loans. The Bank also competes with large financial institutions including U.S. Bank, Bank of America, and Wells Fargo. As of June 30th, 2021, nbkc bank was the 19th largest financial institution by deposit market share with 1.08 percent².

Table 8: Summary of Deposits
FDIC Deposit Market Share Report as of June 30th, 2021

¹ FDIC Deposit Market Share Report as of June 30th, 2021.

² FDIC Deposit Market Share Report as of June 30th, 2021.

Institution Name	CERT	State (Hybrid)	Bank Class	State/Federal Charter	No. of Offices	Deposits (\$000)	No. of Offices	Deposits (\$000)	Market Share
UNB Bank, National Association	3273	MO	N	Federal	66	9,423,382	29	20,852,544	25.44%
Commerce Bank	24966	MO	SM	State	124	17,884,144	43	9,844,422	12.01%
Bank of America, National Association	3510	NC	N	Federal	4,182	1,864,924,826	33	6,287,890	7.87%
U.S. Bank National Association	3548	OH	N	Federal	2,274	418,081,183	48	4,861,183	5.71%
Capitol Federal Savings Bank	27981	KS	SB	Federal	28	3,689,053	26	3,138,800	3.83%
Central Bank of The Midwest	26247	MO	SM	State	8	268,430	43	3,089,370	3.74%
Security Bank of Kansas City	4705	KS	NM	State	3	76,890	40	3,883,788	3.82%
Nbc Bank	59052	CO	SM	State	58	4,038,479	24	2,230,890	2.72%
Country Club Bank	3668	MO	SM	State	0	0	28	1,958,990	2.39%
Crossfirst Bank	59540	KS	NM	State	8	2,588,237	3	1,869,227	2.07%
Bank, National Association	4214	OK	N	Federal	118	36,173,231	7	1,488,281	1.79%
North American Savings Bank, F.S.B.	29708	MO	SB	Federal	1	144,636	10	1,302,183	1.69%
Enterprise Bank & Trust	27237	MO	NM	State	34	7,567,886	1	1,188,228	1.41%
Bank Harris Bank National Association	18571	IL	N	Federal	634	133,183,732	10	1,144,890	1.40%
Academy Bank, National Association	19800	MO	N	Federal	55	565,565	28	1,127,495	1.39%
Wells Fargo Bank, National Association	3511	SD	N	Federal	4,982	1,484,911,488	8	1,039,270	1.27%
Bank of Blue Valley	1143	KS	NM	State	3	227,190	7	901,428	1.14%
First National Bank of Omaha	5452	NE	N	Federal	110	20,363,828	9	900,290	1.14%
Nbc Bank	39014	KS	NM	State	0	0	4	888,118	1.09%

In 2021, the most recent year of data available, the aggregate home mortgage data illustrates 651 lenders reported 96,891 loans in the assessment area. nbkc bank ranked 30th with 1.03 percent of the market share. Similarly, there is competition for small business loans among banks, credit unions, and non-depository mortgage lenders in the assessment area.

IV. NBKC BANK CRA STRATEGIC PLAN

A. Overview

The Bank's CRA Strategic Plan goals were established to contribute to and meet the needs of the individuals, families and communities within the assessment area. These goals were also created by combining the Bank's three core strengths and areas of focus: home loans, deposits, and commercial and small business lending. All of these were incorporated to meet the needs identified above, including:

- Increased access to low-cost products and services through the use of product innovation
- Economic Development through increased employment opportunities
- Lending to small businesses
- Lending to LMI borrowers

The Strategic Plan's measurable goal areas were each established using the Bank's historical CRA data, historical home mortgage and business lending numbers, growth strategies, and projected increase in the Bank's asset size. The goal areas were also established by reviewing regulatory guidance as well as reviewing other financial institution's approved strategic plans. The current economic environment of the Bank's assessment area due residual impacts from the COVID-19 pandemic and economic conditions, as discussed elsewhere in this plan, was heavily considered in the establishment of the banks goals. Some goals remain static for plan years 2023-2024 due to the bank's strategic plan impacting those areas.

B. Length and Term

nbkc bank's Strategic Plan will last two (2) years beginning on January 1st, 2023 lasting through December 31st, 2024. The Bank will submit this CRA Strategic Plan to the Federal Deposit Insurance Corporation for approval on December 8th, 2022.

C. Performance Criteria

The Bank's measurable goals were set at a level that should be achievable in the short term and sustainable in the long term, depending on the relevant economic conditions at that time. The Bank feels the measurable goals compare favorably with other similarly situated financial institution's goals that were reviewed during the creation of this plan. The goals were segmented into three main categories: Lending, Community Development, and Service to align with the standard intermediate-small bank CRA examination procedures. This is the Bank's second CRA Strategic Plan, therefore historical goals are included for comparison. Should the Bank miss the measurable targets outlined in this strategic plan, the Bank would elect to be evaluated under the examination standards in Part 345 that are applicable to the bank at that time.

Lending

The Bank has a strong history of providing exceptional customer service, expertise, a wide range of loan products, and competitive pricing for residential mortgage loans and small business loans. Therefore, the goals outlined reflect the Bank's continued commitment in these two core areas and will leverage the Bank's expertise and competitive advantage. However, there are significant economic factors that require consideration when evaluating the mortgage lending and small business and business lending goals below.

Mortgage Lending

The aggregate volume of nbkc's mortgage lending, which correlates to the volume of mortgage lending to LMI borrowers, can vary drastically from year-to-year based primarily on interest rates and economic conditions. Throughout the Bank's 20+ year history, forecasting mortgage volume, which is almost solely dependent on interest rates, is an impossible task. Through no change in focus by the Bank, interest rates can produce record mortgage volumes or conversely, anemic mortgage volume. In other words, all else equal i.e. number of loan officers, number of lead sources, same strategies, effort and focus, still results in volume that will vary widely based on interest rates applicable for the time period.

In 2019, the Bank experienced what nbkc's management and Board of Directors considered, at the time, unprecedented and, unlikely to ever be repeated, record mortgage volume. In 2020, the effect of the pandemic resulted in historically low interest rates, shattering the previous record low interest rates experienced in 2012 during the last economic recession and the extremely low rates throughout 2019. However in 2022, high inflation caused rapid increase in interest rates which eliminated refinance transactions and significantly reduced home purchase volumes.

Each year, the Bank's management team prepares a budget, approved by its Board of Directors, which attempts to forecast mortgage volume based on expected interest rates for the next year. Given this assumption and recognizing our desire to improve nbkc's mortgage lending volume in LMI, we have established the goals shown below. For purposes of the Mortgage Lending goals for 2023 and 2024, nbkc's management believes mortgage volume will be lower than the volumes in 2018 due to high interest rates, inflation impacting home values, and low home mortgage demand. It should be further noted that, as of the date of this plan, interest rates continue to increase month-over-month and home loan volume continues to decrease and therefore it was challenging to determine precise forecasts for calendar year

2023 and therefore projections were used to the best of management's ability and the goals below reflect the mortgage lending volume that we believe, if achieved, would be evaluated as satisfactory and outstanding.

Small Business and Business Lending

The aggregate volume of nbkc's small business and business lending, which correlates to the volume of small business and business lending to LMI borrowers, has generally grown each year since the end of the Great Recession. Management's forecast for 2022 and beyond furthered this experience by forecasting continued growth in this area. The COVID-19 pandemic shattered management's forecasts, as essentially loan demand has dried up and thus all lending has ceased. The dire nature of this uncertain, and constantly changing, pandemic's effect on the economy, exacerbated by several months of business shutdown and consumer quarantines, and effectively terminated all demand for loans other than extremely risky loans to keep businesses afloat. In 2022, the economic conditions and increasing interest rates have made it more expensive for businesses to obtain loans, coupled with concerns over a recession may suppress businesses' desires to obtain loans.

The goals below reflect the small business and business lending that we believe, if achieved, would be evaluated as satisfactory and outstanding. However, due to the current economic conditions as of the date of this plan development, high interest rates and possible recession have resulted in the bank's future projections being suppressed and thus anticipating lower loan volumes than in prior years. nbkc's small business and business lending goals represent an optimistic viewpoint based on the assumption that the economy returns to normal and loan demand resumes at the pace experienced prior to 2020 however all factors were taken into consideration by bank management when setting the goal thresholds.

Community Development

To support community development, particularly in LMI areas and communities within the assessment area, the Bank has elected to focus the goals on two main components: Loans and Investments. The Bank's qualified CRA loans and investments will focus on the Bank's assessment area. The Bank plans to seek out new investment opportunities, including but not limited to: increasing the amount of Community Development investment activities with CDFI's located in the Bank's assessment area, along with women and minority owned financial institutions, purchasing eligible mortgage-backed securities where the underlying loans are made to support low-and moderate-income individuals located within the assessment area, and projects eligible for low-income housing tax credits.

Historically, the Bank has provided support through grants and charitable contributions to: Urban Communities Workforce Development, housing development assistance for the construction of single-family residences for inner-city low income families and non-profit organizations with a mission to transform the homes and lives of veterans, low-income families, seniors, and people with disabilities. The Bank has also supported local schools in the assessment area through contributions for use in providing financial education to students. The goals outlined herein reflect the Bank's continued commitment to supporting LMI communities in the assessment area. Grants will be counted for CRA credit if they meet the primary purpose of community development.

Services

The Bank will increase the number of service hours completed in prior years by looking into additional opportunities throughout the assessment area. This will include qualifying services based on the CRA regulation.

In addition to the specified measurable goals outlined in the Strategic Plan, the Bank requests additional consideration for the deposit products provided through the local branches, the nationwide online channel, and the Bank's strategic Fintech Partnerships, all of which directly benefit LMI communities inside and outside the Bank's assessment area. Often times, access to low-cost banking services is the first step for individuals in LMI areas. The Bank's low-cost deposit product offering is critical to the success of low- and moderate-income consumer both locally and nationwide. These initiatives are a unique competitive advantage for the Bank.

The Bank's Fintech partnerships operate under a low or no-fee model to consumers, offering traditional bank deposit products and services with easy access to deposited funds. The Bank believes the products and services, offered by multiple different Fintech companies, allows for greater access consumers inside and outside the Bank's assessment area. This includes the Bank offering a Health Savings Account program through a Fintech partnership. Currently, none of the Bank's Fintech partnerships offers a credit or lending product and therefore they are not technically eligible for CRA consideration in the Bank's CRA Strategic Plan. The Bank's Fintech programs have a primary focus on providing easy and affordable access to deposit products as well as encouraging and assisting consumers in establishing savings funds, budgeting, and financial education assistance. These principles are important to the Bank and continue our commitment to providing access to financial products to low- and moderate-income level consumers.

D. Oversight

The Bank currently operates a committee, as established by the Board of Directors, which is responsible for the oversight of the CRA activities. The committee is comprised of management from the three lines of business as well as at least one Director. As part of Board oversight, on an annual basis the CRA Officer completes a CRA Self Evaluation which includes a review of the Bank's CRA performance since the previous self-evaluation and all lending and community development activities conducted in the year. The self-evaluation is completed using publicly available information from financial institutions similar in size and located in the Kansas City Metropolitan Area. The purpose of the self-evaluation is to assess the Bank's record of meeting the credit needs of the community in the assessment area, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution, as well as used to establish performance benchmarks in each review category to be used in future years. The self-evaluation is provided to the CRA Committee and Board of Directors. As part of this CRA Strategic Plan, the Bank will continue the process of conducting the self-evaluation to ensure each performance goal is met.

E. Monitoring of Plan Performance

The Bank's Board of Directors and senior management will ensure adequate resources are dedicated to implementing the Strategic Plan and will oversee the Bank's progress in meeting the measurable goals outlined herein. The lending, investment and service goals outlined in this Strategic Plan are based on general assumptions about the Bank's business model, strategic initiatives, and local economic conditions. The assumptions and conditions may change, resulting in a change to the Strategic Plan goals. As a result, the Bank's CRA Committee will monitor the performance on a quarterly basis and provide results to the Bank's Board of Directors and senior management.

F. Lending Test Goals

Goal 1: Small Business Lending – Gross Revenue \$1 million or Less.

Lending Test (small business loans to businesses with gross revenue \$1mil or less). This goal demonstrates a commitment to providing loans to small businesses and supporting local economic growth. The bank will receive credit under this goal if: (i) the loan is made to a business with gross annual revenues of \$1 million or less; (ii) the small business is located in the Bank’s assessment area; and (iii) the loan is for \$1 million or less. The goal has been stated as a total dollar volume for new originations, renewals, refinances, or modifications where the maturity date is extended during the plan year. Because a loan to a business with gross annual revenue \$1 million or less may also be located in, or benefit, a low- or moderate-income census tract in the bank’s assessment area, credit may be applied in Goal 1 and Goal 2. However, loans receiving credit in Goal 1 cannot also receive credit for Goal 5. Loans in call report codes 1e1, 1e2, and 4 will count in this goal if the above criteria is satisfied.

Goal 1: Small Business Lending – Gross Revenue (\$)

	Satisfactory Goal	Outstanding Goal	Historical Performance
2019	--	--	\$3.0M
2020	--	--	\$3.8M
2021	\$15M	\$25M	\$3.1M
2022	\$15M	\$25M	In Progress
2023*	\$4M	\$8M	--
2024*	\$4M	\$8M	--

*Proposed goals

Goal 2: Business Lending – LMI Census Tracts

Lending Test (small business loans to businesses located in, or loan proceeds benefiting LMI areas). This goal demonstrates a commitment to providing small business loans that benefit LMI areas, as well as supporting local economic growth. Credit will be provided for each loan \$1million or less to a business located in, or loans that serve low- or moderate-income census tracts located in the bank’s assessment area, regardless of the business’ gross annual revenue. The goal has been stated as a total dollar volume for new originations, renewals, refinances, or modifications where the maturity date is extended during the plan year. Because a loan to a business with gross annual revenue \$1mil or less may also be located in, or benefit, a low- or moderate-income census tract, credit may be applied in Goal 1 and Goal 2. For avoidance of doubt, loans receiving credit in Goal 2 cannot also receive credit for Goal 5. Loans in call report codes 1e1, 1e2, and 4 will count in this goal if the above criteria is satisfied.

Goal 2: Business Lending – LMI Census Tracts

	Satisfactory Goal	Outstanding Goal	Historical Performance
2019	--	--	\$1.2M
2020	--	--	\$1.1M
2021	\$1.7M	\$2.2M	\$3.9M
2022	\$2.0M	\$2.5M	In Progress
2023*	\$2.5M	\$3.5M	--
2024*	\$2.5M	\$3.5M	--

*Proposed goals

Goal 3: Mortgage Lending to LMI Census Tracts (Dollar Volume of Total Loans in Assessment Area)

Lending Test (home mortgage loans in LMI census tracts). This goal measures the dollar volume of residential mortgage loans in the Bank’s assessment area originated to a borrower with a property located in a LMI census tract. The Bank’s Home Loans department is robust, experienced, and able to meet the needs of most borrowers and currently offers over 50 loan types. The Bank has the resources necessary to assist LMI borrowers in identifying the right product type for their situation at an affordable price. This goal includes loans reported under HMDA.

Goal 3: Mortgage Lending to LMI Census Tracts

	Satisfactory Goal	Outstanding Goal	Historical Performance
2018	--	--	\$10.7M
2019	--	--	\$12.6M
2020	--	--	\$10.2M
2021	\$11M	\$13M	\$18.3M
2022	\$11M	\$13M	In Progress
2023*	\$15M	\$18M	--
2024*	\$15M	\$18M	--

*Proposed goals

Goal 4: Mortgage Lending to LMI Borrowers (Dollar Volume of Total Loans in Assessment Area)

Lending Test (home mortgage loans to LMI borrowers). This goal measures the dollar volume of residential mortgage loans in the Bank’s assessment area originated to a borrower who is defined as low- or moderate-income individuals by the CRA regulation. This goal includes loans reported under HMDA.

