



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

August 12, 2019

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Vast Bank, National Association  
Charter Number 17174

4812 East 81<sup>st</sup> Street  
Tulsa, Oklahoma 74137

Office of the Comptroller of the Currency

8282 South Memorial Drive, Suite 300  
Tulsa, Oklahoma 74133

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 the two full-scope assessment areas (AA) in the state of Oklahoma.
- The loan-to-deposit (LTD) ratio is reasonable.
- A substantial majority of loans were originated inside the bank's AAs.
- The geographic distribution of loans reflects reasonable distribution throughout the bank's AAs.
- The distribution of loans to individuals of different incomes and businesses of different sizes reflects reasonable distribution.
- The Community Development (CD) test rating is based on the two full-scope AAs in the state of Oklahoma.
- CD activities reflect excellent responsiveness to the needs of the communities within the bank's AAs.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable.

Vast Bank N.A.'s (Vast) quarterly LTD ratio since the previous CRA Performance Evaluation (CRA PE) averaged 85.60 percent. We compared the bank's LTD ratio to four similarly situated banks in their market area. The aggregate average LTD ratio for the competing banks was 83.37 percent, with a low average of 64.94 percent and a high average of 96.03 percent.

### Lending in AAs

A substantial majority of the bank's loans are inside its AAs.

The bank originated and purchased 91.2 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.

Lending Inside and Outside of the AA										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	240	95.2	12	4.8	252	40,813	76.4	12,638	23.6	53,451
Small Business	44	73.3	16	26.7	60	35,766	52.2	32,712	47.8	68,478
Consumer	26	92.9	2	7.1	28	347	98.0	7	2.0	354
Total	310	91.2	30	8.8	340	76,926	62.9	45,357	37.1	122,283

The bank's primary products based on loan originations and purchases are home mortgage and commercial loans in the Partial Tulsa MSA AA (Tulsa AA) and home mortgage and consumer loans in the Oklahoma Non-MSA AA (Non-MSA AA).

## Description of Institution

Vast is a \$625 million community bank located in Tulsa, Oklahoma. Vast is a single-state institution with the main bank facility located in Tulsa, Oklahoma. The bank is a subsidiary of Tulsa Valley Bancshares Corporation, a one-bank holding company headquartered at the main bank address.

The bank has one rating area, the State of Oklahoma, with two AAs. AAs include the Tulsa AA and the Oklahoma Non-MSA AA. The Tulsa AA includes Tulsa County, Rogers County, Wagoner County, and portions of Creek and Osage counties. The Non-MSA AA includes all of Craig, Delaware, and Mayes counties. The bank has 10 branches with eight located in the Tulsa AA and two located in the Non-MSA AA. In the Tulsa AA, the main bank and two branches are in the City of Tulsa and one each is located in Bixby, Owasso, Catoosa, Collinsville, and Oologah. In the Non-MSA AA, one branch is in Langley, and one branch is located in Ketchum. The bank also has eight automated teller machines with seven located in the Tulsa AA and one located in the Non-MSA AA.

The bank's primary focus is commercial lending, although they offer a variety of loan and deposit products to meet the needs of the community. As of December 31, 2018, tier 1 capital was approximately \$66 million, and loans totaled \$487 million or 76.9 percent of total assets. The loan portfolio consists of \$387 million in commercial loans, \$84 million in residential real estate loans, \$10 million in consumer loans, and approximately \$6 million in other types of loans.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs. A CRA PE was last prepared as of August 15, 2016, and the bank received an overall rating of "Satisfactory."

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We completed a full-scope review of Vast's CRA activities in its AAs under the Intermediate Small Bank CRA procedures, which includes the lending test and the CD test. The lending test evaluates the bank's record of meeting the credit needs of the bank's AAs through its lending activities. The CD test evaluates the bank's responsiveness to CD needs in its AAs through qualified CD lending, investments and donations, and services.

Conclusions regarding the lending test are based on samples of business, residential real estate, and auto loans originated from the date of the last PE, August 15, 2016, through December 31, 2018.

Conclusions regarding the CD test are based on the bank's CD activities during the same period.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of its AAs within that state was selected for a full-scope review. For this evaluation, that included only the state of Oklahoma. For purposes of this evaluation, bank delineated AAs located within the same MSA 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 the state ratings, and where applicable, multistate ratings.

