

# PUBLIC DISCLOSURE

July 22, 2024

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Capitol Federal Savings Bank Charter Number: 700670

700 South Kansas Avenue Topeka, Kansas 66603

Office of the Comptroller of the Currency

7101 College Boulevard, 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 following table indicates the performance level of Capitol Federal Savings Bank (CFSB) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Capitol Federal Savings Bank Performance Tests								
	Lending Test*	Investment Test	Service Test						
Outstanding		X							
High Satisfactory									
Low Satisfactory	X		X						
Needs to Improve									
Substantial Noncompliance									

<sup>(\*)</sup> The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on an overall adequate distribution of loans in geographies and to borrowers of different income levels in CFSBs assessment areas (AA). The Kansas City multistate metropolitan statistical area (MMSA), Topeka, KS and Wichita, KS AAs carried the greatest weight in making overall conclusions. The level of community development (CD) lending had a neutral impact on lending performance in all AAs.
- The Investment Test rating is based on excellent responsiveness to AA credit and community needs in the Kansas City MMSA and the state of Kansas. Full-scope assessment areas received greater weight in making overall conclusions. The dollar volume of current- and prior-period investments represented 15.6 percent of CFSB's total tier 1 capital.
- The Service Test rating is based on a branch distribution system that is accessible to essentially all
  geographies and individuals of different income levels. CFSB provided an overall adequate level of
  CD services in its AAs.

# **Lending in Assessment Area**

An adequate percentage of CFSB's loans are in in its AA.

CFSB originated and purchased 76.5 percent by number and 63.3 percent by dollar of its total loans inside its 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. Loans originated inside CFSB's AAs are considered for the geographic and borrower income distribution analyses under the Lending Test.

Lending Inside and Outside of the Assessment Area											
Loan Category	Number of Loans					Dollar A	Dollar Amount of Loans \$(000s)				
	Inside Outs		Outsi	de	Total	Inside		Outsio	de	Total	
	#	%	#	%	#	\$	%	\$	%	\$(000s)	
Home Mortgage	12,644	74.5	4,338	25.5	16,982	3,289,496	62.3	1,992,091	37.7	5,281,587	
Small Business	2,063	91.8	185	8.2	2,248	185,646	91.0	18,331	9.0	203,977	
Small Farm	4	66.7	2	33.3	6	490	28.6	1,225	71.4	1,715	
Total	14,711	76.5	4,525	23.5	19,236	3,475,632	63.3	2,011,647	36.6	5,487,279	

#### Flexible lending products available bank-wide

The Home-At-Last (HAL) program is the umbrella branding for CFSB's affordable housing loan product options. Product offerings are designed to provide home ownership opportunities to low- and moderate-income applicants, first-time homebuyers, and others with limited resources. Properties must be located in low-income or high-minority geographies, or designated disaster areas. Flexible terms may include special financing subsidies facilitated through a third-party to provide down payment assistance to eligible borrowers. Reduced costs may include various fee waivers and reduced appraisal fees. During the evaluation period, the HAL program originated 129 loans totaling \$13.2 million. This program had an overall neutral impact on lending performance.

The Federal Home Loan Bank's Affordable Housing Program (AHP) and Homeowner Set-Aside Program (HSP) are available in all AAs. During the evaluation period, the programs assisted 67 borrowers. The AHP is a special program of the Federal Housing Finance Agency. As a member, CFSB offers down payment assistance to very low-, low- and moderate-income first-time homebuyers in the state of Kansas. AHP provides a zero-interest subsidy to borrowers as a grant, subject to a five-year retention period. The HSP assists members in meeting the needs of low-income first-time homebuyers by offering down payment, closing cost, and rehabilitation assistance in the state of Kansas. HSP provides a zero-interest subsidy to first-time homebuyers as a grant, subject to a five-year retention period.

Activity related to other loan product offerings are detailed within the applicable Lending Test sections throughout this performance evaluation.

# **Description of Institution**

CFSB is a \$9.6 billion interstate, federally chartered stock savings bank headquartered in Topeka, Kansas. CFSB is wholly owned by Capitol Federal Financial, Inc. (CFFI), a one-bank holding company, also headquartered in Topeka, Kansas.

CFSB is a community-oriented financial institution offering a variety of retail and commercial banking services with a primary focus in the residential real estate market. Other product or service offerings include free checking accounts and access to electronic banking services such as mobile banking. As of December 31, 2023, CFSB's loan portfolio, by dollar volume, consisted of 85 percent residential retail

and 15 percent commercial loans. Total loans represented 83 percent of total assets. Tier 1 capital was \$857.3 million.

CFSB has two rated areas: Kansas City, MO-KS MMSA (KCMO-KS AA) and the state of Kansas. The KCMO-KS AA is a network of 22 branches and 33 automated teller machines (ATMs). In the state of Kansas, there are five AAs and a network of 27 branches and 40 ATMs. All ATMs are deposit-taking. Within the state of Kansas, the Topeka metropolitan statistical area (MSA), Lawrence MSA, and Wichita AAs have ten, four, and nine branches, respectively. The Manhattan MSA and Non-MSA have two branches in each AA. Since the last CRA evaluation, CFSB opened three new branches in the KCMO-KS AA. No other branches were opened in other AAs during the evaluation period.

There are no known legal, financial, or other factors impeding the institution's ability to help meet credit needs in its AAs. CFSB received a "Satisfactory" rating in its previous CRA evaluation dated October 5, 2020.

## Coronavirus, Small Business Administration (SBA) Paycheck Protection Program (PPP) Participation

In early 2020, the coronavirus (COVID-19) pandemic led to a public health emergency that severely impacted the national economy. COVID-19 caused deteriorating economic conditions resulting from mandated stay-at-home orders and business shutdowns used to slow the spread of the virus. CFSB adapted to changing needs and priorities, providing essential banking products and services to customers during the pandemic. CFSB participated in the SBA's PPP, which provided small businesses with funds to cover payroll costs or other expenses. Between 2020 and 2021, CFSB originated 1,203 PPP loans totaling \$57 million across its service areas. Additionally, CFSB refunded deposit account fees incurred by customers due to financial hardship and provided payment relief options for consumer and mortgage loan customers. CFSB also partnered with a local organization and developed an innovative solution (the "CapFed Community Care Station") for helping struggling families in Topeka, Kansas access vital economic and basic need support, while limiting direct, person-to-person contact.

# **Scope of the Evaluation**

## **Evaluation Period/Products Evaluated**

Examiners evaluated CFSB's CRA performance under the Large Bank Lending, Investment, and Service Tests. Examiners evaluated home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA), small loans to businesses reported under the CRA, CD loans, qualified investments, and CD and retail services from January 1, 2020, through December 31, 2023 (the evaluation period). Qualifying activities performed in response to the COVID-19 pandemic across the United States were also considered in this evaluation. Examiners did not consider consumer loans nor small loans to farms in this evaluation. Neither constituted a substantial majority of CFSB's business and management did not request consideration for consumer lending. Lending data used to evaluate performance are included in appendix D.

Due to updated 2020 Census data and census tract income level designation changes that became effective January 1, 2022, examiners conducted a separate analysis of CFSB's lending performance during the January 1, 2020 through December 31, 2021 period (2020-2021 period), and the January 1, 2022 through December 31, 2023 period (2022-2023 period). Examiners analyzed CFSB's home mortgage lending and small loans to businesses for the 2020-2021 period using the 2015 American

Community Survey (ACS) demographic information. For the 2022-2023 period, examiners used the 2020 Census demographic information to analyze CFSB's lending performance.

Except where noted, examiners gave more consideration to CFSB's lending performance during the 2020-2021 period. Lending volume by count and dollar amount was substantially greater during this time, and comparisons to both demographic and aggregate data were available. Examiners also considered the lasting impacts the COVID-19 pandemic had on CFSB's ability to conduct business, as well as other economic factors when evaluating lending performance between the 2020-2021 and 2022-2023 time periods. Where applicable, the factors contributing to differences in lending performance between the two periods are mentioned.

On June 5, 2020, the OCC published a modernized CRA Rule. The June 2020 CRA Rule was subsequently rescinded on December 14, 2021. The Rule was in effect from October 1, 2020, until December 31, 2021. While in force, the rule expanded bank lending, investment, and services activities that qualified for positive CRA consideration. This included other activities that met the credit needs of economically disadvantaged individuals and entities, low- and moderate-income geographies, and other identified areas of need in banks' communities. The 2020 CRA Rule also expanded the circumstances in which banks received pro-rata consideration for qualifying activities beyond those activities that received consideration under the current framework. Certain CD activities that provided some benefit to, but did not primarily benefit, specified populations, entities, or areas would receive pro-rata credit equal to the partial benefit provided. Finally, the June 2020 CRA Rule allowed for allocation of an activity across all of a bank's AAs and other MSAs or non-MSAs served by the activity according to the share of the bank's deposits in those areas, to the extent the bank cannot document that the services or funding it provided was allocated to a particular project. An activity that met these qualifying criteria under the June 2020 CRA rule that CFSB conducted between October 1, 2020, and December 31, 2021, remained a qualifying activity even after rescission of the June 2020 CRA rule and were included in this evaluation. Examiners did not separate or make special mention of CD activity considered under the expanded June 2020 rule from current criteria in this report.

There were no MSA boundary changes introduced by the Office of Management and Budget during the evaluation period that affected any of CFSB's AAs.

## **Lending Test**

For lending performance, the loan distribution analyses compared originated and purchased home mortgage loans and small loans to businesses to demographic and aggregate data under the applicable Lending Test components. Aggregate data illustrates how CFSB performed compared to other lenders in its AAs and provides context on the reasonableness of CFSB's performance. Examiners generally gave equal weighting to geographic and borrower distribution components of the Lending Test unless performance context factors necessitated a differing comparison.

Towards the end of the evaluation period (2022 and 2023) and as COVID-19 related relief programs expired, activity in the housing market slowed and home costs increased in CFSB's AAs. The rising interest rate environment served to discourage many existing homeowners from listing their homes on the market only to assume a new, potentially costlier mortgage with a new home purchase. This led to a reduction in the supply of existing homes, requiring homebuyers to increasingly rely on new home construction inventory, and subsequently created a greater challenge for creditworthy low- and moderate-income individuals and families to purchase a home. Through this environment, CFSB experienced a 42 percent decrease in AA loan performance activity from earlier evaluation time periods.

For the home mortgage borrower distribution analysis, examiners considered this impact, as well as, the impact income, poverty levels, and housing costs have on limiting homeownership opportunities of low-and moderate-income individuals and families. Additionally, examiners considered the impact of home affordability for low- and moderate-income borrowers in higher cost areas when comparing the distribution of home mortgage loans to the demographics. In these higher cost markets, it is difficult for many low- and moderate-income borrowers to afford a home as the area's median housing value is typically too high for conventional mortgage loan qualifications.

The lending analysis also considered the number and dollar volume of CD loans, with emphasis placed on loans that were particularly complex or responsive to AA needs. To provide perspective regarding the relative level of CD lending, examiners compared the dollar amount of current and prior period investments to tier 1 capital over the evaluation period allocated to each AA based on its pro rata share of deposits. CD lending could have a positive, neutral, or negative impact on the performance rating, which examiners described within narrative comments.

As documented in the Description of Institution section, CFSB originated 1,203 PPP loans during the evaluation period. Examiners considered those loans that met the Call Report definition of a loan to small businesses as part of the Lending Test as small loans to businesses. For a significant majority of PPP loans, CFSB did not collect revenue information as revenue information was not a requirement of the PPP lending program. As a result, CFSB had a substantially higher volume of small business loans with revenues not reported. Interagency guidance<sup>1</sup> states: "When evaluating CRA performance, the agencies will take into account the unique circumstances affecting borrowers and banks resulting from the COVID-19 emergency and will not penalize a bank for making a large volume of loans for which gross annual revenue information is not available." To fully consider CFSB's lending patterns within the context of the PPP program, examiners analyzed performance including PPP loans for which revenue was unavailable or uncollected. This performance context generally resulted in more positive performance in CFSB's AAs when considering the Distribution of Loans by Income Level of the Borrower for small businesses.

#### **Investment Test**

Investment analyses included CFSB's investment portfolio as well as donations and grants made during the evaluation period. Qualified investments included investments that met the definition of CD made in the current evaluation period or the prior period that were still outstanding. Examiners considered prior-period investments at the book value of the investment at the end of the current evaluation period and current-period investments at their original investment amount. Consideration was given for qualified investment activity that benefited a specific AA in the applicable state or MMSA rating area as well as investments in the broader statewide or regional area that included the AA, where the entity or activity had a purpose, mandate, or function (PMF) that included serving the AA.

To provide perspective regarding the relative level of qualified investments, examiners compared the dollar amount of current and prior period investments to tier 1 capital over the evaluation period allocated to each AA based on its pro rata share of deposits.

#### Service Test

Examiners reviewed CFSB's network of branches and deposit-taking ATMs for the availability and effectiveness of delivering retail banking services. Examiners also considered the amount and impact of

Community Reinvestment Act (CRA) Consideration for Activities in Response to the Coronavirus Pandemic Frequently Asked Questions (FAQs) (occ.gov)

CD activities performed by CFSB employees during the evaluation period that benefitted low- and moderate-income individuals, families, and geographies in its AAs.