Goal 4: Mortgage Lending to LMI Borrowers

	Satisfactory Goal	Outstanding Goal	Historical Performance
2018	--	--	\$15.5M
2019	--	--	\$23.1M
2020	--	--	\$31.5M
2021	\$16M	\$24M	\$34.7M
2022	\$16M	\$24M	In Progress
2023*	\$14M	\$17M	--
2024*	\$14M	\$17M	--

*Proposed goals

G. Community Development Test Goals

Goal 5: Community Development Loans (Total Dollar Volume)

Lending Test (community development loans). Achieve a predetermined total dollar volume of community development loans in the Bank’s assessment area benefiting LMI individuals and geographies. The goal has been stated as a total dollar volume for new originations, renewals, refinances, or modifications where the maturity date is extended during the plan year. Credit for loans will be based on the definitions

of Community Development under the CRA. For avoidance of doubt, loans other than multifamily dwelling loans that meet the definition of affordable housing may not be considered under both the lending-related goals (Goals 1-4) and the community development-related goal (Goal 5).

Goal 5: Community Development Loans (\$)

	Satisfactory Goal	Outstanding Goal	Historical Performance
2018	--	--	\$3.1M
2019	--	--	\$405k
2020	--	--	\$10.6M
2021	\$3M	\$5M	\$5.1M
2022	\$3M	\$5M	In Progress
2023*	\$5M	\$8M	--
2024*	\$5M	\$8M	--

*Proposed goals

Goal 6: Community Development Investments (Total Dollar Volume)

Investments Test (community development investments). Achieve a predetermined total dollar volume of community development investments in the Bank’s assessment area benefiting LMI individuals or geographies. This goal will be calculated using the total dollar volume of investments (new, renewals, or outstanding balances of book value from prior period investments) made in the Bank’s assessment area during the plan year. Regarding prior period investments for each Plan year, the total amount of qualified investments may include the outstanding book value of prior period investments (as of December 31st) that were originated and/or purchased in previous strategic Plan goal years. This goal also allows the Bank the opportunity to provide financial resources directly to organizations committed to supporting LMI individuals and communities. Grants and charitable donations made by the Bank that meet the primary purpose of community development will be considered qualified for CRA credit if they meet the needs of the Bank’s assessment area. Credit for investments will be based on the definitions of Community Development under the CRA.

Goal 6: Community Development Investments (\$)

	Satisfactory Goal	Outstanding Goal	Historical Performance
2018	--	--	\$498k
2019	--	--	\$498k
2020	--	--	\$4.6M
2021	\$4M	\$6M	\$4.0M
2022	\$4M	\$6M	In Progress
2023*	\$4M	\$6M	--
2024*	\$4M	\$6M	--

*Proposed goals

H. Services Test Goals

Goal 7: Community Services

Services Test. This Community Development services goal measures the Bank’s ability to serve customers through qualified service activity. This goal will be calculated using the total number of qualified services completed by the bank personnel during the plan year. Credit for services will be based on the definitions of Community Development Services under the CRA.

Goal 7: Community Services

	Satisfactory Goal	Outstanding Goal	Historical Performance
2018	--	--	3
2019	--	--	3
2020	--	--	4
2021	25	50	28
2022	25	50	In Progress
2023*	35	60	--
2024*	40	65	--

*Proposed goals

V. PUBLIC PARTICIPATION

A. Public Comment Period

The Bank published notice of the availability of the proposed Strategic Plan, required by 12 C.F.R. § 345.27(d)(2), on November 4th, 2022 in the Kansas City Star, the newspaper with the largest readership within the Bank’s assessment area. The public comment period started on November 4th, 2022 and ended on December 4th, 2022. All comments will be reviewed and considered by Bank management and the Bank will amend the Strategic Plan, if appropriate, to address concerns identified, where permissible under CRA rules and regulations. All comment letters will be provided to the FDIC as a part of the Strategic Plan submission. The comments will also be included in the Bank’s CRA public file. A copy of the Public Notice is attached as Appendix C.

B. Summary of Public Comment Letters Received

No public comments were received.

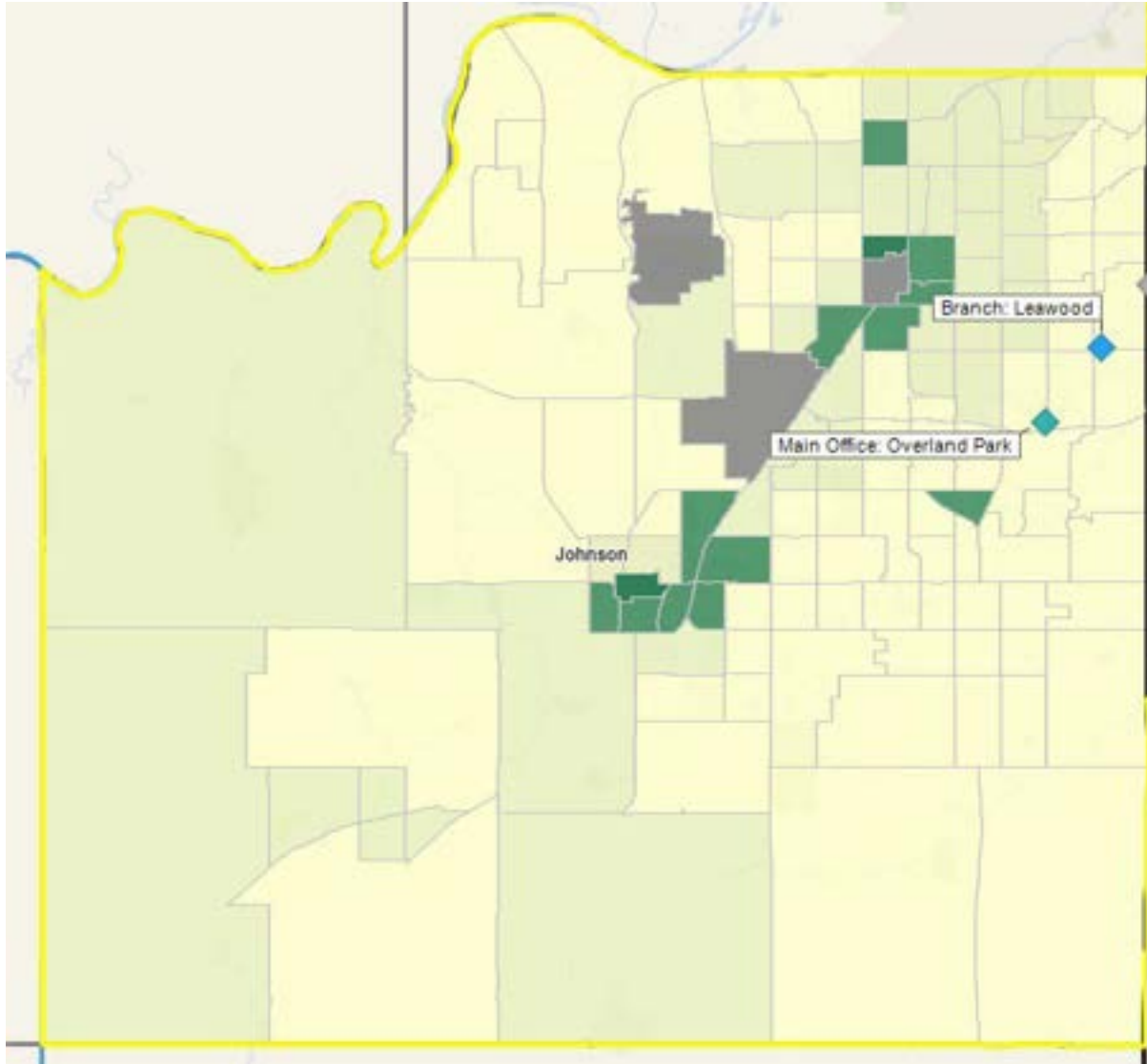
C. Bank Response to the Public Comment Letters

No public comments were received.

