



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

May 28, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

GNBank, National Association
Charter Number 13347
100 E. Forest Avenue
Girard, Kansas 66743

Office of the Comptroller of the Currency
7101 College Blvd., Suite 1600
Overland Park, Kansas 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 Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on an overall assessment of the bank's combined performance of lending in the states of Kansas and Colorado within its delineated assessment areas (AA). Performance in the state of Kansas received more weight with 90 percent of bank loans and 83 percent of total bank deposits.
- The overall geographic and borrower distribution of loans is reasonable. The loan-to-deposit ratio is more than reasonable. A majority of bank loans are inside of its AAs.
 - The Community Development (CD) Test rating is based on an aggregate assessment of the bank's CD activities for loans, investments, and services in Kansas and Colorado AAs. As noted above, we placed more weight on performance in the state of Kansas.
 - GNBank's (GNB) community development lending activities demonstrate an excellent level of responsiveness based on available opportunities in the AAs, during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's loan-to-deposit ratio is more than reasonable. GNB's quarterly average LTD ratio is 87.2 percent from March 31, 2016 to December 31, 2018. GNB's LTD ratio ranged from a low of 84.3 percent to a high of 91.3 percent. The average quarterly LTD ratio for eight similarly situated institutions over the same period is 75.6 percent, which ranged from a low of 54.6 percent to a high of 96.6 percent. GNB ranked third out of the other eight financial institutions in asset size serving the AA. The asset size of the institutions ranged from \$403.6 million to \$1.2 billion, with an average asset size of \$749.1 million.

Lending in Assessment Area

A majority of the bank's loans are inside its assessment areas. GNB originated and/or purchased 80.98 percent of its total loans inside the 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. Lending Test conclusions are based upon loans originated and/or purchased inside the bank's AAs.

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		
	#	%	#	%		\$	%	\$	%	
Consumer	47	88.68	6	11.32	53	598	90.33	64	9.67	662
Small Farm	217	79.49	56	20.51	273	18,357	61.44	11,521	38.56	29,878
Total	264	80.98	62	19.02	326	18,955	62.06	11,586	37.94	30,540

GNB's primary loan product during the evaluation period is agricultural loans in Kansas AAs. In Colorado AAs, the primary loan products are agricultural loans and consumer loans.

Description of Institution

GNB is a \$641.5 million multi-state financial institution headquartered in Girard, Kansas and wholly owned by GN Bankshares, Inc., a one-bank holding company. GNB offers a variety of traditional banking products and services to both individual borrowers and businesses. GNB's lending activity is centered in agricultural and commercial lending by dollar of loans outstanding. GNB operates 15 branches that primarily serve 17 rural counties throughout the state of Kansas and the eastern border of Colorado. These counties make up GNB's three AAs including Kansas non-MSA, Jackson County, Kansas, and Colorado non-MSA.

As of December 31, 2018, total loans of \$465.6 million represent 72.6 percent of total assets. The loan portfolio, by dollar volume, consists of 44.7 percent agriculture related loans, 37.5 percent commercial & commercial real estate loans, 12.8 percent 1-4 family residential loans, and 2.7 percent consumer loans. In addition, deposits of \$502 million represent 78.3 percent of total assets. Tier 1 capital totals \$70.8 million.

There are no legal, financial, or other factors that impede the bank's ability to meet credit needs in its communities. GNB received a rating of "Outstanding" at the previous CRA examination on April 25, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Consistent with GNB's business strategy, the bank's primary product is agricultural loans, by dollar and number, in the Kansas AAs. In the Colorado non-MSA AA, primary products are consumer loans (by number) and agricultural loans (by dollar). This evaluation also included an assessment of the bank's CD lending, services, and investment activities.

The evaluation period for the Lending Test is April 1, 2016 through December 31, 2018. The end date for the previous lending evaluation was March 31, 2016. We placed greater weight on performance in 2017 and 2018 since this analysis includes a two-year time frame. Analysis of data related to calendar year 2016 is based on the 2006-2010 American Community Survey (ACS). Analysis of data related to calendar years 2017 and 2018 are based on the 2011-2015 ACS. The evaluation period for the CD Test is April 26, 2016 through December 31, 2018, since the end date of the previous review of CD activity was April 25, 2016.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas 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 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 ratings for the state of Kansas and the state of Colorado.

