



PUBLIC DISCLOSURE

July 17, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

North American Savings Bank, FSB
Charter Number: 703927

12498 S US Highway 71
Grandview, MO 64030

Office of the Comptroller of the Currency

7101 College Boulevard, Suite 1600
Overland Park, KS 66210

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 following table indicates the performance level of North American Savings Bank, FSB (NASB) with respect to the Lending, Investment, and Service Tests:

Performance Levels	North American Savings Bank, FSB Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			X
High Satisfactory		X	
Low Satisfactory	X		
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on performance in both the Kansas City multistate metropolitan statistical area (MMSA) and the St. Joseph MMSA. The greatest amount of weight is placed on performance in the Kansas City MMSA, with 90.0 percent of the bank deposits and 98.9 percent of the bank loans within the bank’s assessment areas (AAs). The bank exhibits a good distribution of home mortgage loans among individuals in different income levels. NASB exhibits adequate geographic distribution to loans in its AAs.
- The Investment Test rating is based on performance in both the Kansas City MMSA and the St. Joseph MMSA. The dollar volume of current- and prior-period investments represented 4.5 percent of NASB’s total tier 1 capital with the bank exhibiting a good level of investments. The Service Test rating is based on performance in both the Kansas City MMSA and the St. Joseph MMSA. The greatest weight is placed on performance in the Kansas City MMSA with highest volume of bank’s branches, deposit-taking ATMs, and service hours provided by bank personnel. Service delivery systems are accessible to geographies and individuals of different income levels.

Lending in Assessment Area

An adequate percentage of the bank’s loans are in in its AAs when considering the institutions business strategy to originate and purchase home mortgage loans across the country. The bank originated and purchased 10.4 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. The OCC considered the bank’s business strategy to originate and purchase home mortgage loans across the country when determining the conclusion. The OCC additionally considered loans inside the AAs for the Lending Test geographical distribution analysis.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2020	1,834	11.6	13,976	88.4	15,810	497,711	8.9	5,111,809	91.1	5,609,519
2021	1,579	9.4	15,277	90.6	16,856	441,181	7.5	5,480,010	92.5	5,921,191
Subtotal	3,413	10.4	29,253	89.6	32,666	938,891	8.1	10,591,819	91.9	11,530,710
Total	3,413	10.4	29,253	89.6	32,666	938,891	8.1	10,591,819	91.9	11,530,710

Source: Bank Data
Due to rounding, totals may not equal 100.0%

Description of Institution

NASB is a \$2.2 billion (as of December 31, 2021) wholly owned subsidiary of NASB Financial, Inc., with both headquartered in Grandview, Missouri. NASB is a full-service financial institution with 10 branches that include on premises deposit-taking automated teller machines (ATMs). The bank did not open any new branches during the evaluation period, but closed one middle-income tract branch located in Lafayette County. NASB has two AAs: the Kansas City MMSA and the St. Joseph MMSA.

NASB's business strategy primarily focuses on the residential real estate market, specifically home purchase and refinancing of conventional loans in local market areas and Veterans Affairs (VA) and Federal Housing Administration (FHA) loans nationally. Other product/service offerings include nationwide ATM access with no fees and access to electronic banking services such as mobile banking.

As of December 31, 2021, NASB had tier 1 capital of \$397.9 million. The loan portfolio accounted for approximately 83 percent of total assets. Real estate loans totals approximately 99.4 percent of the loan portfolio, consisting primarily of home mortgage loans. According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report dated June 30, 2021, NASB had total deposits of \$1.3 billion and is ranked twelfth in deposit market share in the Kansas City MMSA and fifth in the St. Joseph MMSA.

There are no known legal, financial, or other factors that may impede the bank's ability to meet the credit needs in its AAs. NASB was rated "Satisfactory" in the last published CRA Performance Evaluation (PE) dated August 17, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test review is January 1, 2020, through December 31, 2021. Lending Test data for 2022 was not included in this evaluation as aggregate lending data for 2022 was not available at the time of our review. The 2022 data will be included in the bank's next PE. The evaluation period for the Investment Test, Service Test, and all CD activities is January 1, 2020, through

December 31, 2022. NASB's primary loan products for this evaluation period are loans reported under the Home Mortgage Disclosure Act (HMDA). Multi-family, small business, small farm loans, and consumer loans have minimal volumes and are not primary products for the bank. Therefore, we did not evaluate these products.