Vast has only one rating area, the state of Oklahoma, and the bank's overall rating is based solely on the full-scope reviews of the two AAs within the state. Due to the bank's focus on commercial lending and the fact that a significant portion of the loan portfolio is composed of commercial loans, we placed more emphasis on the bank's performance under small loans to businesses.

The state rating is based on performance in all bank AAs. Refer to the "Scope" section under each State 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 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

## State Rating

### State of Oklahoma

#### **CRA rating for the State of Oklahoma: Satisfactory**

**The Lending test is rated: Satisfactory**

**The CD test is rated: Outstanding**

The major factors that support this rating include:

- The geographic distribution of loans reflects reasonable distribution throughout the AAs.
- The distribution of loans to individuals of different incomes and businesses of different sizes is reasonable.
- CD lending reflects excellent responsiveness to the needs of the bank's AAs.
- CD services reflect excellent responsiveness to the needs of the bank's AAs.

### Description of Institution's Operations in Oklahoma

The bank operates 10 branches in two AAs in the state of Oklahoma. The bank's primary focus overall is commercial lending, although they offer a variety of loan and deposit products to meet the needs of the community. Due to differences in the primary products in each AA, we chose different products for analysis in each AA. In the Tulsa AA, we reviewed home mortgage and commercial loans, and in the Non-MSA AA, we reviewed home mortgage and consumer loans.

#### Partial Tulsa MSA AA

The Tulsa AA consists of 245 contiguous census tracts (CT), including all of Tulsa County, Rogers County, Wagoner County, and portions of Creek and Osage counties. The Tulsa AA consists of 17 low-income CTs, 66 moderate-income CTs, 94 middle-income CTs, and 68 upper-income CTs. Eight of the 10 bank branches are located in the Tulsa AA. The main bank and one Tulsa branch are in upper-income CTs, while the other Tulsa branch and the Bixby, Owasso, Catoosa, Collinsville, and Oologah branches are located in middle-income CTs.



Table A – Demographic Information of the AA						
AA: Tulsa AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	245	6.9	26.9	38.4	27.8	0.0
Population by Geography	860,913	5.8	23.6	40.0	30.6	0.0
Housing Units by Geography	372,221	6.2	25.3	39.9	28.6	0.0
Owner-Occupied Units by Geography	215,842	3.1	17.7	42.8	36.3	0.0
Occupied Rental Units by Geography	118,456	10.4	36.0	36.0	17.6	0.0
Vacant Units by Geography	37,923	10.4	35.2	35.1	19.3	0.0
Businesses by Geography	68,818	3.3	22.0	38.7	36.0	0.0
Farms by Geography	1,708	2.0	14.2	50.0	33.8	0.0
Family Distribution by Income Level	221,979	20.8	17.3	20.4	41.5	0.0
Household Distribution by Income Level	334,298	23.4	16.2	17.9	42.4	0.0
Median Family Income MSA - 46140 Tulsa, OK MSA		\$61,182	Median Housing Value			\$138,313
			Median Gross Rent			\$779
			Families Below Poverty Level			11.1%
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.						

Competition in the Tulsa AA is strong with more than 50 other financial institutions in the area, including several large nationwide and regional banks. Based on FDIC Deposit Market Share data as of June 30, 2018, Vast holds 1.91 percent of the market share of deposits and is ranked 16<sup>th</sup> among financial institutions in the MSA. The Tulsa AA accounts for approximately 87 percent of the bank's deposits and accounted for approximately 75 percent of the number of loans the bank originated during the evaluation period.

We consulted two community contacts in the MSA to gain a better understanding of the general community credit and development needs, as well as local economic conditions. One contact indicated that there is strong need for loans to small businesses and support services for small and startup businesses. The second contact indicated that there is a need for higher paying jobs in the area.

### Oklahoma Non-MSA AA

The Non-MSA AA consists of 23 CTs, including all of Craig County, Delaware County, and Mayes County. The Non-MSA AA consists of three moderate-income CTs, 18 middle-income CTs, and two upper-income CTs. Eight of the middle-income CTs are considered distressed. There are no low-income CTs in the AA. Two of the 10 bank branches are in the Non-MSA AA. One branch is in Langley, Oklahoma, and one branch is in Ketchum, Oklahoma. Both branches are in middle-income CTs.

