



**PUBLIC DISCLOSURE**

July 3, 2023

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

First National Bank of Fort Smith  
Charter Number: 1950

602 Garrison Ave.  
Fort Smith, AR 72902

Office of the Comptroller of the Currency

Victory Building  
1401 West Capitol Ave.  
Suite 350  
Little Rock, AR 72201

**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 Community Reinvestment Act (CRA) Rating:** This institution is rated Satisfactory

The following table indicates the performance level of **The First National Bank of Fort Smith** with respect to the Lending, Investment, and Service Tests:

Performance Levels	First National Bank of Fort Smith Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		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 the performance across all rating areas. The Fort Smith AR-OK multi-state metropolitan statistical area (MMSA) received greater emphasis based on the bank’s source of deposits, lending activity, and branching. A substantial majority of the bank’s loans were made in its assessment areas (AAs). Community Development (CD) loans supported community needs for affordable housing.
- The Investment Test rating is based on performance in all rating areas. Qualified CD investments compared to allocated tier 1 capital were adequate across all rating areas. CD investments addressed community needs for affordable housing across both rating areas.
- The Service Test rating is based on the performance across all rating areas, with weight given to the Fort Smith AR-OK MMSA. CD services benefited low- and moderate-income (LMI) individuals through providing technical support for entities providing food security, affordable childcare, and affordable housing.

**Lending in Assessment Area**

A substantial majority the bank’s loans are in in its AAs.

The bank originated and purchased 94.3 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. Farm loans are not a primary product but were included in the table below for informational purposes.

<b>Table D - Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total #</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total \$(000s)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
Home Mortgage										
2020	777	95.3	38	4.7	815	206,492	96.3	7,843	3.7	214,335
2021	697	93.2	51	6.8	748	232,928	82.1	50,672	17.9	283,600
<b>Subtotal</b>	<b>1,474</b>	<b>94.3</b>	<b>89</b>	<b>5.7</b>	<b>1,563</b>	<b>439,420</b>	<b>88.2</b>	<b>58,516</b>	<b>11.8</b>	<b>497,935</b>
Small Business										
2020	732	95.6	34	4.4	766	112,752	97.9	2,416	2.1	115,168
2021	766	96.2	30	3.8	796	114,592	95.6	5,314	4.4	119,906
<b>Subtotal</b>	<b>1,498</b>	<b>95.9</b>	<b>64</b>	<b>4.1</b>	<b>1,562</b>	<b>227,344</b>	<b>96.7</b>	<b>7,730</b>	<b>3.3</b>	<b>235,074</b>
Small Farm										
2020	99	83.2	20	16.8	119	4,676	71.6	1,857	28.4	6,533
2021	61	80.3	15	19.7	76	3,716	67.5	1,787	32.5	5,503
<b>Subtotal</b>	<b>160</b>	<b>82.1</b>	<b>35</b>	<b>17.9</b>	<b>195</b>	<b>8,392</b>	<b>69.7</b>	<b>3,644</b>	<b>30.3</b>	<b>12,036</b>
<b>Total</b>	<b>3,132</b>	<b>94.3</b>	<b>188</b>	<b>5.7</b>	<b>3,320</b>	<b>675,156</b>	<b>90.6</b>	<b>69,890</b>	<b>9.4</b>	<b>745,045</b>
<i>Source: Bank Data</i>										
<i>Due to rounding, totals may not equal 100.0%</i>										

### Description of Institution

First National Bank of Fort Smith (“FNB FS” or “the bank”) chartered in 1872. In 1989 First Bank Corporation formed to be the parent holding company. During the review period, affiliates included Citizens Bank and Trust in Van Buren, Arkansas (TA \$531 million), Central National Bank of Poteau, Oklahoma (TA \$346 million), Brown-Hiller-Clark & Associates (an insurance company), and Realty Appraisals. Activities of the affiliate bank and non-bank affiliates were not considered in the FNB FS CRA performance evaluation. Both the affiliate bank and non-bank affiliates are relatively close in proximity to Fort Smith, Arkansas.

FNB FS is the largest locally owned bank in Fort Smith. For the years 2020 and 2021, the bank had two AA, the Fort Smith AR-OK MMSA #22900 and the Fayetteville-Springdale-Rogers AR MSA #22220. In 2020, senior management added 11 census tracts (CTs) in Washington County Arkansas to the Fayetteville-Springdale-Rogers, AR MSA AA. During the evaluation period, FNB FS had the evaluation period with 15 full-service locations in the Fort Smith AR-OK MMSA including four off-site automated teller machines (ATMs), and six full-service locations in the Fayetteville-Springdale-Rogers AR MSA. Fort Smith is the third largest city in Arkansas and located on the Arkansas and Oklahoma border. Fort Smith is a regional manufacturing hub and home to a National Guard facility, a four-year university, and a medical college.

