



**PUBLIC DISCLOSURE**

May 3, 2021

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

BancCentral, National Association  
Charter Number 12152

604 Flynn St.  
Alva, OK 73717

Office of the Comptroller of the Currency  
301 NW 63<sup>rd</sup> St. Ste 490  
Oklahoma City, OK 73116

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

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## Overall CRA Rating

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

**The lending test is rated: Satisfactory**

**The community development test is rated: Satisfactory**

The major factors that support this rating include:

- The Lending Test rating is based on two full-scope assessment areas (AAs), one each in Oklahoma and Kansas, and one limited-scope AA in Oklahoma.
- The loan-to-deposit ratio is satisfactory and meets the standard for satisfactory performance.
- BancCentral, National Association ("BCNA" or "the bank") originated a majority of loans inside their AA.
- The bank's distribution to small businesses with revenues of \$1 million or less reflects excellent dispersion in both states.
- The bank's distribution of consumer loans to low- and moderate-income borrowers reflects good distribution across their market area.
- The Community Development (CD) Test rating is based on the full-scope Oklahoma Non-MSA AA, the full-scope Kansas Non-MSA AA, and the limited-scope Enid MSA AA.
- BCNA's performance under the CD test demonstrates adequate responsiveness to the CD needs of its AA.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit (LTD) ratio is reasonable. The bank's LTD ratio at December 31, 2020 was 62.39 percent and the bank's average quarterly LTD from June 30, 2018 to December 31, 2020 was 58 percent. We compared this average to three other similarly sized banks with operations in the same market areas as BCNA. See the following table for detail.

Bank Name	Total Assets \$(000s)	Avg. LTD Ratio
BancCentral, National Association	554,283	<b>58.00</b>
Stock Exchange Bank, The	265,902	49.69
Alva State Bank & Trust Company	420,698	87.76
Peoples Bank, The	487,422	71.14

### Lending in Assessment Area

A majority of the bank's loans are inside its AAs. The bank originated and purchased 85.5 percent of its total loans inside the bank's AAs during the evaluation period. We analyzed this at the bank level, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	126	80.8	30	19.2	156	22,610	55.4	18,173	44.6	40,783
Consumer	110	91.7	10	8.3	120	1,516	97.2	44	2.8	1,560
Total	236	85.5	40	14.5	276	24,126	57.0	18,217	43.0	42,343

The bank's primary products based on originations and purchases over the exam period are loans to small businesses and loans to consumers.

## Description of Institution

BCNA is a \$554 million financial institution headquartered in Alva, Okla., located in northwestern Oklahoma. BCNA is a wholly owned subsidiary of Myers Bancshares, Inc., a two-entity holding company also headquartered in Alva. BancCentral Financial Services Corporation (BCFSC) is also a subsidiary of the holding company. BCFSC provides transaction processing and internet provider services to the bank. We did not consider BCFSC in the evaluation.

The bank has six full-service locations including the main office in Alva, and branches in Woodward, Enid, and Cherokee, Okla. and Anthony and Harper, Kan. The bank added the Cherokee branch as a loan production office and deposit production office on April 14, 2020 and converted it to a full-service branch on August 17, 2020. BCNA did not close any branches during the evaluation period.

The tables below provide information on BCNA's five bank locations and the 12 Automated Teller Machines (ATMs). Six of the machines are deposit-taking ATMs. Each of the branch locations has an on-site ATM.

<b>BCNA's Branch Locations</b>		
<b>Location</b>	<b>Address</b>	<b>City</b>
Main Office	604 Flynn Street	Alva, OK
Woodward Branch	2519 Williams Avenue	Woodward, OK
Enid Branch	300 West Randolph	Enid, OK
Cherokee Branch	105 N Grand Ave	Cherokee, OK
Anthony Branch	300 West Main Street	Anthony, KS
Harper Branch	1002 Central Street	Harper, KS

<b>BCNA's ATM Locations</b>		
<b>Location</b>	<b>Address</b>	<b>City</b>
Main Bank (drive-up)	604 Flynn Street	Alva
College & Oklahoma (drive-up)	516 Oklahoma Boulevard	Alva
Lite-N-Nite Convenience Store	1624 Oklahoma Boulevard	Alva
Shepard Truck Stop	1512 E. Oklahoma Blvd	Alva
Woodward Branch (drive-up)	2519 Williams Avenue	Woodward
Honk-N-Holler Convenience Store	802 Northwest Highway 270	Woodward
United Grocery Store	8 <sup>th</sup> and Downs	Woodward
Enid Branch (Drive-Up)	300 W. Randolph	Enid
Enid Branch (Drive-Up)	2314 West Owen Garriott	Enid
Cherokee Branch	105 N Grand Ave	Cherokee
Anthony Branch (Drive-Up)	203 West Main	Anthony
Harper Branch (Drive-Up)	1002 Central	Harper

