



## Public Disclosure

October 1, 1999

### Community Reinvestment Act Performance Evaluation

The Boone County National Bank of Columbia  
Charter Number: 1770

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Columbia, Missouri 65205-0678

Office of the Comptroller of the Currency

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**NOTE:** 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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## General Information

*The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.*

*This document is an evaluation of the CRA performance of **The Boone County National Bank of Columbia** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **October 1, 1999**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Block Numbering Area (BNA)** - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

**Census Tract (CT)** - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

**Community Development (CD)** - Affordable 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301)) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

**Community Reinvestment Act (CRA)** - The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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.

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

**Geography** - A census tract or a block numbering area 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 do 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, and the disposition of the application (e.g., approved, denied, withdrawn).

**Home Mortgage Loans** - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwellings loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

**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, branch distribution).

**Low-Income** - Income levels that are less than 50% of the median family income.

**Median Family Income (MFI)** - The median income determined by the United States Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 it and half below it.

**Metropolitan Statistical Area (MSA)** - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

**Middle-Income** - Income levels that are at least 80% and less than 120% of the MFI.

**Moderate-Income** - Income levels that are at least 50% and less than 80% of the MFI.

**Small Business Loans** - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

**Small Farm Loans** - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

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

**Upper-Income** - Income levels that are 120% or more of the MFI.

## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Outstanding**.

The following table indicates the performance level of **The Boone County National Bank of Columbia** with respect to the Lending, Investment, and Service Tests:

Performance Levels	The Boone County National Bank of Columbia Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory			
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- < In the Columbia MSA, Boone County National Bank (BCNB) is the market leader for reported home purchase loans, home mortgage refinance loans, and small business loans. In addition, BCNB's market share in LMI geographies and to LMI borrowers meets or exceeds its overall market share for all reported loan types, except small farm.
- < In the Columbia MSA, 89 percent of BCNB's reported small business loans were provided to businesses with revenues of \$1 million or less.
- < BCNB extended a substantial majority of its reported loans within its assessment areas(AAs). By number, 87 percent of home mortgage loans and 89 percent of small business loans were in the AAs.
- < The distribution of BCNB's branches and automatic teller machines (ATMs) in LMI CTs substantially exceeds the percentage of families residing in these tracts.

## **Description of Institution**

BCNB is headquartered in Columbia, Missouri. As of June 30, 1999, BCNB had assets of \$739 million and operated 12 offices in two AAs. One of the AAs is the Columbia MSA, and one is Cooper County, which BCNB designated in 1997. Prior to 1997, all bank offices were located in the Columbia MSA.

BCNB is a subsidiary of Central Bancompany, which is a 12-bank holding company, with assets of approximately \$4 billion. Central Bancompany is located in Jefferson City, Missouri, and its banks are located throughout Missouri.

BCNB is a full-service commercial bank, and it seeks to serve the commercial and retail banking needs of its markets. As of June 30, 1999, BCNB reported total loans of \$471 million. Of this amount, 49 percent were commercial and commercial real estate related, 33 percent were residential real estate related, 16 percent were personal loans, and 2 percent were agricultural and agricultural real estate related. Also on this date, net loans were 63 percent of total assets, and Tier 1 Capital was \$49 million.

There are no known legal, financial, or other impediments to BCNB's ability to help meet the credit needs in its AAs.

## **Scope of the Evaluation**

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

For the Lending Test, we evaluated the bank's HMDA, small business, and community development lending data for 1997 and 1998. We gave no weight to home refinance loans. BCNB originated a relatively large number of home refinance loans, but these types of loans were not specifically identified as a community credit need. Due to the very small number of small farm loans originated, we did not consider small farm lending data. We used 1997 peer data for HMDA and small business loans to compare BCNB's lending performance to other lenders in its AAs. Peer data for 1998 is not yet available.

For the Investment Test, we evaluated equity investments, grants and donations through the date of this evaluation, including prior period investments still on the bank's books.

For the Service Test, we evaluated retail banking and community development services from September 1996 through the date of this evaluation.

We also used deposit information reported by the Federal Deposit Insurance Corporation, to determine BCNB's deposit market share and market presence



relative to other financial institutions in its AAs. The most recent deposit information available was as of June 30, 1998.

We last evaluated the bank's CRA performance as of October 4, 1996, and we rated the bank outstanding.