The state of Kansas received the greatest weight in arriving at the bank's overall CRA rating. By dollar, the state of Kansas has 89.8 percent of GNB's loans and 80.1 percent by number. In addition, the state of Kansas has 13 of the 15 total banking locations and 82.8 percent of total bank deposits.

The Kansas non-MSA AA received the greatest weight in arriving at the overall rating for the state of Kansas. By dollar, the Kansas non-MSA AA has 91.6 percent of the loans in the state of Kansas and 89.3 by number. In addition, the Kansas non-MSA AA has 88.4 percent of the deposits in the state of Kansas and 11 bank locations.

The state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) 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.

State Rating

State of Kansas

CRA rating for the State of Kansas¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- Lending in moderate-income geographies reflects reasonable dispersion. There are no low-income geographies.
- Lending to small farms with revenues of \$1 million or less reflects reasonable penetration.
- GNB's aggregate level of responsiveness to CD needs is excellent.

Description of Institution's Operations in Kansas

Kansas non-MSA – Full-Scope Review

The Kansas non-MSA AA consists of census tracts in 14 counties including: Atchison, Brown, Cherokee, Clark, Clay, Comanche, Crawford, Edwards, Ford, Hamilton, Hodgeman, Kiowa, Nemaha, and Woodson. GNB is headquartered in Crawford County with eleven locations across the AA. Branches that serve these counties are located in the following Kansas communities; Arma, Bucklin, Clay Center, Galena, Girard, Hiawatha, Horton, Offerle, Pittsburg, Wetmore, and Yates Center. Nine of the branches offer 24-hour ATMs.

Competition from other financial institutions is strong. As of June 30, 2018, GNB holds a 9.1 percent deposit market share within the AA, which ranks first of 52 institutions. Deposits from counties within the AA account for the majority of GNB's deposit base at 73.2 percent of total deposits with 88.4 percent of the bank's deposits in Kansas.

The Kansas non-MSA AA consists of 32 middle-income, five upper-income, and four moderate-income tracts. Although the majority of tracts are identified as middle-income, the demographic data shows a large number of census tracts are either distressed or underserved. Of the 32 middle-income census tracts within the AA eight are distressed, three underserved, and five are distressed and underserved. The demographic data also report a moderate level of low- to moderate-income (LMI) population. The family distribution by income levels is 21.1 percent low income, 17.7 percent moderate, 22.6 percent middle, and 38.7 percent upper. Additionally, 12.3 percent of families within the AA are below the poverty level.

According to Moody's Analytics, key economic drivers in the state of Kansas are manufacturing, defense, and agriculture. These three sectors have significant impact on the labor market in Kansas. Kansas experienced three percent job growth during 2018, which is the largest annual growth rate since 2005. The major employers in the state include aviation manufacturing, education, health care, and government. According to the US Census Bureau of Labor and Statistics, as of December 2018, the state of Kansas's unemployment rate at 3.3 percent was below the national unemployment rate of 3.9 percent.

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

The unemployment rate in Kansas declined slightly from a rate of 4.0 percent in December 2016. However, a moderate level of households remain below the poverty line at 16 percent according to the US Census Bureau’s American Community Survey.

During the examination, we reviewed multiple community contacts with nonprofit social service agencies in the AA. Overall, the contacts reported financial institutions have met the needs of the local communities through financing and participating in outreach programs. Each of the contacts shared various needs of the local communities including the deteriorating housing supply and financial education services for LMI individuals.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2017-18 Kansas non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	45	0.0	8.9	80.0	11.1	0.0
Population by Geography	157,481	0.0	8.3	79.7	12.1	0.0
Housing Units by Geography	69,379	0.0	8.0	80.0	11.9	0.0
Owner-Occupied Units by Geography	40,721	0.0	5.9	82.6	11.4	0.0
Occupied Rental Units by Geography	18,679	0.0	11.4	74.9	13.7	0.0
Vacant Units by Geography	9,979	0.0	10.3	78.9	10.8	0.0
Businesses by Geography	8,446	0.0	12.1	76.7	11.2	0.0
Farms by Geography	1,508	0.0	1.3	76.8	21.9	0.0
Family Distribution by Income Level	39,256	21.1	17.7	22.6	38.7	0.0
Household Distribution by Income Level	59,400	24.7	17.3	17.9	40.1	0.0
Median Family Income non-MSA Kansas		\$56,877	Median Housing Value			\$90,144
			Median Gross Rent			\$616
			Families Below Poverty Level			12.3%
Source: 2015 ACS Census and 2018 D&B Data. Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Scope of Evaluation in Kansas