The bank's primary focus is to serve commercial, agriculture, and consumer customers located in the AAs. Historically, the bank's emphasis has been on agricultural and commercial loans. BCNA meets these needs by providing various types of loan and deposit products and services, as well as internet banking, telephone banking, and full trust services. BCNA provides lobby services Monday through Friday at all locations. The Alva and Woodward locations have Saturday drive-up services. Strong competition from a substantial number of financial institution competitors affects the bank's ability to lend in its AA.

As of December 31, 2020, BCNA's assets totaled \$554 million, of which \$320 million or 57 percent were made up of various types of loans to individuals, commercial and agriculture businesses, and commercial and residential real estate. Specifically, the bank's loan portfolio consists of the following:

<b>Loan Portfolio Composition as of December 31, 2020</b>		
	<b>\$(000s)</b>	<b>%</b>
Agriculture	\$58,301	18.23%
Commercial	\$88,649	27.72%
Real Estate	\$140,277	43.87%
Individual Loans	\$6,450	2.02%
Other	\$26,077	8.16%
<b>Total</b>	<b>\$319,754</b>	<b>100.00%</b>

*Source: December 31, 2020 Report of Condition and Income.*

BCNA was a Home Mortgage Disclosure Act (HMDA) reporter under the now outdated mortgage lending thresholds. As of July 1, 2020, the threshold for the minimum number of closed-end mortgage loans changed from a minimum of 25 to a minimum of 100 in each of the previous two years. BCNA is no longer required to report HMDA loans as it originated 63 closed-end mortgage loans in 2018 and 44 in 2019.

There are no significant financial or legal barriers currently limiting BCNA's ability to help meet the identified credit needs of its AAs. The bank is financially capable of meeting most any request for credit, subject to certain legal restrictions applicable to all national banks.

The Office of the Comptroller of the Currency last evaluated BCNA's CRA performance April 16, 2018. The bank received an overall rating of "Satisfactory" at the previous evaluation.

## Scope of the Evaluation

A data integrity review began on November 30, 2020 to evaluate the bank's system of internal controls for collecting and verifying data collected from lending activities. We also reviewed community development activities to ensure they qualified for CRA credit.

### Evaluation Period/Products Evaluated

We identified two AAs for full-scope review and one AA for limited-scope review. We conducted full-scope reviews of the Oklahoma Non-MSA and the Kansas Non-MSA AAs and a limited-scope review of the Enid MSA AA. The Oklahoma Non-MSA AA contains 71 percent of the bank's total loans and 73 percent of the bank's total deposits. The Enid MSA AA has 16 percent of the bank's total loans and 2 percent of the bank's total deposits. The Kansas Non-MSA AA has 13 percent of the bank's total loans and 25 percent of the bank's total deposits. We placed more emphasis on performance in the State of Oklahoma versus in the State of Kansas because the majority of loans and deposits are in Oklahoma. Within Oklahoma, the Oklahoma Non-MSA AA was weighted more than the Enid MSA AA because within the state, the Non-MSA AA has the majority of loans and deposits.

The full-scope reviews included a random sample of loans to small businesses and consumer loans originated between January 1, 2018 and December 31, 2020. Small business loans and consumer loans are the main loan products in the bank considering originations by number and dollar volume. The limited-scope review included a random sample of loans to small businesses originated between January 1, 2018 and December 31, 2020. This Performance Evaluation is based on 2015 American Community Survey data. Conclusions regarding the Lending Test are based on the origination of business and consumer loans between January 1, 2018 and December 31, 2020. Conclusions regarding the Community Development Test are based on CD activities from January 1, 2018 and December 31, 2020.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, we selected one of the AAs within that state for a full-scope review. For purposes of this evaluation, bank delineated Non-MSA AAs within the same state are combined and evaluated as a single area. We evaluated these combined AAs as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how we selected full-scope AAs. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### Ratings

The bank's overall rating is a blend of the state ratings. BCNA has two rating areas; the State of Oklahoma and the State of Kansas. There are three AAs between the two states, the Oklahoma Non-MSA AA, Enid MSA AA, and Kansas Non-MSA AA. The Oklahoma Non-MSA AA is responsible for 71 percent of loans and 73 percent of deposits in the bank. We gave more weight to this AA than the others based on the above details. Refer to the "Scope" section under each state rating for details on each of the AAs.