VI. APPENDIX AND SUPPLEMENTAL INFORMATION

Appendix A: Assessment Area Maps

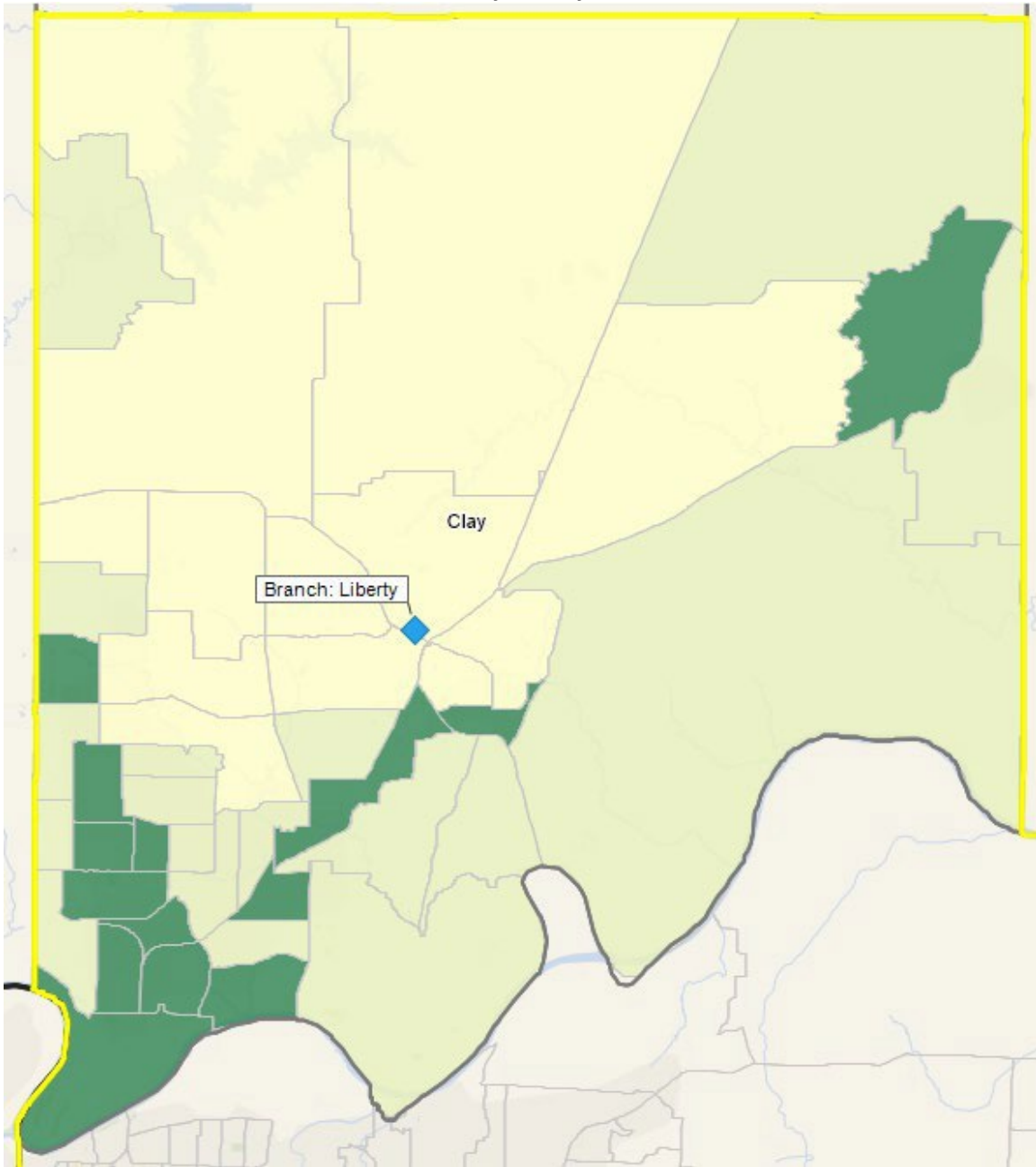
Table 9: Johnson County, Kansas



Income Level

- Low
- Moderate
- Middle
- Upper
- N/A

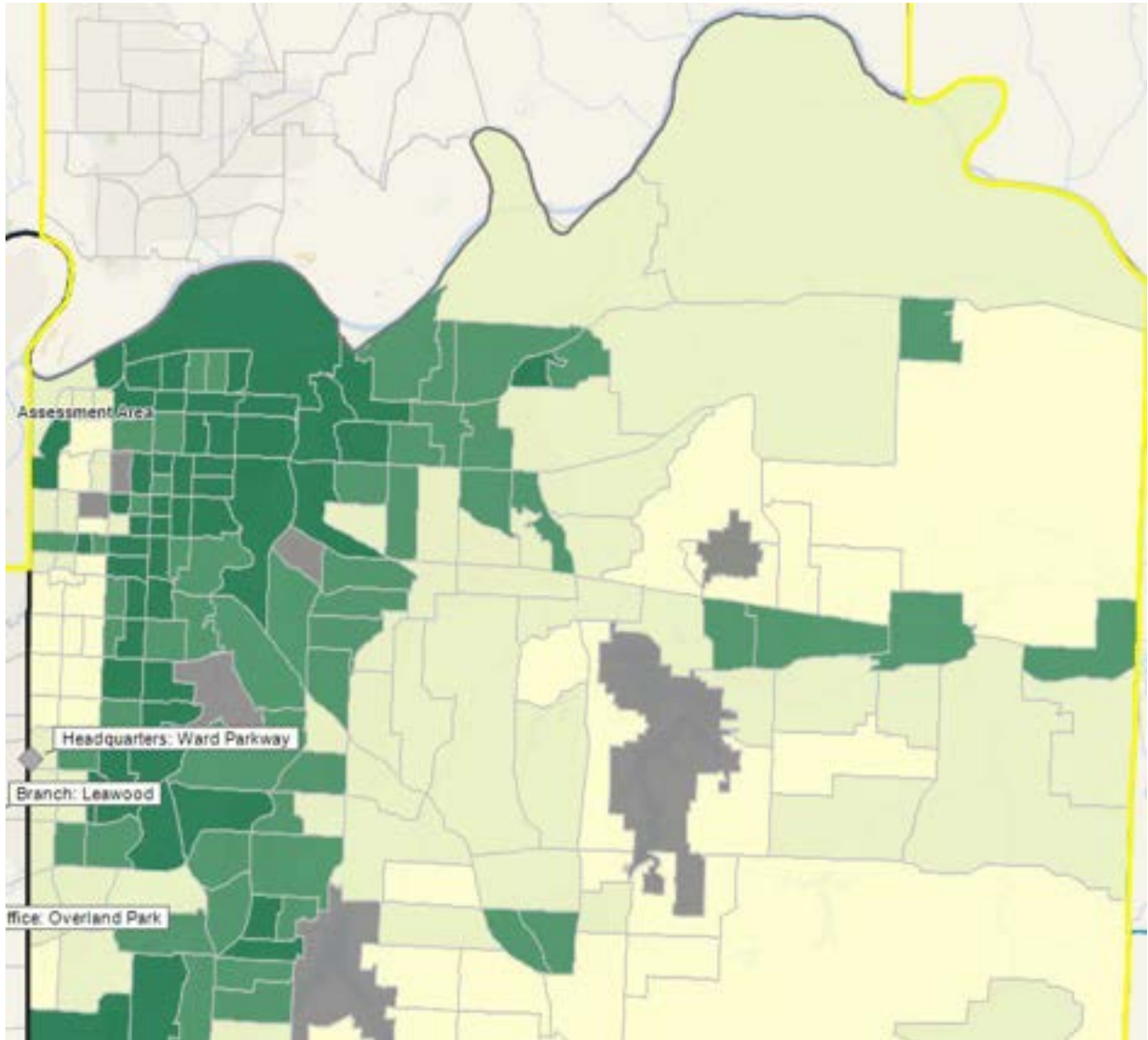
Table 10: Clay County, Missouri



Income Level

- Low
- Moderate
- Middle
- Upper
- N/A

Table 11: Jackson County, Missouri



Income Level

- Low
- Moderate
- Middle
- Upper
- N/A

Appendix B: Assessment Area Census Tract Income Levels

Clay County, Missouri

State Code	County Code	Tract Code	Tract Income Level	2015 MSA/MD Statewide non-MSA/MD Median Family Income	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2015 Tract Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Household Income
29	047	0202.01	Moderate	\$72,623	\$86,300	14.87	67.92	\$49,327	\$58,615	\$43,411
29	047	0202.02	Middle	\$72,623	\$86,300	7.12	107.91	\$78,371	\$93,126	\$76,693
29	047	0203.00	Moderate	\$72,623	\$86,300	17.84	67.98	\$49,375	\$58,667	\$47,134
29	047	0204.00	Moderate	\$72,623	\$86,300	4.82	77.71	\$56,438	\$67,064	\$46,541
29	047	0205.00	Moderate	\$72,623	\$86,300	25.81	61.12	\$44,388	\$52,747	\$35,869
29	047	0206.02	Moderate	\$72,623	\$86,300	18.56	67.55	\$49,057	\$58,296	\$42,555
29	047	0206.03	Moderate	\$72,623	\$86,300	14.88	65.51	\$47,578	\$56,535	\$43,766
29	047	0206.04	Middle	\$72,623	\$86,300	9.05	89.45	\$64,962	\$77,195	\$54,136
29	047	0208.01	Moderate	\$72,623	\$86,300	14.86	76.07	\$55,246	\$65,648	\$47,716
29	047	0209.01	Middle	\$72,623	\$86,300	2.54	95.57	\$69,408	\$82,477	\$64,825
29	047	0209.02	Middle	\$72,623	\$86,300	5.49	84.38	\$61,282	\$72,820	\$58,443
29	047	0210.01	Moderate	\$72,623	\$86,300	18.24	79.63	\$57,833	\$68,721	\$43,965
29	047	0210.03	Middle	\$72,623	\$86,300	5.19	114.10	\$82,865	\$98,468	\$68,854
29	047	0210.04	Moderate	\$72,623	\$86,300	9.06	67.91	\$49,321	\$58,606	\$47,263
29	047	0211.01	Moderate	\$72,623	\$86,300	17.74	75.65	\$54,946	\$65,286	\$41,693
29	047	0211.02	Middle	\$72,623	\$86,300	13.19	88.47	\$64,250	\$76,350	\$55,863
29	047	0211.03	Middle	\$72,623	\$86,300	7.43	97.82	\$71,042	\$84,419	\$61,580
29	047	0212.04	Middle	\$72,623	\$86,300	12.62	80.89	\$58,750	\$69,808	\$53,821
29	047	0212.05	Upper	\$72,623	\$86,300	5.73	136.67	\$99,259	\$117,946	\$86,089
29	047	0212.06	Upper	\$72,623	\$86,300	1.78	122.14	\$88,704	\$105,407	\$75,852
29	047	0212.07	Moderate	\$72,623	\$86,300	20.10	68.44	\$49,707	\$59,064	\$52,847
29	047	0212.08	Middle	\$72,623	\$86,300	14.98	93.52	\$67,920	\$80,708	\$50,536
29	047	0213.03	Upper	\$72,623	\$86,300	5.94	143.86	\$104,479	\$124,151	\$102,892
29	047	0213.05	Upper	\$72,623	\$86,300	4.64	120.66	\$87,633	\$104,130	\$82,803
29	047	0213.06	Middle	\$72,623	\$86,300	1.90	97.17	\$70,571	\$83,858	\$64,470
29	047	0213.07	Middle	\$72,623	\$86,300	9.52	113.48	\$82,415	\$97,933	\$68,651
29	047	0213.09	Upper	\$72,623	\$86,300	1.45	192.77	\$140,000	\$166,361	\$128,710
29	047	0213.10	Upper	\$72,623	\$86,300	2.99	144.60	\$105,015	\$124,790	\$103,318
29	047	0214.01	Upper	\$72,623	\$86,300	9.92	126.03	\$91,530	\$108,764	\$71,629
29	047	0214.03	Moderate	\$72,623	\$86,300	11.24	69.69	\$50,611	\$60,142	\$41,024
29	047	0214.04	Upper	\$72,623	\$86,300	12.69	124.71	\$90,573	\$107,625	\$65,583
29	047	0216.00	Middle	\$72,623	\$86,300	7.26	109.43	\$79,477	\$94,438	\$76,290
29	047	0217.01	Moderate	\$72,623	\$86,300	5.70	72.79	\$52,863	\$62,818	\$54,428
29	047	0217.02	Middle	\$72,623	\$86,300	23.15	85.77	\$62,292	\$74,020	\$48,218
29	047	0218.03	Upper	\$72,623	\$86,300	0.36	125.45	\$91,111	\$108,263	\$86,854
29	047	0218.04	Upper	\$72,623	\$86,300	0.74	143.43	\$104,167	\$123,780	\$91,764
29	047	0218.05	Upper	\$72,623	\$86,300	1.79	122.97	\$89,311	\$106,123	\$80,970
29	047	0218.06	Middle	\$72,623	\$86,300	8.10	81.51	\$59,196	\$70,343	\$52,260
29	047	0219.00	Upper	\$72,623	\$86,300	2.57	145.43	\$105,619	\$125,506	\$93,451
29	047	0220.00	Middle	\$72,623	\$86,300	7.56	100.02	\$72,644	\$86,317	\$61,682
29	047	0221.00	Moderate	\$72,623	\$86,300	8.62	67.43	\$48,973	\$58,192	\$38,474

State Code	County Code	Tract Code	Tract Income Level	2015 MSA/MD Statewide non-MSA/MD Median Family Income	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2015 Tract Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Household Income
29	047	0222.00	Middle	\$72,623	\$86,300	10.19	87.32	\$63,417	\$75,357	\$60,661
29	047	0223.01	Middle	\$72,623	\$86,300	7.80	104.85	\$76,146	\$90,486	\$66,806
29	047	0223.02	Middle	\$72,623	\$86,300	4.78	119.14	\$86,524	\$102,818	\$78,139

Jackson County, Missouri

State Code	County Code	Tract Code	Tract Income Level	2015 MSA/MD Statewide non-MSA/MD Median Family Income	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2015 Tract Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Household Income
29	095	0003.00	Low	\$72,623	\$86,300	44.54	39.31	\$28,550	\$33,925	\$25,167
29	095	0006.00	Low	\$72,623	\$86,300	46.22	43.03	\$31,250	\$37,135	\$22,139
29	095	0007.00	Moderate	\$72,623	\$86,300	30.73	51.06	\$37,083	\$44,065	\$35,191
29	095	0008.00	Moderate	\$72,623	\$86,300	22.04	59.00	\$42,849	\$50,917	\$32,130
29	095	0009.00	Low	\$72,623	\$86,300	37.20	45.06	\$32,727	\$38,887	\$23,378
29	095	0010.00	Low	\$72,623	\$86,300	37.02	37.38	\$27,149	\$32,259	\$21,538
29	095	0011.00	Middle	\$72,623	\$86,300	21.08	67.78	\$63,750	\$75,754	\$35,563
29	095	0018.00	Low	\$72,623	\$86,300	48.35	35.06	\$25,463	\$30,257	\$17,473
29	095	0019.00	Low	\$72,623	\$86,300	35.58	46.20	\$33,557	\$39,871	\$22,674
29	095	0020.00	Low	\$72,623	\$86,300	41.07	46.88	\$34,052	\$40,457	\$19,306
29	095	0021.00	Low	\$72,623	\$86,300	47.46	34.44	\$25,013	\$29,722	\$23,472
29	095	0022.00	Low	\$72,623	\$86,300	33.81	42.12	\$30,595	\$36,350	\$17,569
29	095	0023.00	Low	\$72,623	\$86,300	43.99	45.57	\$33,100	\$39,327	\$25,339
29	095	0034.00	Low	\$72,623	\$86,300	44.58	31.73	\$23,047	\$27,383	\$16,341
29	095	0037.00	Low	\$72,623	\$86,300	49.20	30.77	\$22,353	\$26,555	\$20,208
29	095	0038.00	Moderate	\$72,623	\$86,300	30.41	65.79	\$47,782	\$56,777	\$23,786
29	095	0043.00	Middle	\$72,623	\$86,300	29.38	92.94	\$67,500	\$80,207	\$28,548
29	095	0044.00	Upper	\$72,623	\$86,300	18.55	142.59	\$103,558	\$123,055	\$62,177
29	095	0046.00	Middle	\$72,623	\$86,300	18.91	91.30	\$68,310	\$78,792	\$45,050
29	095	0051.00	Upper	\$72,623	\$86,300	27.19	125.40	\$91,071	\$108,220	\$61,189
29	095	0052.00	Low	\$72,623	\$86,300	50.09	42.92	\$31,176	\$37,040	\$11,776
29	095	0053.00	Middle	\$72,623	\$86,300	18.27	93.01	\$67,552	\$80,268	\$41,471
29	095	0054.00	Moderate	\$72,623	\$86,300	42.86	54.01	\$39,226	\$46,611	\$14,321
29	095	0055.00	Low	\$72,623	\$86,300	34.27	33.86	\$24,597	\$29,221	\$22,821
29	095	0056.01	Low	\$72,623	\$86,300	44.38	42.32	\$30,741	\$36,522	\$17,267
29	095	0056.02	Low	\$72,623	\$86,300	38.19	34.60	\$25,278	\$30,032	\$26,190
29	095	0057.00	Low	\$72,623	\$86,300	26.88	47.56	\$34,545	\$41,044	\$30,284
29	095	0058.01	Low	\$72,623	\$86,300	30.95	45.25	\$32,865	\$39,051	\$28,333
29	095	0060.00	Moderate	\$72,623	\$86,300	43.15	53.35	\$38,750	\$46,041	\$30,288
29	095	0061.00	Low	\$72,623	\$86,300	45.83	32.87	\$23,875	\$28,367	\$27,582
29	095	0063.00	Low	\$72,623	\$86,300	47.23	31.76	\$23,068	\$27,409	\$16,061
29	095	0065.00	Moderate	\$72,623	\$86,300	23.74	71.32	\$51,797	\$61,549	\$40,881
29	095	0066.00	Upper	\$72,623	\$86,300	18.15	120.48	\$87,500	\$103,974	\$44,556
29	095	0067.00	Low	\$72,623	\$86,300	29.74	33.57	\$24,383	\$28,971	\$27,464
29	095	0069.00	Middle	\$72,623	\$86,300	11.10	119.19	\$86,563	\$102,861	\$45,714
29	095	0071.00	Middle	\$72,623	\$86,300	16.16	111.38	\$80,893	\$96,121	\$55,189
29	095	0072.00	Upper	\$72,623	\$86,300	5.07	237.52	\$172,500	\$204,980	\$121,364
29	095	0073.00	Upper	\$72,623	\$86,300	15.59	226.21	\$164,282	\$195,219	\$54,812
29	095	0074.00	Upper	\$72,623	\$86,300	20.10	142.95	\$103,819	\$123,366	\$57,361
29	095	0075.00	Moderate	\$72,623	\$86,300	43.83	69.64	\$50,577	\$60,099	\$32,872
29	095	0076.00	Low	\$72,623	\$86,300	35.55	38.52	\$27,976	\$33,243	\$24,597

State Code	County Code	Tract Code	Tract Income Level	2015 MSA/MD Statewide non-MSA/MD Median Family Income	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2015 Tract Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Household Income
29	095	0077.00	Low	\$72,623	\$86,300	47.49	39.29	\$28,534	\$33,907	\$21,111
29	095	0078.02	Moderate	\$72,623	\$86,300	23.97	55.26	\$40,132	\$47,689	\$28,304
29	095	0079.00	Moderate	\$72,623	\$86,300	19.46	55.34	\$40,192	\$47,758	\$29,624
29	095	0080.00	Low	\$72,623	\$86,300	34.18	49.79	\$36,163	\$42,969	\$28,750
29	095	0081.00	Moderate	\$72,623	\$86,300	20.23	65.95	\$47,898	\$56,915	\$41,359
29	095	0082.00	Upper	\$72,623	\$86,300	7.79	148.23	\$107,652	\$127,922	\$76,546
29	095	0083.00	Upper	\$72,623	\$86,300	3.69	191.05	\$138,750	\$164,876	\$119,191
29	095	0084.00	Upper	\$72,623	\$86,300	0.37	261.29	\$189,762	\$225,493	\$176,905
29	095	0085.00	Upper	\$72,623	\$86,300	2.40	228.37	\$165,855	\$197,063	\$142,250
29	095	0086.00	Upper	\$72,623	\$86,300	8.12	173.43	\$125,952	\$149,670	\$92,398
29	095	0087.00	Low	\$72,623	\$86,300	35.49	40.52	\$29,432	\$34,969	\$25,302
29	095	0088.00	Low	\$72,623	\$86,300	34.29	43.48	\$31,583	\$37,523	\$30,054
29	095	0089.00	Low	\$72,623	\$86,300	41.87	37.07	\$26,923	\$31,991	\$25,694
29	095	0090.00	Moderate	\$72,623	\$86,300	19.89	60.71	\$44,095	\$52,393	\$37,237
29	095	0091.00	Upper	\$72,623	\$86,300	6.77	132.82	\$96,458	\$114,624	\$63,839
29	095	0092.00	Upper	\$72,623	\$86,300	5.59	159.60	\$115,909	\$137,735	\$80,508
29	095	0093.00	Middle	\$72,623	\$86,300	8.29	97.42	\$70,750	\$84,073	\$58,333
29	095	0094.00	Moderate	\$72,623	\$86,300	21.26	76.80	\$55,781	\$66,278	\$32,464
29	095	0095.00	Low	\$72,623	\$86,300	33.80	41.71	\$30,294	\$35,996	\$26,972
29	095	0096.00	Low	\$72,623	\$86,300	55.80	22.72	\$16,500	\$19,607	\$16,676
29	095	0097.00	Low	\$72,623	\$86,300	39.70	36.36	\$26,406	\$31,379	\$24,592
29	095	0098.00	Middle	\$72,623	\$86,300	14.46	88.04	\$63,938	\$75,979	\$50,584
29	095	0099.00	Middle	\$72,623	\$86,300	18.62	101.55	\$73,750	\$87,638	\$51,200
29	095	0100.01	Middle	\$72,623	\$86,300	5.47	115.79	\$84,091	\$99,927	\$59,891
29	095	0100.02	Moderate	\$72,623	\$86,300	9.76	70.89	\$51,483	\$61,178	\$42,719
29	095	0101.03	Moderate	\$72,623	\$86,300	8.68	76.88	\$55,833	\$66,347	\$42,284
29	095	0101.05	Middle	\$72,623	\$86,300	7.13	115.20	\$83,667	\$99,418	\$56,164
29	095	0102.01	Low	\$72,623	\$86,300	40.05	30.83	\$22,394	\$26,606	\$21,604
29	095	0102.03	Middle	\$72,623	\$86,300	8.81	89.71	\$65,152	\$77,420	\$60,409
29	095	0102.04	Moderate	\$72,623	\$86,300	25.53	61.82	\$44,896	\$53,351	\$43,926
29	095	0105.00	Moderate	\$72,623	\$86,300	29.30	61.45	\$44,634	\$53,031	\$34,111
29	095	0106.00	Moderate	\$72,623	\$86,300	16.07	74.46	\$54,079	\$64,259	\$48,527
29	095	0107.02	Moderate	\$72,623	\$86,300	34.28	56.60	\$41,111	\$48,846	\$31,621
29	095	0110.00	Low	\$72,623	\$86,300	37.50	44.40	\$32,250	\$38,317	\$27,966
29	095	0111.00	Moderate	\$72,623	\$86,300	15.97	58.31	\$42,353	\$50,322	\$35,906
29	095	0112.00	Moderate	\$72,623	\$86,300	24.74	79.89	\$58,021	\$68,945	\$40,792
29	095	0113.00	Moderate	\$72,623	\$86,300	25.67	59.92	\$43,520	\$51,711	\$41,489
29	095	0114.01	Middle	\$72,623	\$86,300	20.64	81.63	\$59,286	\$70,447	\$39,127
29	095	0114.05	Low	\$72,623	\$86,300	54.12	19.26	\$13,991	\$16,621	\$15,647
29	095	0114.06	Moderate	\$72,623	\$86,300	15.33	74.95	\$54,435	\$64,682	\$51,893
29	095	0115.00	Moderate	\$72,623	\$86,300	26.32	52.37	\$38,036	\$45,195	\$34,929
29	095	0116.00	Moderate	\$72,623	\$86,300	28.20	58.05	\$42,163	\$50,097	\$23,781
29	095	0117.00	Moderate	\$72,623	\$86,300	22.08	65.85	\$47,826	\$56,829	\$31,188
29	095	0118.00	Low	\$72,623	\$86,300	31.61	43.96	\$31,930	\$37,937	\$29,324
29	095	0119.00	Moderate	\$72,623	\$86,300	18.78	63.83	\$46,357	\$55,085	\$37,068