Selection of Areas for Full-Scope Review

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

Ratings

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

The Kansas City MMSA received the most weight to arrive at overall conclusions since it represents the majority of bank-wide loans and deposits. The Kansas City MMSA accounts for 90.0 percent of bank-wide deposits and 98.9 percent of home loan originations. The MMSA and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area 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 bank (or any affiliate whose loans have been considered as part of the bank's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this bank engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the bank'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.

Multistate Metropolitan Statistical Area Rating

Kansas City MMSA

CRA rating for the Kansas City MMSA¹: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- An adequate distribution of home mortgage loans in low- and moderate-income (LMI) tracts.
- A good distribution of home mortgages to borrowers of different incomes.
- An adequate level of responsiveness of CD loans to address community needs.
- A good level of responsiveness to CD investments towards community needs.
- An excellent level of community services with a readily accessible level of banking services in LMI tracts.

Description of Institution's Operations in the Kansas City MMSA

NASB operates nine full-service branches in the Kansas City MMSA. This AA consists of seven of the 14 counties in the Kansas City, MO-KS metropolitan statistical area (MSA): Cass, Clay, Jackson, Platte, and Lafayette in Missouri. In addition, although the bank does not have branches in the state of Kansas, the counties of Johnson and Wyandotte are adjacent to Jackson County and are included within the bank's Kansas City MMSA delineation. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude any areas, particularly LMI geographies.

Strong competition exists for financial services within the Kansas City MMSA. Competition includes large regional banks, large nationwide banks, and community banks. According to June 30, 2021, FDIC Deposit Market Share Report, NASB had \$1.3 billion in deposits in the Kansas City MMSA for a 1.67 percent deposit market share. NASB's deposit market share ranked twelfth out of 106 deposit-taking institutions in the AA. As of December 31, 2021, the U.S. Bureau of Labor Statistics unemployment rate in the Kansas City MMSA was 2.4 percent, which was lower than the nation average of 3.9 percent. The Kansas City MMSA is home to several major industries, including restaurants, hospitals, pharmaceutical, and employment services. The federal and state government also employs large numbers of workers. The top employers in the AA include Cerner Corporation, HCA Midwest Health System, St. Luke's Health System, Ford Motor Co., the University of Kansas Hospital, and Children's Mercy Hospital and Clinics.

Based on reports from the Kansas City Regional Association of Realtors, average median sales price for homes in the Kansas City MMSA counties increased 12.2 percent from \$229,279 in 2020 to \$257,190 in 2021. The average monthly inventory of active properties available in those counties dropped from 542

¹This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

in 2020 to 376 in 2021, reflecting a decrease of 31 percent. The average days on the market until sale dropped from 42 days in 2020 to 22 days in 2021, representing an increase in market competition.

We reviewed two community contacts in the Kansas City MMSA. Both contacts serve in organizations that assist with housing needs for LMI residents. Economic growth has been steady, and unemployment is low. Affordable housing remains a challenge as renters struggle to afford a home. Rent continues to rise, and LMI individuals now need to allocate an average of 50 percent of their income for rent. Our contacts indicated a continual need for physical banking locations and financial literacy services in underserved communities. Contacts did not note any instances of discrimination.