## Discriminatory or Other Illegal Credit Practices Review

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

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

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

## State of Oklahoma Rating

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

**The Lending Test is rated: Satisfactory**

**The Community Development Test is rated: Satisfactory**

The major factors that support this rating include:

- Excellent lending to businesses in the Oklahoma Non-MSA AA with \$1 million or less in gross revenues.
- Overall adequate lending to low- and moderate-income borrowers.
- CD lending indicates adequate responsiveness to the needs of the bank's AA.
- CD qualified investments indicates adequate responsiveness to the needs of the bank's AA.
- The amount of CD services indicates adequate responsiveness to the needs of the bank's AA.

## Description of Institution's Operations in Oklahoma

### Oklahoma Non-MSA AA

The Oklahoma Non-MSA AA consists of 16 contiguous census tracts (CT), including all of Alfalfa, Harper, Major, Woods, and Woodward counties. There are no low- or moderate-income CTs in this AA, seven middle-income CTs and nine upper-income CTs. Three of the middle-income CTs are distressed or underserved; two in Alfalfa County and one in Harper County. Three branches and eight ATMs are in the Oklahoma Non-MSA AA. The main branch in Alva, Okla. is in a middle-income CT and the Woodward, Okla. branch is in an upper-income CT.

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.



<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: BancCentral - OK Non-MSA AA 2020</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	16	0.0	0.0	43.8	56.3	0.0
Population by Geography	47,240	0.0	0.0	36.5	63.5	0.0
Housing Units by Geography	21,666	0.0	0.0	35.0	65.0	0.0
Owner-Occupied Units by Geography	12,622	0.0	0.0	34.3	65.7	0.0
Occupied Rental Units by Geography	4,738	0.0	0.0	35.4	64.6	0.0
Vacant Units by Geography	4,306	0.0	0.0	36.5	63.5	0.0
Businesses by Geography	3,937	0.0	0.0	36.6	63.4	0.0
Farms by Geography	434	0.0	0.0	36.2	63.8	0.0
Family Distribution by Income Level	11,597	15.2	12.1	18.4	54.3	0.0
Household Distribution by Income Level	17,360	19.4	12.9	15.0	52.7	0.0
Median Family Income Non-MSAs - OK		\$51,491	Median Housing Value			\$95,668
			Median Gross Rent			\$631
			Families Below Poverty Level			10.0%
<i>Source: 2015 ACS and 2020 D&amp;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>						

Competition is strong in the Oklahoma Non-MSA AA with 20 other financial institutions in the AA, including three large national and state banks. Based on FDIC Market Share Data as of June 30, 2020, BCNA holds 13.6 percent of deposits in the AA and is ranked 2<sup>nd</sup> among institutions in the AA. The Oklahoma Non-MSA AA is responsible for 71 percent of loans and 73 percent of deposits in the bank.

We interviewed two community contacts, one each from Woodward and Major Counties, to gain insight into the community credit and developmental needs along with overall economic conditions in the area. The community contacts work to provide economic opportunity in Woodward County through innovation, helping rural America to thrive; to promote agriculture production that better nourishes Americans while also helping feed others throughout the world and to support the economic development of businesses in Major County to aid in creation of long-term or quality jobs through business retention or expansion. Both contacts stated that the oil and gas (O&G) industry is a large driver in their areas for jobs and economic support. Both of the contacts stated that economic prosperity is somewhat dependent on the health of the O&G industry. The O&G industry suffered from reduced commodity prices and layoffs due to the COVID-19 pandemic in 2020. In Woodward County, farming and ranching is the next biggest driver of economic prosperity and is in good shape overall. Little manufacturing exists in Woodward County, and what manufacturing that does exist is tied to the O&G industry. Fairview, Okla., the county seat of Major County, and the surrounding area has an older population; however, some growth was noted recently in the number of students in local schools, indicating a growing younger-aged population with families. The primary credit needs in both counties were centered in small business and agriculture. The Major County contact noted that housing was not a significant credit need at the time. Both contacts stated they felt local financial institutions are meeting the credit needs of the communities.