A full-scope review was selected for the Kansas non-MSA AA and a limited-scope review for the Jackson County AA. The Kansas non-MSA AA has 88.4 percent of the deposits in the state of Kansas and 11 bank locations. Based on loan dollar amount, the Kansas non-MSA AA makes up 91.6 percent of GNB’s loans in the state of Kansas and 89.3 percent by number of loans. Bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation. Refer to appendix A for a listing of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

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

Based on full- and limited-scope reviews, the bank's lending performance in the state of Kansas is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

Small Loans to Farms

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

The geographic distribution of small loans to farms in the Kansas non-MSA AA shows reasonable dispersion. While the bank made no loans in moderate-income tracts in 2017-18, demographics show that only 1.2 percent of small farms are located in these geographies and aggregate peer data is less than one percent. The bank's performance is reasonable considering strong competition in the AA and limited lending opportunities with only one farm located in moderate-income tracts. In addition, only four of the 41 census tracts in the AA have moderate-income designations. There are no low-income census tracts in the AA. The majority of the AA tracts have a middle-income designation.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to farms of different sizes, given the product lines offered by the bank.

Small Loans to Farms

Refer to Table T in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of loans to small farms with revenues less than \$1 million is reasonable. Although the percentage of bank loans is lower than the demographics at 75.8 percent compared to 95.8 percent, the bank had no income information for 18.7 percent of the loans. The majority of the bank's loans were originated for \$250 thousand or less. This low loan amount is indicative of serving smaller farms.

GNB's performance in 2016 is consistent with the bank's performance in the combined 2017-18 period with a reasonable distribution.

Responses to Complaints

GNB did not receive any written complaints regarding its CRA performance during the evaluation period.

Conclusions for Area Receiving a Limited-Scope Review

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

COMMUNITY DEVELOPMENT TEST

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

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

Aggregate CD activities demonstrated excellent responsiveness to CD needs and opportunities in both AAs. CD investments, donations, and loans total \$10.5 million. This represents approximately 17.9 percent of AA allocated tier 1 capital as of December 31, 2018. Bank employees provided 1,366 service hours to 18 qualified CD organizations, during the evaluation period.

Number and Amount of Community Development Loans

Refer to the lending activity tables below for the facts and data used to evaluate the bank's CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Kansas non-MSA	11	73.3	8,300	84.7
Jackson County KS	4	26.7	1,500	15.3

CD loans demonstrated excellent responsiveness to CD needs and opportunities in the AA, during the evaluation period. CD loans totaled \$8.3 million. The bank originated 11 CD loans in the full scope AA. Eight loans, totaling more than \$6.7 million, provided support for revitalization and stabilization in distressed or underserved census tracts. Three loans, totaling more than \$1.6 million, provided support for community services targeted to LMI individuals and families.

Number and Amount of Qualified Investments

<i>Qualified Investments</i>										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Kansas non-MSA	0	0	82	744	82	86.3	744	99.7	0	0
Jackson County KS	0	0	13	2	13	13.7	2	0.3	0	0
Broader Statewide	4	2000	2	550	2	100	550	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.

GNB demonstrated adequate responsiveness to CD investment opportunities. CD qualified investments totaled \$744 thousand. Three investments totaling \$710 thousand provided support for revitalization and stabilization primarily in distressed or underserved census tracts. In addition, management made 79 qualified donations, totaling \$34 thousand to 33 organizations in the AA during the evaluation period. Donations supported organizations who provide community services primarily to LMI individuals or those that support small businesses. There were no prior period investments for this AA.