### **Data Integrity**

Prior to the evaluation, we performed a file review to determine the accuracy of the bank's reported data, and we found the small business and small farm data to be inaccurate. BCNB scrubbed the 1997, 1998, and year-to-date 1999 data to correct any inaccuracies. Management also instituted process and system changes to help ensure accurate data in the future. We sampled a portfolio of the scrubbed loans to determine the accuracy of the data. We found no significant errors, and we used the data for this evaluation. Bank management resubmitted corrected 1997 and 1998 small business and small farm data to the FFIEC.

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

We selected the Columbia MSA for full-scope review, and the Cooper County AA for limited-scope review. The Columbia MSA is by far the most significant market in which BCNB operates in terms of both population and bank loans originated. In addition, BCNB did not include Cooper County as an AA until December 1997. Please refer to Appendix A for more information about the examination scope.

### **Ratings**

The bank's overall rating is based primarily on performance in the Columbia MSA which received a full-scope review. Ninety-seven percent of the bank's total deposits and 94 percent of the bank's reported HMDA, small business, and small farm originations and purchases were attributed to the Columbia MSA.

### **Other**

We performed one community contact in conjunction with the examination, and we reviewed and analyzed two other regulatory contacts that were performed in 1999. We also reviewed the Columbia, MO Consolidated Plan Executive Summary because it contains information on housing and community development needs.

Our contact was with a community service office of the City of Columbia. The other contacts were with a business and community advocacy group and a community-based development organization. All of the contacts occurred in Columbia.

A common thread in the community contacts is that Columbia and the surrounding area are growing, they have been for several years, and that trend is expected to continue. The local economy is thriving, and unemployment is low.

The contacts did not identify any unmet credit need or investment opportunities, and they described the local banks as active in the Columbia area. One contact indicated that BCNB was one of two banks which dominated the small business market in Columbia.

The Consolidated Plan Executive Summary lists rental assistance, public housing rehabilitation, and new construction of affordable units as priorities for renters. The Summary lists rehabilitation, home maintenance for the elderly, and home ownership assistance as priorities for home owners.

## **Fair Lending Review**

The Fair Lending review involved a comparative file analysis of individual female applicants that were denied direct vehicle loans, compared to individual male applicants who were approved for direct vehicle loans. We did not identify any violations of the substantive provisions of the antidiscrimination laws and regulations. BCNB has historically complied with the substantive provisions of antidiscrimination laws.

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

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

BCNB's performance under the Lending Test is rated Outstanding. We weighted the bank's home purchase, home improvement, small business lending most heavily because it represented the largest portion of the bank's reported loan originations, and because home loans were identified as a community credit need. Based on a full-scope review, the bank's performance in the Columbia MSA is excellent.

#### **Lending Activity**

BCNB's level of lending is good. The bank's most recent quarter-end loan to deposit ratio was 75 percent, and BCNB sold about \$178 million of loans during the evaluation period. In most reported loan categories, BCNB is the market leader, despite a very competitive banking environment, which includes several very large lenders of regional and national scope. BCNB reported 3,867 loans, for

a total of approximately \$304 million. About 2,200 of these loans, totaling almost \$192 million were home mortgage loans. Approximately 1,600 loans, totaling \$110 million, were small business loans. The remaining 55 loans, totaling about \$3 million were small farm and community development related. Ninety-four percent of the reported loans are in the Columbia MSA, compared to 97 percent of the bank's deposits.

For the period ended June 30, 1998, BCNB had a 37.26 percent share of all FDIC insured deposits in the AA, which was the highest market share in the AA. The next highest market share rank was about 17 percent. There were 13 FDIC insured institutions with offices in the AA.

In comparison to the deposit market share, BCNB was the top home purchase loan originator with 20 percent of the AA's market share. The bank was second in overall market rank for home improvement loan originations with 17 percent of the market share. BCNB also lead the market in home refinance originations with 16 percent of the market share. BCNB again lead the market in small business loan originations. The bank had 45 percent of the small business loan market share. For small farm loan originations, BCNB was ranked second in the market with a 27 percent market share.

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.

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

We performed an analysis of the bank's lending data to determine if there were conspicuous gaps in the geographical distribution of loans. BCNB originated home loans in all 29 MSA tracts, and originated business or farm loans in 28 of the 29 tracts. We identified no conspicuous gaps in the lending distribution.

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

The geographic distribution of home purchase loan originations is excellent. The percentage of bank loans in LMI CTs exceeds the percentage of owner occupied housing units in those tracts. In moderate-income tracts, the percentage of loans originated by BCNB significantly exceeds the percentage of owner occupied housing units located in the those tracts. In addition, the bank's market share of home purchase loans in LMI CTs exceeds its overall home purchase loan market share. BCNB is the market share leader in home purchase loan originations.