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29	095	0120.00	Middle	\$72,623	\$86,300	21.94	84.07	\$61,055	\$72,552	\$47,014
29	095	0121.00	Moderate	\$72,623	\$86,300	18.20	72.29	\$52,500	\$62,386	\$47,702
29	095	0122.00	Middle	\$72,623	\$86,300	8.24	85.67	\$62,220	\$73,933	\$50,833
29	095	0123.00	Moderate	\$72,623	\$86,300	7.36	69.99	\$50,833	\$60,401	\$40,677
29	095	0124.00	Middle	\$72,623	\$86,300	10.68	80.71	\$58,616	\$69,653	\$45,598
29	095	0125.01	Moderate	\$72,623	\$86,300	25.95	75.04	\$54,500	\$64,760	\$41,609
29	095	0125.02	Middle	\$72,623	\$86,300	6.03	87.14	\$63,289	\$75,202	\$47,122
29	095	0126.00	Moderate	\$72,623	\$86,300	10.41	58.45	\$42,452	\$50,442	\$37,783
29	095	0127.01	Middle	\$72,623	\$86,300	8.56	96.66	\$70,203	\$83,418	\$55,424
29	095	0128.02	Middle	\$72,623	\$86,300	3.84	94.32	\$68,505	\$81,398	\$58,968
29	095	0128.03	Middle	\$72,623	\$86,300	9.19	92.94	\$67,500	\$80,207	\$54,030
29	095	0128.04	Moderate	\$72,623	\$86,300	25.10	70.22	\$51,003	\$60,600	\$49,985
29	095	0129.03	Moderate	\$72,623	\$86,300	25.63	60.15	\$43,684	\$51,909	\$36,381
29	095	0129.04	Middle	\$72,623	\$86,300	10.37	97.48	\$70,793	\$84,125	\$61,520
29	095	0129.06	Moderate	\$72,623	\$86,300	14.50	70.16	\$50,953	\$60,548	\$46,571
29	095	0130.03	Moderate	\$72,623	\$86,300	20.25	62.22	\$45,189	\$53,696	\$43,173
29	095	0131.00	Moderate	\$72,623	\$86,300	22.36	54.84	\$39,831	\$47,327	\$39,270
29	095	0132.03	Low	\$72,623	\$86,300	44.09	43.38	\$31,509	\$37,437	\$31,724
29	095	0132.08	Low	\$72,623	\$86,300	36.48	37.00	\$26,875	\$31,931	\$27,143
29	095	0132.10	Moderate	\$72,623	\$86,300	13.88	74.14	\$53,846	\$63,983	\$42,059
29	095	0133.01	Moderate	\$72,623	\$86,300	18.22	67.25	\$48,839	\$58,037	\$41,003
29	095	0133.07	Moderate	\$72,623	\$86,300	7.55	76.11	\$55,278	\$65,683	\$41,825
29	095	0133.09	Moderate	\$72,623	\$86,300	16.33	61.49	\$44,659	\$53,066	\$36,560
29	095	0133.13	Middle	\$72,623	\$86,300	17.10	85.78	\$62,300	\$74,028	\$53,016
29	095	0134.01	Low	\$72,623	\$86,300	32.52	47.21	\$34,286	\$40,742	\$36,550
29	095	0134.05	Low	\$72,623	\$86,300	34.34	48.02	\$34,875	\$41,441	\$38,472
29	095	0134.07	Upper	\$72,623	\$86,300	3.49	142.66	\$103,611	\$123,116	\$84,840
29	095	0134.08	Middle	\$72,623	\$86,300	4.72	105.56	\$76,667	\$91,098	\$55,938
29	095	0134.10	Moderate	\$72,623	\$86,300	27.11	57.70	\$41,910	\$49,795	\$35,775
29	095	0134.16	Middle	\$72,623	\$86,300	7.48	66.14	\$62,560	\$74,339	\$66,393
29	095	0135.02	Middle	\$72,623	\$86,300	7.27	107.67	\$78,344	\$93,092	\$75,306
29	095	0135.04	Upper	\$72,623	\$86,300	6.92	139.00	\$100,952	\$119,957	\$80,110
29	095	0136.06	Upper	\$72,623	\$86,300	1.75	176.46	\$128,155	\$152,285	\$113,971
29	095	0136.08	Middle	\$72,623	\$86,300	9.94	113.38	\$82,340	\$97,847	\$51,222
29	095	0136.12	Upper	\$72,623	\$86,300	1.53	162.54	\$118,044	\$140,272	\$107,393
29	095	0137.03	Moderate	\$72,623	\$86,300	28.66	61.68	\$44,796	\$53,230	\$36,786
29	095	0137.04	Upper	\$72,623	\$86,300	7.09	124.70	\$90,568	\$107,616	\$73,264
29	095	0138.01	Middle	\$72,623	\$86,300	11.27	101.64	\$73,819	\$87,715	\$68,147
29	095	0138.02	Upper	\$72,623	\$86,300	3.14	121.64	\$88,343	\$104,975	\$81,043
29	095	0139.01	Upper	\$72,623	\$86,300	3.33	131.12	\$95,227	\$113,157	\$90,024
29	095	0139.02	Middle	\$72,623	\$86,300	10.90	96.19	\$69,861	\$83,012	\$62,315
29	095	0139.04	Upper	\$72,623	\$86,300	3.68	131.53	\$95,525	\$113,510	\$87,969
29	095	0139.16	Upper	\$72,623	\$86,300	3.22	141.61	\$102,845	\$122,209	\$97,364
29	095	0140.02	Middle	\$72,623	\$86,300	8.12	116.87	\$84,875	\$100,859	\$71,667
29	095	0140.04	Moderate	\$72,623	\$86,300	10.83	62.17	\$45,150	\$53,653	\$38,388

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29	095	0140.05	Middle	\$72,623	\$86,300	4.25	98.70	\$71,684	\$85,178	\$59,828
29	095	0140.06	Middle	\$72,623	\$86,300	6.96	100.74	\$73,167	\$86,939	\$64,010
29	095	0140.07	Moderate	\$72,623	\$86,300	19.69	73.61	\$53,463	\$63,525	\$51,441
29	095	0141.01	Moderate	\$72,623	\$86,300	13.01	60.33	\$43,819	\$52,065	\$38,930
29	095	0141.05	Middle	\$72,623	\$86,300	6.81	86.74	\$63,000	\$74,857	\$61,465
29	095	0141.08	Moderate	\$72,623	\$86,300	22.64	63.38	\$46,034	\$54,697	\$44,131
29	095	0141.11	Upper	\$72,623	\$86,300	8.72	127.56	\$92,639	\$110,084	\$89,722
29	095	0141.12	Middle	\$72,623	\$86,300	4.56	117.84	\$85,583	\$101,696	\$74,531
29	095	0141.14	Middle	\$72,623	\$86,300	12.10	105.99	\$76,974	\$91,469	\$69,969
29	095	0141.20	Upper	\$72,623	\$86,300	11.69	124.11	\$90,139	\$107,107	\$84,417
29	095	0142.03	Upper	\$72,623	\$86,300	0.73	167.71	\$121,801	\$144,734	\$99,968
29	095	0142.04	Middle	\$72,623	\$86,300	7.88	105.25	\$76,441	\$90,831	\$70,917
29	095	0143.00	Middle	\$72,623	\$86,300	14.04	87.43	\$63,500	\$75,452	\$47,008
29	095	0144.00	Middle	\$72,623	\$86,300	8.94	92.89	\$67,321	\$79,991	\$58,992
29	095	0145.01	Middle	\$72,623	\$86,300	4.77	85.27	\$61,928	\$73,588	\$54,531
29	095	0145.02	Middle	\$72,623	\$86,300	4.17	102.62	\$74,531	\$88,561	\$54,718
29	095	0146.01	Middle	\$72,623	\$86,300	7.62	80.62	\$58,553	\$69,575	\$52,481
29	095	0146.03	Middle	\$72,623	\$86,300	13.67	93.48	\$67,888	\$80,673	\$63,443
29	095	0146.04	Moderate	\$72,623	\$86,300	11.17	73.61	\$53,462	\$63,525	\$36,250
29	095	0147.01	Middle	\$72,623	\$86,300	9.93	89.56	\$65,042	\$77,290	\$53,137
29	095	0147.02	Middle	\$72,623	\$86,300	3.24	104.99	\$76,250	\$90,606	\$70,911
29	095	0148.04	Upper	\$72,623	\$86,300	6.66	147.94	\$107,440	\$127,672	\$102,292
29	095	0148.06	Upper	\$72,623	\$86,300	3.58	126.87	\$92,143	\$109,489	\$77,963
29	095	0149.02	Moderate	\$72,623	\$86,300	22.99	79.07	\$57,429	\$68,237	\$47,545
29	095	0149.03	Upper	\$72,623	\$86,300	3.55	132.21	\$96,017	\$114,097	\$89,597
29	095	0149.04	Upper	\$72,623	\$86,300	8.20	130.60	\$94,846	\$112,708	\$80,341
29	095	0149.05	Upper	\$72,623	\$86,300	1.70	137.94	\$100,179	\$119,042	\$97,121
29	095	0150.00	Middle	\$72,623	\$86,300	12.22	102.20	\$74,223	\$88,199	\$60,038
29	095	0151.00	Middle	\$72,623	\$86,300	10.75	97.45	\$70,776	\$84,099	\$63,571
29	095	0152.00	Middle	\$72,623	\$86,300	16.21	106.71	\$77,500	\$92,091	\$44,031
29	095	0153.00	Low	\$72,623	\$86,300	34.40	39.87	\$28,955	\$34,408	\$27,634
29	095	0154.00	Low	\$72,623	\$86,300	72.96	15.78	\$11,466	\$13,618	\$11,301
29	095	0155.00	Low	\$72,623	\$86,300	44.72	30.07	\$21,844	\$25,950	\$20,553
29	095	0156.00	Low	\$72,623	\$86,300	40.17	38.36	\$27,865	\$33,105	\$23,067
29	095	0157.00	Middle	\$72,623	\$86,300	9.89	106.46	\$77,321	\$91,875	\$56,063
29	095	0158.00	Upper	\$72,623	\$86,300	12.40	149.74	\$108,750	\$129,226	\$74,145
29	095	0159.00	Middle	\$72,623	\$86,300	34.89	106.22	\$77,143	\$91,668	\$45,346
29	095	0160.00	Moderate	\$72,623	\$86,300	30.85	53.60	\$38,929	\$46,257	\$25,417
29	095	0161.00	Moderate	\$72,623	\$86,300	25.91	66.41	\$48,235	\$57,312	\$27,063
29	095	0162.00	Unknown	\$72,623	\$86,300	32.25	0.00	\$0	\$0	\$25,682
29	095	0163.00	Low	\$72,623	\$86,300	41.10	39.21	\$28,477	\$33,838	\$29,219
29	095	0164.00	Low	\$72,623	\$86,300	44.64	41.77	\$30,339	\$36,048	\$25,000
29	095	0165.00	Low	\$72,623	\$86,300	29.43	43.98	\$31,944	\$37,955	\$23,431
29	095	0166.00	Low	\$72,623	\$86,300	37.84	49.70	\$36,098	\$42,891	\$16,306
29	095	0167.00	Middle	\$72,623	\$86,300	11.87	82.26	\$59,744	\$70,990	\$33,770

State Code	County Code	Tract Code	Tract Income Level	2015 MSA/MD Statewide non-MSA/MD Median Family Income	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2015 Tract Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Household Income
29	095	0168.00	Moderate	\$72,623	\$86,300	26.31	67.38	\$46,939	\$58,149	\$41,279
29	095	0169.00	Low	\$72,623	\$86,300	32.53	44.98	\$32,672	\$38,818	\$26,818
29	095	0170.00	Low	\$72,623	\$86,300	23.22	40.80	\$29,636	\$35,210	\$30,903
29	095	0171.00	Moderate	\$72,623	\$86,300	20.84	51.32	\$37,273	\$44,289	\$29,816
29	095	0172.00	Moderate	\$72,623	\$86,300	11.92	70.35	\$51,091	\$60,712	\$42,777
29	095	0173.00	Middle	\$72,623	\$86,300	4.17	111.71	\$81,128	\$96,406	\$63,702
29	095	0174.00	Low	\$72,623	\$86,300	23.15	49.85	\$36,208	\$43,021	\$30,011
29	095	0175.00	Moderate	\$72,623	\$86,300	22.32	76.13	\$55,294	\$65,700	\$44,375
29	095	0176.00	Middle	\$72,623	\$86,300	7.86	106.64	\$77,448	\$92,030	\$65,660
29	095	0177.00	Middle	\$72,623	\$86,300	6.02	97.53	\$70,833	\$84,168	\$69,233
29	095	0178.00	Unknown	\$72,623	\$86,300	44.99	0.00	\$0	\$0	\$19,063
29	095	0179.00	Middle	\$72,623	\$86,300	5.00	111.42	\$80,923	\$96,155	\$64,853
29	095	0180.00	Moderate	\$72,623	\$86,300	16.96	72.07	\$52,344	\$62,196	\$47,442
29	095	0181.00	Upper	\$72,623	\$86,300	3.35	156.87	\$113,924	\$135,379	\$104,266
29	095	0182.00	Upper	\$72,623	\$86,300	3.10	168.88	\$122,650	\$145,743	\$120,887
29	095	0185.00	Upper	\$72,623	\$86,300	4.53	147.39	\$107,045	\$127,198	\$94,635
29	095	0186.00	Upper	\$72,623	\$86,300	1.01	130.00	\$94,417	\$112,190	\$86,056
29	095	0193.00	Middle	\$72,623	\$86,300	8.75	96.38	\$70,000	\$83,176	\$59,513
29	095	9801.01	Unknown	\$72,623	\$86,300	0.00	0.00	\$0	\$0	\$0
29	095	9806.02	Unknown	\$72,623	\$86,300	0.00	0.00	\$0	\$0	\$0
29	095	9883.00	Unknown	\$72,623	\$86,300	0.00	0.00	\$0	\$0	\$0
29	095	9891.00	Unknown	\$72,623	\$86,300	0.00	0.00	\$0	\$0	\$0
29	095	9892.00	Unknown	\$72,623	\$86,300	0.00	0.00	\$0	\$0	\$0