Please refer to the Demographic Information for the Kansas City MMSA in Table A below for detailed demographics and other performance context information.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2020-2021 Kansas City MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	490	15.9	22.2	31.4	26.5	3.9
Population by Geography	1,865,977	9.6	21.4	36.9	31.8	0.3
Housing Units by Geography	801,706	11.4	22.6	37.2	28.4	0.5
Owner-Occupied Units by Geography	474,321	6.0	17.6	39.0	37.2	0.2
Occupied Rental Units by Geography	255,134	16.8	30.1	36.1	16.3	0.7
Vacant Units by Geography	72,251	27.1	28.5	29.4	13.1	1.9
Businesses by Geography	168,507	7.3	18.6	34.1	38.2	1.9
Farms by Geography	4,703	5.0	17.1	41.7	35.9	0.4
Family Distribution by Income Level	470,787	21.3	17.4	20.3	41.0	0.0
Household Distribution by Income Level	729,455	23.5	16.7	17.6	42.2	0.0
Median Family Income MSA - 28140 Kansas City, MO-KS MMSA		\$72,623	Median Housing Value			\$162,916
			Median Gross Rent			\$857
			Families Below Poverty Level			9.1%
<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>						

Scope of Evaluation in the Kansas City MMSA

NASB has one delineated AA within the MMSA used in the analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KANSAS CITY MMSA

LENDING TEST

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

Based on a full-scope review, the bank’s performance in the Kansas City MMSA is adequate.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Kansas City MMSA	3,376	0	0	17	3,393

Dollar Volume of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Kansas City MMSA	\$933,337	0	0	\$6,512	\$939,849

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the “MMSA” section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank’s home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage loans in the Kansas City MMSA is adequate given the amount of vacant housing available combined with the affordability of housing in the market. The distribution of home mortgages in moderate-income geographies is adequate. The geographic distribution is slightly below area demographics and the industry aggregate. The distribution of home mortgages in low-income geographies is adequate. The geographic distribution is below the industry aggregate and is significantly below area demographics. The OCC recognizes limited availability of LMI housing can make it difficult for the bank to originate mortgages in LMI areas in the MMSA. Demographics show owner-occupied units and occupied rentals at 6.04 percent and 16.8 percent in low-income tracts, and 17.6 percent and 30.1 percent in moderate income areas, all respectively. The OCC considered demographic information showing 27.1 percent of houses in low-income areas, and 28.51 percent of houses in moderate income areas, as vacant.

During the analysis, examiners considered the real estate market during the assessment period. Using industry data from the Kansas City Regional Association of Realtors and the Federal Reserve Economic Data (FRED), examiners conclude that LMI individuals could not afford a home at the average selling price. The OCC considered multiple community contacts confirming that there is a need in the MMSA for more affordable housing.

Lending Gap Analysis

We reviewed summary reports and analyzed NASB’s home mortgage lending activity over the evaluation period to identify gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels.

Home Mortgage Loans

Refer to Table P in the “MMSA” section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall borrower distribution of home mortgage loans in the Kansas City MMSA is good. The distribution of home mortgage loans to moderate-income borrowers is good. The percentage of loans to moderate-income borrowers is only slightly below area demographics and is only slightly below the industry aggregate. The distribution of home mortgage loans to low-income borrowers is adequate. Although the percentage of loans to low-income borrowers is slightly below the industry aggregate, the bank’s percentage is below area demographics. Other factors considered during the lending analysis were the affordability of home mortgages at this income level and strong competition from other banks. In addition, we were unable to evaluate the borrower distribution for a portion of the bank’s loans since income information was not available for 11.3 percent of bank reported home loan mortgages for during the evaluation period.

Housing costs with lower inventories impact LMI borrower’s ability to qualify for a home mortgage loan. The median family income for this AA is \$86,300 (2021). Based on data from the Kansas City Regional Association of Realtors, the average median housing cost in the Kansas City MMSA was \$257,190 (2021). A common rule is housing costs should be no more than 28 percent of gross income. For this analysis, we considered the cost of housing compared to LMI family incomes of up to \$43,150 for low-income families and up to \$69,040 for moderate-income families. Lower-income families’ do not have the ability to qualify for a home mortgage loan with their current income levels, as the estimated monthly payments for the average median sales price home would be approximately \$1,386, including insurance and maintenance for 2021. Housing costs would be 39 percent of gross income. Moderate-income families’ have limited ability to qualify for a home mortgage loan with their current income levels. Using the same \$1,386, including insurance and maintenance for 2021, a moderate-income family with gross income less than \$59,400 would not have the ability to qualify for a home mortgage loan. In addition, the number of families living below the poverty level is 9.1 percent, which makes it difficult to afford a home loan at this level when unable to meet minimum living needs. Down payment requirements also affect the affordability of LMI borrowers to purchase a home throughout the market. A private study indicates 39 percent of potential home buyers could not make a down payment of at least five percent in 2022, up from 33 percent in 2019.