**Enid MSA AA**

The Oklahoma Non-MSA AA consists of 12 CTs, including all of Garfield county. The Enid, OK MSA AA consists of no low-income CTs, three moderate-income CTs, six middle-income CTs and three upper-income CTs. One branch is located in a moderate-income CT in Enid, OK MSA AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: BancCentral - Enid MSA 2020</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	12	0.0	25.0	50.0	25.0	0.0
Population by Geography	62,192	0.0	30.4	44.2	25.4	0.0
Housing Units by Geography	26,856	0.0	30.1	43.0	26.9	0.0
Owner-Occupied Units by Geography	15,938	0.0	26.6	40.3	33.2	0.0
Occupied Rental Units by Geography	7,999	0.0	33.0	49.7	17.2	0.0
Vacant Units by Geography	2,919	0.0	41.3	39.4	19.3	0.0
Businesses by Geography	4,557	0.0	31.5	41.2	27.3	0.0
Farms by Geography	282	0.0	18.8	42.6	38.7	0.0
Family Distribution by Income Level	16,911	19.0	19.9	22.3	38.8	0.0
Household Distribution by Income Level	23,937	21.8	17.0	20.1	41.2	0.0
Median Family Income MSA - 21420 Enid MSA		\$57,419	Median Housing Value			\$97,211
			Median Gross Rent			\$746
			Families Below Poverty Level			9.9%
<i>Source: 2015 ACS and 2020 D&amp;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>						

Competition in the Enid MSA AA is strong with approximately 14 other financial institutions in the areas, including several large regional banks. Based on FDIC Deposit Market Share data as of June 30, 2020, BCNA holds 0.45 percent of the market share of deposits and is ranked 13<sup>th</sup> among financial institutions in the MSA. The Enid MSA AA accounts for approximately 1.8 percent of the bank's deposits and 15.7 percent of the number of loans originated during the evaluation period.

We referred to two recent community contacts in the AA to gain a better understanding of the general community credit and developmental needs, as well as economic conditions. These community contacts have an economic development purpose and provide services for small businesses and farmers. Both organizations serve Garfield County. They both indicated a need for agricultural lending. Additionally, one of the two contacts mentioned a need for affordable housing, specifically moderate-income housing. They indicated that baby boomers were not leaving their homes, which accounts for a majority of moderate-income housing. The areas have received grants and funding for low-income housing, which presently includes more supply than demand.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

### LENDING TEST

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

Based on a full-scope review, the bank's performance in the Oklahoma Non-MSA AA is good. We did not analyze geographic dispersion for the Oklahoma Non-MSA AA as there are no low- or moderate-income (LMI) tracts in that AA. We performed a limited-scope review in the Enid MSA AA because there were only enough loans to test one loan type in the AA. There are no low-income tracts in the Enid MSA AA and only three of the 12 tracts in the AA are moderate-income tracts. Small business lending to moderate-income tracts was reasonable in the Enid MSA AA.

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

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

#### *Small Loans to Businesses*

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

The distribution of business loans in the Oklahoma Non-MSA AA reflects more than reasonable distribution. Lending to small businesses, those with less than \$1 million in gross annual revenues, in the Oklahoma Non-MSA AA reflects excellent penetration. For the time period of 2018-2020, the penetration to small businesses exceeds the percentage of businesses identified as having revenues of \$1 million or less along with the aggregate lending for these businesses.

#### *Consumer Loans*

Refer to Table V in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in the Oklahoma Non-MSA AA reflects adequate distribution to low- and moderate-income borrowers. For the time period of 2018-2020, the penetration to low-income borrowers reflected adequate performance as the percentage loans extended to low-income borrowers was somewhat lower than the percentage of low-income households identified in the AA. For the same period, the penetration to moderate-income borrowers was poor. The percentage of loans extended to moderate-income borrowers was lower than the percentage of moderate-income borrowers identified in the AA. However, many of the loans sampled were for amounts less than \$10 thousand and the bank does not require proof of income if sufficient collateral is pledged. As such, 59.6 percent of loans in the sample did not have income reported by the borrower.

## Responses to Complaints

There was one complaint during the exam period. The complaint was filed in late December 2019 and resolved in early January 2020. The bank investigated and responded in a timely manner to the customer lodging the complaint.

## Conclusions for Enid MSA AA Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Enid MSA AA is consistent with the bank's overall performance under the Lending Test in the full scope area(s).

## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the State of Oklahoma is rated Satisfactory.

## Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment areas.

## Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000s)	% of Total \$
Oklahoma Non-MSA	23	71.88%	14,170	85.12%
Enid MSA	9	28.12%	2,478	14.88%

### Oklahoma Non-MSA AA

The number and dollar level of qualified CD loans within the Oklahoma Non-MSA AA reflects adequate responsiveness. BCNA originated 18 CD loans totaling \$13.4 million and assisted five borrowers obtaining Paycheck Protection Program (PPP) loans.

During the evaluation period BCNA originated seven loans to two borrowers totaling \$12.7 million that provided funding to local small businesses for economic development within the AA and to create and retain LMI jobs. Examples include a \$4 million loan with annual renewals to a local company that resulted in maintaining jobs for LMI employees and four loans totaling \$659,000 to a local business to buy additional trucks and land to expand the business that helped create and maintain LMI jobs.

The bank originated 11 loans to three borrowers totaling \$767,000 to purchase 10 rental houses and one apartment complex that offer rents that are affordable for LMI residents. Note that seven of the 10 single family homes are technically HMDA reportable loans; but the other three originated in 2020 when the bank was no longer a HMDA reporter. We did not include the real estate loans in the retail lending test because residential real estate loans represent less than 6 percent of the loan portfolio and the lack of HMDA data for the entire review period.

BCNA actively assisted with the PPP loans within the AA to help sustain operations of local businesses and allow them to maintain employment of their workforce during the COVID-19 crisis. BCNA's participation resulted in the origination of five qualifying PPP loans totaling \$745,000 that maintained 91 jobs in the AA.

### **Enid MSA AA**

The number and dollar level of qualified CD loans within the Enid MSA AA reflects adequate responsiveness. BCNA originated seven CD loans totaling \$2.2 million and assisted two borrowers obtaining PPP loans.

During the evaluation period BCNA originated three loans to three borrowers totaling \$439,000 that provided funding to local small businesses for economic development within the AA, including moderate-income areas, and to create and retain LMI jobs.

Additionally, the bank originated four loans to one borrower totaling \$1.8 million to purchase or refinance rental houses that offer rents that are affordable for LMI residents. Note that the three of the four single family homes are technically HMDA reportable loans; but the other one originated in 2020 when the bank was no longer a HMDA reporter. We did not include the real estate loans in the retail lending test because residential real estate loans represent less than 6 percent of the loan portfolio and the lack of HMDA data for the entire review period.

BCNA actively assisted with the PPP loans within the AA to help sustain operations of local businesses and allow them to maintain employment of their workforce during the COVID-19 crisis. BCNA's participation resulted in the origination of two qualifying PPP loans totaling \$285 thousand that helped maintain 21 jobs in the AA, which includes three moderate-income areas.

### **Number and Amount of Qualified Investments**

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Oklahoma Non-MSA	0	0	15	51	15	88.24%	51	89.47%	0	0
Enid MSA	0	0	2	6	2	11.76%	6	10.53%	0	0

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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

**Oklahoma Non-MSA AA**

The number and dollar level of qualified CD investments within the Oklahoma Non-MSA AA reflects adequate responsiveness.

BCNA donated \$51,000 to 15 qualified organizations within the Oklahoma Non-MSA AA during the evaluation period. These donations were to local nonprofit organizations that provide economic development opportunities in the AA, organizations that have a goal to revitalize rural communities by increasing the supply of low- and moderate-income housing, and organizations that focus on community services that include programs for shelter, food, and family programs and services.

**Enid MSA AA**

The number and dollar level of qualified CD investments within the Enid MSA AA reflects adequate responsiveness.

BCNA donated \$6,000 to two qualified organizations within the Enid MSA AA during the evaluation period. These donations were to local nonprofit organizations that provide economic development support in the AA and provide school supplies and clothing for kids at risk and kids of low-income families.

**Extent to Which the Bank Provides Community Development Services**

**Oklahoma Non-MSA AA**

The extent of qualified CD services within the Oklahoma Non-MSA AA reflects adequate responsiveness.

Nine bank officers serve in various leadership positions in 11 organizations that are involved in economic or small business development activities, or in organizations that provide community services to LMI residents within the AA. Their donation of time and expertise includes providing technical and financial assistance to these organizations. Examples of qualifying CD services include the following.

**Northwest Family Services**

This program provides services to youth, their family members, and others who have, or who are at risk of psychiatric disabilities, alcohol or drug abuse, and who are experiencing other behavioral needs. Services provided include temporary, emergency care of youth, first offender program for adolescents, divorce counseling, and counseling to youth who are runaways, homeless, or in unhealthy family situations. The program operates in Alfalfa County, Woods County, and Major County. An officer has been a board member of the group since 2008.