Johnson County, Kansas

State Code	County Code	Tract Code	Tract Income Level	2015 MSA/MD Statewide non-MSA/MD Median Family Income	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2015 Tract Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Household Income
20	091	0500.00	Upper	\$72,623	\$86,300	2.53	158.92	\$115,417	\$137,148	\$91,653
20	091	0501.00	Middle	\$72,623	\$86,300	9.90	97.71	\$70,962	\$84,324	\$56,602
20	091	0502.00	Middle	\$72,623	\$86,300	3.38	108.65	\$78,906	\$93,765	\$65,637
20	091	0503.01	Middle	\$72,623	\$86,300	10.60	95.97	\$69,697	\$82,822	\$46,792
20	091	0503.02	Middle	\$72,623	\$86,300	9.58	110.78	\$80,455	\$95,603	\$49,052
20	091	0504.00	Middle	\$72,623	\$86,300	17.83	80.78	\$58,669	\$69,713	\$47,713
20	091	0505.00	Middle	\$72,623	\$86,300	3.36	97.24	\$70,625	\$83,918	\$57,354
20	091	0506.00	Middle	\$72,623	\$86,300	4.15	108.88	\$79,074	\$93,963	\$70,157
20	091	0507.00	Upper	\$72,623	\$86,300	3.82	159.21	\$115,625	\$137,398	\$80,582
20	091	0508.00	Upper	\$72,623	\$86,300	1.78	314.63	\$228,500	\$271,526	\$208,500
20	091	0509.00	Upper	\$72,623	\$86,300	3.61	171.35	\$124,444	\$147,875	\$96,902
20	091	0510.00	Upper	\$72,623	\$86,300	4.51	155.20	\$112,716	\$133,938	\$87,173
20	091	0511.00	Middle	\$72,623	\$86,300	9.38	87.44	\$63,505	\$75,461	\$55,927
20	091	0512.00	Middle	\$72,623	\$86,300	11.63	91.68	\$66,585	\$79,120	\$45,781
20	091	0513.00	Middle	\$72,623	\$86,300	9.91	87.03	\$63,205	\$75,107	\$52,232
20	091	0514.00	Upper	\$72,623	\$86,300	0.84	129.15	\$93,798	\$111,456	\$80,508
20	091	0515.00	Upper	\$72,623	\$86,300	6.04	121.66	\$88,355	\$104,993	\$67,900
20	091	0516.00	Upper	\$72,623	\$86,300	4.42	201.47	\$146,319	\$173,869	\$117,463
20	091	0517.00	Upper	\$72,623	\$86,300	1.64	176.63	\$126,281	\$152,432	\$103,934
20	091	0518.01	Upper	\$72,623	\$86,300	2.78	226.16	\$164,250	\$195,176	\$122,212
20	091	0518.02	Middle	\$72,623	\$86,300	5.23	95.74	\$69,531	\$82,624	\$54,100
20	091	0518.03	Middle	\$72,623	\$86,300	6.02	100.22	\$72,786	\$86,490	\$56,250
20	091	0518.04	Middle	\$72,623	\$86,300	16.89	101.69	\$73,651	\$87,758	\$53,625
20	091	0518.05	Upper	\$72,623	\$86,300	2.35	147.96	\$107,456	\$127,689	\$77,750
20	091	0518.06	Upper	\$72,623	\$86,300	3.26	152.75	\$110,938	\$131,623	\$87,564
20	091	0519.02	Middle	\$72,623	\$86,300	3.30	93.08	\$67,600	\$80,328	\$58,661
20	091	0519.03	Moderate	\$72,623	\$86,300	6.36	71.51	\$51,938	\$61,713	\$53,899
20	091	0519.04	Upper	\$72,623	\$86,300	6.96	142.46	\$103,459	\$122,943	\$67,261
20	091	0519.06	Moderate	\$72,623	\$86,300	13.04	63.37	\$46,026	\$54,688	\$48,669
20	091	0519.07	Moderate	\$72,623	\$86,300	18.19	73.62	\$53,466	\$63,534	\$51,274
20	091	0519.08	Upper	\$72,623	\$86,300	8.59	134.54	\$97,708	\$116,108	\$75,106
20	091	0519.09	Middle	\$72,623	\$86,300	3.59	111.20	\$80,763	\$95,966	\$68,402
20	091	0520.01	Middle	\$72,623	\$86,300	12.20	102.17	\$74,200	\$88,173	\$53,628
20	091	0520.03	Middle	\$72,623	\$86,300	15.56	83.00	\$60,283	\$71,629	\$50,140
20	091	0520.04	Middle	\$72,623	\$86,300	3.60	95.04	\$69,022	\$82,020	\$57,930
20	091	0521.01	Middle	\$72,623	\$86,300	10.97	100.88	\$73,264	\$87,059	\$54,375
20	091	0521.02	Moderate	\$72,623	\$86,300	13.07	67.64	\$49,125	\$58,373	\$46,285
20	091	0522.01	Middle	\$72,623	\$86,300	11.92	92.76	\$67,371	\$80,052	\$55,463
20	091	0522.02	Middle	\$72,623	\$86,300	2.19	115.32	\$83,750	\$99,521	\$75,265
20	091	0523.03	Middle	\$72,623	\$86,300	12.37	118.41	\$86,000	\$102,188	\$63,681
20	091	0523.04	Middle	\$72,623	\$86,300	5.76	102.58	\$74,500	\$88,527	\$68,167

State Code	County Code	Tract Code	Tract Income Level	2015 MSA/MD Statewide non-MSA/MD Median Family Income	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2015 Tract Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Household Income
20	091	0523.05	Upper	\$72,623	\$86,300	4.98	121.86	\$88,500	\$105,165	\$81,233
20	091	0523.06	Upper	\$72,623	\$86,300	3.93	185.97	\$135,057	\$160,492	\$125,104
20	091	0524.05	Middle	\$72,623	\$86,300	10.87	103.04	\$74,831	\$88,924	\$66,893
20	091	0524.10	Upper	\$72,623	\$86,300	5.48	154.14	\$111,944	\$133,023	\$83,370
20	091	0524.11	Upper	\$72,623	\$86,300	1.87	159.67	\$115,962	\$137,795	\$106,734
20	091	0524.14	Upper	\$72,623	\$86,300	1.27	155.17	\$112,692	\$133,912	\$110,123
20	091	0524.15	Upper	\$72,623	\$86,300	2.42	136.19	\$98,906	\$117,532	\$78,545
20	091	0524.16	Middle	\$72,623	\$86,300	9.32	108.71	\$78,953	\$93,817	\$64,828
20	091	0524.17	Moderate	\$72,623	\$86,300	8.29	86.14	\$48,036	\$57,079	\$44,278
20	091	0524.18	Low	\$72,623	\$86,300	31.51	39.36	\$28,590	\$33,968	\$30,729
20	091	0524.19	Upper	\$72,623	\$86,300	12.98	129.63	\$94,143	\$111,871	\$81,852
20	091	0524.21	Middle	\$72,623	\$86,300	3.78	119.39	\$86,711	\$103,034	\$69,900
20	091	0525.02	Upper	\$72,623	\$86,300	1.08	179.69	\$130,500	\$155,072	\$116,607
20	091	0525.04	Middle	\$72,623	\$86,300	5.85	119.85	\$87,045	\$103,431	\$78,041
20	091	0526.01	Upper	\$72,623	\$86,300	2.47	173.80	\$126,220	\$149,989	\$123,981
20	091	0526.03	Upper	\$72,623	\$86,300	1.69	168.73	\$122,538	\$145,614	\$114,643
20	091	0526.04	Upper	\$72,623	\$86,300	3.73	151.20	\$109,808	\$130,486	\$101,389
20	091	0526.06	Upper	\$72,623	\$86,300	6.01	126.32	\$91,742	\$109,014	\$80,417
20	091	0526.07	Upper	\$72,623	\$86,300	2.31	163.73	\$118,906	\$141,299	\$111,000
20	091	0527.00	Middle	\$72,623	\$86,300	16.03	103.37	\$75,076	\$89,208	\$59,271
20	091	0528.01	Upper	\$72,623	\$86,300	1.01	158.61	\$115,192	\$136,880	\$112,205
20	091	0528.02	Upper	\$72,623	\$86,300	0.75	156.92	\$113,962	\$135,422	\$107,250
20	091	0528.03	Middle	\$72,623	\$86,300	7.75	80.27	\$58,295	\$69,273	\$48,792
20	091	0529.04	Upper	\$72,623	\$86,300	3.71	121.18	\$88,011	\$104,578	\$75,347
20	091	0529.05	Moderate	\$72,623	\$86,300	16.17	61.71	\$44,817	\$53,256	\$40,896
20	091	0529.06	Middle	\$72,623	\$86,300	14.78	101.76	\$73,906	\$87,819	\$64,063
20	091	0529.07	Middle	\$72,623	\$86,300	11.61	93.92	\$68,214	\$81,053	\$52,209
20	091	0529.08	Moderate	\$72,623	\$86,300	10.14	73.58	\$53,438	\$63,500	\$42,385
20	091	0529.10	Upper	\$72,623	\$86,300	4.51	165.23	\$120,000	\$142,593	\$101,923
20	091	0530.02	Upper	\$72,623	\$86,300	5.96	126.87	\$92,143	\$109,489	\$84,158
20	091	0530.04	Middle	\$72,623	\$86,300	5.46	112.95	\$82,031	\$97,476	\$68,853
20	091	0530.05	Middle	\$72,623	\$86,300	5.01	105.02	\$78,270	\$90,632	\$74,236
20	091	0530.06	Middle	\$72,623	\$86,300	6.78	117.45	\$85,300	\$101,359	\$59,671
20	091	0530.07	Upper	\$72,623	\$86,300	4.22	133.62	\$97,042	\$115,314	\$85,321
20	091	0530.08	Upper	\$72,623	\$86,300	5.84	125.64	\$91,250	\$108,427	\$57,117
20	091	0530.09	Upper	\$72,623	\$86,300	4.20	175.51	\$127,461	\$151,465	\$103,875
20	091	0530.10	Upper	\$72,623	\$86,300	1.38	204.21	\$148,309	\$176,233	\$145,977
20	091	0530.11	Upper	\$72,623	\$86,300	2.73	180.99	\$131,442	\$156,194	\$130,288
20	091	0531.01	Upper	\$72,623	\$86,300	3.84	127.26	\$92,426	\$109,825	\$68,708
20	091	0531.02	Upper	\$72,623	\$86,300	5.96	141.09	\$102,464	\$121,781	\$81,298
20	091	0531.05	Moderate	\$72,623	\$86,300	12.12	71.82	\$52,159	\$61,981	\$50,216
20	091	0531.08	Upper	\$72,623	\$86,300	6.33	147.06	\$106,806	\$126,913	\$81,569
20	091	0531.09	Upper	\$72,623	\$86,300	1.74	126.60	\$91,944	\$109,256	\$75,321
20	091	0531.10	Upper	\$72,623	\$86,300	0.92	172.84	\$125,525	\$149,161	\$114,102
20	091	0532.01	Upper	\$72,623	\$86,300	1.94	143.26	\$104,044	\$123,633	\$93,542

State Code	County Code	Tract Code	Tract Income Level	2015 MSA/MD Statewide non-MSA/MD Median Family Income	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2015 Tract Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Household Income
20	091	0532.02	Upper	\$72,623	\$86,300	6.11	149.99	\$108,929	\$129,441	\$84,435
20	091	0532.03	Upper	\$72,623	\$86,300	2.75	182.25	\$132,361	\$157,282	\$87,715
20	091	0533.01	Upper	\$72,623	\$86,300	1.12	223.40	\$162,241	\$192,794	\$136,683
20	091	0533.02	Upper	\$72,623	\$86,300	2.32	229.65	\$166,779	\$198,188	\$152,076
20	091	0534.03	Upper	\$72,623	\$86,300	3.71	159.04	\$115,506	\$137,252	\$87,009
20	091	0534.06	Upper	\$72,623	\$86,300	1.88	178.50	\$129,636	\$154,046	\$124,301
20	091	0534.09	Upper	\$72,623	\$86,300	5.60	186.98	\$135,795	\$161,364	\$88,625
20	091	0534.10	Upper	\$72,623	\$86,300	2.23	234.73	\$170,471	\$202,572	\$165,184
20	091	0534.11	Upper	\$72,623	\$86,300	4.10	141.19	\$102,543	\$121,847	\$92,155
20	091	0534.13	Upper	\$72,623	\$86,300	1.84	199.40	\$144,816	\$172,082	\$134,350
20	091	0534.14	Upper	\$72,623	\$86,300	6.68	161.12	\$117,014	\$139,047	\$81,283
20	091	0534.15	Upper	\$72,623	\$86,300	10.43	124.11	\$90,136	\$107,107	\$89,435
20	091	0534.17	Upper	\$72,623	\$86,300	1.61	172.22	\$125,078	\$148,626	\$117,009
20	091	0534.18	Upper	\$72,623	\$86,300	2.49	143.05	\$103,889	\$123,452	\$95,500
20	091	0534.19	Upper	\$72,623	\$86,300	3.60	256.65	\$186,389	\$221,489	\$152,589
20	091	0534.21	Upper	\$72,623	\$86,300	1.73	172.32	\$125,144	\$148,712	\$110,488
20	091	0534.22	Upper	\$72,623	\$86,300	0.78	241.69	\$175,524	\$208,578	\$136,389
20	091	0534.23	Upper	\$72,623	\$86,300	2.22	235.72	\$171,190	\$203,426	\$169,219
20	091	0534.24	Upper	\$72,623	\$86,300	2.09	239.88	\$174,211	\$207,016	\$175,439
20	091	0535.02	Moderate	\$72,623	\$86,300	11.79	55.31	\$40,172	\$47,733	\$36,588
20	091	0535.05	Upper	\$72,623	\$86,300	1.98	148.30	\$107,703	\$127,983	\$105,309
20	091	0535.06	Upper	\$72,623	\$86,300	2.67	144.09	\$104,648	\$124,350	\$94,375
20	091	0535.07	Upper	\$72,623	\$86,300	1.41	134.07	\$97,367	\$115,702	\$95,526
20	091	0535.08	Middle	\$72,623	\$86,300	8.18	106.05	\$77,019	\$91,521	\$77,700
20	091	0535.09	Upper	\$72,623	\$86,300	7.78	128.99	\$93,681	\$111,318	\$79,973
20	091	0535.10	Upper	\$72,623	\$86,300	1.25	138.57	\$100,635	\$119,586	\$90,714
20	091	0535.55	Low	\$72,623	\$86,300	21.31	44.30	\$32,172	\$38,231	\$28,702
20	091	0535.56	Moderate	\$72,623	\$86,300	20.83	61.36	\$44,564	\$52,954	\$45,321
20	091	0535.57	Moderate	\$72,623	\$86,300	31.03	56.49	\$41,028	\$48,751	\$32,649
20	091	0536.01	Moderate	\$72,623	\$86,300	24.38	63.57	\$46,172	\$54,861	\$44,643
20	091	0536.02	Middle	\$72,623	\$86,300	11.53	96.85	\$70,341	\$83,582	\$63,596
20	091	0537.01	Middle	\$72,623	\$86,300	7.75	100.69	\$73,125	\$86,895	\$58,583
20	091	0537.03	Middle	\$72,623	\$86,300	3.44	83.53	\$60,663	\$72,086	\$49,952
20	091	0537.05	Middle	\$72,623	\$86,300	8.04	90.32	\$65,596	\$77,946	\$64,833
20	091	0537.07	Middle	\$72,623	\$86,300	3.78	96.17	\$69,844	\$82,995	\$67,734
20	091	0537.09	Middle	\$72,623	\$86,300	3.41	109.41	\$79,464	\$94,421	\$75,145
20	091	0537.11	Upper	\$72,623	\$86,300	3.54	149.90	\$108,869	\$129,364	\$85,938
20	091	0537.12	Upper	\$72,623	\$86,300	0.54	136.49	\$99,130	\$117,791	\$85,341
20	091	0538.01	Middle	\$72,623	\$86,300	5.43	95.60	\$69,432	\$82,503	\$64,811
20	091	0538.03	Upper	\$72,623	\$86,300	4.76	154.01	\$111,853	\$132,911	\$102,365
20	091	0538.04	Upper	\$72,623	\$86,300	1.62	137.22	\$99,659	\$118,421	\$94,500
20	091	9800.01	Unknown	\$72,623	\$86,300	0.00	0.00	\$0	\$0	\$0
20	091	9800.02	Unknown	\$72,623	\$86,300	0.00	0.00	\$0	\$0	\$0
20	091	9800.03	Unknown	\$72,623	\$86,300	0.00	0.00	\$0	\$0	\$0

Appendix C: nbkc bank Community Reinvestment Act (CRA) Strategic Plan Public Notice

The CRA regulations require a bank that has developed a Strategic Plan to publish Notice of the plan and solicit formal written public comment for at least a 30-day period. In accordance with this requirement, nbkc bank (the "Bank") hereby provides notice to the public of its plan to submit a two (2) year CRA Strategic Plan to the Federal Deposit Insurance Corporation (FDIC).