To assist LMI borrowers, NASB implemented a lending assistance program, Good Neighbor Discount, which waives lender fees and provides lender credits for closing assistance for applicants within LMI tracts in the Kansas City and St. Joseph MMSA. This is in addition to the other products NASB offers through federal programs, including Good Neighbor Loans (Federal Housing Administration (FHA) and Veterans Affairs (VA)), HomeReady (Fannie Mae), HomePossible (Freddie Mac), and the Missouri Housing Development Commission’s First Place and Next Step Loans. Of the 3,413 home loans originated by NASB in its AAs, 26.8 percent utilized one of the flexible lending programs.

Community Development Lending

The bank has made an adequate level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Management originated 17 CD loans totaling \$6.5 million, or 1.8 percent of tier 1 capital allocated to the Kansas City MMSA. Fifteen loans were to owners of affordable housing units where the bank modified the loan to allow COVID-19 forbearance. Two loans were for rehabilitation of affordable housing for LMI individuals.

Product Innovation and Flexibility

The bank uses innovative and/or flexible lending practices in order to serve the Kansas City MMSA credit needs. Flexible lending programs include Good Neighbor Discount Program with FHA and VA loans, Fannie Mae Home Ready, Freddie Mac Home Possible, and the Missouri Housing Development Commission (MHDC). These programs offer credit flexibilities and low down payments to LMI individuals and/or borrowers in LMI census tracts (CTs).

The Good Neighbor Loan Program provides affordable loan terms to applicants in LMI CTs or with a household income that does not exceed 80 percent of median family income. Borrowers must be in an FHA or VA loan product to qualify. The program offers lower qualifying credit scores, lender fee waivers, and lender credits for closing cost assistance to borrowers in its AAs. In total, the bank has loaned \$52 million throughout the Kansas City MMSA using the Good Neighbor Discount Program, with \$538 thousand in fees saved for 345 loans originated. For the Fannie Mae Home Ready and Freddie Mac Home Possible loan programs, it provides affordable, low-down payment purchase loans for LMI borrowers. Both programs permit loans for non-occupant borrowers. Between the two programs, the bank originated 113 loans totaling \$19.7 million within the Kansas City MMSA. In addition, the MHDC First Place and Next Step loan products are first-time home buyer programs targeted to LMI individuals. Programs target borrowers based on income and geography and offer cash assistance in the form of a forgivable second lien for a down payment and closing costs. During the evaluation period, the bank originated 12 MHDC loans totaling \$1.68 million.

INVESTMENT TEST

The institution's performance under the Investment Test in the Kansas City MMSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Kansas City MMSA is good. During the evaluation period, investments totaled \$16.7 million and represent 4.6 percent of the AA's allocated tier one capital.

The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The bank rarely uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Kansas City MMSA	5	\$1,430	152	\$15,324	157	90.23%	\$16,754	94.25%	0	\$0
BSRA	1	\$23	0	\$0	1	0.57%	\$23	0.13%	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 bank's financial reporting system.

SERVICE TEST

The bank's performance under the Service Test in the Kansas City MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Kansas City MMSA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AAs.

Distribution of Branch Delivery System								2020-2021			
Assessment Area	Deposits		Branches				Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Kansas City MMSA	100	10	100	0	60	30	10	9.6	21.4	36.9	31.8

Distribution of Branch Delivery System								2022			
Assessment Area	Deposits		Branches				Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Kansas City MMSA	100	9	100	11.1	66.7	22.2	0.0	7.2	24.2	37.2	30.6

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings		Net change in Location of Branches (+ or -)			
	# of Branch Openings	# of Branch Closings	Low	Mod	Mid	Upp
Kansas City MMSA	0	1	0	0	-1	0

The bank's opening and closing of branches has not affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

Services, including where appropriate, business hours are tailored to the convenience and needs of the various portions of its AAs, particularly LMI geographies and/or individuals.