Statewide and/or Regional

During the evaluation period, GNB demonstrated excellent responsiveness to CD needs and opportunities in the broader statewide and regional area including the bank's AA. The bank made two qualified investments, totaling \$550 thousand to two organizations in the broader statewide area in historical bonds that rehabilitated buildings that were located in low or moderate-income census tracts and were part of a redevelopment plan. Management provided four prior period qualified donations, totaling \$2 million to one organization that provides affordable housing to LMI individuals.

Extent to Which the Bank Provides Community Development Services

GNB employees provided 1,363 hours to 17 qualified CD organizations, during the evaluation period. Examples of CD services provided by bank staff include:

- Board member for an organization that provides affordable housing and empowers individuals by engaging homeowner in the building or rehabilitation of their home.
- Board member of a youth organization that provides mentoring opportunities for children of LMI individuals in need.
- Bank provides financial education through an online education program, primarily serving schools with more than 50 percent of students eligible for the free and or reduced lunch program.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the Jackson County Kansas AA is consistent with the bank's overall performance under the CD Test in the full-scope area.

State Rating

State of Colorado

CRA rating for the State of Colorado²: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- Overall lending in LMI geographies reflects reasonable dispersion. Lending to borrowers of different incomes and small farms with revenues of less than \$1 million reflects reasonable penetration.
- GNB's aggregate level of responsiveness to CD needs is excellent.

Description of Institution's Operations in Colorado

Colorado non-MSA AA

The Colorado non-MSA AA consists of Kiowa and Prowers counties. The two counties combine for a population of 12,823. GNB operates two branches in Eads and Lamar, Colorado. The Lamar branch location offers a 24-hour ATM. As of June 30, 2018, GNB had 20.4 percent of the deposit market share within the AA. Competition in the AA is moderate with four other institutions. Frontier Bank has the largest market share with 30.9 percent of deposits. Deposits from Kiowa and Prowers Counties account for 17.2 percent of GNB's total deposits.

The Colorado non-MSA AA consists six census tracts. Three of the tracts are classified as moderate-income and the remaining three are classified as middle-income. This is a change from year 2016 which was based upon the 2010 census data. In 2016, there was one low-income, one moderate-income and three middle-income census tracts. The three middle-income geographies are identified as distressed and underserved tracts in 2018. Based on US census data, the median family income from the AA is \$60,701. The family distribution by income level is 27.5 percent low, 22.5 percent moderate, 18.3 percent middle, and 31.7 percent upper. Additionally, families below the poverty level total 13.7 percent.

Primary industries in the area include agriculture, government and healthcare. Our community contact noted that the area experienced an increase in alternative energy infrastructure, which has job growth potential. According to the US Census Bureau of Labor and Statistics, the 2018 unemployment rates for Kiowa and Prowers County were low at 1.8 percent and 3.3 percent, respectively. The unemployment rate for both counties remained stable relative to 2016 levels at 2.0 percent and 3.2 percent, respectively. Although the unemployment rate remains low, the AA reports elevated levels of LMI households. The combined distribution of LMI income families throughout the AA is 50 percent.

During the examination, we performed one community contact with a local nonprofit organization. Our contact reported local institutions are involved in community development and generally meet the needs of the community. The contact identified multiple development and revitalization initiatives to attract

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

small businesses, increase tourism, and housing for current residents. The community has a continued credit need within agricultural lending. Our contact also suggested local banks expand their SBA and other guaranteed loan programs to help bolster local commerce.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2017-18 Colorado non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	50.0	50.0	0.0	0.0
Population by Geography	13,698	0.0	41.4	58.6	0.0	0.0
Housing Units by Geography	6,719	0.0	42.4	57.6	0.0	0.0
Owner-Occupied Units by Geography	3,706	0.0	40.6	59.4	0.0	0.0
Occupied Rental Units by Geography	1,733	0.0	37.7	62.3	0.0	0.0
Vacant Units by Geography	1,280	0.0	54.2	45.8	0.0	0.0
Businesses by Geography	953	0.0	49.7	50.3	0.0	0.0
Farms by Geography	175	0.0	42.9	57.1	0.0	0.0
Family Distribution by Income Level	3,702	27.5	22.5	18.3	31.7	0.0
Household Distribution by Income Level	5,439	31.3	18.0	19.9	30.8	0.0
Median Family Income non-MSAs - CO		\$60,701	Median Housing Value			\$87,687
			Median Gross Rent			\$586
			Families Below Poverty Level			13.7%
Source: 2015 ACS Census and 2018 D&B Data. Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Scope of Evaluation in Colorado

There is only one AA within the state of Colorado (Colorado non-MSA), which received a full-scope review. Bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation.