**Bill Johnson Correctional Facility**

This is a dedicated substance abuse/cognitive behavior facility operated by the Oklahoma Department of Corrections. The mission of the facility is to provide a comprehensive regimented substance abuse treatment program, meaningful work opportunities through institutional jobs and the Prison Public Work Program, educational opportunities, and health care services in order to return the inmate to society with the tools necessary to be a productive citizen. An officer has been a member of the facility's advisory board since 2003.

**Enid MSA AA**

The extent of qualified CD services within the Enid MSA AA reflects adequate responsiveness.

One officer serves in leadership positions in two organizations that are involved in providing community services to LMI residents within the AA. Their donation of time and expertise includes providing technical and financial assistance to these organizations. An example of qualifying CD services includes the following.

**Back-A-Youth (YMCA)**

The Back-A-Youth is a campaign to raise money for underprivileged children with money applied for membership to the YMCA in Enid. Services provided by the YMCA include childcare, youth sports, swim lessons, and other community programs. An officer of the bank has served as the Board President/Capital Campaign Co-Chair since 2017.

**Other Services**

One officer is involved with two organizations located in the broader statewide area that have the potential of helping in the bank's AAs. One organization is involved in statewide capital improvements and the other organization provides assistance and remediation services to Oklahomans with any type of agricultural and environmental issue.

## State of Kansas Rating

### **CRA rating for the State of Kansas<sup>2</sup>: Outstanding**

**The Lending Test is rated: Outstanding**

**The Community Development Test is rated: Outstanding**

The major factors that support this rating include:

- Excellent lending to businesses earning \$1 million or less in gross annual revenues.
- Excellent lending to low- and moderate-income borrowers.
- CD lending indicates excellent responsiveness to the needs of the bank's AA.
- CD qualified investments indicates adequate responsiveness to the needs of the bank's AA.
- The amount of CD services indicates adequate responsiveness to the needs of the bank's AA.

### **Description of Institution's Operations in Kansas**

#### **Kansas Non-MSA AA**

The Kansas Non-MSA AA is comprised of two whole counties, Barber and Harper. There are five census tracts in the AA, all of which are middle-income tracts. There are two branches and two ATMs in the AA. Competition is moderate in the AA. There are six other state banks in the AA. BCNA has the largest share of deposits at 31.8 percent according to the FDIC Market Share Data as of June 30, 2020 with the second largest share of 14.52 percent.

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<sup>2</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.



<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: BancCentral - KS Non-MSA AA 2020</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	5	0.0	0.0	100.0	0.0	0.0
Population by Geography	10,631	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	5,940	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	3,302	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,112	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	1,526	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	856	0.0	0.0	100.0	0.0	0.0
Farms by Geography	192	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	2,820	17.4	17.8	22.1	42.7	0.0
Household Distribution by Income Level	4,414	22.5	16.2	17.2	44.1	0.0
Median Family Income Non-MSAs - KS		\$57,229	Median Housing Value			\$73,701
			Median Gross Rent			\$608
			Families Below Poverty Level			9.9%
<i>Source: 2015 ACS and 2020 D&amp;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>						

We consulted with a community contact in the AA to gain a better understanding of the local economy and credit needs in the community. This community contact is based in Anthony, KS and works to attract new businesses, retain existing businesses, and connect state and federal grant funds to eligible businesses in the Harper County area of Kansas. Manufacturing and agriculture are dominant industries in the area. The manufacturing businesses fared well during the COVID-19 pandemic as did agriculture. Oil and gas is also an influential industry that suffered economically during the pandemic, but has since began to revive. The contact stated that there are more jobs than population in Harper County. Over the previous 12 months ending March 2021, unemployment in the county has varied, with a high of 6.9 percent in January 2021 and a low of 3.1 percent in March 2020, with a current unemployment rate of 3.2 percent according to economic data collected by the St. Louis Federal Reserve Bank. The contact stated that many of the actively available manufacturing jobs are skilled or semi-skilled but that business owners will train new employees. Housing was noted as a need in Harper County, specifically quality traditional housing along with senior focused housing. Many typical homes have severe deferred maintenance, discouraging many prospective home buyers. There is one nursing home each in Anthony, Harper, and Attica. There is a need for independent or assisted senior living communities for seniors to downsize in square footage and reduce their maintenance burden. The contact noted that the City of Harper is currently in early negotiations for a senior living development of patio or garden type homes.