As of December 31, 2021, total assets were \$1.9 billion of which \$1.0 billion or 54.6 percent comprised of loans. The bank’s primary lending product is real estate loans which totaled \$878.2 million or 84.7

percent of net loans. The bank's second primary lending product is commercial loans which totaled \$142.2 million or 13.7 percent of net loans. Tier 1 capital totals \$165.2 million.

There were no legal or financial factors impeding the bank's ability to help meet credit needs in its AAs during the evaluation period. FNB FS's CRA performance was rated "High Satisfactory" in the last public evaluation dated April 27, 2020.

## **Scope of the Evaluation**

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

This Performance Evaluation (PE) assesses the bank's performance under the large bank Lending, Investment, and Service Tests. The evaluation period is January 1, 2020, through December 31, 2021. All products reviewed are bank wide. For the Lending Test, examiners analyzed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans made to businesses reported under the CRA. Information regarding small loans to farms is included; however, this is not a primary product and was not considered in final ratings.

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

In each state where the bank has an office, one or more AA(s) 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), 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.

When determining our rating, we gave the most weight to the Fort Smith AR-OK MMSA AA, as it represents the bank's most significant market in terms of deposit concentration, branch distribution, and reportable loans. As of June 2021, 85.4 percent of the bank's deposits are centered in this AA.

When determining our rating, we considered the impact of innovative and flexible lending opportunities the bank made nationwide outside their core AAs. Throughout the evaluation the bank made an additional 143 Small Business Administration (SBA) Paycheck Protection Program (PPP) loans totaling \$27.5 million. These loans were in either a low- or moderate-income CT outside of the bank's AA. In addition, some consideration was given for the bank's small loans to businesses with no income reported. During the evaluation period, the bank originated a significant number of SBA PPP loans within its AA and bank-wide data collection efforts laxed to accommodate higher origination volumes.

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 bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and

regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the 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.

## Multistate Metropolitan Statistical Area Rating

### Fort Smith, AR-OK MMSA #22900

**CRA rating for the Fort Smith, AR-OK MMSA<sup>1</sup>:** Satisfactory

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

**The Investment Test is rated:** Low Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to AA credit needs;
- The bank exhibits an adequate geographic distribution of loans in the AA;
- The bank exhibits an adequate distribution of loan amounts to individuals of different income levels and businesses of different sizes;
- The bank is a leader in making CD loans;
- The bank has an adequate level of qualified CD investments;
- The bank provides a relatively high level of CD services.

### Description of Institution's Operations in Fort Smith, AR-OK MMSA

The Fort Smith AR – OK MMSA represents the bank's most significant AA in terms of deposits and lending. The Fort Smith market is located on the Arkansas and Oklahoma border known as the "River Valley." During the evaluation period, FNB FS had 15 full-service locations in the Fort Smith MMSA including four off-site ATMs. As of the June 30, 2021, Federal Deposit Insurance Corporation (FDIC) deposit market share report, the bank's deposits accounts for 23.1 percent of the market share in the AA totaling \$1.3 billion in deposits. The deposits within the AA accounts for 85.4 percent of total deposits. The bank's competitors in this market include Arvest Bank, Cadence Bank, and Armstrong Bank.

The Fort Smith MMSA has a population of approximately 248,000. The AA consists of Sebastian, Crawford, and Franklin Counties in Arkansas and Sequoyah County in Oklahoma. The AA is consisted of 10 upper-income CTs, 26 middle-income CTs, 13 moderate-income CTs, and no low-income CTs. The median income totals \$48,258 and approximately 17 percent of the families are below the poverty level. The median housing value totals \$107,971. Approximately 39.7 percent of families are within LMI levels and 21.8 percent of the population are in moderate income tracts which concludes that some LMI families are in middle- and upper-income tracts where house and rent prices would be more expensive. Per the U.S. Bureau of Labor Statistics December 2022 report, 2.8 percent of the labor force is unemployed.