In 2020-21, the bank had no branch locations or deposit-taking ATMs located in low-income CTs. The bank had six branches and six deposit-taking ATMs located in moderate-income CTs. This represents 60.0 percent each of branch locations and deposit-taking ATMs located in moderate-income CTs. In 2022, after a CTs change, the bank had one branch location and one deposit-taking ATM located a in low-income CT. The bank continued to have six branch locations and six deposit-taking ATMs located in moderate-income CTs. This represents 77.8 percent of branches and deposit-taking ATMs in LMI CTs.

The bank complements its traditional service delivery systems with alternative delivery systems, including debit cards, telephone and online banking, electronic bill-pay, and mobile banking options. These systems provide additional delivery availability and access to banking services to both retail and business customers. NASB participates in nationwide system of non-deposit taking ATMs, which customers can use with no fee charged. This includes 302 ATMs located in the AA. The OCC does not place significant weight on these services, as no data was available to determine their impact on LMI income individuals.

The bank closed one branch in 2021 in a middle-income CT during the evaluation period. The OCC did not identify any negative impact to LMI individuals from the closure. The bank's opening and closing of branches has not affected the accessibility of its delivery systems, particularly in LMI geographies and/or individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals.

Community Development Services

The bank provides a significant level of CD services.

The bank had 78 different employees provide 476 hours of CD services to 15 different organizations and conducted 14 financial education trainings primarily to LMI individuals. One employee provided 39 hours of services to an organization that assists small business owners and entrepreneurs with financial education and business planning during the evaluation period. The remaining 437 service hours were to organizations with a purpose of community service, economic development, or affordable housing. Examples of service hours include the following:

- Providing financial education to youth employment program for LMI households.
- Serving as a member of an advisory committee to an organization that provides financial education and community services to LMI individuals.
- Serving on a committee of a CD Corporation to ensure LMI households have affordable housing.

Statewide or Regional

Management originated four CD loans totaling \$7,297,844 in the Statewide or Regional AA. All CD loans provided support and/or rehabilitation for affordable housing.

Multistate Metropolitan Statistical Area Rating

St. Joseph MMSA

CRA rating for the St. Joseph MMSA²: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- An adequate level of loans in LMI CTs.
- A good distribution of loans to borrowers of different incomes.
- An adequate level of CD investments.
- A good level of CD services reflecting responsiveness to community needs.

Description of Institution's Operations in the St. Joseph MMSA

NASB operates one full-service branch in the St. Joseph MMSA. The AA consists of the single county of Buchanan. This one county AA is one of four counties within the MMSA. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude any areas, particularly LMI geographies. Competition for financial services is strong and includes large regional banks, large nationwide banks, and community banks. The top four competitors within the AA has a combined deposit market share totaling 71.54 percent. According to the June 30, 2021, FDIC Deposit Market Share Report, NASB had \$144.6 million in deposits in the St. Joseph MMSA. NASB had a 6.59 percent deposit market share, ranking fifth out of 14 deposit-taking institutions in the AA. As of December 31, 2021, the U.S. Bureau of Labor Statistics unemployment rate in the St. Joseph MMSA was 2.3 percent, which was lower than the national average of 3.9 percent and Missouri of 3.1 percent. Major industries include health care, food processing, education, government, and animal pharmaceuticals. The top employers in the AA include Mosaic Life Care, Triumph Foods, St. Joseph School District, 139th Airlift Wing MO Air National Guard, and Boehringer Ingelheim.