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

In each state where CFSB has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, examiners combined and evaluated bank delineated AAs located within the same MSA or MMSA as a single AA. Similarly, examiners combined and evaluated bank delineated non-MSA AAs within the same state as a single AA. Examiners may evaluate these combined AAs using full- or limited-scope procedures.

When determining areas for full-scope reviews, examiners considered factors such as CFSB's percentage of deposits within the rating area, business strategy within a particular MMSA or state, the number of branches, the volume of reportable loans originated and purchased in each state and/or MMSA, the significance of CFSB to the AA based on its deposit market share and rank, comments received from the public, and conclusions from prior CRA evaluations. Where necessary, examiners selected multiple AAs to complete sufficient full-scope analyses to support the conclusions and ratings. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## **Ratings**

CFSB's overall rating is a blend of the state ratings, and multistate ratings. The KCMO-KS AA and state of Kansas carried equal weight. The state of Kansas had 51.8 percent of total bank deposits, and the KCMO-KS AA had 55.2 percent of the reported loans by number, excluding CD loans, during the evaluation period. For the Lending Test, home mortgage lending carried the most weight as the loans reported represented 85.9 percent of total loans originated or purchased by number in CFSB's AAs during the evaluation period.

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

# **Discriminatory or Other Illegal Credit Practices Review**

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

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

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

# **Multistate Metropolitan Statistical Area Rating**

## Kansas City, MO-KS MMSA AA (KCMO-KS AA)

CRA rating for the Kansas City, MO-KS AA<sup>2</sup>: Low Satisfactory

The Lending Test is rated: Low Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Based upon the data in the tables and performance context considerations noted, geographic distribution of originated and purchased home mortgage loans was poor, and geographic distribution of small loans to businesses was good.
- Based upon the data in the tables and performance context considerations noted, borrower
  distribution of originated and purchased home mortgage loans among individuals of different income
  levels was adequate, and borrower distribution of small loans to businesses of various sizes was
  good.
- CD lending reflected good responsiveness to meeting community credit needs. CFSB made a relatively high level of CD loans in the AA which had a positive impact on the overall conclusion.
- Qualified investments were responsive and effective in meeting community credit needs. CFSB made an excellent level of qualified investments, grants, and donations in the AA.
- CFSB's branches and alternative delivery systems were readily accessible to geographies and individuals of different incomes and responsive in helping CFSB provide services across the community.
- CFSB provided a limited level of CD services in the AA.
- CFSB had a good record of lending addressing the needs of AA small businesses in response to the COVID-19 pandemic.

# Description of Institution's Operations in Kansas City, MO-KS AA

The KCMO-KS AA includes a portion of the Kansas City MO-KS MMSA. The KCMO-KS AA is comprised of the entire counties of Johnson and Wyandotte in Kansas (KS), Clay and Platte in Missouri (MO), and a portion of Jackson County, MO consisting of the city limits of Kansas City, and the cities of Raytown and Grandview. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

Based on the Federal Deposit Insurance Corporation (FDIC) summary of deposit information as of June 30, 2023, CFSB ranked fifth in the MMSA (top 6 percent) in deposit market share with deposits totaling

<sup>&</sup>lt;sup>2</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

\$3 billion in the AA, which represented 48 percent of CFSB's total deposits. During the evaluation period, CFSB made \$2.3 billion, or 66.7 percent, of its reported dollar volume of home mortgage loans and small loans to businesses in this AA. Per 2022 peer mortgage data, by loan count, CFSB ranked fifth out of 523 lenders (top 1 percent) in the MMSA with a 3.1 percent market share.

CFSB had 22 branches and 33 deposit-taking ATMs in the AA. Strong competition for financial services exists within the KCMO-KS AA. 92 nationwide and regional institutions had branch locations in the MMSA. Primary competitors, based upon deposit share included Commerce Bank (12.82 percent), Bank of America N.A. (7.12 percent), U.S. Bank, National Association N.A. (5.6 percent), Crossfirst Bank (3.59 percent), and Security Bank of Kansas City (3.47 percent).

The following tables provide a summary of demographics, including housing and business information for the AA from each evaluation period.

Table A – Der	mographic Iı	nformation	of the Assessn	nent Area		
Assess	ment Area: ]	KCMO-KS	AA – 2020-20	21		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	399	18.8	21.6	27.6	28.1	4.0
Population by Geography	1,435,541	11.6	20.8	32.2	35.0	0.4
Housing Units by Geography	624,651	13.6	21.7	32.9	31.1	0.6
Owner-Occupied Units by Geography	356,956	7.3	17.1	33.7	41.6	0.2
Occupied Rental Units by Geography	208,359	19.2	28.1	33.7	18.2	0.9
Vacant Units by Geography	59,336	31.6	26.6	25.4	14.0	2.3
Businesses by Geography	137,713	8.5	17.3	30.3	41.5	2.3
Farms by Geography	3,266	6.9	16.2	33.4	43.0	0.5
Family Distribution by Income Level	356,396	21.4	16.8	19.5	42.3	0.0
Household Distribution by Income Level	565,315	23.8	16.5	17.2	42.4	0.0
Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$72,623	Median Housi	ng Value		\$168,427
Median Gross Rent						
			Families Belo	w Poverty Le	vel	9.3%

Source: 2015 ACS and 2021 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.

Table A – De	Table A – Demographic Information of the Assessment Area										
Assessment Area: KCMO-KS AA – 2022-2023											
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #					
Geographies (Census Tracts)	442	11.3	24.2	30.8	28.7	5.0					
Population by Geography	1,539,938	8.3	23.0	33.0	34.9	0.9					
Housing Units by Geography	652,374	9.1	24.4	34.0	31.3	1.1					
Owner-Occupied Units by Geography	374,896	5.4	18.8	35.5	39.7	0.5					
Occupied Rental Units by Geography	224,635	13.3	31.1	33.8	20.2	1.7					

Vacant Units by Geography	52,843	18.0	36.7	24.2	18.3	2.8
Businesses by Geography	230,495	6.4	20.4	30.7	39.2	3.4
Farms by Geography	5,327	5.1	19.1	35.3	39.2	1.4
Family Distribution by Income Level	373,227	20.4	16.7	20.9	42.0	0.0
Household Distribution by Income Level	599,531	24.0	16.1	17.6	42.4	0.0
Median Family Income MSA - 28140 Kansas City, MO-KS MSA	\$86,562	Median Hous		\$211,718		
		Median Gross		\$1,016		
	Families Belo	7.1%				

Source: 2020 U.S. Census and 2023 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.

#### Employment and Economic Factors

The Department of Housing and Urban Development (HUD) prepared a Comprehensive Housing Market Analysis for the KCMO-KS AA as of January 1, 2024. The analysis included economic factors impacting the AA and indicated the general economy had recovered from the recession of early 2020 by 2022. By the end of 2023, 9-of-the-11 major sectors had contributed to job gains. The largest nonfarm payroll sectors were professional and business services, education and health services, and leisure and hospitality. According to the Bureau of Labor Statistics, the unemployment rate over the evaluation period remained below the national rate and steadily decreased in the AA. As of December 2023, the rate was 2.5 percent compared to the U.S. unemployment rate of 3.6 percent (2.7 and 3.0 percent in Kansas and Missouri). Top employers in the AA include Children's Mercy Hospital, Cerner Corporation, Honeywell, St Luke's Health System, and Truman Medical Centers.

#### Housing

Per Federal Financial Institution Examination Council (FFIEC) data, the median housing value increased 26.2 percent from \$168,000 to \$212,000, and median gross rent increased 16.5 percent from \$858 to \$1,000 in the AA. In addition to FFEIC data, examiners considered housing cost information from the Kansas City Regional Association of Realtors (KCRAR). KCRAR data, for 2020-2021 indicated the median home sales price in the AA was \$280,000 and increased to \$308,000 for 2022-2023. HUD indicated the housing market in the AA is balanced, and rising mortgage interest rates since 2022 have tempered home sales leaving homes for sale inventory low.

Based upon the FFIEC data in the above tables, depending upon the respective evaluation period (2020-2021 or 2022-2023), low-income families earned up to \$36,312 or \$43,281 and moderate-income families \$58,098 or \$69,250 per year. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Per this analysis, the maximum monthly payment for low-income borrowers is \$908 and \$1,082 and \$1,452 and \$1,731 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be \$904 or \$1,137. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

## Community Contacts

Examiners considered feedback from six community contacts in the KCMO-KS AA as part of this performance evaluation. Contacts were performed from May 2022 through April 2024, and included two

economic development organizations, one local government economic development department, two housing organizations, and one community services organization. Several contacts mentioned the lack of affordable housing for various reasons including limited housing stock, high prices, increased material costs, appraisal gaps, and fewer properties making it to market due to investor purchases. Small businesses are also struggling to renew leases due to increased rent.

Primary needs include affordable housing, small business lending for new businesses, and investments in vital community services such as public transportation and daycare. Specific affordable housing needs include first-time homebuyer education and assistance, HUD-certified housing counselors, down payment assistance programs, and funds to rehabilitate older properties.

There are numerous CD opportunities in this AA, including participation on boards and advisory committees, loan participations, equity investments, and grants. Examiners noted six Community Development Financial Institutions (CDFIs), two Small Business Development Centers (SBDCs), and four HUD-approved housing counseling agencies in the AA. The CDFIs include one loan fund, one bank holding company, one bank or thrift, and three credit unions.

## Scope of Evaluation in the Kansas City, MO-KS AA

For purposes of this evaluation, examiners combined CFSB's five delineated AAs (Johnson and Wyandotte counties in Kansas and Clay, Jackson, and Platte counties in Missouri) into one and aggregated the data at the MMSA level for analysis and presentation.

Examiners placed more emphasis on home mortgage loans versus small loans to businesses. Based on the total number of reported loans, excluding CD loans, home mortgage loans represented 89 percent of CFSB's loan originations/purchases during the evaluation period.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS CITY, MO-KS AA

#### LENDING TEST

CFSB's performance under the Lending Test in the KCMO-KS AA is rated Low Satisfactory.

Based on a full-scope review, CFSB's performance in the KCMO-KS AA is adequate.

## **Lending Activity**

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total				
2020-2021									
KCMO-KS AA	4,895	776	0	6	5,677				
2022-2023									
KCMO-KS AA	2,344	107	1	6	2,458				
Total	7,239	883	1	12	8,135				

Dollar Volume of L	oans \$(000s)				
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
2020-2021					
KCMO-KS AA	1,408,499	53,263	0	10,441	1,472,203
2022-2023					
KCMO-KS AA	883,043	22,592	100	19,832	925,567
Total	2,291,542	75,855	100	30,273	2,397,770

For the years 2020-2021, CFSB ranked 10<sup>th</sup> out of 645 institutions in home mortgage lending market share by number of loans (2.5 percent), and seventh by dollar amount (3 percent). For 2022-2023, based upon aggregate HMDA data available in 2022, CFSB ranked fifth out of 626 institutions with 3.1 percent of the by number market share, and third with 4.1 percent of the dollar amount market share. The top 10 mortgage lenders by market share in the AA represented just over 37 percent of the by number of loans market share and 34 percent by dollar amount in 2020-2021, and just over 35 percent and 31 percent in 2022. Market share information for mortgage loans shows CFSB operates in a highly competitive banking environment that includes specialized mortgage lending companies and larger state and nationwide banks. Based upon 2022 data, of the top 15 home mortgage lenders, seven were non-depository financial institutions (NDFIs), one was a credit union, and three were national banks with large mortgage loan operations.

For small loans to businesses in 2020-2021, CFSB ranked 68<sup>th</sup> out of 198 lenders in market share by number of loans, with less than 0.1 percent. For 2022-2023, based upon aggregate small business data in 2022, CFSB ranked 34<sup>th</sup> out of 179 lenders in market share by number of loans, with 0.2 percent. Across the evaluation period, the majority of the top 10 small business lenders in the AA, by number production, were large national banks with large credit card portfolios including JPMorgan Chase Bank N.A. (22.5 percent), U.S. Bank N.A. (17 percent), and Bank of America N.A. (11 percent). Based upon 2022 data, Of the top 10 small business lenders in the AA, seven were institutions with large business credit card portfolios with average loan sizes of \$9,500 or less. CFSB's average small business loan size was \$211,500.

# Distribution of Loans by Income Level of the Geography

CFSB exhibits a poor geographic distribution of loans in the AA. Examiners placed equal emphasis on performance in low- and moderate-income geographies as both offer sufficient opportunities for CFSB to lend.

#### Home Mortgage Loans

Refer to Table O in the KCMO-KS AA section of appendix D for the facts and data used to evaluate the geographic distribution of CFSB's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was poor.

#### 2020-2021

The percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies was well below the percentage of owner-occupied housing located in these geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was below, and in moderate-income geographies was well below, the aggregate percentage of all reporting lenders.

#### 2022-2023

The geographic distribution of home mortgage loans was consistent with 2020-2021 performance.