The primary loan product by dollar is agricultural loans and by number is consumer loans. Consumer loans received more weighting in our analysis, since this is the primary product by number of loans in the AA. This evaluation also included an evaluation of GNB's CD lending, services, and investment activities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

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

Based on a full-scope review, the bank's lending performance in the State Colorado is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

Small Loans to Farms

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

The geographic distribution of small loans to farms in the Colorado non-MSA AA shows poor dispersion in 2017-18. Lending in the moderate-income census tracts is below area demographics of 42.4 percent at 21.7 percent and the aggregate of 63.5 percent. There is moderate competition in the AA with four other lenders. There are no low-income census tracts in the AA based upon the 2015 ACS data. The economy has been depressed with declining commodity prices for grain and hay along with a population decline of younger people creating fewer opportunities to lend.

GNB's performance in 2016 is stronger with reasonable distribution compared to the bank's performance in the moderate-income geographies for the combined 2017-18 period.

Consumer Loans

Refer to Table U in the state of Colorado section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of loans to moderate-income borrowers is excellent with bank lending significantly exceeding demographics. There are no low-income census tracts in the AA for the combined 2017-18 period.

GNB's performance in 2016 is weaker than the bank's performance in the combined 2017-18 period with a reasonable distribution. GNB did not make any loans in the low-income geography, which has 14.7 percent of households.

Distribution of Loans by Income Level of the Borrower

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

Small Loans to Farms

Refer to Table T in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of loans to small farms is reasonable with the percentage of bank loans of 78.3 percent in relation to demographics of 97.1 and exceeding aggregate lending of 74 percent. GNB had no income information for 17 percent of the bank's loans. The majority of loans were originated for \$250 thousand or less. This low loan amount is indicative of serving small farms.

GNB's performance in 2016 is consistent with the bank's performance in the combined 2017-18 period with a reasonable distribution.

Consumer Loans

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

The borrower distribution of consumer loans is reasonable. Lending is excellent for moderate-income borrowers with the percentage of bank loans at 37 percent in relation to demographics of 18 percent. However, lending to low-income borrowers by the bank at 11.1 percent is poor compared to demographics of 31.3 percent.

GNB's performance in 2016 is consistent with the bank's performance in the combined 2017-18 period with a reasonable distribution.

Responses to Complaints

GNB did not receive any written complaints regarding its CRA performance during the evaluation period.

COMMUNITY DEVELOPMENT TEST

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

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

Aggregate CD activities demonstrated excellent responsiveness to CD needs and opportunities in the AA, despite poor responsiveness through qualified investments. CD loans and donations totaled \$948 thousand. This represents approximately 7.80 percent of AA allocated tier 1 capital, as of December 31, 2018. Bank employees provided 904 service hours to 10 qualified CD organizations, during the evaluation period.

Number and Amount of Community Development Loans

Refer to the Lending Activity tables below for the facts 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.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Colorado non-MSA	8	100	931	100

CD loans demonstrated excellent responsiveness to CD needs and opportunities in the AA, during the evaluation period. Management originated eight CD loans totaling \$931 thousand that provided support for revitalization and stabilization in distressed and underserved census tracts.

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)
Colorado non-MSA AA	0	0	17	17	17	100	17	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.

CD investments demonstrated poor responsiveness to CD needs and opportunities in the AA, during the evaluation period. CD qualified investments in the form of donations, totaled \$17 thousand. The donations supported 12 organizations who provide community services primarily to LMI individuals or those that support small businesses.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, GNB employees provided 904 hours to ten qualified CD organizations. Examples of CD services provided by bank staff include:

- Serving as board member for an organization that provides opportunities and support for new and existing small businesses.
- Serving as board member of a domestic resource center, which assists victims of domestic abuse and provides safe housing and primarily serves LMI individuals.
- Providing online financial education, primarily serving schools with more than 50 percent of students eligible for the free and or reduced lunch program and located in distressed or underserved census tracts.