The geographic distribution of home improvement loans is also excellent. Even though BCNB only originated 99 loans during the evaluation period, they are second in the market for home improvement loan originations, and housing rehabilitation was listed as a priority in the most recent Consolidated Plan Executive Summary. The percentage of bank loans in LMI CTs exceeds the

percentage of owner occupied housing units in those tracts. In low-income tracts, the BCNB's origination percentage is four times the percentage of owner occupied housing units. BCNB's market share in LMI CTs is also greater than its market share, overall.

Refer to Tables 2, 3 and 4 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.

### ***Small Business Loans***

The geographic distribution of small business loans is adequate. BCNB's level of lending in LMI CTs is relatively near the percentage of businesses located those CTs, and the bank's market share in LMI CTs exceeds its overall market share.

Refer to Table 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's small business loan originations.

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

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

The borrower distribution of home purchase loans is excellent. The percentage of bank loans to low-income borrowers is close to the percentage of low-income families in the AA, and the loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. In addition, BCNB's market share to low-income borrowers and to moderate-income borrowers exceeds its overall market share.

The distribution of home improvement loans is also excellent. The percentage of the bank's loans to LMI borrowers exceeds the percentage of LMI families. The bank's market share to low-income borrowers significantly exceeds its overall market share. BCNB has over one third of the home improvement market share to low-income borrowers. In addition, BCNB's market share to moderate-income borrowers exceeds its overall market share. Also, housing rehabilitation was listed as a priority in the most recent Columbia Consolidated Plan Executive Summary.

Refer to Tables 7, 8 and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

### ***Small Business Loans***

BCNB's distribution of small business loans is excellent. Eighty-nine percent of the bank's small business loans were made to businesses with revenues of \$1 million or less. This percentage compares favorably to 52 percent for other small

business reporters in the market, and 74 percent of businesses in the AA. In addition, a substantial majority of loans to businesses regardless of asset size, were \$100,000 or less, and BCNB originated 58 percent of all such loans in the market. Also, BCNB originated almost half of all business loans, regardless of business revenue size, in the market.

Refer to Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's small business loan originations.

### **Community Development Lending**

BCNB made two community development loans, totaling approximately \$351,000 during the evaluation period. Although the numbers are not large, both loans are for LMI rental housing units. Affordable housing was noted as a community need, and the bank's efforts in this area contribute to the overall rating.

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of community development lending.

### **Product Innovation and Flexibility**

BCNB has been very active in the city-sponsored CARE loan program, which is designed to increase home ownership among LMI people in specific LMI CTs. For qualifying applicants, the City of Columbia will provide grants of up to \$2,000 to assist with closing costs and down payments. Participating banks agree to loan up to 98 percent of the homes' value. In 1997, 27 lenders originated 71 loans through this program, and BCNB originated 65 percent of those loans. In 1998, 24 lenders participated, and BCNB originated 45 percent of the loans. BCNB's strong participation in this program has helped to meet an identified community credit need.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Cooper County AA is weaker than the bank's overall performance; however, it did not change the overall Lending Test rating. In general, the distribution of home loan products to LMI borrowers is poor. However, less than nine percent of the banks home mortgage loans are in Cooper County, and there is a lower concentration of LMI people in Cooper County, than in the Columbia MSA. The borrower distribution of small business loans is excellent, but BCNB reported only 35 such loans in the Cooper County AA.

Refer to the Tables 1 through 11 in Appendix C for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the Investment Test is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Columbia MSA is adequate.

The bank's level of qualified investments total \$123,000. BCNB's most significant investment is its \$58,000 investment in a multi-bank community development corporation, of which the bank is a founding member. The CDC purchases, renovates, and builds homes in LMI geographies for LMI occupants. These types of activities were listed as priorities in the Columbia Consolidated Plan Executive Summary. Other investments include grants and contributions to local organizations that provide community development services in the AA.

Although the investment dollars generated are small, opportunities to make community development investments in the AA were limited. We conducted and reviewed several recent community contacts, and we identified no investment opportunities. We also used other resources and contacts available to us, and we could not identify any qualified investments offered by the state, county, or local governments during this evaluation period. In addition, we did not identify any other locally-based community development corporations, small business investment corporations, or other types of community development services in which the bank could invest.