Based on reports from the Kansas City Regional Association of Realtors, average monthly median sales price for existing homes in Buchanan County increased 12.8 percent from \$126,583 in 2020 to \$142,725 in 2021. The inventory of active available properties in Buchanan County averaged 219 in 2020, and dropped to 140 in 2021, reflecting a decrease of 36 percent. The average days on market until sale dropped from 52 days in 2020 to 31 days in 2021, representing an increase in market competition.

We reviewed two community contacts for the St. Joseph MMSA. Both organizations promote traditional economic development and services for lower income residents. Contacts indicate that overall economic conditions are stable as unemployment remains low and businesses have recovered since the pandemic. While housing prices are high, St. Joseph offers a fair amount of affordable housing in the downtown

²This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

area. Payday loans and predatory lending are high as borrowers search for alternatives to traditional lending products to meet their needs.

Please refer to the Demographic Information for the St. Joseph MMSA in Table A below for detailed demographics and other performance context information.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2020-2021 St Joseph MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	4.0	28.0	48.0	20.0	0.0
Population by Geography	89,561	2.0	26.7	45.8	25.5	0.0
Housing Units by Geography	38,487	2.8	28.3	47.5	21.3	0.0
Owner-Occupied Units by Geography	21,091	0.9	22.8	48.9	27.4	0.0
Occupied Rental Units by Geography	12,085	5.3	30.6	48.2	15.9	0.0
Vacant Units by Geography	5,311	4.7	45.2	40.6	9.5	0.0
Businesses by Geography	5,301	7.7	18.3	41.5	32.5	0.0
Farms by Geography	209	1.4	7.7	60.8	30.1	0.0
Family Distribution by Income Level	20,874	22.3	17.2	24.0	36.4	0.0
Household Distribution by Income Level	33,176	25.9	16.0	17.4	40.6	0.0
Median Family Income MSA - 41140 St. Joseph, MO-KS MMSA		\$59,820	Median Housing Value			\$115,283
			Median Gross Rent			\$702
			Families Below Poverty Level			13.9%
<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>						

Scope of Evaluation in the St. Joseph MMSA

There is only one AA within the MMSA, consisting of Buchanan County, part of the St. Joseph MMSA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ST. JOSEPH MMSA

LENDING TEST

The bank’s performance under the Lending Test in the St. Joseph MMSA is rated Low Satisfactory.

Based on a full-scope review, the bank’s performance in the St. Joseph MMSA is adequate.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
St. Joseph	37	0	0	0	37

Dollar Volume of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
St. Joseph	\$5,554	0	0	0	\$5,554

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the “MMSA” section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank’s home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage loans in the St. Joseph MMSA is adequate. The distribution of home mortgages in moderate-income geographies is adequate. The geographic distribution is slightly below the industry aggregate. During the analysis, we took into consideration the high percentage of rental and vacant units in moderate-income geographies at 30.6 percent and 45.2 percent, respectively. A geographic analysis of low-income geographies is not meaningful since less than one percent of the housing units for this area are owner-occupied.

Lending Gap Analysis

We reviewed summary reports and analyzed NASB’s home mortgage lending activity over the evaluation period to identify gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels.

Home Mortgage Loans

Refer to Table P in the “MMSA” section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall borrower distribution of home mortgage loans in the St. Joseph MMSA is good. The distribution of home mortgage loans to moderate-income borrowers is good. The percentage of loans to moderate-income borrowers exceeds the area demographics and slightly exceeds the industry aggregate. The distribution of home mortgage loans to low-income borrowers is adequate. The percentage of loans to low-income borrowers exceeds the industry aggregate, but is below area demographics.