Table A – Demographic Information of the AA						
AA: Non-MSA AA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.0	13.0	78.3	8.7	0.0
Population by Geography	97,160	0.0	15.5	73.5	11.0	0.0
Housing Units by Geography	50,809	0.0	12.1	79.1	8.8	0.0
Owner-Occupied Units by Geography	28,147	0.0	11.1	77.4	11.5	0.0
Occupied Rental Units by Geography	9,572	0.0	21.5	71.3	7.2	0.0
Vacant Units by Geography	13,090	0.0	7.4	88.5	4.1	0.0
Businesses by Geography	5,001	0.0	17.4	73.8	8.8	0.0
Farms by Geography	331	0.0	12.4	72.8	14.8	0.0
Family Distribution by Income Level	26,161	23.6	18.1	22.2	36.1	0.0
Household Distribution by Income Level	37,719	25.0	17.6	17.4	40.1	0.0
Median Family Income Non-MSAs - OK		\$51,698	Median Housing Value			\$109,557
			Median Gross Rent			\$622
			Families Below Poverty Level			15.6%
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.						

Competition in the Non-MSA AA is strong with more than 20 other financial institutions in the area, including several large regional banks. Based on FDIC Deposit Market Share data as of June 30, 2018, Vast holds 3.79 percent of the market share of deposits and is ranked ninth among financial institutions in the Non-MSA AA. The Oklahoma Non-MSA AA accounts for approximately 13 percent of the bank's deposits and accounted for approximately 25 percent of the number of loans the bank originated during the evaluation period.

We consulted two community contacts in the AA to gain a better understanding of the general community credit and development needs, as well as local economic conditions. One contact indicated that there is a strong need for education and training for small business owners. Another contact indicated that there is a need for more housing and small business administration programs that would allow the area to grow.

## Scope of Evaluation in Oklahoma

Both the Tulsa MSA AA and the Non-MSA AA received full-scope reviews. No limited-scope reviews were conducted. Non-MSA AAs within the same state are combined, analyzed, and presented as one AA for this evaluation. Refer to the table in appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

### LENDING TEST

The bank's performance under the lending test in Oklahoma is rated Satisfactory.

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

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

The bank exhibits reasonable geographic distribution of loans in the state. Overall, the geographic distribution of home mortgage loans, small loans to businesses, and consumer loans is reasonable given performance context.

#### Partial Tulsa MSA AA

#### *Home Mortgage Loans*

Refer to Table O in the state of Oklahoma 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 geographic distribution of home mortgage loans in the Tulsa AA reflects excellent distribution.

In 2016, the percentage of bank loans in low-income census tracts exceeded both the percentage of owner-occupied housing units and the aggregate distribution of loans in the AA. The bank's percentage of loans in moderate-income CTs was near to the percentage of owner-occupied housing units and exceeded the aggregate distribution of loans in the AA.

For 2017-2018, the percentage of bank loans in low-income geographies exceeded both the percentage of owner-occupied housing units and the aggregate lending in the AA. The percentage of bank loans in moderate-income geographies also exceeded both the percentage of owner-occupied housing units and the aggregate lending in the AA.

#### *Small Loans to Businesses*

Refer to Table Q in the state of Oklahoma 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 geographic distribution of small loans to businesses reflects reasonable distribution.

For 2016, the bank's small business lending in low-income geographies was near the percentage of businesses located in those geographies and near the aggregate lending level. For moderate-income geographies, the bank's lending was also near both the percentage of businesses and the aggregate lending in moderate-income geographies.

For 2017-2018, the bank's lending to small businesses in low-income geographies exceeded both the percentage of businesses and the aggregate lending in low-income geographies. For moderate-income geographies, the bank's lending was somewhat near to both the percentage of businesses and the aggregate lending in those geographies.

### Oklahoma Non-MSA AA

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

Refer to Table O in the state of Oklahoma 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 geographic distribution of home mortgage loans in the Non-MSA AA reflects poor distribution among low- and moderate-income (LMI) borrowers in the AA.

In 2016, the percentage of bank loans in moderate-income census tracts was significantly below the percentage of owner-occupied housing units and the aggregate distribution of loans in those geographies. There are no low-income CTs in the AA.

For 2017-2018, the percentage of bank loans in moderate-income census tracts was below the percentage of owner-occupied housing units and the aggregate distribution of loans in those geographies. There are no low-income CTs in the AA.

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

Refer to Table U in the state of Oklahoma 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 consumer loans in the AA reflects reasonable distribution.

There were a minimal number of consumer loans originated during the 2016 evaluation period, between August 15, 2016 to December 31, 2016. An analysis of consumer loans for 2016 would not be meaningful. Analysis of consumer loans is based solely on loans originated in 2017 and 2018.