The bank's lending focus in the AA is on home mortgage and small business loans. During the evaluation period, 601 home mortgages and 910 small business loans were originated in the bank's AA. Home

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<sup>1</sup>This 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.



mortgage loans made in the AA make up 40.8 percent of the bank's total home mortgages and small business loans made in the AA make up 60.7 percent of the bank's total small business loans.

Fort Smith, Arkansas is a medical, food processing, manufacturing, and trucking hub which includes companies such as Baptist Health – Fort Smith, St. Edward Mercy Medical Center, Planters, OK Foods, Inc., Gerber Products Company, Rheem Manufacturing Company, Inc., The Trane Company, and ArcBest Corporation. Fort Smith is also home to the Arkansas Colleges of Health Education and the University of Arkansas – Fort Smith.

Community needs in the full-scope AA were determined by reviewing recent housing and demographic information and holding discussions with community contacts from organizations that provide services in the Fort Smith AR-OK MMSA. The most critical needs per these discussions were affordable housing and childcare services.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 22900 Fort Smith AR-OK MSA 2021</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)	49	0.0	26.5	53.1	20.4	0.0
Population by Geography	248,351	0.0	21.8	57.8	20.4	0.0
Housing Units by Geography	108,960	0.0	21.5	58.3	20.2	0.0
Owner-Occupied Units by Geography	64,184	0.0	14.2	63.1	22.8	0.0
Occupied Rental Units by Geography	31,380	0.0	35.3	46.3	18.5	0.0
Vacant Units by Geography	13,396	0.0	24.3	63.5	12.2	0.0
Businesses by Geography	12,906	0.0	24.5	51.0	24.5	0.0
Farms by Geography	431	0.0	13.5	64.0	22.5	0.0
Family Distribution by Income Level	66,088	22.2	17.5	18.9	41.5	0.0
Household Distribution by Income Level	95,564	24.5	15.4	17.0	43.1	0.0
Median Family Income MSA - 22900 Fort Smith, AR-OK MSA		\$48,258	Median Housing Value			\$107,971
			Median Gross Rent			\$622
			Families Below Poverty Level			17.4%
<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>						

**Scope of Evaluation in Fort Smith, AR-OK MMSA**

The Fort Smith AR-OK MMSA was selected for a full-scope review.

Refer to the table in appendix A for a list of all AAs under review.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Fort Smith, AR-OK MMSA**

Based on a full-scope review, the bank's performance in the Fort Smith AR-OK MMSA is adequate.

## LENDING TEST

The bank's performance under the Lending Test in the Fort Smith AR-OK MMSA is rated High Satisfactory.

### 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
Fort Smith AR-OK MMSA	601	910	129	10	1,650

Dollar Volume of Loans (\$000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Fort Smith AR-OK MMSA	\$129,464	\$94,279	\$6,546	\$16,764	\$247,053

The bank's overall lending activity is adequate. The bank's lending activities demonstrate adequate geographic distribution and adequate income distribution. The bank's primary lending activity within the AA is small business lending and home mortgages. Most of the bank's small business and small farm lending is conducted within the AA. Per 2021 data, the bank is the leader in market share in the area in deposits and small business loans by dollar volume. By originations, the bank is the eighth largest mortgage lender and third largest small business lender within the AA. In addition to the loans above, the bank originated 1,124 small loans to businesses totaling \$93.73 million as part of the SBA PPP during the evaluation period.

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

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

There are no low-income CTs within the Fort Smith AR-OK MMSA for this evaluation period.

### *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 bank's geographic distribution of home mortgage loans during the evaluation period is good. In 2020, the percentage of mortgage loans in moderate-income CTs was near the percentage of owner-occupied units and aggregate lending. In 2021, the percentage of mortgage loans in moderate-income CTs exceeded both the percentage of owner-occupied units and aggregate lending.

***Small Loans to Businesses***

Refer to table Q in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to businesses.

The bank’s borrower distribution of small loans to businesses during the evaluation period is adequate. In 2020, the percentage of small loans to businesses in moderate-income tracts was somewhat lower than the percentage of businesses and aggregate lending. In 2021, the percentage of small loans to businesses in moderate-income tracts was somewhat lower than the percentage of businesses and near aggregate lending.

***Lending Gap Analysis***

We did not identify any unexplained conspicuous lending gaps in the geographic distribution of loans. There appears to be a lending gap in small business loans; however, income data was not collected for most businesses within the evaluation period. During the period, high demand for SBA PPP loans resulted in less data collection at origination to process loans quickly to address business’ needs resulting from the COVID-19 pandemic. In addition, the small loans to businesses data does not account for 1,124 SBA PPP small loans to businesses totaling \$93.73 million.