#### Small Loans to Businesses

Refer to Table Q in the KCMO-KS AA section of appendix D for the facts and data used to evaluate the geographic distribution of CFSB's originations and purchases of small loans to businesses.

The geographic distribution of loans to small businesses was adequate.

#### 2020-2021

The percentage of small loans to businesses originated or purchased in low-income geographies was well below both the percentage of businesses located in these geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses located in these geographies and the aggregate percentage of all reporting lenders.

#### 2022-2023

The geographic distribution of small loans to businesses was stronger than 2020-2021 performance positively impacting the overall conclusion. The percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses located in these geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies was near to both the percentage of businesses located in these geographies and the aggregate percentage of all reporting lenders.

#### Lending Gap Analysis

Examiners analyzed CFSB's lending patterns and reviewed summary reports and maps of home mortgage loans and small loans to businesses to identify any gaps in the geographic distribution of loans in the AA. Examiners focused on clusters of low- and moderate-income census tracts with no lending in the AA, and then evaluated those clusters to determine if demographic information, or other performance context data reflected lending opportunities within those clusters. Examiners did not identify any unexplained conspicuous lending gaps.

## Distribution of Loans by Income Level of the Borrower

CFSB exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution. Examiners considered housing costs in relation to the median family incomes and the significant increase in home values during the evaluation period, which limited the affordability for low-income borrowers.

## Home Mortgage Loans

Refer to Table P in the KCMO-KS AA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans among individuals of different income levels was poor.

#### 2020-2021

The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of families in the AA and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was below for both percentage of families in the AA and the aggregate percentage of all reporting lenders.

#### 2022-2023

The borrower distribution of home mortgage loans among individuals of different income levels was consistent with 2020-2021 performance.

#### Small Loans to Businesses

Refer to Table R in the KCMO-KS AA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was adequate. Examiners placed more emphasis on performance during the 2022-2023 analysis period due to the difficulty in evaluating 2020-2021 performance due to the large volume of PPP loans without gross annual revenue information.

#### 2020-2021

The percentage of loans to small businesses originated or purchased was well below both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders. However, CFSB did not collect or consider the gross annual revenues in the underwriting of 77.2 percent of its small loans to businesses, including PPP loans in the AA. Consideration of PPP lending had a positive impact on performance.

#### 2022-2023

The distribution of loans to businesses of different sizes was stronger than 2020-2021 performance positively impacting the overall conclusion. The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

# **Community Development Lending**

CFSB made a relatively high level of CD loans. CD lending had a positive impact on the Lending Test conclusion for the AA.

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

CFSB originated 12 CD loans totaling more than \$30.2 million or 7.3 percent of tier 1 capital allocated to the KCMO-KS AA. CD loans were responsive to identified community needs. Seven CD loans totaling \$1.9 million supported affordable housing and five CD loans totaling \$28.3 million funded revitalization and stabilization efforts. Examples of loans provided include:

- \$3.3 million in financing that supported the purchase and rehabilitation of two multifamily residences totaling 78 units in low- and moderate-income census tracts. The purpose of the project is to promote revitalization through the rehabilitation, conservation, or redevelopment to protect the public health, safety, and welfare of area residents.
- A \$1.6 million loan that supported the preservation of affordable housing for low- and moderate-income households.
- A line of credit totaling \$132,000 to a community organization that completes home improvements for low-income residents of owner-occupied properties consistent with the terms of the Federal Home Loan Bank Affordable Housing Program.

## **Product Innovation and Flexibility**

CFSB made limited use of flexible lending practices in order to serve AA credit needs. During the evaluation period, CFSB made 49 loans totaling \$7 million among the various flexible lending products in the AA. This includes loans made under the HAL, AHP, and HSP programs discussed in the "Overall CRA Rating" section above. Specific to the KCMO-KS AA, CFSB:

- Reduced closing costs and provided downpayment assistance for 35 borrowers in the AA through the HAL and HSP programs.
- Through the Capitol Federal Foundation, which awards grant funds up to \$1,500 to community partners dedicated to assisting a borrower's purchase of a primary residence in low-income areas, CFSB provided a total of seven grants for down payment and closing cost assistance.
- Through the Federal Home Loan Bank's Affordable Housing Program which provides down payment assistance to low- and moderate-income borrowers through subsidies, which are forgiven over five years, CFSB assisted three borrowers in the AA.
- Through the Marlborough Community Land Trust (MCLT) which builds new homes and rehabilitates existing homes, CFSB assisted three borrowers with loans totaling \$316,000 dollars. MCLT separates ownership of the house from the ownership of the land the house sits on. MCLT sells the house to an eligible buyer for approximately \$50,000 less than the market appraisal price and leases the land the house sits on for \$25 per month. In exchange for the subsidy, the buyers agree that if they resell their MCLT home, the price will be affordable to another eligible buyer.

#### **INVESTMENT TEST**

CFSB's performance under the Investment Test in the KCMO-KS AA is rated Outstanding.

Based on a full-scope review, CFSB's performance in the KCMO-KS AA is excellent.

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

Qualified In	Qualified Investments											
Assessment	Pric	or Period*	Curr	ent Period	od Total Commitm				d Total			Unfunded mmitments**
Area	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)		
KCMO-KS AA	28	\$9,557	119	\$28,616	147	100.0	\$38,173	100.0	0	0		

<sup>(\*)</sup> Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

CFSB had an excellent level of qualified CD investments and grants, particularly those that are not routinely provided by private investors, occasionally in a leadership position. CFSB exhibits excellent responsiveness to credit and community development needs making significant use of innovative and/or complex investments to support CD initiatives.

During the evaluation period, investments totaled \$38.2 million and represented 9.2 percent of the AA's allocated tier 1 capital. CFSB purchased six new investments totaling more than \$27.7 million and had 28 prior period investments totaling over \$9.5 million. All investments supported affordable housing for low- and moderate-income individuals. Five current period investments totaling \$25.3 million were made through a Low-Income Housing Tax Credit (LIHTC) Program. LIHTC is a resource for creating affordable housing. LIHTC encourages investment in the construction and rehabilitation of housing for low- and moderate-income individuals by subsidizing project costs. All LIHTC projects must comply with low- and moderate-income requirements and rent tests for 15 years, generally extending low-income use to 30 years in total.

Additionally, CFSB made 113 qualifying grants and donations totaling \$871,000 to 46 organizations in the AA during the evaluation period. Donations and grants supported organizations that provide community services such as programs for individuals with disabilities, affordable housing, health care, youth programs, and more targeted to low- to moderate-income individuals.

#### **SERVICE TEST**

CFSB's performance under the Service Test in the KCMO-KS AA is rated Low Satisfactory.

Based on a full-scope review, CFSB's performance in the KCMO-KS AA is adequate.

#### **Retail Banking Services**

Distribution	of Branch	Delivery Syst	em										
	Deposits	Branches Population						n					
<b>A</b>	% of	# of Bank	% of					•	% (	of Popul			ach
Assessment Area	Rated	Branches		Rated Income of Geographies (%)					G	eograpi	ıy	1	
Alta	Area Deposits in AA		Area Branches in AA	Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
KCMO-KS AA	100.0	22	100.0	0.0	18.2	40.9	40.9	0.0	8.3	23.0	33.0	34.9	0.9

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

<sup>(\*\*)</sup> Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institutions AA when considering the impact of updates to US Census data. CFSB does not operate any branches in low-income geographies and the distribution of branches in moderate-income geographies was near to the percentage of the population living within those geographies.

## Impact of US Census Changes on Retail Banking Services

Examiners evaluated the impact of changes to the income-level designation of low- and moderate-income geographies from the 2020 US Census on the accessibility of CFSB's service delivery systems to low- and moderate-income geographies and individuals. As shown in the table below, the US Census changes to the income-level designations in the AA resulted in the net loss of two low- and two moderate-income geographies. This change had a significant impact on the branch distribution in low- and moderate-income geographies relative to the percentage of the population in low- and moderate-income geographies.

	Low-income	Geographies	Moderate-income Geographies			
Kansas City MO-KS AA	Branches (#)	% of Total	Branches (#)	% of Total		
Prior to 2020 US Census Change	2	2 9.1		27.3		
After 2020 US Census Change	0	0	4	18.2		
Net Change	-2	-9.1	-2	-9.1		

CFSB supplements its retail branch services with several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. CFSB had 33 ATMs in the AA, of which all were deposit-taking. CFSB did not have any ATMs in low-income areas. The distribution of ATMs in moderate-income areas was adequate. ATMs were similarly impacted by the 2020 US Census changes. Examiners did not place significant weight on these systems since no data was available to determine their impact on low- and moderate-income individuals or geographies.

Distribution of Branch Openings/Closings										
	Branch Openings/Closings									
Assessment Area	# of Branch	# of Branch	Net change in Location of Branches (+ or -)							
	Openings	Closings	Low	Mod	Mid	Upp	N/A*			
KCMO-KS AA	1	4	0	0	-2	-1	0			

(\*) The NA category consists of geographies that have not been assigned an income classification.

To the extent changes have been made, CFSB's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, CFSB opened one branch located in a moderate-income geography and closed four branches, one of which was in a moderate-income geography. Three of the four branches closed (including the one located in a moderate-income geography) were retail in-store locations where the retailer did not renew their contract with CFSB.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. All locations offered traditional banking products and maintained standard business hours. CFSB had four

retail in-store branches with extended lobby hours on Saturdays. The other 18 branches offered extended lobby and drive-up hours on Fridays.

## **Community Development Services**

CFSB provided a limited level of CD services. During the evaluation period, 13 employees provided 282 hours of CD services to nine organizations. Examples of CD services in the KCMO-KS AA include:

- Financial education targeted to low- and moderate-income individuals related to home mortgage financing, banking products, and budgeting.
- Employees in leadership positions with CD organizations that provide community services to low and moderate-income individuals, including healthcare and mentoring services.

# **State Rating**

## **State of Kansas**

CRA rating for the State of Kansas<sup>3</sup>: Low Satisfactory

The Lending Test is rated: Low Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Based upon the data in the tables and performance context considerations noted, geographic
  distribution of originated and purchased home mortgage loans and small loans to businesses was
  adequate.
- Based upon the data in the tables and performance context considerations noted, borrower distribution among individuals and businesses of different income levels and sizes was adequate.
- CD lending activity reflected adequate responsiveness to meeting community credit needs. CD lending had a neutral impact on the overall conclusion.
- Qualified investments were responsive and effective to meeting community credit needs. Qualified
  investments, grants, and donations in the Lawrence and Wichita demonstrated excellent
  responsiveness to AA needs.
- CFSB's branches and alternative delivery systems were readily accessible to geographies and individuals of different incomes.
- CFSB provided a limited level of CD services in its AAs.
- CFSB had a good record of lending addressing the needs of small businesses in response to the COVID-19 pandemic.

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

CFSB delineated six AAs within the state of Kansas. These AAs include the entire Lawrence, KS MSA, portions of the Wichita, KS, Topeka, KS, and Manhattan, KS MSAs, and two non-metropolitan AAs that were combined into the Kansas Non-MSA AA for analysis and presentation purposes. All AAs meet regulation requirements and do not arbitrarily exclude low- or moderate-income geographies. Refer to Appendix A for a list of counties in each AA.

Based on the FDIC summary of deposit information as of June 30, 2023, CFSB ranked third in deposit market share (9.2 percent) with deposits totaling \$3.2 billion in the state of Kansas, which represented 51.8 percent of CFSB's total deposits. During the evaluation period, CFSB made \$1.1 billion, or 20.2

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<sup>&</sup>lt;sup>3</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

percent, of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in the state of Kansas.

CFSB had 27 branches and 40 deposit-taking ATMs in Kansas. Primary competitors in the state included Intrust Bank, N.A. with 25 branches and 14.7 percent market share, Bank of America, N.A. with 10 branches and 14.5 percent market share, and Fidelity Bank N.A. with 12 branches and 6.7 percent market share. There were 82 additional depository institutions within CFSB's state of Kansas AAs.

#### Lawrence AA

The following tables provide a summary of demographics, including housing and business information for the Lawrence AA for each evaluation period.