For 2017-2018, the percentage of the bank's lending to consumers in moderate-income geographies was somewhat near to the percentage of households located in moderate-income geographies. There are no low-income geographies in the Non-MSA AA.

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

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

Partial Tulsa MSA AA***Home Mortgage Loans***

Refer to Table P in the state of Oklahoma 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 distribution of home mortgage loans in the Tulsa AA reflects poor distribution among LMI borrowers in the Tulsa AA but is reasonable when considering performance context.

In 2016, the percentage of bank loans to low-income borrowers was well below the percentage of low-income families, but the bank's percentage of loans is near to the aggregate percentage of lending. The percentage of bank loans to moderate-income borrowers was below the percentage of moderate-income families and the aggregate lending in the AA.

For 2017-2018, the percentage of bank loans to low-income borrowers was well-below the percentage of low-income families but near to the percentage of aggregate lending in the AA. The percentage of bank loans to moderate-income borrowers was below the percentage of moderate-income families and the aggregate lending in the AA.

The bank faces strong competition in the Tulsa AA from larger, nationwide and regional institutions. The bank's ability to lend is also hindered by the fact that many LMI borrowers in the AA cannot meet current home mortgage lending standards.

***Small Loans to Businesses***

Refer to Table R in the state of Oklahoma 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 businesses.

The borrower distribution of business loans in the Tulsa AA reflects reasonable distribution.

In 2016, the bank's loans to businesses with revenues less than or equal to \$1 million was somewhat below the percentage of businesses identified as having revenues of less than or equal to \$1 million but exceeded the aggregate lending for these businesses.

For 2017-2018, the bank's loans to businesses with revenues less than or equal to \$1 million was below the percentage of businesses identified as having revenues of less than or equal to \$1 million but exceeded the aggregate lending in the AA.

OK Non-MSA AA***Home Mortgage Loans***

Refer to Table P in the state of Oklahoma 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 distribution of home mortgage loans reflects reasonable distribution among LMI borrowers in the Non-MSA AA.

In 2016, the percentage of bank loans to low-income borrowers was near the percentage of low-income families in the AA and far exceeded the aggregate percentage of lending. The percentage of bank loans to moderate-income borrowers was also near the percentage of moderate-income families and exceeded the aggregate lending in the AA.

For 2017-2018, the percentage of bank loans to low-income borrowers was near the percentage of low-income families and far exceeded the percentage of aggregate lending in the AA. The percentage of bank loans to moderate-income borrowers was below the percentage of moderate-income families and the aggregate lending in the AA.

### ***Consumer Loans***

Refer to Table V in the state of Oklahoma 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 in the Non-MSA AA was excellent.

There were a minimal number of consumer loans originated during the 2016 evaluation period, from August 15, 2016 to December 31, 2016. An analysis of consumer loans for 2016 would not be meaningful. Analysis of consumer loans is based on loans originated in 2017 and 2018.

For 2017-2018, the bank's percentage of consumer loans to low-income borrowers exceeded the percentage of low-income households in the AA. The bank's percentage of consumer loans to moderate-income borrowers also exceeded the percentage of moderate-income households in the AA.

### **Responses to Complaints**

Vast received no CRA-related complaints during the evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the CD test in the state of Oklahoma is rated Outstanding.

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

### **Number and Amount of CD Loans**

The bank's level of CD lending demonstrates excellent responsiveness to the community needs within its AAs.

Partial Tulsa MSA AA

During the evaluation period, the bank originated or renewed 19 CD loans, totaling \$53.9 million in the Tulsa AA. These loans included seven loans, totaling \$30.8 million, for economic development and 12 loans, totaling \$23.1 million, to revitalize and stabilize designated areas within the Tulsa AA.

Significant loans include \$14.7 million in loans to build a large hotel in downtown Tulsa as part of the City of Tulsa's Santa Fe Square Economic Development Project Plan and \$1.9 million in loans to build two retail stores that provided multiple LMI jobs within the AA.

OK Non-MSA AA

During the evaluation period, the bank originated or renewed five CD loans, totaling \$1.2 million in the Non-MSA AA. These loans included four loans, totaling \$1 million, for economic development and one loan, totaling \$165 thousand, for a local government to revitalize an area within the Non-MSA AA.

Significant loans include a \$928 thousand loan to build a retail store which provided multiple LMI jobs in the AA and \$165 thousand to repair and expand the sewer system of a local municipality.