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

The bank exhibits adequate distribution of loans among individuals of different income levels and businesses of different sizes.

***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 institution’s home mortgage loan originations and purchases.

The bank’s borrower distribution of home mortgage loans during the evaluation period is adequate. In 2020 and 2021, the percentage of mortgage loans to low-income borrowers was lower than the percentage of low-income families and somewhat lower than aggregate lending. In the same periods, the percentage of mortgage loans to moderate-income borrowers was somewhat lower than the percentage of moderate-income families and aggregate lending.

***Small Loans to Businesses***

Refer to table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the institution’s originations and purchases of small loans to businesses.

The bank’s geographic distribution of small loans to businesses during the evaluation period is adequate. In 2020, the percentage of small loans to small businesses, or businesses with gross revenues less than \$1 million, was lower than the percentage of small businesses and exceeded aggregate lending. In 2021, the percentage of small loans to small businesses was lower than the percentage of small businesses and somewhat lower aggregate lending.

## Community Development Lending

The institution is a leader in making CD loans.

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

FNB FS originated 10 CD loans totaling \$16.8 million. CD loan volume represents 11.9 percent of allocated tier 1 capital. Key lending in the MMSA includes loans for affordable housing and community services targeted to LMI individuals. The bank's CD loans supported 389 affordable housing units, two community services to LMI individuals, and one LMI revitalization and stabilization activity.

## Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

## INVESTMENT TEST

The institution's performance under the Investment Test in Fort Smith AR-OK MMSA is rated Low Satisfactory.

Based on a full-scope review, the institution's performance in the Fort Smith AR-OK 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.

The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally 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)
Fort Smith AR-OK MMSA	13	\$2,052	37	\$722	50	100%	\$2,774	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 bank has sufficient opportunity to make qualified CD investments within the MMSA. Based on opportunities, the bank's level of CD investments is the AA is adequate.

Qualified investments in the MMSA during the evaluation period total \$722,000 and consist of donations and grants to local CD organizations. Current period donations and grants supported entities focused on revitalizing and stabilizing the Fort Smith downtown area, improving food access, and education opportunities for LMI individuals. Prior period investments total \$2.05 million and consist of outstanding school district bonds where most students qualify for free or reduced-cost lunch programs. The bank's total investment amount represented approximately 2.0 percent of allocated tier 1 capital.

## SERVICE TEST

The institution's performance under the Service Test in Fort Smith AR-OK MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Fort Smith AR-OK MMSA is good.

## Retail Banking Services

Service delivery systems are readily accessible geographies and individuals of different income levels in the institution's AA(s).

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches Location of Branches by Income of Geographies (%)				Population % of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
	Fort Smith AR-OK MMSA	85.4	15	71.4	0.00	26.7	46.7	26.7	0.00	21.8	57.8

FNB FS's deposits from the Fort Smith AR-OK MMSA total approximately \$1.3 billion as of June 2021. This represents 85.4 percent of the bank's total deposit balances.

The bank's distribution of branches and availability and effectiveness of alternative delivery systems are consistent with the distribution of LMI geographies and LMI individuals. Alternative delivery systems include online and mobile banking services accessible by all customers and deposit-taking ATMs available at all branch locations. The bank has four additional deposit-taking ATMs within the AA, with one located in a moderate-income CT.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Fort Smith AR-OK MMSA	0	0	-	-	-	-

The bank did not open or close branches during the evaluation period.

Services, including business hours, are tailored to the convenience and needs the various portions of its AA(s), particularly LMI geographies and/or individuals.

### **Community Development Services**

The institution provides a significant level of CD services.

The bank committed a total of 838 hours in CD service hours. CD services for LMI individuals were the primary services provided by the bank. Members of the bank provided technical assistance to various national and local non-profit entities focused on providing services for LMI individuals. The entities included services to improve food access, foster system support, affordable childcare, and more. In addition, members of the bank provided services to school districts with a majority of students qualifying for free- or reduced-cost lunch programs. Members also provided technical assistance to an entity focused on local economic development. Bank employees committed these CD hours despite the COVID-19 pandemic which limited in-person activities for a portion of the review period.

## State Rating

### State of Arkansas

**CRA rating for the State of Arkansas<sup>2</sup>:** Satisfactory

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

**The Investment Test is rated:** Low Satisfactory

**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- The bank exhibits an adequate geographic distribution of loans in the state of Arkansas;
- The bank exhibits an adequate distribution of loan amounts to individuals of different income levels and businesses of different sizes;
- The bank originated a relatively high level of CD loans;
- The bank has an adequate level of qualified CD investments;
- The bank provides an adequate level of CD services.