Housing costs continue to impact LMI borrower’s ability to qualify for and/or to obtain a home mortgage loan. Based on data from the Kansas City Regional Association of Realtors, the average monthly median sales price in Buchanan Country was \$142,725 for 2021. A common rule is housing costs should be no more than 28 percent of an individual’s gross income. For the analysis, we considered the costs of housing compared to 2021 LMI family incomes of up to \$33,900 for low-

income families and up to \$54,240 for moderate-income families in this AA. Lower-income borrower's do not have the ability to qualify for a home mortgage loan with their current income levels, as the estimated monthly payments for the average median sales price home would be approximately \$902, including insurance and maintenance for 2021. Housing costs would be 32 percent of gross income. Moderate-income families' have limited ability to qualify for a home mortgage loan with their current income levels. Using the same \$902, including insurance and maintenance for 2021, a moderate-income family with gross income less than \$38,657 would not have the ability to qualify for a home mortgage loan. In addition, the number of families living below the poverty level is 13.9 percent, which makes it difficult to afford a home loan when unable to meet minimum living needs. Down payment requirements also affect the affordability of LMI borrowers to purchase a home throughout the market. A private study indicates 39 percent of potential home buyers could not make a down payment of at least five percent in 2022, up from 33 percent in 2019. To assist LMI borrowers, NASB implemented a lending assistance program, Good Neighbor Discount, which waives lender fees and provides lender credits for closing assistance for applicants within LMI CTs in the Kansas City and St. Joseph MMSAs. This is in addition to the other products NASB offers through federal programs, including Good Neighbor Loans (FHA and VA), Fannie Mae HomeReady, and Freddie Mac Home Possible.

Community Development Lending

The bank has made few if any CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

No CD loans were provided by bank management for the St. Joseph MMSA.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve St. Joseph MMSA credit needs. Flexible lending programs include Good Neighbor Discount Program with FHA and VA loans, Fannie Mae Home Ready, Freddie Mac Home Possible, and the MHDC. These programs offer credit flexibilities and low down payments to LMI individuals and/or borrowers in LMI CTs.

The Good Neighbor Loan Program provides affordable loan terms to applicants in LMI CTs or with a household income that does not exceed 80 percent of median family income. Borrowers must be in an FHA or VA loan product to qualify. The program offers lower qualifying credit scores, lender fee waivers, and lender credits for closing cost assistance to borrowers in its AAs. In addition, the MHDC First Place and Next Step loan products are first-time home buyer programs targeted to LMI individuals. Programs target borrowers based on income and geography and offer cash assistance in the form of a forgivable second lien for a down payment and closing costs. During the evaluation period, the bank originated 12 Good Neighbor FHA and VA loans totaling \$2.0 million and one MHDC loan totaling \$150,000 in the MMSA.

In addition, the bank participates in Fannie Mae Home Ready and Freddie Mac Home Possible loan programs. Both programs provide affordable, low-down payment purchase loans for LMI borrowers. Both programs permit loans for non-occupant borrowers. The bank originated one Fannie Mae Home Ready loan within the St. Joseph MMSA, in the amount of \$61,000. The bank did not originate any Freddie Mac Home Possible loans in the St. Joseph MMSA during the evaluation period.

INVESTMENT TEST

The institution's performance under the Investment Test in the St. Joseph MMSA is rated Low Satisfactory.

Based on a full-scope review, the institution's performance in the St. Joseph MMSA is adequate. The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. During the evaluation period, investments and grants totaled \$1 million and represent 2.4 percent of allocated tier 1 capital. Bank management provided 13 donations totaling more than \$796 thousand.

Management purchased two new investments totaling more than \$140 thousand in the AA during the evaluation period. All investments support affordable housing for LMI individuals. The bank had two prior period investments totaling over \$63 thousand.

Management made 13 qualified donations totaling more than \$796 thousand to five organizations in the AA during the evaluation period. Donations supported organizations who provide community services such as programs for childcare, literacy resources, youth programs, and more targeted to LMI individuals.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank rarely uses, innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
St. Joseph AA	2	\$63	14	\$937	16	9.20%	\$1,000	5.63%	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 bank's financial reporting system.

SERVICE TEST

The institution's performance under the Service Test in the St. Joseph MMSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the St. Joseph MMSA is good.

Retail Banking Services

Delivery systems are reasonably accessible to significant portions of the AAs, particularly LMI geographies and/or individuals.