Written comments from the public concerning the Strategic Plan are encouraged. To obtain a copy of the Bank's Strategic Plan at no charge to the requesting party, individuals may request a copy at any nbkc branch, by phone by contacting Stephen Carter, CRA Officer at 816-965-1400, or mail Attn: Stephen Carter, 8320 Ward Parkway, Kansas City, MO 64114.

All written comments regarding the plan should be directed to Stephen Carter, CRA Officer, at the address listed above.

Comments and suggestions will be accepted until December 4th, 2022, following which time the plan will be submitted for approval to the Federal Deposit Insurance Corporation. The Bank will review all comments and incorporate suggestions to the plan at its discretion. The Bank received a Satisfactory rating on its last CRA performance evaluation under the CRA Strategic Plan, conducted in April 2022. Copies of most recent CRA examination are available upon request.

Appendix D: Summary Balance Sheet

as of June 30th, 2022; Dollar Figures in thousands (000's)

> 3. Total Assets	\$1,093,114
> 4. Total Liabilities and Capital	\$1,093,114
> 5. Past Due and Nonaccrual Assets	
> 6. Assets covered by loss-sharing agreements with the FDIC	
> 7. Off-Balance Sheet Items	
> 8. Fiduciary and Related Services ⁶	
> 9. Bank Assets Sold and Securitized	
10. Regulatory reporting form number (FFIEC Call report number or before 2012 100 indicates FHLB TFR reporter)	51
> 2. Total Interest Income	\$12,411
> 3. Total Interest Expense	\$1,012
4. Net Interest Income	\$11,399
5. Provision For Credit Losses	\$0
> 6. Total Noninterest Income	\$79,319
> 7. Total Noninterest Expense	\$56,849
8. Pre-tax Net Operating Income	\$33,869
9. Securities Gains (Losses)	-\$261
10. Applicable Income Taxes	\$331
11. Income Before Extraordinary Items	\$33,277
12. Discontinued Operations (Extraordinary Gains - Net)	\$0
13. Net Income Attributable to Bank and Noncontrolling Interests	\$33,277
14. Net Income Attributable to Noncontrolling Interests	\$0
15. Net Income Attributable to Bank	\$33,277
> 16. Net Charge-Offs	-\$192
> 17. Cash Dividends	\$0
18. Net Additions to Capital Stock	\$0
19. Net Operating Income	\$33,535
20. % of Unprofitable Institutions	N/A
21. % of Institutions with Earnings Gains	N/A



8320 Ward Parkway
Kansas City, MO 64114
816.965.1400
nbkc.com

Summary of Amendments to the 2023 – 2024 nbkc bank CRA Strategic Plan

Introduction

nbkc bank is requesting an amendment to the 2024 Plan year of the 2023 – 2024 CRA Strategic Plan. This proposed amendment will result in changes to the dollar volume goals for Goals 1 and 3. The following information details the requested amendment to the “Satisfactory” and “Outstanding” thresholds for the goals.

Development of the nbkc bank Strategic Plan

nbkc bank reached out to community organizations to seek suggestions from members of the public in the assessment area when developing the proposed Strategic Plan amendment.

The bank published notice of the availability of the amended Strategic Plan on November 29, 2023, in the Kansas City Star, the newspaper with the largest readership within the bank’s assessment area. The public comment period started on November 29, 2023, and ends on December 29, 2023. All comments will be reviewed and considered by bank management and the bank will amend the Strategic Plan, if appropriate, to address concerns identified, where permissible under CRA rules and regulations. All comment letters will be provided to the FDIC as a part of the amended Strategic Plan submission. The comments will also be included in the bank’s CRA public file.

CRA Strategic Plan Development Performance Context

nbkc bank is requesting the amendment to the Plan as a result of continued, industry-wide declines in commercial and home mortgage loan demand. Updated loan demand projections for 2024 resulted in the revised 2024 Plan year Goal 1 and Goal 3 figures, as described below. The updated calculations use the bank’s projected origination volumes for 2024 and previous years’ aggregate data to set the performance goals for Plan year 2024.

nbkc bank’s Assessment Area

nbkc bank’s designated CRA assessment area (AA) continues to include all of Clay and Jackson Counties, Missouri and all of Johnson County, Kansas. No changes have been made to the AA since the last CRA Performance Evaluation or the approval of the 2023 – 2024 Strategic Plan.

Proposed Amendment to the 2024 Plan Year

The proposed amendment will affect Goals 1 and 3 for the 2024 Plan year. Goal 1 covers lending to small



businesses meeting the following criteria: gross annual revenues of \$1 million or less, located in the bank's assessment area (AA), and a loan amount of \$1 million or less. Goal 3 covers home mortgage lending to borrowers located in low- and moderate-income census tracts in the bank's AA. As previously noted, these updated goals reflect 2024 projected origination volumes of commercial and home mortgage lending and use previous years' aggregate data to calculate the updated performance goals in the Plan.

For **Goal 1**, the "**Satisfactory**" and "**Outstanding**" goals for 2024 will be adjusted to **\$2.5 million** and **\$3.5 million**, respectively. This figure is calculated using the bank's historical performance of small business lending by dollar volume in the AA multiplied by peer banks' aggregate performance as a percent of dollar volume.

For **Goal 3**, the "**Satisfactory**" and "**Outstanding**" goals for 2024 will be adjusted to **\$9.5 million** and **\$12.5 million**, respectively. This figure is calculated using the bank's overall projected number of originations multiplied by the historical percentage of loans originated in the AA, resulting in the projected number of originations inside the AA. These projected AA originations are multiplied by the average dollar amount of a home mortgage loan in low- and moderate-income (LMI) census tracts in the AA, resulting in the projected dollar volume of home mortgage loans in the AA located in LMI census tracts. This dollar volume is then multiplied by peer banks' aggregate performance as a percent of dollar volume, resulting in an estimate of the bank's home mortgage lending performance in the AA's LMI tracts.

No amendments to Goals 2, 4, 5, 6, or 7 are proposed.

Conclusion

nbkc bank feels that adjusting Goals 1 and 3 to more reasonable levels will allow the bank to continue its focus on providing exceptional service while lending to small businesses and home mortgage borrowers in the Kansas City area. The revised goals remain measurable, reasonable, and supported through peer data, as reflected in business and HMDA aggregate data.

Written Comments



Thank you! Your time & effort is much appreciated

Thank you for showing us around & your time! - Molly
We learned so much!
Thank you! - Leila

Thank you for sharing your stories on how you went to banking!

Thank you for taking time to explain what you do and answer questions!

Thank you for letting us come to NBKC and explain more about banking! - Grace

Thank you so much for making the day fun + informative

thank you,
NBKC!

Thank you to everyone who made this possible, I was so invested! - Leah L

Thank you for all the time you took to plan the amazing day. The games were so fun, especially cash count!

Thank you for taking the time to share your job with us. I enjoyed learning about your experiences in fraud. - Veronica Wilson →

- Gianna

Thanks for
answering our
questions & coming to STA!

I learned so much!
Thank you! Leila

Y.M.M.Y!

Thank you! You are much
appreciated - Jassani V.

Thank you! I loved learning more
about banking, and the things
within it! - Joella

Thank you for coming to STA and
speaking w/ us + answering
our questions! - Grace

Thank you for sharing your
stories!! - Georgia

I loved listening to all your
stories. Thank you for sharing
your experiences! - Amanda

thank you,
Stephanie!

Thank you for sharing your
experiences and giving us
great advice. I enjoyed the
activities and challenges - Veronica
Wilson

Thank you so much for taking
the time to organize this experience!
I will most definitely use the "other
duties as needed" technique on my
resume! - Leah L. →



Improving Lives, One Community at a Time

February 12, 2022

NBKC Bank
10700 Nall Ave
Overland Park, KS 66211

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Kansas City Regional Office
1100 Walnut Street, Suite 2100
Kansas City, Missouri 64106

RE: Comment on NBKC Bank's Community Reinvestment Act (CRA) Performance/Discrimination Compliant

I am submitting this letter to NBKC Bank's Community Reinvestment Act (CRA) public file for consideration on NBKC Bank's CRA Performance Evaluation. I have a couple concerns with NBKC Bank lending in Dallas.

The undersigned community organization is submitting this letter to file a discrimination complaint against NBK Bank.

Fair Lending Concerns

I worked with the National Community Reinvestment Coalition (NCRC) to analyze the lending of NBKC Bank in Dallas.

- According to the Home Mortgage Disclosure Act (HMDA) data from 2019 to 2020, NBKC Bank made a total of 447 loans in the DFW MSA. This data demonstrated that in 2020, 22.14% (99) of all home loans in Dallas went to minorities however only 4.69% (21) of NBKC's home loans were extended to Blacks (African Americans).
 - Dallas County, Texas's estimated population is 2,641,680. Of that approximately 606,168 are African Americans.
 - City of Dallas's estimated population is 1,343,573. Of that approximately 322,457 are African Americans.
 - Less than 1.0% of the bank's total loans were made in Southern Dallas.

The Equal Credit Opportunity Act (ECOA) and its accompanying **Regulation B** generally prohibit discriminatory practices in lending. The provisions broadly apply to "any aspect of a credit transaction."

The **Fair Housing Act** (FHA) prohibits discrimination “in making available a [residential real estate related transaction]” based on a prohibited factor.

NBKC Bank violates Equal Credit Opportunity Act (ECOA) and the Fair Housing Act (FHA) by discriminating against African Americans and other minority consumers. The Equal Credit Opportunity Act (ECOA) prohibits lenders from discriminating based on race and other characteristics.

In terms of the discrimination, SDPCDC asserts that NBKC Bank engages in the following:

- Makes no effort to market to African Americans in the DFW MSA.
- Does not specifically target any marketing toward African Americans in the DFW MSA¹
- Receives few applications from African Americans & Hispanics in the DFW MSA
- Received almost no applications from applicants for properties located in African American and Hispanic Low to Moderate Income neighborhoods in the DFW MSA
- Made a smaller percentage of HMDA-reportable residential mortgage loans in majority-Black and Hispanic neighborhoods compared to its peers in the DFW MSA

Regulation B, the ECOA’s implementing regulation, provides that a creditor shall not make any oral or written statement, in advertising or otherwise, to applicants or prospective applicants that would discourage on a prohibited basis a reasonable person from making or pursuing an application. But the ECOA itself does not set forth such a prohibition.

In addition, NBK Bank engages in lending discrimination by “redlining” predominantly African American and Hispanic neighborhoods in Southern Dallas which is located within the City of Dallas, Texas. “Redlining” is a term describing an illegal practice in which lenders intentionally avoid providing services to individuals living in predominantly minority neighborhoods because of the race of the residents in those neighborhoods.

Dallas is a majority minority city (66.1 percent of population) with 41.8 percent of residents identifying as Hispanic and 24.3 percent identifying as Black.

Dallas is a city with a population of just under 1,344,000, including 24.3 percent African American residents, 41.8 percent Hispanic/Latinx residents, and 3.4 percent Asian residents; and 30.5 White (Non-Hispanic)

Southern Dallas Zip Codes (High Minority Areas)

75203, 75207, 75208, 75210, 75211, 75212, 75215, 75216, 75217, 75223, 75224, 75226, 75227, 75228, 75232, 75233, 75236, 75237, 75241, 75249, 75253

¹ For example, the [Interagency Fair Lending Examination Procedures](#) identify the following as “indicators of potential disparate treatment”: advertising only in media serving nonminority areas, using marketing programs or procedures for residential loan products that exclude one or more regions or geographies that have significantly higher percentages of minority group residents than does the remainder of the assessment or marketing area, and using mailing or other distribution lists or other marketing techniques for prescreened or other offerings of residential loan products that explicitly exclude groups of prospective borrowers or exclude geographies that have significantly higher percentages of minority group residents than does the remainder of the marketing area.

Conclusion

We appreciate this opportunity to comment on NBKC's CRA performance and would look forward to discussing a plan for Southern Dallas and be a leader in addressing inequality in Dallas.

Sincerely,

James McGee

James McGee
President/Chair
JMcGee@SouthernDallasProgress.com
Southern Dallas Progress Community Development Corporation



To: CRA Public File
From: Eric Garretson, Chief Financial Officer
Date: April 22, 2022
Re: February 12, 2022 letter from Southern Dallas Progress Community Development Corporation

On February 12, 2022, Mr. James McGee, President/Chair of the Southern Dallas Progress Community Development Corporation, via an email requested a letter be attached to our CRA Public File. This memo outlines nbkc's response to the letter.