### Description of Institution's Operations in Arkansas

Fayetteville-Springdale-Rogers MSA is the bank's second largest market in terms of deposits and lending. The Fayetteville-Springdale-Rogers market is in Northwest Arkansas. FNB FS began the evaluation period with six full-service locations with ATMs. In this market there is substantial competition as FNB FS has the 14<sup>th</sup> largest deposit market share of 1.5 percent. As of the June 30, 2021, FDIC deposit market share report, the deposits within the AA total \$226.9 million which accounts for 14.6 percent of the bank's total deposits. The four largest competitors in this market are Arvest Bank, First Security Bank, Bank of America, and Legacy National Bank. The bank's competitors make up 64.0 percent of the deposit market share.

The Fayetteville-Springdale-Rogers MSA has a population of approximately 455,000. The AA consists of Benton and Washington County. The AA consisted of 25 upper-income CTs, 39 middle-income CTs, 15 moderate-income CTs, and 2 low-income CTs. The median income totals \$60,876. Approximately 11 percent of families live below the poverty level. 37.7 percent of families are LMI, and 22.9 percent of the population lives in LMI CTs, which means there are LMI individuals that live in middle- and upper-income CTs. Per the U.S. Bureau of Labor Statistics December 2021 report, 2.0 percent of the labor force is unemployed.

The bank's lending focus in the AA is on home mortgage and small business loans. During the evaluation period, 840 home mortgages and 534 small business loans were originated in the AA. Home mortgage loans made in the AA make up 57 percent of the bank's total home mortgage loans and small business loans made in the AA make up 35.6 percent of the bank's total small business loans.

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<sup>2</sup> This 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.



Northwest Arkansas is a metropolitan area and housing in the downtown areas have lower affordability. Northwest Arkansas is home to the University of Arkansas, J.B. Hunt Transport, Inc., Tyson Foods, Inc., Wal-Mart, Inc., and Simmons Foods Inc.

Community needs in the full-scope AA were determined by reviewing recent housing and demographic information and holding discussions with community contacts from organizations that provide services in the Fayetteville-Springdale-Rogers MSA AA. The most critical needs per these discussions were for affordable housing.

### Fayetteville-Springdale-Rogers MSA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 22220 Fayetteville MSA 2021</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)	81	2.5	18.5	48.1	30.9	0.0
Population by Geography	454,630	2.6	20.3	44.3	32.8	0.0
Housing Units by Geography	185,720	3.1	19.5	44.0	33.4	0.0
Owner-Occupied Units by Geography	102,054	0.7	15.4	46.2	37.7	0.0
Occupied Rental Units by Geography	65,338	6.8	26.6	39.4	27.3	0.0
Vacant Units by Geography	18,328	3.1	17.2	48.6	31.1	0.0
Businesses by Geography	29,916	1.8	16.7	44.8	36.6	0.0
Farms by Geography	1,029	1.3	14.8	51.2	32.8	0.0
Family Distribution by Income Level	114,420	19.5	18.2	20.2	42.0	0.0
Household Distribution by Income Level	167,392	22.3	16.5	18.4	42.7	0.0
Median Family Income MSA - 22220 Fayetteville-Springdale- Rogers, AR MSA		\$60,876	Median Housing Value			\$157,293
			Median Gross Rent			\$757
			Families Below Poverty Level			10.9%
<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>						

**Scope of Evaluation in Arkansas**

The Fayetteville -Springdale-Rogers MSA AA was selected for a full-scope review.

Refer to the table in appendix A for a list of all AAs reviewed.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Arkansas****LENDING TEST**

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

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

Based on a full-scope review, the bank's performance in the Fayetteville-Springdale-Rogers MSA 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	%State Loans	%State Deposits
Fayetteville-Springdale-Rogers MSA	840	534	3	2	1,379	100%	100%

\*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State*	%State Deposits
Fayetteville-Springdale-Rogers MSA	\$304,802	\$128,562	\$109	\$19,000	\$452,473	100%	100%

\*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank's overall lending activity is adequate. The bank's lending activities demonstrate adequate geographic distribution and adequate income distribution. The bank's primary lending activity within the AA is home mortgages and small business lending. Per 2021 data, the bank has a small presence in market share in the area in deposits, mortgages, and small business loans. By originations, the bank is the 10th largest small business lender and 20th largest mortgage lender within the AA. In addition to the loans above, the bank originated 302 small loans to businesses totaling \$14.02 million as part of the SBA PPP during the evaluation period.