Table A – Der	nographic I	nformation	of the Assessn	nent Area					
Assess	sment Area:	Lawrence A	AA – 2020-202	21					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #			
Geographies (Census Tracts)	22	9.1	31.8	36.4	22.7	0.0			
Population by Geography	114,967	10.2	29.2	31.9	28.6	0.0			
Housing Units by Geography	47,812	6.3	33.6	31.6	28.5	0.0			
Owner-Occupied Units by Geography	22,806	1.3	25.4	36.9	36.3	0.0			
Occupied Rental Units by Geography	20,923	11.2	41.0	25.8	22.0	0.0			
Vacant Units by Geography	4,083	9.0	40.9	31.9	18.2	0.0			
Businesses by Geography	8,510	6.0	30.2	31.9	31.9	0.0			
Farms by Geography	355	0.6	20.3	53.2	25.9	0.0			
Family Distribution by Income Level	23,794	19.1	19.6	20.6	40.7	0.0			
Household Distribution by Income Level	43,729	26.4	15.1	17.5	41.0	0.0			
Median Family Income MSA - 29940 Lawrence, KS MSA		\$72,755	Median Housi	ng Value		\$188,808			
Median Gross Rent									
	Families Below Poverty Level								

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

Table A – De	Table A – Demographic Information of the Assessment Area										
Assessment Area: Lawrence AA – 2022-2023											
Demographic Characteristics # Low Moderate % of # Middle Upper % of # % of # % of # % of #											
Geographies (Census Tracts)	27	0.0	25.9	48.1	18.5	7.4					
Population by Geography	118,785	0.0	20.8	48.2	23.1	7.9					
Housing Units by Geography	51,039	0.0	24.6	48.0	23.5	3.8					
Owner-Occupied Units by Geography	24,333	0.0	17.9	54.0	27.9	0.1					
Occupied Rental Units by Geography	23,639	0.0	31.3	42.5	19.3	6.9					
Vacant Units by Geography	3,067	0.0	26.4	43.1	21.3	9.1					

Businesses by Geography	10,252	0.0	24.1	46.0	25.2	4.7
Farms by Geography	417	0.0	17.3	57.6	24.9	0.2
Family Distribution by Income Level	26,281	19.6	18.9	22.6	38.9	0.0
Household Distribution by Income Level	47,972	25.1	16.1	17.2	41.6	0.0
Median Family Income MSA - 29940 \$90,062 Lawrence, KS MSA			Median Hous	\$211,376		
	Median Gross	\$945				
	Families Below Poverty Level			6.8%		

Source: 2020 U.S. Census and 2023 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.

CFSB had four branches and nine deposit-taking ATMs within the AA. As of June 30, 2023, deposit market share was 16.9 percent ranking CFSB first among the 22 other financial institutions with branches in the AA. Primary competitors included Bank of America N.A with one branch and 16.3 percent market share, U.S. Bank N.A. with three branches and 16.3 percent market share, and Commerce Bank with three branches and 8.4 percent market share.

#### Employment and Economic Factors

According to the 2023 Moody's Analytics Report for the Lawrence MSA, the economy performed well during the evaluation period. However, the lack of industrial diversity, limited career opportunities, and below-average salaries have led to higher-than-average employment volatility. According to the Bureau of Labor Statistics, the unemployment rate for the AA declined to 1.9 percent in December 2023, from a peak of 11.8 percent in April 2020. The December 2023 unemployment rate in the AA was below the state of Kansas (2.7 percent) and the U.S. (3.6 percent). Top industries in the AA include the local and federal government, hospitals, and restaurants. Top employers in the AA include the University of Kansas, Lawrence Memorial Hospital, and Berry Global.

#### Housing

Per FFIEC data, the median housing value increased 11.6 percent from \$189,000 to \$211,000, and median gross rent increased 10.7 percent from \$854 to \$945 in the AA. In addition to FFIEC data, examiners considered hosting cost information from the Sunflower Association of Realtors (SAR). SAR data, for 2020-2021 indicated the median home sales price in the AA was \$243,000 with an average sales price of \$285,000. For 2022-2023, the median home sales price increased to \$287,000 with an average sales price of \$297,000.

Based upon the FFIEC data in the above tables, depending upon the respective evaluation period (2020-2021 or 2022-2023), low-income families earned up to \$36,377 or \$45,031 and moderate-income families \$58,204 or \$72,049 per year. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Per this analysis, the maximum monthly payment for low-income borrowers is \$909 and \$1,126 and \$1,455 and \$1,801 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be \$1,013 or \$1,135. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

## Community Contacts

Examiners considered feedback from one community contact in Lawrence as part of this performance evaluation. The contact was performed in March 2024 with a local government economic development department. The contact mentioned retail and restaurants are bouncing back after the pandemic. Primary needs include affordable housing and accessible commercial credit options. There are numerous CD opportunities in this AA, including participation on boards and advisory committees, loan participations, equity investments, and grants. Examiners noted no CDFIs, one SBDC, and one HUD-approved housing counseling agency in the AA.

Topeka AA

The following tables provide a summary of demographics, including housing and business information for the Topeka AA for each evaluation period.

Table A – Den	nographic I	nformation	of the Assessn	nent Area		
Asses	ssment Area	: Topeka A	A – 2020-2021	[		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	11.6	23.3	39.5	25.6	0.0
Population by Geography	178,792	8.2	18.8	39.7	33.3	0.0
Housing Units by Geography	79,425	9.0	20.6	41.1	29.3	0.0
Owner-Occupied Units by Geography	45,873	4.6	15.3	39.1	41.0	0.0
Occupied Rental Units by Geography	25,495	14.2	26.6	45.9	13.3	0.0
Vacant Units by Geography	8,057	18.0	31.1	37.2	13.7	0.0
Businesses by Geography	11,747	15.4	17.8	40.1	26.6	0.0
Farms by Geography	416	4.8	8.9	27.6	58.7	0.0
Family Distribution by Income Level	44,654	20.8	17.2	21.8	40.3	0.0
Household Distribution by Income Level	71,368	24.0	17.2	18.1	40.7	0.0
Median Family Income MSA - 45820 Topeka, KS MSA		\$64,984	Median Housi	ng Value		\$116,437
			Median Gross	Rent		\$752
			Families Belo	w Poverty Le	vel	10.5%

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

Table A – De	Table A – Demographic Information of the Assessment Area									
Assessment Area: Topeka AA – 2022-2023										
Demographic Characteristics # Low Moderate % of # Middle Upper NA* % of # % of # % of # % of #										
Geographies (Census Tracts)	46	8.7	23.9	47.8	19.6	0.0				
Population by Geography	178,909	7.0	21.9	43.8	27.3	0.0				
Housing Units by Geography	80,126	7.5	22.6	45.7	24.3	0.0				
Owner-Occupied Units by Geography	48,363	4.1	16.2	47.4	32.3	0.0				
Occupied Rental Units by Geography	24,599	11.9	31.8	44.1	12.1	0.0				
Vacant Units by Geography	7,164	15.0	33.8	39.5	11.7	0.0				

Businesses by Geography	13,572	6.4	25.4	41.8	26.4	0.0
Farms by Geography	473	1.3	11.8	46.9	40.0	0.0
Family Distribution by Income Level	45,339	18.6	18.4	23.7	39.3	0.0
Household Distribution by Income Level	72,962	22.8	18.3	18.9	40.0	0.0
Median Family Income MSA - 45820 Topeka, KS MSA			Median Hous	\$129,110		
	Median Gross	\$837				
	Families Below Poverty Level			7.5%		

Source: 2020 U.S. Census and 2023 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.

CFSB had 10 branches and 14 deposit-taking ATMs within the AA. As of June 30, 2023, deposit market share was 34.4 percent ranking CFSB first among the 19 other financial institutions with branches in the AA. Primary competitors included Corefirst Bank & Trust with 11 branches and 18.5 percent market share and U.S. Bank N.A. with 11 branches and 18.5 percent market share.

#### Employment and Economic Factors

According to the 2023 Moody's Analytics Report for the Topeka MSA, the economy performed modestly in the evaluation period. A downward trend of high-paying jobs exerted pressure on employment growth and the broader economy over the years. According to the Bureau of Labor Statistics, the unemployment rate for the AA declined to 2 percent in December 2023, from a peak of 11.7 percent in April 2020. The December 2023 unemployment rate in the AA was below the state of Kansas (2.7 percent) and the U.S. (3.6 percent). Top industries in the AA include the local and federal government, and hospitals. Top employers in the AA include Stormont-Vail Health Care, Goodyear Tire and Rubber Co., and University of KS Health Systems-St. Francis Campus.

#### Housing

Per FFIEC data, the median housing value increased 11.2 percent from \$116,000 to \$129,000, and median gross rent increased 11.3 percent from \$752 to \$837 in the AA. In addition to FFIEC data, examiners considered housing cost information from SAR. SAR data, for 2020-2021 indicated the median home sales price in the AA was \$180,000 with an average sales price of \$190,000. For 2022-2023, the median home sales price increased to \$193,000 with an average sales price of \$202,000.

#### Community Contacts

Examiners considered feedback from two community contacts in Topeka as part of this performance evaluation. Contacts were performed in July 2024 with one housing organization and one HUD-approved housing counseling agency. Areas of concern noted by the contacts include an aging population unable to maintain homes, cost-of-living outpacing wages, high property taxes, and homelessness. One contact mentioned the community was underbanked and they have seen an increase in LMI individuals utilizing non-traditional products in place of traditional banking. Since the pandemic, they have seen fewer physical bank branches in low- or moderate-income areas and more restrictive lobby hours. The other contact mentioned the need for second chance checking and savings products.

Primary needs include affordable housing and financial education. There are numerous CD opportunities in this AA, including participation on boards and advisory committees, loan participations, equity investments, and grants. Examiners noted no CDFIs, two SBDCs, and one HUD-approved housing counseling agency in the AA.

# Wichita AA

The following tables provide a summary of demographics, including housing and business information for the Wichita AA for each evaluation period.

Table A – Der	nographic I	nformation	of the Assessn	nent Area				
Asse	ssment Area	: Wichita A	A - 2020-202	1				
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	137	10.9	27.7	29.9	31.4	0.0		
Population by Geography	572,621	8.3	23.0	31.8	36.9	0.0		
Housing Units by Geography	240,029	9.2	25.0	32.4	33.4	0.0		
Owner-Occupied Units by Geography	141,382	5.1	17.9	32.4	44.6	0.0		
Occupied Rental Units by Geography	75,852	14.7	34.7	33.7	16.9	0.0		
Vacant Units by Geography	22,795	17.0	36.4	28.0	18.7	0.0		
Businesses by Geography	40,526	5.3	25.6	28.3	40.8	0.0		
Farms by Geography	1,448	3.2	12.2	32.0	52.6	0.0		
Family Distribution by Income Level	141,972	20.8	17.6	21.1	40.5	0.0		
Household Distribution by Income Level	217,234	23.7	16.6	18.3	41.4	0.0		
Median Family Income MSA - 48620 Wichita, KS MSA		\$64,331	Median Housi	ng Value		\$124,626		
	Median Gross Rent							
			Families Belo	w Poverty Le	vel	10.5%		

Source: 2015 ACS and 2021 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.

Table A – Der	nographic I	nformation	of the Assessr	nent Area		
Asses	ssment Area	: Wichita A	A – 2022-202	3		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	154	5.2	28.6	38.3	26.6	1.3
Population by Geography	591,204	3.4	25.4	38.4	32.2	0.6
Housing Units by Geography	247,724	4.2	28.6	38.3	27.9	1.0
Owner-Occupied Units by Geography	142,816	1.8	19.5	42.4	36.1	0.2
Occupied Rental Units by Geography	81,337	6.9	40.7	33.8	16.5	2.1
Vacant Units by Geography	23,571	9.1	41.8	29.3	17.7	2.2
Businesses by Geography	48,909	2.3	21.3	33.5	40.0	2.8
Farms by Geography	1,729	1.0	13.4	40.5	44.0	1.0
Family Distribution by Income Level	144,062	19.6	18.3	21.3	40.9	0.0
Household Distribution by Income Level	224,153	23.1	17.4	17.6	41.8	0.0
Median Family Income MSA - 48620 Wichita, KS MSA		\$74,120	Median Housi	ing Value		\$143,390

	Median Gross Rent	\$845
	Families Below Poverty Level	8.8%
Source: 2020 U.S. Census and 2023 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 cla	assification.	

CFSB had nine branches and nine deposit-taking ATMs within the AA. As of June 30, 2023, deposit market share was 2.8 percent ranking CFSB eighth among the 38 other financial institutions with branches in the AA. Primary competitors included Emprise Bank with 24 branches and 8.1 percent market share, Commerce Bank with 10 branches and 5.4 percent market share, Equity Bank with seven branches and 4.7 percent market share, and Crossfirst Bank with one branch and 4.6 percent market share.

## Employment and Economic Factors

According to the 2023 Moody's Analytics Report for the Wichita MSA, the economy performed well in the evaluation period. However, Wichita's overreliance on manufacturing and inability to maintain college graduates will keep it trailing the rest of the country. According to the Bureau of Labor Statistics, the unemployment rate for the AA steadily declined to 2.4 percent in December 2023, from a peak of 18 percent in April 2020. The December 2023 unemployment rate in the AA was below the state of Kansas (2.7 percent) and the U.S. (3.6 percent). Top industries in the AA include manufacturing, and defense. Top employers in the AA include Spirit Aerosystems, Textron Aviation, and McConnel Air Force Base.

## Housing

Per FFIEC data, the median housing value increased 14.4 percent from \$125,000 to \$143,000, and the median gross rent increased 13.1 percent from \$747 to \$845 in the AA. In addition to FFIEC data, examiners considered housing costs information from the Realtors of South-Central Kansas (RSCK). RSCK data, for 2020-2021 indicated the median home sales price in the AA was \$190,000 with an average sales price of \$220,000. For 2022-2023, the median home sales price increased to \$202,000 with an average sales price of \$248,000.