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 MSA(s) and non-MSA(s) 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:	January 1, 2016 – December 31, 2018	
Bank Products Reviewed:	Small farm and consumer loans 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
Kansas		
Kansas non-MSA AA	Full-scope	14 non-MSA counties in Kansas (Atchison, Brown, Cherokee, Clark, Clay, Comanche, Crawford, Edwards, Ford, Hamilton, Hodgeman, Kiowa, Nemaha, and Woodson)
Jackson County AA	Limited-scope	Jackson County Kansas (part of the Topeka, Kansas MSA)
Colorado		
Colorado non-MSA AA	Full-scope	Kiowa and Prowers Counties in Colorado

Appendix B: Summary of MMSA and State Ratings

Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank / State Rating
GNB	Satisfactory	Outstanding	Satisfactory
State:			
Kansas	Satisfactory	Outstanding	Satisfactory
Colorado	Satisfactory	Outstanding	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight 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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

The following is a listing and brief description of the tables included this report:

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s AA.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table 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/AA.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
2016 KS non-MSA	46	3,032	64.8	417	0.0	0.0	0.0	7.6	0.0	7.0	88.7	80.4	88.5	3.7	19.6	4.6	0.0	0.0	0.0
2016 Topeka MSA - Jackson Cnty	25	3,029	35.2	19	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	71	6,061	100.0	436	0.0	0.0	0.0	7.0	0.0	6.7	89.7	87.3	89.0	3.3	12.7	4.4	0.0	0.0	0.0
Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
2017-18 KS non-MSA	91	7,352	82	713	0.0	0.0	0.0	1.2	0.0	0.3	76.9	86.8	76.3	21.9	13.2	23.4	0.0	0.0	0.0
2017-18 Topeka MSA - Jackson Cnty	20	1,695	18	26	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	111	9,047	100.0	739	0.0	0.0	0.0	1.1	0.0	0.3	78.5	89.2	77.1	20.1	10.8	22.6	0.0	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
2016 CO - Kiowa Prowers	24	1,868	100.0	32	2.3	0.0	0.0	18.3	12.5	34.4	79.4	87.5	65.6	0.0	0.0	0.0	0.0	0.0	0.0
Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
2017-18 CO - Kiowa Prowers	23	2,217	100.0	208	0.0	0.0	0.0	42.4	21.7	63.5	57.6	78.3	36.5	0.0	0.0	0.0	0.0	0.0	0.0		
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.																					

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
2016 KS non-MSA	46	3,032	64.8	417	96.2	82.6	32.4	2.7	4.4	1.1	13.0
2016 Topeka MSA - Jackson Cnty	25	3,029	35.2	19	99.4	80.0	26.3	0.0	8.0	0.6	12.0
Total	71	6,061	100.0	436	96.5	81.7	32.1	2.5	5.6	1.0	12.7
Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-18											
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
2017-18 KS non-MSA	91	7,352	81.8	713	95.8	75.8	37.2	3.0	5.5	1.3	18.7
2017-18 Topeka MSA - Jackson Cnty	20	1,695	18.2	26	99.2	80.0	23.1	0.0	10.0	0.8	10.0
Total	111	9,047	100.0	739	96.0	76.6	36.7	2.8	6.3	1.2	17.1
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2016											
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
2016 CO - Kiowa Prowers	24	1,868	100.0	32	96.8	75.0	9.4	1.8	4.2	1.4	20.8
Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
2017-18 CO - Kiowa Prowers	23	2,217	100.0	208	97.1	78.3	74.0	2.3	4.4	0.6	17.4
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.											

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2016
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
2016 CO - Kiowa Prowers	20	249	100%	14.7	0.0	9.1	30.0	76.2	70.0	0.0	0.0	0.0	0.0
Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0.													

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-18
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
2017-18 CO - Kiowa Prowers	27	349	100%	0.0	0.0	39.6	48.2	60.4	51.9	0.0	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0.													

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2016
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
2016 CO - Kiowa Prowers	20	249	100	36.3	15.00	18.4	35.00	14.6	25.00	30.8	25.00	0.0	0.0
Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0													

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower												2017-18	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
2017-18 CO - Kiowa Prowers	27	349	100.0	31.3	11.1	18.0	37.0	19.9	18.5	30.8	33.3	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													