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

The bank exhibits adequate geographic distribution of loans in its AA(s).

### ***Home Mortgage Loans***

Refer to table O in the state of Arkansas 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 bank's geographic distribution of home mortgage loans during the evaluation period is good. In 2020, the percentage of mortgage loans in low-income tracts exceeded the percentage of owner-occupied units and aggregate lending. In the same period, the percentage of mortgage loans in moderate-income CTs was lower than the percentage of owner-occupied units and somewhat lower aggregate lending. In 2021, the percentage of mortgage loans in low-income CTs exceeded the percentage of owner-occupied units and aggregate lending. In the same period, the percentage of mortgage loans in moderate-income CTs was somewhat lower than the percentage of owner-occupied units and exceeded aggregate lending.

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

Refer to table Q in the state of Arkansas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank's geographic distribution of small loans to businesses during the evaluation period is poor. In 2020, the percentage of business loans in LMI CTs was lower than the percentage of businesses and aggregate lending. In 2021, the percentage of business loans in low-income CTs was somewhat lower than the percentage of businesses and near aggregate lending. In the same period, the percentage of business loans in moderate-income CTs was lower than the percentage of businesses and aggregate lending.

### ***Lending Gap Analysis***

We did not identify any unexplained conspicuous lending gaps in the geographic distribution of loans.

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

The bank exhibits adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

### ***Home Mortgage Loans***

Refer to table P in the state of Arkansas 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 bank's borrower distribution of home mortgage loans during the evaluation period is adequate. In 2020, the percentage of mortgage loans to low-income borrowers was lower than the percentage of low-income families and near aggregate lending. In the same period, the percentage of mortgage loans to moderate-income borrowers was somewhat lower than the percentage of moderate-income families and aggregate lending. For 2021, the percentage of mortgage loans to low-income borrowers was lower than the percentage of low-income families and aggregate lending. In the same period, the percentage of mortgage loans to moderate-income borrowers was lower than the percentage of moderate-income families and somewhat lower than aggregate lending.

***Small Loans to Businesses***

Refer to table R in the state of Arkansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The bank's borrower distribution of small loans to businesses during the evaluation period is good. In 2020, the percentage of small loans to small business was lower than the percentage of small businesses. In 2021, the percentage of small loans to small businesses was somewhat lower than the percentage of small businesses. In 2020 and 2021, the percentage of small loans to small businesses, or businesses with gross revenues less than \$1 million, exceeded aggregate lending.

**Community Development Lending**

The institution has made a relatively high level of CD loans.

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

FNB FS originated two CD loans totaling \$19.0 million. CD loan volume represents 78.8 percent of allocated tier 1 capital. Key lending in the AA are loans for affordable housing. The bank's CD loans supported 150 affordable housing units.

**Product Innovation and Flexibility**

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

**INVESTMENT TEST**

The bank's performance under the Investment Test in Arkansas is rated High Satisfactory.

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

Based on a full-scope review, the bank's performance in the Fayetteville-Springdale-Rogers MSA AA is good.

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

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Fayetteville-Springdale-Rogers MSA	2	\$998	14	\$95	16	100%	\$1,093	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 bank has sufficient opportunity to make qualified CD investments within the AA. Based on opportunities, the bank's level of CD investments is the AA is good.

Qualified investments in the Fayetteville-Springdale-Rogers MSA AA during the evaluation period total \$95,000 and consist of donations and grants to local CD organizations. Current period donations and grants supported entities focused on providing affordable housing, safety programs, and food access for LMI individuals. Prior period investments total \$998,000 and consist of outstanding school district bonds where most students qualify for free or reduced-cost lunch programs. The bank's total investment amount represented approximately 4.5 percent of allocated tier 1 capital.

### **SERVICE TEST**

The bank's performance under the Service Test in Arkansas is rated Low Satisfactory.

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

Based on a full-scope review, the bank's performance in the Fayetteville-Springdale-Rogers MSA AA is adequate.

### **Retail Banking Services**

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
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
Fayetteville-Springdale-Rogers MSA	14.6	6	28.6	16.7	0.0	16.7	66.7	2.6	20.3	44.3	32.8

FNB FS's deposits from Fayetteville-Springdale-Rogers MSA total approximately \$226.9 million as of June 2021. This represents 21.52 percent of the bank's total deposit balances.