- This letter was the sixth iteration from Mr. McGee with previous letters containing inaccurate dates, references to other banks, and statistics that were not related to nbkc bank.
- The "final" letter states that nbkc made 447 loans in the DFW MSA and states several numbers and percentages of loans to minorities and Blacks (African Americans). Based on the inaccuracies and various bank names used throughout the multiple iterations of letters, we believe this letter still contains inaccurate statistics. Our investigation concluded the following statistics for nbkc bank:
 - nbkc's LAR information was verified to show nbkc had 71 applications in 2018 and 111 applications in 2019 (total of 182 applications in 2018 and 2019) and 54 originations in 2018 and 58 originations in 2019 (total of 112 originations in 2018 and 2019) in this county. In 2018 nbkc received applications in Dallas County from 56.34% (peer banks were 54.98%) minority applicants and in 2019 45.95% (peer banks were 49.05%) minority applicants. In 2018 the bank originated loans in Dallas County to 50.0% (peer banks were 52.77%) minority applicants and in 2019 55.17% (peer banks were 47.53%) minority applicants.
 - Dallas County, TX has 387 majority-minority census tracts (74.56%). Low- and Moderate-income tracts account for 294 tracts, representing 55.57% of all tracts in the county.
- Reviewing nbkc's results as compared to the census tracts and peer banks, nbkc's applications and loan originations are in line with and at times far better than peer banks in several categories and significantly better than stated in the letter.
- Accordingly, we conclude that the data in the letter are the results from a different bank than nbkc and all of Mr. McGee's allegations and citations around nbkc's violation of various laws/regulations including the ECOA, Regulation B, FHA, and redlining (all terms defined in the letter) are without merit as nbkc's results speak for themselves.

THANK YOU



Thank you for being a case challenge partner for 3DE by Junior Achievement! Your involvement has helped me and my classmate gain confidence in skills like analytical thinking, communication, and critical reasoning. These real-world experiences will expand our view of what's possible for our futures and prepare us for choice-filled lives. Thank you for your mentorship and making a difference in our lives!

Sincerely,
Abby



Literacy KC

Changing lives beyond words

October 15, 2022

nbc bank
8320 Ward Pkwy
Kansas City, MO 64114

Dear Nicole,

Because of you, students like Yosibel will be able to get better jobs, improve their English skills, or graduate from high school. Thank you for your support of the Literacy KC Classic!

Many thanks to all the teams, volunteers, and auction bidders who participated. Without their contributions, the Classic would not have been possible.

For your records, we acknowledge receipt of your Long Drive Sponsorship.

Again, we thank you on behalf of our students whose lives are changed through literacy and your support.

With much appreciation,

Gillian Helm
CEO



Literacy KC student Yosibel receiving her high school equivalency credential in July.

Litera
Please ret

**Most Recent CRA
Performance Evaluation**



PUBLIC DISCLOSURE

March 14, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

NBKC Bank
Certificate Number: 35014

3510 West 95th Street
Leawood, Kansas 66206

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Kansas City Regional Office

1100 Walnut Street, Suite 2100
Kansas City, Missouri 64106

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

TABLE OF CONTENTS

INSTITUTION RATING.....	1
DESCRIPTION OF INSTITUTION.....	2
DESCRIPTION OF ASSESSMENT AREA	3
SCOPE OF EVALUATION	6
CONCLUSIONS ON PERFORMANCE CRITERIA – STRATEGIC PLAN.....	7
CONCLUSIONS ON PERFORMANCE CRITERIA – INTERMEDIATE SMALL INSTITUTION EVALUATION PROCEDURES	10
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	15
APPENDICES.....	16
INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA.....	16
GLOSSARY	17

INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory.**

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income (LMI) neighborhoods, in a manner consistent with its resources and capabilities.

Examiners used two sets of evaluation procedures to assess NBKC Bank's Community Reinvestment Act (CRA) performance for this evaluation period. Examiners utilized the Examination Procedures for Institutions with Strategic Plans for the portion of the review period covered by the bank's approved CRA Strategic Plan, which became effective January 1, 2021. Additionally, examiners evaluated the bank's performance prior to that date using the Intermediate Small Institution Examination Procedures.

As discussed later in this evaluation, NBKC Bank achieved satisfactory performance based on the goals in the Strategic Plan. Examiners placed greater weight on the performance under the Strategic Plan, as this highlights the bank's most recent activity, and the bank will continue to operate under the plan through December 31, 2022.

Examiners did not assign a separate rating for the period of time evaluated under the Intermediate Small Institution Examination Procedures. However, NBKC Bank's performance was consistent with a Needs to Improve rating, because the bank made only a small percentage of loans within the assessment area, and the bank demonstrated poor lending performance in relation to comparative data. NBKC Bank's distinctive national footprint in lending was the primary reason bank management sought and received approval from the FDIC to operate under a Strategic Plan.

DESCRIPTION OF INSTITUTION

NBKC Bank is headquartered in Leawood, Kansas, and is wholly owned by Ameri-National Corporation, a one-bank holding company, based in Overland Park, Kansas. There are no lending or other subsidiaries or affiliates relevant to the CRA evaluation. The institution received a Needs to Improve rating at its previous FDIC Performance Evaluation, dated February 10, 2020, based on Interagency Intermediate Small Institution Examination Procedures.

NBKC Bank continues to operate from four offices in the Kansas City, Missouri-Kansas Metropolitan Statistical Area (Kansas City MSA). The bank has two offices located in Kansas, and two offices located in Missouri. Since the previous evaluation, the bank made only one change to these offices by interchanging its Kansas offices (both in Johnson County). Specifically, in July 2021, the bank re-designated its Leawood branch as the main office, while the previous headquarters in Overland Park became a branch office. The Missouri offices are in the neighboring counties of Jackson and Clay. There have been no branch openings or closings since the previous evaluation.

NBKC Bank is extensively involved in nationwide digital delivery systems that offer traditional loan products. The bank offers residential, commercial, and consumer loans. Agricultural loans are not offered. The institution's overwhelming lending focus is residential loans, but commercial loans are also a primary focus.

The bank has a particularly substantial residential loan operation in which digital nationwide channels are used to offer a variety of home mortgage loans, most of which are sold on the secondary market. The bank offers both conventional home loans, and loans through various government programs such as the Veterans Administration, Federal Home Loan Bank, Federal Home Loan Mortgage Corporation, Federal National Mortgage Association, Government National Mortgage Association, and Federal Housing Administration.

The bank offers conventional commercial loans, and commercial loans guaranteed through the Small Business Administration (SBA). The bank was an active originator of loans under the SBA's Paycheck Protection Program (PPP), which was established in 2020 to provide relief financing to small businesses during the Coronavirus Disease 2019 (COVID-19) pandemic. The bank originated 684 PPP loans totaling \$51.7 million since the program's inception.

NBKC Bank's notable use of nationwide digital delivery systems is also heavily utilized to provide a variety of deposit services. The bank offers checking, savings, money market deposit accounts, and certificates of deposit. Alternative banking services are a major part of the bank's strategy, and include an extensive internet outreach network, mobile banking, electronic bill pay, prepaid cards, remote deposit capture, interactive teller machines (ITMs), and bank-owned ATMs.

According to the December 31, 2021 Reports of Condition and Income (Call Report), the institution reported total assets of \$1.0 billion, total loans of \$557.7 million, total deposits of \$840.5 million, and total securities of \$80.7 million. The Call Report shows only a small fraction of NBKC's originated loan volume, because most of the bank's lending activity includes

residential loans that are subsequently sold to the secondary market. Although most residential loans are sold to the secondary market, the bank retains the servicing on these loans. Bank records indicate that as of December 31, 2021, the bank’s designated home loan servicing provider was servicing \$11.1 billion in residential loans.

Aside from the significant off-portfolio home loan activity, the Call Report shows that residential loans comprise the largest category of loans in the portfolio at 55.2 percent. The next largest portfolio categories are commercial loans at 30.0 percent; and construction, land development, and other land loans at 12.1 percent. The following table shows the portfolio distribution for each loan category by dollar volume.

Loan Portfolio Distribution		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	67,373	12.1
Secured by Farmland	-	0.0
Secured by 1-4 Family Residential Properties	285,298	51.2
Secured by Multi-family (5 or more) Residential Properties	22,519	4.0
Secured by Non-Farm Non-Residential Properties	140,017	25.1
Total Real Estate Loans	515,207	92.4
Commercial and Industrial Loans	27,471	4.9
Agricultural Production and Other Loans to Farmers	57	0.0
Consumer	11,472	2.1
Obligations of States and Political Subdivisions in the United States	-	0.0
Other Loans	276	0.0
Lease Financing Receivables (net of unearned income)	3,230	0.6
Less: Unearned Income	-	0.0
Total Loans	557,713	100.0
<i>Source: Call Report dated December 31, 2021</i>		

Examiners did not identify any financial, legal, or other impediments that affect the bank’s ability to meet its assessment area’s credit needs.

DESCRIPTION OF ASSESSMENT AREA

NBKC Bank’s sole assessment area continues to include all of Johnson County in Kansas, and all of Jackson and Clay counties in Missouri. These three contiguous counties are located in the central portion of the 14-county multistate Kansas City MSA. The following section shows demographic and economic information from the 2015 American Community Survey (ACS), and 2020 and 2021 D&B data for the assessment area.

Economic and Demographic Data

According to 2015 ACS data, the assessment area includes 373 census tracts, of which 51 are low-income, 80 are moderate-income, 114 are middle-income, 118 are upper-income, and 10 have no income classification. The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	373	13.7	21.4	30.6	31.6	2.7
Population by Geography	1,478,080	8.3	21.0	33.3	37.1	0.3
Housing Units by Geography	639,577	10.3	22.5	33.8	32.9	0.5
Owner-Occupied Units by Geography	376,837	5.2	17.1	34.5	43.1	0.2
Occupied Rental Units by Geography	205,059	15.0	30.6	34.5	19.1	0.8
Vacant Units by Geography	57,681	26.4	28.8	27.5	15.4	1.9
Businesses by Geography - 2020	118,996	6.6	18.9	31.4	41.2	1.8
Businesses by Geography - 2021	141,581	6.5	18.4	30.7	42.6	1.7
Family Distribution by Income Level	371,398	20.0	16.9	20.0	43.1	0.0
Household Distribution by Income Level	581,896	22.8	16.4	17.4	43.4	0.0
Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$72,623	Median Housing Value			\$170,061
			Median Gross Rent			\$868
			Families Below Poverty Level			8.5%
<i>Source: 2015 ACS, and 2020 and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Federal Financial Institutions Examination Council (FFIEC) updates median family income figures annually. Examiners used the Kansas City MSA median family income figures to analyze home mortgage loans under the Borrower Profile criterion, and determine certain qualifying community development activities in this evaluation. These figures along with the corresponding low-, moderate-, middle-, and upper-income thresholds are presented in the following table.

Median Family Income Ranges - Kansas City, MO-KS MSA				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2020 (\$85,900)	<\$42,950	\$42,950 to <\$68,720	\$68,720 to <\$103,080	≥\$103,080
2021 (\$86,300)	<\$43,150	\$43,150 to <\$69,040	\$69,040 to <\$103,560	≥\$103,560
<i>Source: FFIEC</i>				

The 2021 D&B data indicates the primary industries in the assessment area include service industries, which comprise 40.9 percent of all area businesses (non-farm and farm), followed by non-classifiable establishments at 18.2 percent. This data also indicates that a notable number of area businesses are relatively small, with 89.2 percent having nine or fewer employees, 85.9 percent generating \$1 million or less in annual revenues, and 89.9 percent operating from a single location.

Competition

Competition for financial services in the assessment area is very strong. According to FDIC Deposit Market Share data as of June 30, 2021, there are 89 banks operating 479 offices in the assessment area, with NBKC Bank holding a 1.3 percent market share. The 2020 Home Mortgage Disclosure Act (HMDA) aggregate data also shows strong competition for home mortgage loans, with 616 HMDA lenders reporting 89,161 home mortgage loans in the assessment area. Based on the number of loans from these 616 lenders, NBKC Bank ranked 28th with a 1.0 percent market share.

Community Contact

Examiners contact community members or other third parties in the assessment area to help gain insight into the area's economy, demographic trends, and business environment. This information not only helps in identifying credit and community development needs and opportunities, but also assists in determining whether local financial institutions are responsive to those needs.

Examiners conducted an interview with a representative from a research-based organization within the Kansas portion of the assessment area. The contact indicated that while the area's economy is stable, residents and businesses are feeling the pinch of current inflation. Home prices in the area are soaring, with homes selling very quickly and well above asking prices. The primary credit needs include home loans and business loans. In regards to community development opportunities for area financial institutions, the contact stated that in addition to actively making loans, there are always opportunities for providing basic financial education for LMI individuals.

Credit and Community Development Needs and Opportunities

Considering information from demographic data and the community contact, examiners determined that home mortgage and small business loans represent the primary credit needs in the assessment area. Opportunities exist for originating such loans, as indicated by HMDA aggregate data, along with demographic data on the number of families and small businesses in the assessment area. Community development needs in the assessment area include affordable housing, community services, economic development, and activities that revitalize and/or stabilize LMI areas. This conclusion is supported by the number of LMI families, the level of LMI geographies, and the percentage of small businesses in the assessment area.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated February 10, 2020, to the current evaluation dated March 14, 2022. As previously noted, examiners evaluated NBKC Bank's performance using two sets of CRA examination procedures, because the bank received approval for a Strategic Plan in the midst of the evaluation period. Examiners used the Interagency Intermediate Small Institution Examination Procedures to evaluate performance from February 10, 2020, to December 31, 2020. These procedures focus on the bank's performance under the Lending Test and Community Development Test as outlined in the Intermediate Small Bank Performance Criteria Appendix. Thereafter, examiners used the Interagency Examination Procedures for Institutions with Strategic Plans to evaluate the bank's performance under its Strategic Plan, which has an effective date of January 1, 2021. Since Strategic Plans generally involve measurable annual goals, partial year performance under the bank's Strategic Plan for 2022 was not reviewed, and will be incorporated into the next CRA Performance Evaluation.

Regardless of evaluation method, examiners determined the bank's major product line, by far, is residential loans, followed by commercial loans. This conclusion is based on the bank's business strategy, home loan servicing records, loan portfolio composition, and recent loan origination activity. Accordingly, while examiners reviewed both home mortgage lending and business lending in this evaluation, home mortgage lending performance received the most weight in forming overall conclusions, as this is the bank's major product line. The following sections discuss the activities reviewed by examiners for the Strategic Plan and Intermediate Small Institution evaluation processes.

Strategic Plan Activities Reviewed

NBKC Bank developed the Strategic Plan specifically to address local activities within its assessment area, particularly in light of the impact of the bank's nationwide home mortgage lending footprint. The Strategic Plan contains measurable annual goals that the FDIC used to evaluate performance. The Plan outlines seven goals that measure the bank's activities to help meet assessment area needs through lending and community development activities. Each of the seven goals contains a minimum volume threshold necessary to achieve favorable CRA performance levels (satisfactory and outstanding) regarding the following specific activities.

- Goal 1: Loans to Small Businesses
- Goal 2: Business Loans in LMI Census Tracts
- Goal 3: Home Mortgage Loans in LMI Census Tracts
- Goal 4: Home Mortgage Loans to LMI Borrowers
- Goal 5: Community Development Loans
- Goal 6: Community Development Investments
- Goal 7: Community Development Services

Bank management tracked and provided data on the 2021 activities under each goal. NBKC Bank's results for each of the Strategic Plan goals are addressed later in this evaluation.

Intermediate Small Institution Activities Reviewed

Given the bank's aforementioned areas of lending focus, the specific loan categories reviewed under the Lending Test were home mortgage loans, as reported under the HMDA regulation, and small business loans, in accordance with the standard CRA definition (see Glossary in Appendices). No other loan types, such as small farm loans, represent a major product line or provide material support for conclusions.

Examiners reviewed all 20,060 loans totaling \$7.2 billion that the bank reported on its 2020 HMDA Loan Application Register. For small business loans, examiners utilized bank records to identify all small business loans originated or renewed in 2020 since the February 10, 2020 performance evaluation. During this time, the bank made 539 small business loans totaling \$43.3 million. Of those small business loans, 481 loans totaling \$26.5 million were PPP loans, and 58 loans totaling \$16.9 million were non-PPP loans.