#### Community Contacts

Examiners considered feedback from two community contacts in Wichita as part of this performance evaluation. Contacts were performed from March 2023 through May 2024, and included two economic development organizations. Both contacts commented that area financial institutions are receptive to community needs including credit. Primary needs include loans for new small businesses and financial education for small businesses. There are numerous CD opportunities in this AA, including participation on boards and advisory committees, loan participations, equity investments, and grants. One contact mentioned opportunities for community development in the Ballpark District located next to Riverfront Stadium in downtown Wichita. Examiners noted no CDFIs, one SBDC, and one HUD-approved housing counseling agency in the AA.

# **Scope of Evaluation in Kansas**

Examiners completed full-scope reviews in the Lawrence, Topeka, and Wichita AAs, and limited-scope reviews in the Manhattan MSA (Manhattan AA) and Kansas Non-MSA (KS Non-MSA AA) AAs.

The Topeka and Wichita AAs carried the most weight as they represented in the AAs with the most deposit (68.7 percent) and lending production (76.2 percent) in the state. The Lawrence AA carried more weight than the Manhattan and KS Non-MSA AAs as it represented 15.5 percent of loans originated or purchased in the state. Examiners placed more weight on home mortgage loans since they represented the majority of CFSB's lending in all AAs.

There were no low-income geographies within the KS Non-MSA or Manhattan AA during either analysis period. Additionally, there were no low-income geographies in the Lawrence AA during the 2022-2023 analysis period. Geographic conclusions during these periods were based solely on performance within moderate-income geographies.

The bank did not originate a sufficient volume of small loans to business in the Manhattan and KS Non-MSA AAs to conduct a meaningful analysis and performance is based solely on home mortgage lending.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

#### LENDING TEST

CFSB's performance under the Lending Test in Kansas is rated Low Satisfactory.

## **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, CFSB's performance in the Lawrence, Topeka, and Wichita AAs is adequate.

## **Lending Activity**

Lending levels reflect adequate responsiveness to AA credit needs.

## 2020-2021

Number of Loan	s*						
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope							
Lawrence AA	475	267	0	1	743	16.4	16.4
Topeka AA	968	604	1	4	1,577	34.7	54.0
Wichita AA	1,774	51	0	0	1.825	40.1	17.2
<b>Limited Scope</b>			•				
Manhattan AA	265	14	0	0	279	6.1	5.4
Kansas Non- MSA	106	12	0	0	118	2.6	7.0
Total	3,588	948	1	5	4,542	100.0	100.0

<sup>(\*)</sup> The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume o	of Loans \$(000s)	)*					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope							
Lawrence AA	103,069	16,920	0	7,505	127,494	17.9	16.4
Topeka AA	139,697	58,056	8	4,715	202,476	28.4	54.0
Wichita AA	310,190	865	0	0	311,055	43.6	17.2
<b>Limited Scope</b>							
Manhattan AA	54,354	227	0	0	54,581	7.7	5.4
Kansas Non- MSA	17,279	227	0	0	17,506	2.4	7.0
Total	624,589	76,295	8	12,220	713,113	100.0	100.0

<sup>(\*)</sup> The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

## 2022-2023

Number of Loai	1 <b>s</b> *						
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full-Scope							
Lawrence AA	245	32	0	0	277	13.5	18.3
Topeka AA	494	184	1	0	679	33.1	50.3
Wichita AA	929	15	0	1	945	46.1	17.9
Limited Scope							
Manhattan AA	95	1	0	0	96	4.7	5.9
Kansas Non- MSA	54	0	0	0	54	2.6	7.6
Total	1,817	232	1	1	2,051	100.0	100.0

<sup>(\*)</sup> The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans \$(000s)*											
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits				
Full-Scope											
Lawrence AA	65,346	6,236	0	0	71,582	17.3	18.3				

Topeka AA	109,497	22,865	20	0	132,382	31.9	50.3
Wichita AA	177,177	4,295	0	7,525	188,997	45.6	17.9
Limited Scope							
Manhattan AA	16,000	100	0	0	16,100	3.9	5.9
Kansas Non- MSA	5,345	0	0	0	5,345	1.3	7.6
Total	373,364	33,496	20	7,525	414,405	100.0	100.0

<sup>(\*)</sup> The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

#### Lawrence AA

For the years 2020-2021, CFSB ranked fourth out of 249 institutions in home mortgage lending market share by both number of loans (5.3 percent) and by dollar amount (5.1 percent). For 2022-2023, based upon aggregate HMDA data available in 2022, CFSB ranked third out of 224 institutions for both number of loans (5.1 percent) and dollar amount (7 percent) market share. The top two lenders across the evaluation period were Mid America Bank and Fairway Independent Mortgage Corporation with a combined by number of loans market share of 20 percent.

For small loans to businesses in 2020-2021, CFSB ranked 44<sup>th</sup> out of 73 lenders in market share by number of loans, and for 2022-2023, based upon aggregate small business data in 2022, CFSB ranked 15<sup>th</sup> out of 73 lenders in market share by number of loans, with 1 percent. Across the evaluation period, the majority of the top 10 small business lenders in the AA, by number of loans, were large national banks with large credit card portfolios including JPMorgan Chase Bank N.A. (26.1 percent), U.S. Bank N.A. (22.2 percent), and American Express National Bank (8.1 percent). JP Morgan Chase and U.S. Bank made up almost 50 percent of the total market share by number of loans in 2022 at 48.31 percent. Of the top 10 small business lenders in the AA, seven were institutions with large business credit card portfolios with average loan sizes of \$9,500 or less. CFSB's average small business loan size was \$133,300.

#### Topeka AA

For the years 2020-2021, CFSB ranked fourth out of 236 institutions in home mortgage lending market share by both number of loans (7 percent), and by dollar amount (6.5 percent). For 2022-2023, based upon aggregate HMDA data available in 2022, CFSB ranked fifth out of 218 institutions with 6.3 percent of the by number market share, and fourth with 5.9 percent of the dollar amount market share. Across the evaluation period, the top 10 mortgage lenders by number of loans market share in the AA represented almost 60 percent of the by number of loans market share and just over 50 percent of the by dollar amount market share. Based upon 2022 data, of the top 10 home mortgage lenders, three were NDFIs, two were credit unions, and one was a national bank with a large mortgage loan operation.

For small loans to businesses in 2020-2021, CFSB ranked 37<sup>th</sup> out of 70 lenders in market share by number of loans, and for 2022-2023, based upon aggregate small business data in 2022, CFSB ranked ninth out of 66 lenders in market share by number of loans, with 1.9 percent. Across the evaluation period, the majority of the top 10 small business lenders in the AA, by number of loans, were large national banks with large credit card portfolios including JPMorgan Chase Bank N.A. (20.9 percent), U.S. Bank N.A. (19.1 percent), and Capital One N.A. (11.4 percent). Of the top 10 small business lenders in the AA, seven were institutions with large business credit card portfolios with average loan sizes of \$9,700 or less. CFSB's average small business loan size was \$209,000.

#### Wichita AA

For the years 2020-2021, CFSB ranked seventh out of 371 institutions in home mortgage lending market share by both number of loans (3.2 percent) and by dollar amount (3.1 percent). For 2022-2023, based upon aggregate HMDA data available in 2022, CFSB ranked fifth out of 372 institutions for both number of loans (3.3 percent) and dollar amount (3.2 percent) market share. Market share information for mortgage loans shows CFSB operates in a highly competitive banking environment that includes specialized mortgage lending companies. Based upon 2022 data, of the top 10 home mortgage lenders, five were NDFIs with large mortgage loan operations, and two were credit unions.

For small loans to businesses in 2020-2021, CFSB ranked 52<sup>nd</sup> out of 117 lenders in market share by number of loans, and for 2022-2023, based upon aggregate small business data in 2022, CFSB ranked 35<sup>th</sup> out of 101 lenders in market share by number of loans, with 0.1 percent. Across the evaluation period, the majority of the top 10 small business lenders in the AA, by number production, were large national banks with large credit card portfolios including JPMorgan Chase Bank N.A. (14.9 percent), U.S. Bank N.A. (14 percent), and Synchrony Bank (11.7 percent). Of the top 10 small business lenders in the AA, seven were institutions with large business credit card portfolios with average loan sizes of \$9,100 or less. CFSB's average small business loan size was \$288,100.

## Distribution of Loans by Income Level of the Geography

CFSB exhibits an adequate geographic distribution of loans in its AAs. Considering full-scope AAs, examiners generally placed more emphasis on performance in moderate-income geographies as these areas were more prevalent in number across CFSB's state of Kansas AAs and had a higher percentage of owner-occupied housing units and small businesses within them.

#### Home Mortgage Loans

Refer to Table O in the state of Kansas section of appendix D for the facts and data used to evaluate the geographic distribution of CFSB's home mortgage loan originations and purchases. Examiners considered the impact of heavy competition among home mortgage lenders, including the significant operations of NDFIs in CFSB's state of Kansas AAs.

#### Lawrence AA

The geographic distribution of home mortgage loans in the Lawrence AA was good.

#### 2020-2021

The percentage of home mortgage loans originated or purchased in low-income geographies exceeded both the percentage of owner-occupied housing units located in these geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was near to both percentage of owner-occupied housing units and the aggregate percentage of all reporting lenders. There were only two low-income census tracts in the AA during this analysis period.

#### 2022-2023

The geographic distribution of home mortgage loans was stronger than 2020-2021 performance. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded the percentage of owner-occupied housing units located in these geographies and was near to the aggregate percentage of all reporting lenders.

## Topeka AA

The geographic distribution of home mortgage loans in the Topeka AA was adequate.

#### 2020-2021

The percentage of home mortgage loans originated or purchased in low-income geographies was well below the percentage of owner-occupied homes but was near to the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was well below the percentage of owner-occupied housing units and the percentage of all reporting lenders.

#### 2022-2023

The geographic distribution of home mortgage loans was stronger than 2020-2021 performance, positively impacting the overall conclusion. The percentage of home mortgage loans originated or purchased in low-and moderate-income geographies was near to the percentage of owner-occupied housing units located in these geographies. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded, and in moderate-income geographies was near to, the aggregate percentage of all reporting lenders.

## Wichita AA

The geographic distribution of home mortgage loans in the Wichita AA was adequate. Low-income tracts made up less than 11 percent of the AAs census tracts during the evaluation period.

#### 2020-2021

The percentage of home mortgage loans originated or purchased in low- and moderate-income geographies was well below the percentage of owner-occupied housing units located in these geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was near to, and in moderate-income geographies well below, the aggregate percentage of all reporting lenders.

#### 2022-2023

The geographic distribution of home mortgage loans was stronger than 2020-2021 performance, positively impacting the overall conclusion. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded both the percentage of owner-occupied housing units located in these geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was well below both the percentage of owner-occupied housing units located in these geographies and the aggregate percentage of all reporting lenders.

#### Small Loans to Businesses

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

#### Lawrence AA

The geographic distribution of small loans to businesses in the Lawrence AA was adequate.

#### 2020-2021

The percentage of small loans to businesses originated or purchased in low-income geographies was well below both the percentage of businesses located in these geographies and the aggregate percentage

of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses located in these geographies and the aggregate percentage of all reporting lenders. There were only two low-income census tracts in the AA during this analysis period.

#### 2022-2023

The geographic distribution of small loans to businesses was stronger than 2020-2021 performance, positively impacting the overall conclusion. The percentage of small loans to businesses in moderate-income geographies was near to both the percentage of businesses located in these geographies and the aggregate percentage of all reporting lenders.

#### Topeka AA

The geographic distribution of small loans to businesses in the Topeka AA was adequate.

#### 2020-2021

The percentage of small loans to businesses originated or purchased in low-income geographies was below both the percentage of businesses located in these geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses located in these geographies and the aggregate percentage of all reporting lenders.

#### 2022-2023

The geographic distribution of small loans to businesses was weaker than 2020-2021 performance. This performance had a neutral impact on the overall conclusion. The percentage of small loans to businesses originated or purchased in both low- and moderate-income geographies was below both the percentage of businesses located in these geographies and the aggregate percentage of all reporting lenders negatively impacting the overall conclusion.

#### Wichita AA

The geographic distribution of small loans to businesses in the Wichita AA was good. Low-income tracts made up less than 11 percent of the AAs census tracts during the evaluation period.

#### 2020-2021

The percentage of small loans to businesses originated or purchased in low-income geographies was below both the percentage of businesses located in these geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses located in these geographies and the aggregate percentage of all reporting lenders.

#### 2022-2023

CFSB did not make any loans in low-income geographies during this analysis period as there were very few low-income census tracts in the AA. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses located in these geographies and the aggregate percentage of all reporting lenders.

## Lending Gap Analysis

Examiners analyzed CFSB's lending patterns and reviewed summary reports and maps of home mortgage loans and small loans to businesses to identify any gaps in the geographic distribution of loans

in all AAs, including limited-scope AAs. Examiners focused on clusters of low- and moderate-income census tracts with no lending, and then evaluated those clusters to determine if demographic information, or other performance context data reflected lending opportunities within those clusters. Examiners did not identify any unexplained conspicuous lending gaps.