**Number and Amount of Qualified Investments**

Qualified Investments										
AA	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Partial Tulsa MSA AA	0	0	12	117	12	85.7	117	99.2		
Oklahoma Non-MSA AA	0	0		1	2	14.3	1	0.8		

\* 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's level of investments and donations demonstrates adequate responsiveness to the needs or its AAs given performance context.

Partial Tulsa MSA AA

The bank did not make any qualified investments in the Tulsa AA, but the bank made 12 donations, totaling \$135,241 to qualified organizations in the AA. Significant donations included \$15 thousand to the Day Center for the Homeless and more than \$9 thousand to Family and Children Services.

Competition for qualified investments in the Tulsa MSA is strong. There are limited qualified investments available, and it is often difficult for small community banks to compete with the large nationwide and regional banks in the MSA.

OK Non-MSA AA

The bank did not make any qualified investments in the Non-MSA AA, but they made two donations, totaling \$800 to qualified organizations in the AA. Donations included \$100 for Ketchum High School, which has 60 percent of students on the free or reduced lunch program, and \$700 to the South Grand Lake Lions to support eye exam and glasses program for low-income children, and the weekend food program for children in need.

There are few qualified CD investments available in areas of rural Oklahoma, consisting primarily of low-income school bonds, and competition is strong for the limited number of investments available.

**Extent to Which the Bank Provides CD Services**

The bank provides an excellent level of CD services within its AAs.

Partial Tulsa MSA AA

Five bank officers and employees serve in leadership positions in local qualifying organizations that provide community services to LMI individuals, support economic development, and revitalize and stabilize areas within the AA. Six bank officers and employees also conducted financial literacy classes for LMI students. More than 1,200 service hours were provided within the AA during the evaluation period.

OK Non-MSA AA

One bank employee serves on the board or a board committee for three local qualifying organizations that provide community services to LMI families and individuals in the AA. More than 100 service hours were provided within the AA during the evaluation period.



## 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>	August 15, 2016 to December 31, 2018	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, and consumer loans CD loans, qualified investments, and CD services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A		
<b>List of AAs and Type of Examination</b>		
<b>Rating and AAs</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Oklahoma</b>		
Partial Tulsa MSA AA	Full-scope	Counties of Tulsa, Rogers, and Wagoner; Partial Counties of Creek and Osage
Oklahoma Non-MSA AA	Full-scope	Counties of Mayes, Craig, and Delaware

## Appendix B: Summary of State Ratings

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RATINGS      Vast Bank, N.A.			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Vast Bank, N.A.	Satisfactory	Outstanding	Satisfactory
State:			
State of Oklahoma	Satisfactory	Outstanding	Satisfactory

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

## Appendix C: Definitions and Common Abbreviations

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

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

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

**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/AA.

**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 CD.

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the AA. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year.