For the Lending Test, examiners reviewed all of the above noted loans for the Assessment Area Concentration analysis. Examiners then reviewed all loans within the assessment area for the Geographic Distribution and Borrower Profile analyses. This lending within the assessment area included 1,001 home mortgage loans totaling \$292.2 million, and 265 small business loans totaling \$27.0 million.

For the Geographic Distribution and the Borrower Profile analyses, examiners used prescribed comparative data as the standard of comparison for the bank's lending performance. The 2020 HMDA aggregate data and 2015 ACS data provided a standard of comparison for the bank's home mortgage lending performance, and 2020 D&B data provided a standard of comparison for the bank's small business lending performance. Additionally, although both the number and dollar volume of loans are analyzed, examiners emphasize performance by the number of loans, because it is a better indicator of the number of individuals and businesses served.

For the Community Development Test, bank management provided data on community development loans, qualified investments, and community development services since the prior CRA evaluation through year-end 2020.

CONCLUSIONS ON PERFORMANCE CRITERIA – STRATEGIC PLAN

NBKC Bank met all Strategic Plan goals for 2021 with the exception of Goal 1. Since Outstanding performance was achieved on four of the seven goals, including those related to home mortgage loans, which is the bank's primary lending product, examiners considered the Strategic Plan's 2021 goals substantially met for an overall Satisfactory performance.

Business Lending – Goals 1 and 2

These goals measure the bank’s CRA business lending performance based on borrower profile and geographic distribution. Specifically, Goal 1 measures the bank’s performance to small businesses, and Goal 2 measures the bank’s performance in LMI census tracts. For both goals, business loans are defined as assessment area loans, regardless of loan amount, that are included in the Call Report categories of “Secured by Non-Farm Non-Residential Properties” or “Commercial and Industrial Loans.” For Goal 1, small businesses are those in which the gross annual revenues of the entity or entities considered by the bank for the loan are \$1 million or less. NBKC Bank did not meet Goal 1, but exceeded the Outstanding threshold for Goal 2. Refer to the following table for specific goal thresholds and the bank’s performance.

Business Lending – Goals 1 and 2			
Strategic Plan Goal	Institution Established Goals		Institution Performance
	Satisfactory	Outstanding	
Goal 1: Loans to Small Businesses	\$15 million	\$25 million	\$10.4 million
Goal 2: Business Loans in LMI Census Tracts	\$1.7 million	\$2.2 million	\$3.9 million
<i>Source: 2021 Bank records</i>			

Home Mortgage Lending – Goals 3 and 4

These goals measure the bank’s home mortgage lending performance based on borrower profile and geographic distribution. Specifically, Goal 3 measures the bank’s performance in LMI census tracts, and Goal 4 measures the bank’s performance to LMI borrowers. For both goals, home mortgage loans are those that are reported pursuant to the HMDA regulation and located within the assessment area. NBKC Bank substantially exceeded the Outstanding thresholds for both Goals 3 and 4. Refer to the following table for specific goal thresholds and the bank’s performance.

Home Mortgage Lending – Goals 3 and 4			
Strategic Plan Goal	Institution Established Goals		Institution Performance
	Satisfactory	Outstanding	
Goal 3: Home Mortgage Loans in LMI Census Tracts	\$11 million	\$13 million	\$18.3 million
Goal 4: Home Mortgage Loans to LMI Borrowers	\$16 million	\$24 million	\$34.7 million
<i>Source: 2021 Bank records</i>			

Community Development Activities – Goals 5, 6, and 7

These goals measure the bank’s community development performance in 2021. Specifically, Goal 5 measures the bank’s community development lending performance, Goal 6 measures the community investment performance, and Goal 7 measures the community development service performance. For the community development lending, this goal was calculated using the total dollar volume of loans originated or renewed in the bank’s assessment area. For community development investments, this goal was calculated using the total dollar volume of investments (new and renewals) made in the bank’s assessment area. For the community development

services, this goal was calculated using the total number of qualified services completed by the bank or by bank personnel during the calendar year. To be counted and considered, the activities must meet the definition of the community development in the CRA regulation.

NBKC Bank met the Outstanding threshold for Goal 5, and met the Satisfactory thresholds for Goals 6 and 7. Refer to the following table for specific goal thresholds and the bank’s performance.

Community Development Activities – Goals 5, 6, and 7			
Strategic Plan Goal	Institution Established Goals		Institution Performance
	Satisfactory	Outstanding	
Goal 5: Community Development Loans	\$3 million	\$5 million	\$5.1 million
Goal 6: Community Development Investments	\$4 million	\$6 million	\$4.0 million
Goal 7: Community Development Services	25	50	28
<i>Source: 2021 Bank records</i>			

The following are notable examples of the community development activities in 2021.

- The bank extended a \$2.8 million loan that contributed to the economic development of the assessment area, and had a stabilizing effect in a moderate-income census tract. The loan was made to a small business that provides permanent jobs in the food service industry for LMI individuals.
- The bank provided a \$2.1 million loan on a 24-unit apartment building that provides affordable housing, with nearly all units set below fair market rent figures for the area.
- In addition to \$40,000 in donations to LMI programs and service organizations, NBKC Bank invested \$4 million in a CRA-oriented investment fund that specifically directed the bank’s dollars to various qualifying investments throughout the assessment area. All of the qualifying items through this fund were for the purpose of affordable housing.
- NBKC Bank partnered with multiple different companies in the financial technologies industry to offer checking accounts under a low- or no-fee model. Through these partnerships, NBKC Bank offers a checking account with no monthly maintenance fee, no minimum balance requirement, no overdraft fees, and no return item fees. This account receives consideration as a community development service since it demonstrates a responsiveness to helping to meet the banking needs of LMI individuals.
- NBKC Bank partnered with an area organization to provide financial literacy education at a school in which most of the students receive free or reduced-price lunches. Numerous bank representatives were involved in teaching lessons ranging from budgeting and personal finance, to the importance of understanding credit scores and responsible credit and debit card use.

CONCLUSIONS ON PERFORMANCE CRITERIA – INTERMEDIATE SMALL INSTITUTION EVALUATION PROCEDURES

As previously noted, although a rating was not assigned under this evaluation method, NBKC Bank’s performance is consistent with a Needs to Improve rating. This conclusion is supported by the bank’s performance under the Lending Test.

LENDING TEST

NBKC Bank’s performance is consistent with a Needs to Improve under the Lending Test. The bank’s Assessment Area Concentration, Geographic Distribution, and Borrower Profile performance supports this conclusion.

Loan-to-Deposit Ratio

The loan-to-deposit ratio for 2020 is reasonable given the institution’s size, financial condition, and assessment area credit needs. Examiners evaluated the bank’s performance based on its four quarterly loan-to-deposit ratios in 2020. As shown in the following table, the resulting average loan-to-deposit ratio of 76.4 percent compares reasonably to similarly situated banks. Examiners selected the similarly situated banks based on their asset size, geographic location, and product mix.

Loan-to-Deposit (LTD) Ratio Comparison		
Bank	Total Assets as of 12/31/2020 (\$000s)	Average Net LTD Ratio (%)
NBKC Bank, Leawood, Kansas	1,148,196	76.4
Bank of Labor, Kansas City, Kansas	760,690	43.7
Citizens Bank and Trust Company, Kansas City, Missouri	983,992	70.0
First Federal Bank of Kansas City, Kansas City, Missouri	794,480	96.1
<i>Source: Reports of Condition and Income 01/01/2020 - 12/31/2020</i>		

Assessment Area Concentration

A substantial majority of the bank’s lending is outside the assessment area. This performance conclusion is supported solely by the bank’s home mortgage loan activity. Despite the considerable volume of home mortgage lending within the assessment area, the bank’s heavy nationwide delivery and footprint for these loans results in a substantial majority originated outside of the assessment area. Although a majority of the small business loan activity is also outside the assessment area, most of the small business loans were PPP loans. Since PPP financing was an important part of relief funding in response to the COVID-19 emergency, such loans do not negatively impact conclusions. An analysis of only non-PPP small business loans (58 total loans) revealed 36 loans, or 62.1 percent, were within the assessment area. See the following table for details.

Lending Inside and Outside of the Assessment Areas										
	Number of Loans					Dollar Amount of Loans \$(000s)				
Loan Category	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage	1,001	5.0	19,059	95.0	20,060	292,232	4.1	6,886,578	95.9	7,178,810
Small Business	265	49.2	274	50.8	539	27,048	62.4	16,280	37.6	43,328

Source: Bank Data, 2020 HMDA Data

Geographic Distribution

Overall, the geographic distribution of loans reflects poor dispersion throughout the assessment area. Examiners focused on the percentage of loans in LMI areas located in the assessment area. Although the bank’s small business lending performance is reasonable, the bank’s home mortgage lending performance was poor, which is more heavily weighted.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects poor performance. As shown in the following table, the bank’s lending to borrowers in LMI areas lags aggregate and demographic data. Specifically, the bank’s activity is less than a fifth of aggregate levels in the low-income census tracts, and about half of aggregate levels in the moderate-income census tracts.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	5.2	2.2	4	0.4	387	0.1
Moderate	17.1	12.0	61	6.1	12,820	4.4
Middle	34.5	31.4	230	23.0	54,265	18.6
Upper	43.1	54.3	704	70.3	223,956	76.6
Not Available	0.2	0.2	2	0.2	804	0.3
Totals	100.0	100.0	1,001	100.0	292,232	100.0

Source: 2015 ACS, Bank Data, 2020 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%

Small Business Loans

The geographic distribution of small business loans reflects reasonable performance. As shown in the following table, the bank’s lending performance is comparable to the corresponding demographic data for both low-income and moderate-income census tracts.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	6.6	14	5.3	1,421	5.3
Moderate	18.9	45	17.0	5,593	20.7
Middle	31.4	55	20.8	4,300	15.9
Upper	41.2	137	51.7	12,881	47.6
Not Available	1.8	14	5.3	2,853	10.5
Totals	100.0	265	100.0	27,048	100.0
<i>Source: 2020 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%</i>					

Borrower Profile

The distribution of borrowers reflects poor penetration among individuals of different income levels and businesses of different sizes. Examiners focused on the percentage of home loans to LMI borrowers, and the percentage of small business loans to operations with revenues of \$1 million or less. This conclusion is supported by the bank's poor home mortgage and small business lending performance.

Home Mortgage Loans

The distribution of borrowers reflects poor penetration among individuals of different income levels. Since the previous evaluation, while the number and dollar volume of assessment area home mortgage loans has more than doubled, the bank's performance still lags aggregate and demographic data for LMI borrowers. As shown in the following table, while the bank's performance to moderate-income borrowers slightly lags demographic and aggregate data, the bank's performance is less than half of aggregate data for low-income borrowers

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	20.0	5.8	25	2.5	3,552	1.2
Moderate	16.9	17.1	145	14.5	28,005	9.6
Middle	20.0	21.2	216	21.6	55,705	19.1
Upper	43.1	39.1	557	55.6	183,570	62.8
Not Available	0.0	16.8	58	5.8	21,400	7.3
Totals	100.0	100.0	1,001	100.0	292,232	100.0
<i>Source: 2015 ACS, Bank Data, 2020 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>						

Small Business Loans

The distribution of small business loans reflects poor penetration among businesses of different revenue sizes. This analysis is focused on the bank's non-PPP loans.

Of the 265 small business loans in this analysis, 229 were PPP loans in which revenue information was not available given the relief program requirements. Assessing the bank's performance without considering these PPP loans, the bank made 11 of 36 loans to businesses with revenues of \$1 million or less (revenue information was unavailable on 3 non-PPP loans), which is 30.6 percent. Since the bank's lending performance is significantly below demographic data in this revenue category, performance is considered poor.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	83.4	11	4.2	3,014	11.1
>\$1,000,000	5.9	22	8.3	9,380	34.7
Revenue Not Available	10.7	232	87.5	14,654	54.2
Total	100.0	265	100.0	27,048	100.0

*Source: 2020 D&B Data, Bank Data.
Due to rounding, totals may not equal 100.0%*

Response to Complaints

The institution has not received any CRA-related complaints regarding its performance in meeting the credit needs of its assessment area since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

COMMUNITY DEVELOPMENT TEST

NBKC Bank's performance demonstrates adequate responsiveness to community development needs in its assessment area through community development loans, qualified investments, and community development services, considering the institution's capacity and the need and availability of such opportunities for community development in the assessment area.

Community Development Loans

NBKC Bank originated two community development loans totaling \$10.6 million. This dollar volume represents 0.9 percent of total assets, and 2.0 percent of net loans as of December 31, 2020. Examiners compared NBKC Bank's performance to six similarly situated banks operating in Kansas and/or Missouri that were recently evaluated for CRA. The bank's level of community development lending is in the lower-range among the similarly situated banks. Specifically, considering an approximate one-year period, the similarly situated banks' ratios of community development loans to total assets ranged from 0.6 percent to 5.2 percent.

Both of the community development loans were highly responsive to the assessment area's affordable housing needs. Each loan provided approximately \$5 million in financing to major housing complexes that provide affordable rental housing primarily to LMI individuals. This

financing helped to provide extensive renovations and repairs, improve safety for residents, and increase the number of rentable units. Both complexes are located in low-income census tracts in Jackson County.

Qualified Investments

NBKC Bank made eight qualified investments totaling approximately \$4.6 million that benefited the assessment area. This total is comprised of debt securities, deposits in Community Development Financial Institutions (CDFIs), and qualifying donations. The total dollar amount of investments equates to 0.4 percent of total assets, and 4.2 percent of total securities as of December 31, 2020. The bank’s level of qualified investments is considered responsive, and is in the upper-range among similarly situated banks. Considering an approximate one-year period, the similarly situated banks’ ratios of qualified investments to total assets ranged from 0.1 percent to 0.5 percent. The following table illustrates NBKC Bank’s qualified investments.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	0	0	0	0	0	0	0	0	0	0
2020 (since 2-10-2020)	2	4,017	0	0	2	498	0	0	4	4,515
Qualified Grants & Donations	1	1	3	35	0	0	0	0	4	36
Total	3	4,018	3	35	2	498	0	0	8	4,551

Source: Bank Records

The following are details on the qualified investment activities in the above table.

- The bank purchased two securities for \$4.0 million for the purpose of affordable housing as they are backed by mortgage loans to LMI residents in the assessment area.
- The bank invested in two annually renewing certificates of deposit totaling \$498,000 with two CDFIs that supports economic development in the assessment area.
- During the review period, the bank donated \$36,000 to qualifying area programs and organizations that provide community services or affordable housing primarily to LMI individuals.

Community Development Services

During the 2020 evaluation period, the bank had four qualifying community development services that benefited the assessment area. Considering an approximate one-year period, the similarly situated banks’ average number of qualifying community development services was 34, and ranged from 11 to 60. NBKC Bank’s services demonstrated some responsiveness to identified community development needs, but were very limited in comparison to the similarly situated banks.

In addition to the bank's low-cost checking account (see the Strategic Plan section for details), the following are the bank's three remaining community development services.

- A bank officer serves as an Executive Board member of an organization that supports economic development by helping small businesses obtain SBA 504 loan financing.
- A bank employee provides financial education during an annual area event that benefits primarily LMI students.
- A bank employee serves on the board of an organization that offers emergency support to LMI individuals through vital services such as food pantry access, utility assistance, rent and mortgage assistance, winter coats, and prescriptions.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution's overall CRA rating.

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

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.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income

groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
 - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as

measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, 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 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 applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, 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.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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.

Micropolitan Statistical Area: CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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 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.

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

Small Business Loan: 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 are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area’s population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.