## Scope of Evaluation in Kansas

We reviewed one full-scope AA, the Kansas Non-MSA AA, for the State of Kansas. To assess performance, we sampled loans to small businesses and loans to consumers. This is the only AA in Kansas.

We did not analyze geographic distribution because the Kansas Non-MSA AA does not have any LMI census tracts.

## LENDING TEST

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

### **Conclusions for Kansas Non-MSA AA Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Kansas Non-MSA AA is excellent. We did not analyze geographic dispersion for the Kansas Non-MSA AA as there are no LMI tracts in that AA.

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

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

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

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

The distribution of business loans in the Kansas Non-MSA AA reflects excellent distribution. Lending to small businesses, those with less than \$1 million in gross annual revenues, in the Kansas Non-MSA AA reflects excellent penetration. For the time period of 2018-2020, the penetration to small businesses exceeds the percentage of businesses identified as having revenues of \$1 million or less along with the aggregate lending for these businesses.

#### ***Consumer Loans***

Refer to Table V in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in the Kansas Non-MSA AA reflects good distribution to low- and moderate-income borrowers. For the time period of 2018-2020, the penetration to low-income borrowers reflected excellent performance as the percentage of loans extended to low-income borrowers exceeded the percentage of low-income households identified in the AA. For the same period, the penetration to moderate-income borrowers was good. The percentage of loans extended to moderate-income borrowers was near to the percentage of moderate-income borrowers identified in the AA. Many of the loans sampled were for amounts less than \$10 thousand and the bank does not require proof of income if sufficient collateral is pledged. As such, 31.0 percent of loans in the sample did not have income reported by the borrower.

### **Responses to Complaints**

No complaints of the bank originated in the Kansas Non-MSA AA.

## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Kansas is rated Outstanding.

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

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

### Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000s)	% of Total \$
Kansas Non-MSA	49	100%	16,000	100%

The number and dollar level of qualified CD loans within the Kansas Non-MSA AA reflects excellent responsiveness. BCNA originated 12 CD loans totaling \$14.9 million and assisted 37 borrowers obtaining PPP loans.

During the evaluation period BCNA originated seven loans to three borrowers totaling \$11.5 million that provided funding to local small businesses for economic development within the AA and to create and retain LMI jobs. Examples include an \$3.5 million loan with annual renewals to a local company that expanded their service department. This resulted in the creation and retention of 10-12 jobs for LMI employees in an underserved area. Three loans totaling \$952 thousand for an auto repair business helped maintain two LMI jobs.

Additionally, the bank originated four loans to four borrowers totaling \$177 thousand to acquire 1-4 family rental properties that are affordable for LMI residents. All of the properties are within middle-income underserved census tracts. Note that two of the four single family home loans are technically HMDA reportable loans; but the other two originated in 2020 when the bank was no longer a HMDA reporter. We did not include the real estate loans in the retail lending test because residential real estate loans represent less than 6 percent of the loan portfolio and the lack of HMDA data for the entire review period.

One loan for \$3.3 million was to revitalize the local school facility where a majority of the students qualify for the free/reduced lunch program for LMI families.

BCNA actively assisted with PPP loans within the AA to help sustain operations of local businesses and allow them to maintain employment of their workforce during the COVID-19 crisis. BCNA's participation resulted in the origination of 37 qualifying PPP loans totaling \$1.1 million that helped retain 150 jobs in the AA.

### Number and Amount of Qualified Investments

Assessment Area	Qualified Investments								Unfunded Commitments**	
	Prior Period		Current Period		Total				#	\$(000's)
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$		
Kansas Non-MSA	0	0	2	40	2	100%	40	100%	0	0

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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

The number and dollar level of qualified CD investments within the Kansas Non-MSA AA reflects adequate responsiveness.

BCNA donated \$40,000 to 2 qualified organizations within the Kansas Non-MSA AA during the evaluation period. A large donation was for a program the bank initiated to enhance financial literacy in the four school districts in Barber and Harper Counties. The program partners with schools, businesses, and other community groups to deliver the financial based curriculum. The combined districts have a majority of students approved for free or reduced lunch program for LMI families. An additional donation was to a nonprofit organization dedicated to promoting the health of older Kansans by providing nutritious, well-balanced meals to senior citizens in the AA.