The bank's distribution of branches and availability and effectiveness of alternative delivery systems are reasonably consistent with the distribution of LMI geographies and LMI individuals. Alternative delivery systems include online and mobile banking services accessible by all customers and deposit-taking ATMs available at all branch locations.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Fayetteville-Springdale-Rogers MSA	1	1	+1	0	-2	+1

The bank relocated one permanent location in the Fayetteville-Springdale-Rogers MSA AA during the evaluation. The relocation moved a branch from a middle-income CT to an upper-income CR. In addition, CT changes resulted in one branch within a middle-income CT now being in a low-income CT.

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

Services, including business hours, are tailored to the convenience and needs of its AA(s), particularly LMI geographies and/or individuals.

### Community Development Services

The institution provides an adequate level of CD services.

The bank committed a total of 131 hours in CD service hours. CD services providing affordable housing were the primary services provided by the bank. Members of the bank provided technical assistance to both national and local non-profit entities focused on providing services for LMI individuals. The entities included services to provide affordable housing and food security.



## 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>	01/01/2020 – 12/31/2021	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Citizens Bank and Trust	Common Control	None
Brown-Hiller-Clark & Associates	Common Control	None
Realty Appraisals, Inc.	Common Control	None
Central National Bank of Poteau	Common Control	None
<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>MMSA(s)</b>		
Fort Smith, AR-OK MMSA	Full-scope	
<b>State</b>		
Arkansas	Full-scope	Fayetteville-Springdale-Rogers MSA

**Appendix B: Summary of MMSA and State Ratings**

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RATINGS		First National Bank of Fort Smith		
<b>Overall Bank:</b>	<b>Lending Test Rating*</b>	<b>Investment Test Rating</b>	<b>Service Test Rating</b>	<b>Overall Bank/State/Multistate Rating</b>
	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
<b>MMSA or State:</b>				
Fort Smith AR-OK MMSA	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Arkansas	Low Satisfactory	Low Satisfactory	Low 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

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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 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 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 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.
- 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.

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 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.

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**

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
22220 Fayetteville MSA 2021	460	141,901	60.1	33,418	0.7	0.9	0.4	15.4	7.4	10.3	46.2	32.8	39.7	37.7	58.9	49.5	0.0	0.0	0.0
22900 Fort Smith AR-OK MSA 2021	306	62,481	39.9	9,236	0.0	0.0	0.0	14.2	11.4	12.0	63.1	52.9	59.8	22.8	35.6	28.2	0.0	0.0	0.0
<b>Total</b>	<b>766</b>	<b>204,382</b>	<b>100.0</b>	<b>42,654</b>	<b>0.4</b>	<b>0.5</b>	<b>0.4</b>	<b>15.0</b>	<b>9.0</b>	<b>10.7</b>	<b>52.7</b>	<b>40.9</b>	<b>44.1</b>	<b>31.9</b>	<b>49.6</b>	<b>44.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2021**

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
22220 Fayetteville MSA 2021	380	162,901	56.3	34,106	0.7	2.1	0.5	15.4	10.8	10.7	46.2	34.7	41.6	37.7	52.4	47.3	0.0	0.0	0.0
22900 Fort Smith AR-OK MSA 2021	295	66,983	43.7	10,030	0.0	0.0	0.0	14.2	14.9	12.8	63.1	49.2	59.4	22.8	35.9	27.8	0.0	0.0	0.0
<b>Total</b>	<b>675</b>	<b>229,884</b>	<b>100.0</b>	<b>44,136</b>	<b>0.4</b>	<b>1.2</b>	<b>0.4</b>	<b>15.0</b>	<b>12.6</b>	<b>11.2</b>	<b>52.7</b>	<b>41.0</b>	<b>45.6</b>	<b>31.9</b>	<b>45.2</b>	<b>42.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2020**

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
22220 Fayetteville MSA 2021	460	141,901	60.1	33,418	19.5	4.1	4.8	18.2	9.8	13.2	20.2	13.9	17.0	42.0	53.9	46.7	0.0	18.3	18.3
22900 Fort Smith AR-OK MSA 2021	306	62,481	39.9	9,236	22.2	2.9	3.8	17.5	9.8	12.6	18.9	15.4	18.0	41.5	44.8	40.1	0.0	27.1	25.4
<b>Total</b>	<b>766</b>	<b>204,382</b>	<b>100.0</b>	<b>42,654</b>	<b>20.5</b>	<b>3.7</b>	<b>4.6</b>	<b>18.0</b>	<b>9.8</b>	<b>13.1</b>	<b>19.7</b>	<b>14.5</b>	<b>17.2</b>	<b>41.8</b>	<b>50.3</b>	<b>45.2</b>	<b>0.0</b>	<b>21.8</b>	<b>19.9</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2021**