## Distribution of Loans by Income Level of the Borrower

CFSB exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution. For all three full-scope areas, examiners considered housing costs in relation to the median family incomes and the significant increase in home values during the evaluation period, which limited the affordability for low-income borrowers.

## Home Mortgage Loans

Refer to Table P in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of CFSB's home mortgage loan originations and purchases.

#### Lawrence AA

The distribution of home mortgage loans among individuals of different income levels in the Lawrence AA was adequate.

#### 2020-2021

The percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers was below both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

#### 2022-2023

The borrower distribution of home mortgage loans among individuals of different income levels was stronger than 2020-2021 performance, positively impacting the overall conclusion. The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA and equal to the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was near to the percentage of those families in the AA but below the aggregate percentage of all reporting lenders.

#### Topeka AA

The distribution of home mortgage loans among individuals of different income levels in the Topeka AA was good.

#### 2020-2021

The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA and near to the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of those families in the AA and was near to the aggregate percentage of all reporting lenders.

#### 2022-2023

The borrower distribution of home mortgage loans among individuals of different income levels was weaker than 2020-2021 performance. The percentage of home mortgage loans originated or purchased

to low-income borrowers was well below the percentage of those families in the AA and below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of those families in the AA but was below the aggregate percentage of all reporting lenders.

#### Wichita AA

The distribution of home mortgage loans among individuals of different income levels in the Wichita AA was adequate.

#### 2020-2021

The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA and below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was below the percentage of those families in the AA and below the aggregate percentage of all reporting lenders.

#### 2022-2023

The borrower distribution of home mortgage loans among individuals of different income levels was stronger than 2020-2021 performance, positively impacting the overall conclusion. The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA and below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was near to both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

#### Small Loans to Businesses

Refer to Table R in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of CFSB's origination and purchase of small loans to businesses. Like the KCMO-KS AA, examiners placed more emphasis on performance during the 2022-2023 analysis period due to the difficulty in evaluating 2020-2021 performance due to the large volume of PPP loans without gross annual revenue information.

#### Lawrence AA

The distribution of loans to businesses of different sizes in the Lawrence AA was poor.

## 2020-2021

The percentage of loans to small businesses originated or purchased was well below both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders. However, CFSB did not collect or consider the gross annual revenues in the underwriting of 79.8 percent of its small loans to businesses, including PPP loans in the AA. Consideration of PPP lending had a positive impact on performance.

#### 2022-2023

The distribution of loans to businesses of different sizes was weaker than 2020-2021 performance.

#### Topeka AA

The distribution of loans to businesses of different sizes in the Topeka AA was adequate.

#### 2020-2021

The percentage of loans to small businesses originated or purchased was well below both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders. However, CFSB did not collect or consider the gross annual revenues in the underwriting of 54.1 percent of its small loans to businesses, including PPP loans in the AA. Consideration of PPP lending had a positive impact on performance.

#### 2022-2023

The distribution of loans to businesses of different sizes was consistent with 2020-2021 performance.

## Wichita AA

The distribution of loans to businesses of different sizes in the Wichita AA was poor.

#### 2020-2021

The percentage of loans to small businesses originated or purchased was well below both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders. However, CFSB did not collect or consider the gross annual revenues in the underwriting of 54.1 percent of its small loans to businesses, including PPP loans in the AA. Consideration of PPP lending had a positive impact on performance.

#### 2022-2023

Due to low volume, an analysis could not be conducted on lending performance during this time period.

## **Community Development Lending**

CFSB made an adequate level of CD loans. CD lending had a neutral impact on the Lending Test conclusion in the state.

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

#### Lawrence AA

The bank is a leader in making CD loans.

CFSB originated one CD loan totaling more than \$7.5 million or 9.3 percent of tier 1 capital allocated to the Lawrence AA. The loan promoted economic development.

#### Topeka AA

The bank made a low level of CD loans.

CFSB originated four CD loans totaling more than \$4.7 million or 2.08 percent of tier 1 capital allocated to the Topeka AA. CD loans were responsive to identified community needs. The loans supported affordable housing and community service and promoted economic development efforts in the AA. Examples of loans provided include:

• Line of credit to a community organization that is a HUD certified housing counseling service for first-time homebuyers of owner-occupied properties consistent with the Federal Home Loan Bank affordable housing program.

• Funding to an organization that provides substance abuse treatment along with other comprehensive services primarily to low-to moderate-income individuals.

• Financing as part of the Paycheck Protection Program for a small business to retain employees during the COVID-19 pandemic.

## Wichita AA

The bank is a leader in making CD loans. CD lending performance had a positive impact on the overall conclusion in the AA.

CFSB originated one CD loan totaling \$7.5 million, or 9.6 percent of tier 1 capital allocated to the Wichita AA. CFSB participated in a loan that supported the rehabilitation senior living facility that houses low-and moderate-income individuals.

# **Product Innovation and Flexibility**

CFSB makes limited use of flexible lending practices in order to serve state AA credit needs. During the evaluation period, CFSB made 80 loans totaling \$6.2 million among the various flexible lending products in the AA. This includes loans made under the programs discussed in the "Overall CRA Rating" section above. Specific to the state of Kansas AAs, CFSB:

## Lawrence AA

CFSB originated one loan totaling \$108,000 through the Lawrence Community Housing Trust Program (LCHT). LCHT assists first time homebuyers with closing costs. The LCHT program helps low- and moderate-income individuals purchase and rehabilitate homes by providing subsidies up to \$5,000 at zero percent interest and forgiveness over five years.

#### Topeka AA

CFSB originated 39 loans totaling \$3 million among the various flexible lending products in this AA. During the evaluation period, the HSP assisted 16 borrowers and the AHP assisted 13 borrowers.

Specific to the Topeka AA, the Topeka Opportunity to Own (TOTO) program offers down payment assistance to qualified first-time homebuyers within the city limits of Topeka, Kansas. The assistance is in the form of a self-amortizing, deferred "soft" second mortgage. Eligible household income must be at or below 80 percent of the area median income. The loan is forgiven by \$5,000 after the first year of ownership, 50 percent is forgiven after seven years, and the balance is due upon resale. During the evaluation period, this program assisted 16 borrowers in the AA.

## Wichita AA

CFSB made 30 loans totaling \$2.4 million among the various flexible lending products in the Wichita AA. Specific to the AA, the Homeownership 80 Loan Program is sponsored by the City of Wichita to assist low- and moderate-income families and individuals buy their first home. The program provides a zero-interest, deferred second mortgage loan up to 20 percent of the purchase price of the home to provide assistance with down payments and closing costs. One-half of the loan will be forgiven after 10-years. Borrowers must continue to own and occupy the home for a specified period of time to be eligible for additional loan forgiveness. During the evaluation period, this program assisted 23 borrowers in the AA.

# **Conclusions for Areas Receiving Limited-Scope Reviews**

Due to low volume, an analysis could not be conducted on lending performance in the Manhattan and KS Non-MSA AAs.

CFSB offers innovative and flexible lending products in the limited-scope AAs. During the evaluation period, CFSB made five loans totaling \$383,000 under the AHP and HSP program in the Manhattan AA and five loans totaling \$347,000 under the AHP and HSP program in the KS Non-MSA AAs. Performance in limited-scope areas had a neutral impact on the Lending Test rating for the state of Kansas.

Refer to Tables O through R in the state of Kansas section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

CFSB's performance under the Investment Test in Kansas is rated Outstanding. Broader statewide or regional investments had a positive impact on performance.

Qualified In	vestm	ents*								
Assessment	Prio	r Period**	Curr	ent Period			Total			Unfunded nmitments** *
Area	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Scope:										
Lawrence	8	\$5,054	23	\$3,562	31	8.7	\$8,616	9.0	0	0
Topeka	11	\$679	107	\$6,168	118	33.0	\$6,847	7.1	0	0
Wichita	25	\$5,482	65	\$2,624	90	25.1	\$8,106	8.5	0	0
Limited Sco	pe:									
Manhattan	6	\$3,335	13	\$24	19	5.3	\$3,359	3.5	0	0
Kansas Non-MSA	8	\$411	49	\$1,891	57	15.9	\$2,302	2.4	0	0
Statewide/R	egiona	l:								
BSRA	38	\$25,069	5	\$41,541	43	12.0	\$66,610	69.5	0	0
Total	96	\$40,030	262	\$55,810	358	100.00	\$95,840	100.00	0	0

<sup>(\*)</sup> The table presents the data for all AAs. The narrative below addresses performance in full-scope areas only.

# **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, CFSB's performance was excellent in the Lawrence and Wichita AAs, and adequate in the Topeka AA.

#### Lawrence AA

CFSB had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Current period and prior period investments totaled \$8.6 million and represented 10.8 percent of the AA's allocated tier 1 capital.

CFSB exhibits excellent responsiveness to credit and community development needs making significant use of innovative and/or complex investments to support CD initiatives. During the evaluation period,

<sup>(\*\*)</sup> Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

<sup>(\*\*\*)</sup> Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

CFSB purchased two new investments totaling more than \$3 million, one being a LIHTC investment for \$3 million in the AA. All investments supported affordable housing for low- and moderate-income individuals.

Additionally, CFSB made 21 qualifying grants and donations totaling over \$83,000 to 10 organizations in the AA during the evaluation period. Donations supported organizations providing community services such as homeless centers, financial education, affordable housing, and youth programs targeted to low- to moderate-income individuals. Examples of donations include:

- \$18,000 to local organizations supporting financial literacy and work and career readiness for low- and moderate-income students.
- \$15,000 to support affordable housing initiatives.
- \$9,000 to local organizations helping families experiencing homelessness.

#### Topeka AA

CFSB had an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. During the evaluation period, investments totaled \$6.8 million and represented 3.8 percent of the AA's allocated tier 1 capital.

CFSB exhibits good responsiveness to credit and community development needs making use of innovative and/or complex investments to support CD initiatives. During the evaluation period, CFSB purchased two new investments totaling more than \$2.3 million, one being a LIHTC investment for \$2.2 million in the AA. All investments support affordable housing for low- and moderate-income individuals. CFSB had 11 prior period investments totaling over \$678,000.

Additionally, CFSB made 105 qualifying grants and donations totaling over \$3.4 million to 38 organizations in the AA during the evaluation period. Donations supported organizations providing community services programs for individuals with disabilities, affordable housing and health care services, and youth programs targeted to low- to moderate-income individuals. Examples of donations include:

- \$833,000 to fund revitalization and stabilization efforts of a low-income geography in the AA.
- \$800,000 to renovate an AA senior living facility housing low- and moderate-income individuals.
- \$200,000 to establish a medical clinic in a low- and moderate-income geography in the AA.

#### Wichita AA

CFSB had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. During the evaluation period, investments in the Wichita AA totaled \$8.1 million and represented 10.3 percent of the AA's allocated tier 1 capital.

CFSB exhibits excellent responsiveness to credit and community development needs making use of innovative and/or complex investments to support CD initiatives. During the evaluation period, CFSB purchased four new investments totaling more than \$2.1 million, three being LIHTC investments

totaling \$2 million in the AA. All investments supported affordable housing for low- and moderate-income individuals. CFSB had 25 prior period investments totaling \$5.5 million.

Additionally, CFSB made 61 qualifying grants and donations totaling \$432,000 to 61 organizations in the AA during the evaluation period. Donations supported organizations providing community services programs for individuals with disabilities, affordable housing and health care services, and youth programs targeted to low- to moderate-income individuals. Examples of donations include:

- \$100,000 to fund building renovations for a student achievement organization in a low- and moderate-income area serving a low-income student population.
- \$28,000 to various AA youth centers providing services to low- and moderate-income students.

# Statewide/Regional

Examiners considered qualified investments located in the broader statewide area that have a purpose/mandate/function (P/M/F) potentially benefitting CFSB's AAs. CFSB made five current period LIHTC investments totaling \$41.5 million and retained 38 prior period investments totaling \$25 million. All current and prior period investments supported affordable housing and had a positive impact on CFSB's overall state rating.

# **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, CFSB's performance under the Investment Test in the Manhattan and KS Non-MSA AAs was consistent with CFSB's overall performance under the Investment Test in the full-scope areas. During the evaluation period, investments totaled more than \$3.3 million representing 13.19 percent of allocated tier 1 capital in the Manhattan AA, and \$2.3 million representing 7.47 percent of allocated tier 1 capital in the KS Non-MSA AAs. Performance in the limited-scope areas exhibits excellent responsiveness to credit and community development needs.

#### SERVICE TEST

CFSB's performance under the Service Test in Kansas is rated Low Satisfactory.

# **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, CFSB's performance in the Lawrence, Topeka, and Wichita AAs is adequate.