### Extent to Which the Bank Provides Community Development Services

The extent of qualified CD services within the Kansas non-MSA AA reflects adequate responsiveness.

Two bank officers serve in various leadership positions in four organizations that are involved in economic or small business development activities, or in organizations that provide community services to LMI residents within the AA. Their donation of time and expertise includes providing technical and financial assistance to these organizations. An example of qualifying CD services includes the following.

#### **Anthony Chamber of Commerce and Industrial Development Corp**

These not for profit entities are organized for the purpose to stimulate, promote, improve, and assist in the location and development of new industries and business enterprises within or near the City of Anthony, Kansas and to further the continued expansion of existing industrial businesses. An officer of the bank has served as a Chamber Executive Board member and Vice Chairman of the Industrial Development Corp since 2014.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	January 1, 2018 to December 31, 2020	
<b>Bank Products Reviewed:</b>	Small business, consumer loans, community development loans, qualified investments, community development services	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Oklahoma</b>		
Oklahoma Non-MSA AA	Full-Scope	Whole Counties of: Alfalfa, Harper, Major, Woods, Woodward
Enid MSA AA	Limited-Scope	Entirety of Garfield County, includes City of Enid
<b>State of Kansas</b>		
Kansas Non-MSA AA	Full-Scope	Whole Counties of: Barber, Harper

## Appendix B: Summary of MMSA and State Ratings

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RATINGS BancCentral, National Association			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
BCNA	Satisfactory	Satisfactory	Satisfactory
State:			
Oklahoma	Satisfactory	Satisfactory	Satisfactory
Kansas	Outstanding	Outstanding	Outstanding

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

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

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



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

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

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

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

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

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

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

**Rating Area:** A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018-20
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
BancCentral KS AA 2020	75	13,707	22.2	178	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
BancCentral OK AA 2020	226	76,610	67.1	638	0.0	0.0	0.0	0.0	0.0	0.0	36.6	42.1	37.0	63.4	57.9	63.0	0.0	0.0	0.0
BancCentral Enid MSA 2020	36	10,146	10.7	744	0.0	0.0	0.0	31.5	22.2	33.2	41.2	50.0	35.3	27.3	27.8	31.5	0.0	0.0	0.0
<b>Total</b>	<b>337</b>	<b>100,463</b>	<b>100.0</b>	<b>1,560</b>	<b>0.0</b>	0.0	<b>0.0</b>	<b>15.4</b>	10.8	<b>15.8</b>	<b>44.6</b>	46.0	<b>43.4</b>	<b>40.0</b>	43.2	<b>40.8</b>	<b>0.0</b>	0.0	<b>0.0</b>

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018-20
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
BancCentral KS AA 2020	75	13,707	22.2	178	73.9	75.0	27.0	6.3	0.0	19.7	25.0	
BancCentral OK AA 2020	226	76,610	67.1	638	79.8	63.6	35.6	5.7	13.6	14.5	23.7	
BancCentral Enid MSA 2020	36	10,146	10.7	744	82.9	83.3	39.7	5.0	2.8	12.2	13.9	
<b>Total</b>	<b>337</b>	<b>100,463</b>	<b>100.0</b>	<b>1,560</b>	<b>80.8</b>	93.9	<b>36.5</b>	<b>5.4</b>	6.1	<b>13.8</b>	27.8	

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2018-20	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
BancCentral KS AA 2020	185	1,442	28.9	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0	
BancCentral OK AA 2020	455	6,121	71.1	0.0	0.0	0.0	0.0	34.6	32.7	65.4	67.3	0.0	0.0	
<b>Total</b>	640	7,563	100.0	<b>0.0</b>	0.0	<b>15.0</b>	0.0	<b>45.5</b>	68.2	<b>39.4</b>	31.8	<b>0.0</b>	0.0	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.  
Due to rounding, totals may not equal 100.0%

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2018-20	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
BancCentral KS AA 2020	185	1,442	28.9	22.5	25.7	16.2	13.8	17.2	13.8	44.1	15.5	0.0	31.0	
BancCentral OK AA 2020	455	6,121	71.1	19.4	11.5	12.9	1.9	15.0	7.7	52.7	19.2	0.0	59.6	
<b>Total</b>	640	7,563	100.0	<b>21.0</b>	19.1	<b>15.3</b>	<b>8.2</b>	<b>17.9</b>	<b>10.9</b>	<b>45.8</b>	<b>17.3</b>	<b>0.0</b>	44.6	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.  
Due to rounding, totals may not equal 100.0%