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
22220 Fayetteville MSA 2021	380	162,901	56.3	34,106	19.5	3.4	5.2	18.2	7.9	13.2	20.2	16.1	17.7	42.0	55.3	41.8	0.0	17.4	22.0
22900 Fort Smith AR-OK MSA 2021	295	66,983	43.7	10,030	22.2	3.1	4.4	17.5	10.2	12.8	18.9	15.3	17.7	41.5	43.1	38.3	0.0	28.5	26.8
<b>Total</b>	<b>675</b>	<b>229,884</b>	<b>100.0</b>	<b>44,136</b>	<b>20.5</b>	<b>3.3</b>	<b>5.0</b>	<b>18.0</b>	<b>8.9</b>	<b>13.1</b>	<b>19.7</b>	<b>15.7</b>	<b>17.7</b>	<b>41.8</b>	<b>49.9</b>	<b>41.0</b>	<b>0.0</b>	<b>22.2</b>	<b>23.1</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2020**

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
22220 Fayetteville MSA 2021	278	66,333	39.1	12,090	1.8	0.7	1.9	16.7	6.5	15.4	44.8	34.5	45.1	36.6	58.3	37.5	0.0	0.0	0.0
22900 Fort Smith AR-OK MSA 2021	433	45,188	60.9	3,920	0.0	0.0	0.0	24.5	18.2	24.0	51.0	54.5	51.4	24.5	27.3	24.7	0.0	0.0	0.0
<b>Total</b>	<b>711</b>	<b>111,521</b>	<b>100.0</b>	<b>16,010</b>	<b>1.3</b>	<b>0.3</b>	<b>1.5</b>	<b>19.1</b>	<b>13.6</b>	<b>17.5</b>	<b>46.6</b>	<b>46.7</b>	<b>46.6</b>	<b>33.0</b>	<b>39.4</b>	<b>34.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2021**

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
22220 Fayetteville MSA 2021	256	62,229	34.9	12,735	1.8	1.2	1.5	16.6	6.3	15.3	44.6	38.7	44.7	37.0	53.9	38.5	0.0	0.0	0.0
22900 Fort Smith AR-OK MSA 2021	477	49,091	65.1	4,085	0.0	0.0	0.0	24.3	19.3	21.7	51.9	58.5	54.0	23.8	22.2	24.3	0.0	0.0	0.0
<b>Total</b>	<b>733</b>	<b>111,320</b>	<b>100.0</b>	<b>16,820</b>	<b>1.2</b>	<b>0.4</b>	<b>1.1</b>	<b>18.9</b>	<b>18.0</b>	<b>16.8</b>	<b>46.8</b>	<b>51.6</b>	<b>47.0</b>	<b>33.0</b>	<b>33.3</b>	<b>35.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 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** **2020**

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
22220 Fayetteville MSA 2021	278	66,333	39.1	12,090	83.0	39.6	31.7	4.6	19.1	12.4	41.4
22900 Fort Smith AR-OK MSA 2021	433	45,188	60.9	3,920	79.0	33.3	31.0	6.6	10.9	14.4	55.9
<b>Total</b>	<b>711</b>	<b>111,521</b>	<b>100.0</b>	<b>16,010</b>	<b>81.8</b>	<b>35.8</b>	<b>31.5</b>	<b>5.2</b>	<b>14.1</b>	<b>13.0</b>	<b>50.2</b>

*Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 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** **2021**

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
22220 Fayetteville MSA 2021	256	62,229	33.4	12,735	83.0	55.9	40.5	4.5	12.9	12.5	31.3
22900 Fort Smith AR-OK MSA 2021	477	49,091	62.3	4,085	79.5	28.9	41.0	6.4	10.5	14.1	60.6
<b>Total</b>	<b>733</b>	<b>111,320</b>	<b>100.0</b>	<b>16,820</b>	<b>81.9</b>	<b>38.3</b>	<b>40.6</b>	<b>5.0</b>	<b>11.3</b>	<b>13.0</b>	<b>50.4</b>

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*