Distribution of Branch Delivery System								2020-2021			
Assessment Area	Deposits		Branches					Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
St. Joseph MO MMSA	100	1	100	0	0	0	100	2.0	26.7	45.8	25.5

Distribution of Branch Delivery System								2022			
Assessment Area	Deposits		Branches					Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
St. Joseph MO MMSA	100	1	100	0	0	100	0	6.5	18.1	65.6	9.8

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings		Net change in Location of Branches (+ or -)			
	# of Branch Openings	# of Branch Closings				
			Low	Mod	Mid	Upp
St. Joseph	0	0	0	0	0	0

The bank did not open or close branches in the St. Joseph MMSA during the evaluation period.

Services, including where appropriate, business hours do not vary in a way that inconveniences the various portions of its AAs, particularly LMI geographies and/or individuals. The bank has no branch locations or deposit-taking ATMs located in a LMI CTs, however, NASB has a branch located one mile from a moderate-income CT with a deposit-taking ATM at the same location. For the 2020 to 2021 period, 15.7 percent of the branch's customers were from LMI CTs and for 2022, 14.5 percent of the branch customers were from LMI CTs. The branch is accessible via three public bus routes that serve a busy retail area with stops in walking distance.

The bank complements its traditional service delivery systems with alternative delivery systems, including debit cards, telephone and online banking, electronic bill-pay, access to a no fee ATM network, and mobile banking options. These systems provide additional delivery availability and access to banking services to both retail and business customers. NASB participates in nationwide system of non-deposit taking ATMs, which customers can use with no fee charged with nine such ATMs located in the AA. The OCC does not place significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

The bank provides a significant level of CD services. Three different NASB employees provided 60 hours of CD services to three different organizations. Examples of service hours include the following:

- Serve on an allocations committee with an organization that provides funding to organizations with individuals who have immediate needs not met by traditional funding resources within the community.
- Providing financial education and mentoring to an organization primarily serving children from low- to moderate-income families.

Appendix A: Scope of Examination

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

Time Period Reviewed:	Lending Test: 01/01/2020 – 12/31/2021 Community Development: 01/01/2020 – 12/31/2022	
Bank Products Reviewed:	Home mortgage Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Kansas City MMSA	Large Bank	Jackson, Clay, Cass, Platte, Johnson (Kansas), Lafayette, Wyandotte (Kansas) Counties
St. Joseph MMSA	Large Bank	Buchanan County

Appendix B: Summary of MMSA and State Ratings

RATINGS NORTH AMERICAN SAVINGS BANK, FSB				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
	Low Satisfactory	High Satisfactory	Outstanding	Satisfactory
MMSA or State:				
Kansas City	Low Satisfactory	High Satisfactory	Outstanding	Satisfactory
St. Joseph	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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.

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

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 loans are treated the same 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 30th 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 O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Kansas City MMSA	3,376	933,337	98.9	117,758	6.0	1.6	3.1	17.6	9.8	14.7	39.0	34.6	37.8	37.2	53.9	44.3	0.2	0.1	0.2	
St Joseph MMSA	37	5,554	1.1	3,281	0.9	0.0	0.7	22.8	16.2	19.0	48.9	48.6	49.6	27.4	35.1	30.7	0.0	0.0	0.0	
Total	3,413	938,891	100.0	121,039	6.0	1.6	3.1	17.6	9.8	14.7	39.0	34.6	37.8	37.2	53.9	44.3	0.2	0.1	0.2	

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 North American Savings Bank (10000703927) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Kansas City MMSA	3,376	933,337	98.9	117,758	21.3	5.3	7.6	17.4	16.7	17.8	20.3	21.0	20.2	41.0	45.7	34.3	0.0	11.3	20.1	
St Joseph MMSA	37	5,554	1.1	3,281	22.3	10.8	7.5	17.2	21.6	21.5	24.0	27.0	19.4	36.4	37.8	28.9	0.0	2.7	22.7	
Total	3,413	938,891	100.0	121,039	21.3	5.3	7.6	17.4	16.7	17.8	20.3	21.0	20.2	41.0	45.7	34.3	0.0	11.3	20.1	

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 North American Savings Bank (10000703927) excluded from Aggregate