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

- Table O. AA 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. AA 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/AA. The table also presents aggregate peer data for the years the data is available.
- Table Q. AA 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 AA.
- Table R. AA Distribution of Loans to Small Businesses by Gross Annual Revenue -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table U. AA 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. AA 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 O : AA Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
AA:	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
OK Non-MSA AA	18	707	18.9	2,088	0.0	0.0	0.0	13.7	0.0	13.8	77.8	100.0	74.4	8.5	0.0	11.8	0.0	0.0	0.0
Partial Tulsa MSA AA	77	8,911	81.1	27,323	3.9	6.5	1.5	19.3	15.6	12.1	37.2	36.4	37.7	39.6	41.6	48.8	0.0	0.0	0.0
Total	95	9,618	100.0	29,411	3.4	5.3	1.4	18.6	12.6	12.2	42.0	48.4	40.3	36.0	33.7	46.1	0.0	0.0	0.0
Source: 2010 U.S Census; 08/15/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table O : AA Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
AA:	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
OK Non-MSA AA	23	2,322	15.9	2,127	0.0	0.0	0.0	11.1	4.3	10.9	77.4	87.0	75.3	11.5	8.7	13.9	0.0	0.0	0.0
Partial Tulsa MSA AA	122	28,872	84.1	25,745	3.1	4.1	1.0	17.7	18.9	13.0	42.8	28.7	42.8	36.3	48.4	43.3	0.0	0.0	0.0
Total	145	31,195	100.0	27,872	2.7	3.4	0.9	17.0	16.6	12.8	46.8	37.9	45.3	33.5	42.1	41.0	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: AA Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
AA:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
OK Non-MSA AA	18	707	18.9	2,088	21.8	16.7	4.5	18.8	16.7	14.2	21.4	33.3	17.9	38.0	27.8	43.9	0.0	5.6	19.5
Partial Tulsa MSA AA	77	8,911	81.1	27,323	20.0	2.6	4.9	17.5	7.8	16.5	20.4	5.2	20.3	42.1	37.7	39.7	0.0	46.8	18.5
Total	95	9,618	100.0	29,411	20.2	5.3	4.9	17.7	9.5	16.4	20.5	10.5	20.1	41.6	35.8	40.0	0.0	38.9	18.6
Source: 2010 U.S. Census ; 08/15/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table P: AA Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
AA:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Non-MSA AA 2017	23	2,322	24.5	2,127	23.6	21.7	4.5	18.1	4.3	14.7	22.2	17.4	18.8	36.1	39.1	43.0	0.0	17.4	19.0
Tulsa AA 2017	122	28,872	84.1	25,745	20.8	4.1	5.8	17.3	7.4	16.3	20.4	4.1	20.5	41.5	40.2	37.4	0.0	44.3	20.0
Total	145	31,195	100.0	27,872	21.1	6.9	5.7	17.4	6.9	16.2	20.6	6.2	20.4	40.9	40.0	37.9	0.0	40.0	19.9
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: AA Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
AA:	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
Partial Tulsa MSA AA	23	25,926	100.0	14,907	5.8	4.4	5.7	23.0	17.4	20.8	32.0	47.8	31.2	39.2	30.4	42.3	0.0	0.0	0.0
Total	23	25,926	100.0	14,907	5.8	4.4	5.7	23.0	17.4	20.8	32.0	47.8	31.2	39.2	30.4	42.3	0.0	0.0	0.0
Source: 2016 D&B Data; 08/15/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table Q: AA Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
AA:	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
Partial Tulsa MSA AA	24	10,543	100.0	15,761	3.3	8.3	3.0	22.0	12.5	20.8	38.7	41.7	39.5	36.0	37.5	36.8	0.0	0.0	0.0
Total	24	10,543	100.0	15,761	3.3	8.3	3.0	22.0	12.5	20.8	38.7	41.7	39.5	36.0	37.5	36.8	0.0	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			

Table R: AA Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
AA:	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
Partial Tulsa MSA AA	23	25,926	100.0	14,907	84.8	52.2	46.3	5.9	47.8	9.3	0.0
<b>Total</b>	<b>23</b>	<b>25,926</b>	<b>100.0</b>	<b>14,907</b>	<b>84.8</b>	<b>52.2</b>	<b>46.3</b>	<b>5.9</b>	<b>47.8</b>	<b>9.3</b>	<b>0.0</b>
Source: 2016 D&B Data; 08/15/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table R: AA Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
AA:	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
Partial Tulsa MSA AA	24	10,543	100.0	15,761	84.3	50.0	44.9	6.0	41.7	9.7	8.3
<b>Total</b>	<b>24</b>	<b>10,543</b>	<b>100.0</b>	<b>15,761</b>	<b>84.3</b>	<b>50.0</b>	<b>44.9</b>	<b>6.0</b>	<b>41.7</b>	<b>9.7</b>	<b>8.3</b>
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table U: AA Distribution of Consumer Loans by Income Category of the Geography													2017-18
AA:	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
OK Non-MSA AA	26	347	100.0	0.0	0.0	13.8	7.7	75.8	76.9	10.4	15.4	0.0	0.0
<b>Total</b>	<b>26</b>	<b>347</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>13.8</b>	<b>7.7</b>	<b>75.8</b>	<b>76.9</b>	<b>10.4</b>	<b>15.4</b>	<b>0.0</b>	<b>0.0</b>
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													

Table V - AA Distribution of Consumer Loans by Income Category of the Borrower													2017-18
AA:	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
OK Non-MSA AA	26	347	100.0	25.0	30.8	17.6	19.2	17.4	19.2	40.1	23.1	0.0	7.7
<b>Total</b>	<b>26</b>	<b>347</b>	<b>100.0</b>	<b>25.0</b>	<b>30.8</b>	<b>17.6</b>	<b>19.2</b>	<b>17.4</b>	<b>19.2</b>	<b>40.1</b>	<b>23.1</b>	<b>0.0</b>	<b>7.7</b>
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0													