# **Retail Banking Services**

Distribution	of Branch	Delivery Sy	stem										
	Deposits			Branc	hes					P	opulati	on	
Assessment	% of Rated	# of BANK	% of Rated		ocation ome of				% (	of Popu G	lation v eograp		Each
Area	Area Deposits in AA	Branches	Area Branches in AA	Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full Scope:													
Lawrence AA	18.1	4	14.8	0.0	25.0	25.0	50.0	0.0	0.0	20.8	48.2	23.1	7.9
Topeka AA	50.9	10	37.1	10.0	60.0	20.0	10.0	0.0	7.0	21.9	43.8	27.3	0.0
Wichita AA	17.7	9	33.3	11.1	33.3	0.0	55.6	0.0	3.4	25.4	38.4	32.2	0.6
Limited Scop	e:												
Manhattan AA	5.8	2	7.4	0.0	0.0	50.0	50.0	0.0	4.4	22.7	28.1	41.8	3.0
Kansas Non-MSA	7.5	2	7.4	0.0	50.0	0.0	50.0	0.0	0.0	21.7	46.1	31.9	0.3

(\*) The NA category consists of geographies that have not been assigned an income classification.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the Lawrence, Topeka, and Wichita AAs.

#### Lawrence AA

The distribution of branches in moderate-income geographies exceeded the percentage of the population living in those geographies. The AA did not have any low-income geographies.

CFSB supplements its retail branch services with several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. CFSB had nine ATMs in the AA, of which all were deposit-taking. CFSB did not have any ATMs in low-income geographies. Examiners took into consideration that three of CFSB's ATMs were located in geographies that changed from low-income geographies to income not assigned geographies as a result of the 2020 US Census changes. The distribution of ATMs in moderate-income geographies exceeded the percentage of the population living in those geographies. Examiners did not place significant weight on these systems since no data was available to determine their impact on low- and moderate-income individuals or geographies.

# Topeka AA

The distribution of branches in low- and moderate-income geographies exceeded the percentage of the population living in those geographies.

CFSB supplements its retail branch services with several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. CFSB had 14 ATMs in the AA, of which all were deposit-taking. The distribution of ATMs in low- and moderate-income geographies exceeded the percentage of the population living in those geographies. Examiners did not place significant weight on these systems since no data was available to determine their impact on low- and moderate-income individuals or geographies.

#### Wichita AA

The distribution of branches in low- and moderate-income geographies exceeded the percentage of the population living in those geographies.

CFSB supplements its retail branch services with several alternative delivery systems including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. CFSB had nine ATMs in the AA, of which all were deposit-taking. The distribution of ATMs in low- and moderate-income geographies exceeded the percentage of the population living in those geographies. Examiners did not place significant weight on these systems since no data was available to determine their impact on low- and moderate-income individuals or geographies.

Distribution of Branch O	penings/Closings						
		Branch O	penings/C	losings			
Assessment Area	# of Branch	# of Branch	Net	change i	n Location (+ or -)		nches
	Openings	Closings	Low	Mod	Mid	Upp	N/A*
Full Scope:							
Lawrence AA	0	1	0	-1	0	0	0
Topeka AA	0	1	-1	0	0	0	0
Wichita AA	0	0	0	0	0	0	0
Limited Scope:							
Manhattan AA	0	0	0	0	0	0	0
Kansas Non-MSA	0	0	0	0	0	0	0

To the extent changes have been made, CFSB's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. All locations offered traditional banking products and maintained standard business hours with extended lobby and drive-up hours on Fridays.

#### Lawrence AA

During the evaluation period, CFSB closed one branch in a moderate-income geography and did not open any new branches. The branch that closed was a retail in-store location where the retailer did not renew their contract with CFSB. Services offered, and hours of operation were comparable among branch locations.

#### Topeka AA

During the evaluation period, CFSB closed one branch in a low-income geography. The money saved from closing the branch was reinvested into improvements and updates to a bank branch approximately one mile away and located in a low-income geography. Services offered, and hours of operation were comparable among branch locations.

## Wichita AA

During the evaluation period, CFSB did not open or close any branches. Services offered, and hours of operation were comparable among branch locations.

# **Community Development Services**

CFSB provided a limited level of CD services.

#### Lawrence AA

CFSB provided a limited level of CD services in the AA. CD services focused on financial education to low- and moderate-income children and community services. During the evaluation period, three bank employees provided a total of 12 hours of CD services to three different organizations. One employee served as a committee member for an organization that primarily serves children from low-to moderate-income families. One employee served as a teacher for an organization that provides basic financial education targeted to low- and moderate-income students.

## Topeka AA

CFSB provided an adequate level of CD services in the AA. CD services focused on financial education to low- and moderate-income students and community services. During the evaluation period, 32 bank employees provided a total of 179 hours of CD services to 10 organizations. Examples of CD services in the AA include:

- Financial education to low- and moderate-income students and individuals related to finance, banking products, and budgeting.
- Employees in leadership positions with CD organizations that provide community services to lowand moderate-income individuals, including childcare, foster care/child court appointed advocacy, youth programs, and mentoring services.

#### Wichita AA

CFSB provided an adequate level of CD services in the AA. CD services focused on financial education to low- and moderate-income children and affordable housing. During the evaluation period, eight employees provided a total of 79 hours of CD services to seven organizations. Examples of CD services in the AA include:

- Serving on a committee of an affordable housing fund to help create a plan for affordable housing projects.
- Serving on the board of a community organization that provides support services for low- and moderate-income families. The organization provides confidential money management and credit counseling.

# **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, CFSB's performance under the Service Test in the Manhattan and KS Non-MSA AAs was weaker than CFSB's overall performance under the Service Test in the full-scope area(s). For limited-scope areas reviewed, two employees provided 26 hours of CD services for to two organizations. Weaker performance in limited-scope AAs had a neutral impact on the Service Test rating for the state of Kansas and is due to the limited number of branches in these AAs.

# **Appendix A: Scope of Examination**

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

Time Period Reviewed:	January 1, 2020 to Decemb	per 31, 2023
Bank Products Reviewed:	Home mortgage, small bus	iness, CD loans, qualified investments, CD services
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	None	None
None	None	None
List of Assessment Areas and Typ	e of Examination	
Rating and Assessment Areas	Type of Exam	Other Information
MMSA		
		KS – Entire counties of Johnson and Wyandotte
Kansas City, MO-KS MSA	Full-scope	MO – Entire counties of Clay and Platte, and part
		of Jackson county
Kansas		
Lawrence, KS MSA	Full-scope	All of Douglas county
Topeka, KS MSA	Full-scope	All of Shawnee county
Wichita, KS MSA	Full-scope	All of Butler and Sedgwick counties
Manhattan, KS MSA	Limited-scope	All of Riley county, and part of Pottawatomie county
Kansas Non-MSA	Limited-scope	All of Lyon and Saline counties

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

F	RATINGS: Ca	pitol Federal Savir	ngs Bank (CFSB)	
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Multistate Rating
CFSB	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
MMSA or State:				
Kansas City, MO-KS	Low Satisfactory	Outstanding	Low Satisfactory	Low Satisfactory
Kansas	Low Satisfactory	Outstanding	Low Satisfactory	Low Satisfactory

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

# **Appendix C: Definitions and Common Abbreviations**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Low-Income** (**Low**): An individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

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

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5

million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

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

# **Appendix D: Tables of Performance Data**

# **Content of Standardized Tables**

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

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

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

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

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

2020-21

	Tot	tal Home Mortgag	e Loans		Low-Inc	ome Tı	acts	Moderate	-Income	Tracts	Middle-l	Íncome	Tracts	Upper-I	ncome '	Tracts	Not Avai	ilable-I1 Fracts	ncome
Assessment Area:	#	\$			Occunied			% of Owner- Occupied Housing Units		Aggt.	% of Owner- Occupied Housing Units		Aggt.	% of Owner- Occupied Housing Units		Aggt.	% of Owner- Occupied Housing Units		00
KCMO-KS	4,895	1,408,499,124	100.0	87,001	7.3	2.0	3.6	17.1	4.5	13.9	33.7	23.1	32.8	41.6	70.2	49.5	0.2	0.2	0.2
Total	4,895	1,408,499,124	100.0	87,001	7.3	2.0	3.6	17.1	4.5	13.9	33.7	23.1	32.8	41.6	70.2	49.5	0.2	0.2	0.2

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Capitol Federal Savings Bank (10000700670), CAPITOL FEDERAL SAVINGS (40000000670), CAPITOL FEDERAL SAVINGS BANK (91LNGA8J8EF) excluded from Aggregate

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

2022-23

	T	otal Home Mort	gage Lo	ans	Low-I	ncome T	Tracts	Moderate	e-Incom	ie Tracts	Middle-	Income	Tracts	Upper-	Income	Tracts	Not Ava	ilable-I Tracts	ncome
Assessment Area:	#	\$		Overall Market	% of Owner- Occupied Housing Units		Aggt.	% of Owner- Occupied Housing Units		00	% of Owner- Occupied Housing Units		Aggt.	% of Owner- Occupied Housing Units		00	% of Owner- Occupied Housing Units		Aggt.
KCMO-KS	2,344	883,042,856	100.0	47,499	5.4	2.0	4.4	18.8	5.8	19.2	35.5	25.6	35.2	39.7	66.3	40.7	0.5	0.2	0.6
Total	2,344	883,042,856	100.0	47,499	5.4	2.0	4.4	18.8	5.8	19.2	35.5	25.6	35.2	39.7	66.3	40.7	0.5	0.2	0.6

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

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

2020-21

	Т	Total Home Mortgago	e Loans			v-Incom rrowers			rate-Inco	me		dle-Incom orrowers	ie		per-Inco orrowe			ailable-Inc orrowers	ome
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.
KCMO-KS	4,895	1,408,499,124	100.0	87,001	21.4	2.9	7.0	16.8	10.1	17.2	19.5	19.4	20.0	42.3	65.4	36.6	0.0	2.2	19.2
Total	4,895	1,408,499,124	100.0	87,001	21.4	2.9	7.0	16.8	10.1	17.2	19.5	19.4	20.0	42.3	65.4	36.6	0.0	2.2	19.2

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Capitol Federal Savings Bank (10000700670), CAPITOL FEDERAL SAVINGS (40000000670), CAPITOL FEDERAL SAVINGS BANK (91LNGA8J8EF) excluded from Aggregate

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

2022-23

					3	g			· · · · · · · · ·	J									
	Т	otal Home Mort	gage Lo	ans	Low-Inc	come Borro	wers		erate-In Borrowe		Middle-I	ncome l	Borrowers	Upper-In	icome B	orrowers		ailable- Borrowe	Income ers
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.
KCMO-KS	2,344	883,042,856	100.0	47,499	20.4	4.1	8.9	16.7	11.1	19.1	20.9	19.5	20.3	42.0	62.4	34.3	0.0	2.9	17.4
Total	2,344	883,042,856	100.0	47,499	20.4	4.1	8.9	16.7	11.1	19.1	20.9	19.5	20.3	42.0	62.4	34.3	0.0	2.9	17.4

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

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

2020-21

1 4510 Q 1115			2150	110 44101	or Bound		iuii busi	resses s <sub>j</sub>		e carrege	77 01 0110	o cog.	·P-J						2020 21
		Total Loa Busi	ins to Si inesses	mall	Low-I	ncome T	racts	Moderate	e-Incom	e Tracts	Middle-	Income	Tracts	Upper-	Income	Tracts	Not Availa	ble-Inco	ome Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.
KCMO-KS	776	53,263	100.0	39,633	8.5	3.6	7.3	17.3	12.2	18.5	30.3	25.8	29.8	41.5	54.0	41.9	2.3	4.4	2.5
Total	776	53,263	100.0	39,633	8.5	3.6	7.3	17.3	12.2	18.5	30.3	25.8	29.8	41.5	54.0	41.9	2.3	4.4	2.5

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Capitol Federal Savings Bank (10000700670), CAPITOL FEDERAL SAVINGS (40000000670), CAPITOL FEDERAL SAVINGS BANK (91LNGA8J8EF) excluded from Aggregate

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

2022-23

_								•		0	•								ļ
		Total Loa Bus	ans to Si inesses	mall	Low-I	icome T	Tracts	Moderate	e-Incom	e Tracts	Middle-	Income	Tracts	Upper-	Income	Tracts	Not Ava	ailable-I Tracts	ncome
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.
KCMO-KS	107	22,592	100.0	37,887	6.4	6.5	5.6	20.4	16.8	19.0	30.7	23.4	31.0	39.2	43.9	41.2	3.4	9.3	3.2
Total	107	22,592	100.0	37,887	6.4	6.5	5.6	20.4	16.8	19.0	30.7	23.4	31.0	39.2	43.9	41.2	3.4	9.3	3.2

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

# Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2020-21

	Т	otal Loans to S	Small Businesse	es	Businesses	with Revenues	s <= 1MM	Businesses wit		Businesses wi Not Av	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KCMO-KS	776	53,263	100.0	39,633	85.0	12.2	47.2	5.2	10.6	9.8	77.2
Total	776	53,263	100.0	39,633	85.0	12.2	47.2	5.2	10.6	9.8	77.2

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Capitol Federal Savings Bank (10000700670), CAPITOL FEDERAL SAVINGS (40000000670), CAPITOL FEDERAL SAVINGS BANK (91LNGA8J8EF) excluded from Aggregate

#### Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2022-23

	Т	otal Loans to S	Small Businesse	es	Businesses	with Revenues	s <= 1MM	Businesses wit		Businesses wi Not Av	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KCMO-KS	107	22,592	100.0	37,887	90.5	56.1	51.4	3.1	29.9	6.4	14.0
Total	107	22,592	100.0	37,887	90.5	56.1	51.4	3.1	29.9	6.4	14.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table O: Assessme	nt Area	Distribution	of Ho	ome Mo	rtgage L	oans l	y Inco	me Categ	gory of t	he Go	eography	7						2	020-21
	Т	otal Home Mort	gage Lo	ans	Low-In	icome T	`racts	Moderate	-Income	Γracts	Middle-l	Income	Tracts	Upper-l	ncome	Tracts	Not Ava	ilable-I Tracts	ncome
Assessment Area:	#	\$		Overall Market	% of Owner- Occupied Housing Units		Aggt.	% of Owner- Occupied Housing Units	% Bank Loans	Aggt.	% of Owner- Occupied Housing Units		Aggt.	% of Owner- Occupied Housing Units	% Bank Loans	Aggt.	% of Owner- Occupied Housing Units		Aggt.
KS Non-MSA	106	17,279,239	3.0	1,954	0.0	0.0	0.0	23.8	12.3	19.9	39.1	50.9	45.9	37.1	36.8	34.2	0.0	0.0	0.0
Lawrence	475	103,068,841	13.2	4,799	1.3	2.9	2.0	25.4	20.2	24.7	36.9	32.8	33.8	36.3	44.0	39.5	0.0	0.0	0.0
Manhattan	265	54,354,317	7.4	4,155	0.0	0.0	0.0	2.2	1.9	1.8	53.5	40.0	45.0	43.9	58.1	52.6	0.4	0.0	0.6
Topeka	968	139,696,732	27.0	6,564	4.6	1.9	2.1	15.3	6.3	11.0	39.1	40.0	39.3	41.0	51.9	47.7	0.0	0.0	0.0
Wichita	1,774	310,190,555	49.4	26,386	5.1	2.2	2.7	17.9	5.8	13.8	32.4	21.0	31.0	44.6	71.0	52.5	0.0	0.0	0.0
Total	3,588	624,589,683	100.0	43,858	3.8	2.0	2.2	17.6	7.7	13.7	36.1	30.0	34.5	42.4	60.3	49.5	0.0	0.0	0.1

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Capitol Federal Savings Bank (10000700670), CAPITOL FEDERAL SAVINGS (40000000670), CAPITOL FEDERAL SAVINGS BANK (91LNGA8J8EF) excluded from Aggregate

Table O: Assessm	ent Area	Distribution	of Ho	me Mor	tgage Lo	ans by l	ncon	ne Catego	ory of	the Ge	ography							20	)22-23
	Tot	tal Home Mortga	ige Loa	ns	Low-Ir	icome Tra	icts	Moderate	-Incom	e Tracts	Middle-	Income	Tracts	Upper-I	ncome	Tracts	Not Avai	ilable-I1 Γracts	ıcome
Assessment Area:	#	s	% of Total	Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggt.	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		Aggt.	% of Owner- Occupied Housing Units		Aggt.	% of Owner- Occupied Housing Units		Aggt.
KS Non-MSA	54	5,345,173	3.0	1,177	0.0	0.0	0.0	14.7	7.4	19.4	45.2	59.3	48.6	40.1	33.3	32.0	0.0	0.0	0.0
Lawrence	245	65,346,126	13.5	2,674	0.0	0.0	0.0	17.9	18.4	20.2	54.0	46.5	50.7	27.9	34.3	27.0	0.1	0.8	2.1
Manhattan	95	15,999,763	5.2	2,426	0.0	0.0	0.1	12.8	8.4	18.7	31.0	25.3	24.6	56.0	66.3	55.9	0.2	0.0	0.7
Topeka	494	109,496,596	27.2	4,380	4.1	3.0	2.8	16.2	12.6	16.1	47.4	44.7	48.4	32.3	39.7	32.7	0.0	0.0	0.0
Wichita	929	177,176,615	51.1	17,179	1.8	3.4	1.3	19.5	8.3	19.6	42.4	29.2	41.4	36.1	59.1	37.5	0.2	0.0	0.2
Total	1,817	373,364,272	100.0	27,836	1.8	2.6	1.3	17.8	10.8	19.0	43.9	36.4	42.3	36.4	50.1	37.1	0.1	0.1	0.4

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table P: Assessm	ent A	rea Distribut	ion of	Home N	Aortgag	e Loai	ns by Inc	come Ca	tegory	of the l	Borrowe	er						2	2020-21
	Т	otal Home Mort	gage Lo	oans	Low-Inc	come Bo	orrowers		erate-In Borrowe			ddle-Inc Borrowe		Upper-I	ncome B	Borrowers		ailable-l orrower	
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.
KS Non-MSA	106	17,279,239	3.0	1,954	21.2	6.6	5.3	17.8	12.3	15.7	21.4	24.5	18.5	39.6	51.9	27.8	0.0	4.7	32.8
Lawrence	475	103,068,841	13.2	4,799	19.1	5.1	7.3	19.6	14.7	19.2	20.6	25.9	21.3	40.7	49.1	36.8	0.0	5.3	15.3
Manhattan	265	54,354,317	7.4	4,155	20.5	2.3	3.5	17.9	9.4	12.8	21.2	19.2	19.0	40.5	66.4	36.6	0.0	2.6	28.0
Topeka	968	139,696,732	27.0	6,564	20.8	7.7	8.8	17.2	18.7	20.5	21.8	19.9	21.7	40.3	43.9	28.0	0.0	9.7	20.9
Wichita	1,774	310,190,555	49.4	26,386	20.8	3.8	6.8	17.7	11.4	16.9	21.1	21.6	19.3	40.5	61.1	29.6	0.0	2.0	27.4
Total	3,588	624,589,683	100.0	43,858	20.6	5.0	6.8	17.8	13.7	17.2	21.2	21.7	19.8	40.4	55.0	30.7	0.0	4.7	25.4

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Capitol Federal Savings Bank (10000700670), CAPITOL FEDERAL SAVINGS (40000000670), CAPITOL FEDERAL SAVINGS BANK (91LNGA8J8EF) excluded from Aggregate

Table P: Assessm	ient Ai	rea Distribut	ion of	Home N	Mortgag	e Loai	ıs by Inc	come Ca	tegory	of the l	Borrowe	r						2	2022-23
	Т	otal Home Mort	gage Lo	ans	Low-Inc	come Bo	orrowers		erate-In Borrowe		_	ldle-Inc orrowe		Upper-I	icome B	orrowers	Not Ava	ailable-l orrowei	
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.
KS Non-MSA	54	5,345,173	3.0	1,177	16.6	1.9	6.5	17.3	22.2	20.6	22.9	35.2	18.6	43.2	37.0	27.3	0.0	3.7	27.0
Lawrence	245	65,346,126	13.5	2,674	19.6	9.4	9.4	18.9	15.9	21.6	22.6	22.4	20.6	38.9	46.5	33.8	0.0	5.7	14.5
Manhattan	95	15,999,763	5.2	2,426	18.0	3.2	5.7	16.4	16.8	16.7	20.6	24.2	20.6	45.0	54.7	34.5	0.0	1.1	22.5
Topeka	494	109,496,596	27.2	4,380	18.6	7.1	10.7	18.4	18.8	23.9	23.7	20.2	21.5	39.3	42.5	27.8	0.0	11.3	16.2
Wichita	929	177,176,615	51.1	17,179	19.6	4.8	9.7	18.3	15.0	20.8	21.3	21.5	19.6	40.9	54.7	26.1	0.0	4.0	23.7
Total	1,817	373,364,272	100.0	27,836	19.0	5.9	9.4	18.1	16.5	21.0	21.9	21.8	20.1	40.9	49.8	27.9	0.0	6.1	21.6

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table Q: Assessm	ent A	Area Dis	stribut	ion of I	oans to S	mall E	Business	es by Inco	me Categ	gory o	of the Geo	graph	y					20	20-21
		Total Loa Busi	ans to Si inesses	mall	Low-In	icome T	`racts	Moderate	e-Income Ti	racts	Middle-	Income	Tracts	Upper-l	ncome '	Tracts	Not Avai T	lable-In `racts	come
Assessment Area:	#	\$		Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.
KS Non-MSA	12	227	1.3	752	0.0	0.0	0.0	36.4	0.0	34.4	34.1	75.0	28.0	29.5	25.0	36.4	0.0	0.0	1.2
Lawrence	267	16,920	28.2	2,212	6.0	1.1	3.7	30.2	43.4	31.6	31.9	25.1	32.9	31.9	30.3	31.2	0.0	0.0	0.7
Manhattan	14	227	1.5	1,215	0.0	0.0	0.0	10.8	7.1	10.0	47.7	35.7	47.4	40.8	57.1	41.7	0.8	0.0	0.9

23.7

29.4

29.0

17.4

25.3

24.4

40.1

28.3

32.7

53.1

13.7

43.1

40.7

27.9

31.5

14.7

54.9

22.0

26.6

40.8

36.6

30.0

41.2

38.3

0.0

0.0

0.1

0.0

0.0

0.0

0.4

0.5

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

10,881

15.4

5.3

6.1

8.4

2.0

5.8

11.2

5.4

5.3

604 58,056 63.7 2,417

948 76,295 100.0 17,477

5.4

865

Due to rounding, totals may not equal 100.0%

Topeka

Wichita

Total

Capitol Federal Savings Bank (10000700670), CAPITOL FEDERAL SAVINGS (40000000670), CAPITOL FEDERAL SAVINGS BANK (91LNGA8J8EF) excluded from Aggregate

17.8

25.6

24.5

Table Q: Assessn	ent A	Area Dis	stribut	ion of L	oans to S	mall B	Business	es by Inco	me Ca	ategory	of the Geo	ograph	ıy					20	)22-23
		Total Loa Bus	ans to Si inesses	mall	Low-Ir	icome T	racts	Moderate	e-Incom	e Tracts	Middle-	Income	Tracts	Upper-	Income '	Tracts	Not Avai T	lable-In `racts	come
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.
KS Non-MSA	0	0	0.0	897	0.0	0.0	0.0	29.1	0.0	21.7	38.7	0.0	42.1	31.9	0.0	35.5	0.3	0.0	0.7
Lawrence	32	6,236	13.8	1,961	0.0	0.0	0.0	24.1	21.9	24.7	46.0	59.4	46.0	25.2	15.6	26.1	4.7	3.1	3.2
Manhattan	1	100	0.4	1,123	3.2	0.0	0.3	11.3	0.0	11.5	36.5	0.0	37.7	48.3	100.0	49.8	0.6	0.0	0.7
Topeka	184	22,865	79.3	2,278	6.4	1.6	4.3	25.4	7.1	21.0	41.8	27.2	43.8	26.4	64.1	30.3	0.0	0.0	0.5
Wichita	15	4,295	6.5	10,649	2.3	0.0	2.2	21.3	40.0	20.9	33.5	20.0	33.8	40.0	40.0	39.9	2.8	0.0	3.3
Total	232	33,496	100.0	16,908	2.6	1.3	2.0	22.0	11.2	20.8	37.0	31.0	37.2	36.2	56.0	37.5	2.2	0.4	2.6

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues	
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2020-21

A A	,	Total Loans to	Small Business	es	Businesses	with Revenues	s <= 1MM	Businesses wit 1M		Businesses wi Not Av	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KS Non-MSA	12	227	1.3	752	77.5	0.0	48.7	6.6	0.0	15.9	100.0
Lawrence	267	16,920	28.2	2,212	85.2	12.0	51.4	4.1	8.2	10.6	79.8
Manhattan	14	227	1.5	1,215	80.5	0.0	42.0	5.4	0.0	14.1	100.0
Topeka	604	58,056	63.7	2,417	79.9	10.3	50.7	6.1	35.6	14.0	54.1
Wichita	51	865	5.4	10,881	83.4	5.9	52.5	5.6	0.0	11.0	94.1
Total	948	76,295	100.0	17,477	82.3	10.2	51.2	5.6	25.0	12.1	64.8

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Capitol Federal Savings Bank (10000700670), CAPITOL FEDERAL SAVINGS (40000000670), CAPITOL FEDERAL SAVINGS BANK (91LNGA8J8EF) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2022-23

Assassment Augus	Т	Cotal Loans to S	Small Businesse	es	Businesses	with Revenues	s <= 1MM	Businesses wit 1M		Businesses wi Not Av	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KS Non-MSA				897	80.7		51.7	5.3		14.0	
Lawrence	32	6,236	13.8	1,961	87.1	40.6	54.0	3.3	43.8	9.6	15.6
Manhattan	1	100	0.4	1,123	83.2	0.0	49.8	4.4	0.0	12.4	100.0
Topeka	184	22,865	79.3	2,278	82.3	20.1	46.0	5.1	77.2	12.5	2.7
Wichita	15	4,295	6.5	10,649	85.8	60.0	51.1	4.5	6.7	9.7	33.3
Total	232	33,496	100.0	16,908	84.8	25.4	50.7	4.5	67.7	10.7	6.9

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%