Community development activity in the Columbia MSA is focused largely on constructing, rehabilitating, and maintaining LMI housing. Other than the aforementioned CDC, we did not identify any investment opportunities to address these needs. However, BCNB has attempted to meet those needs through the CDC, and several loan programs, which are discussed under the lending section.

Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

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

Based on a limited-scope review, the bank's performance under the Investment Test in the Cooper County AA is weaker than the bank's overall performance. However, it did not change the overall Investment rating, because we assigned

substantially more weight to the bank's performance in the Columbia MSA. Refer to Table 12 in Appendix C for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the Service Test is rated Outstanding. Based on a full-scope review, the bank's performance in the Columbia MSA is excellent.

### **Retail Banking Services**

Retail delivery systems are readily accessible to all portions of the Columbia AA, particularly to LMI areas. The distribution of BCNB's branches and automatic teller machines (ATMs) in LMI CTs substantially exceeds the percentage of families residing in these tracts.

BCNB provides reasonable hours and services at each branch. Branch hours and services, including the availability of loan officers for all loan products, are comparable among locations regardless of tract income level. Customer feedback and timing of transactions are used to set branch hours, which are 9:00 a.m. to 5:30 p.m. Monday through Friday and 9:00 a.m. to 12:00 noon on Saturdays.

Alternative delivery systems include twenty-four hour telephone banking service. This service allows customers to obtain deposit and loan account information, make payments on BCNB loans, transfer funds, and pay other household bills. No information on how the telephone banking service specifically effects LMI individuals and geographies was available. Consequently, we could not place significant weight on the service when drawing our CRA performance conclusions.

The bank's record of opening and closing offices had no impact on LMI geographies. Bank management did not open or close any branches during our evaluation period.

Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch and ATM delivery system.

### **Community Development Services**

BCNB personnel provide a good level of community development services to the AA, and the bank's responsiveness to identified community needs contributes to

the overall rating. Bank staff support various community development organizations by providing financial expertise. Some examples of these activities include:

- C A bank employee serves on the Board of a nonprofit youth facility that provides employment training, education, alcohol and drug therapy services to a predominantly LMI female population in the county criminal justice system.
- C A bank officer serves on the Board and provides financial oversight for a city sponsored housing loan and grant program for LMI residents. The program provides subsidized funds to LMI persons for the purchase and rehabilitation of residential properties.
- C A bank Director serves on the board of a not-for-profit organization that provides temporary housing, clothing and food to LMI persons.
- C A bank officer serves on the Board and provides financial expertise to a not-for-profit social service organization. The organization provides child care, employment and other services to predominantly LMI residents.
- C A bank employee provides financial expertise by serving on the Board of a not-for-profit organization that provides job training, job placement, career counseling, and housing services to LMI persons in the AA.
- C A bank officer serves on the Board of a local Community Development Corporation that works to construct affordable housing for LMI residents.

Four of the six aforementioned services are related to the provision of affordable housing. As noted earlier in this document, various housing needs were identified as community needs.

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

### **Retail Banking Services**

Based on a limited-scope review, the bank's performance under the Service Test in the Cooper County AA is not inconsistent with the bank's overall outstanding performance under the Service Test. Given Cooper County demographics, the bank's performance in the Cooper County AA is comparable to the bank's overall performance. This conclusion is based solely on a review of branch and ATM distributions. We did not review community development services in the AA.

The bank has one branch and one ATM in the Cooper County AA, which does not contain any LMI geographies. However, BCNB's branch is located in the central business district of Booneville, which is the most populous community in the AA.



In addition, 80 percent of low-income families and 76 percent of moderate-income families in the AA reside in Booneville and its surrounding townships.

## 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 metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term "Full-Scope") and those that received a less comprehensive review (designated by the term "Limited-Scope").

<b>Time Period Reviewed</b>	Lending Test: January 01, 1997, to January 1, 1999 Investment Test: Prior Period to September 14, 1999 Service Test: January 01, 1997, to September 14, 1999	
<b>Financial Institution</b>		<b>Products Reviewed</b>
The Boone County National Bank of Columbia Columbia, MO		Small business loans, small farm loans, mortgage loans, and community development loans
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not Applicable		
List of Assessment Areas and Type of Examination		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Columbia MSA #1740 Cooper County	Full-scope Limited-scope	



# Appendix B: Market Profiles for Full-Scope Areas

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**Market Profiles for Areas Receiving Full-Scope Reviews**  
Columbia, MO MSA . . . . . B2

## Columbia MSA

Demographic Information for Full-scope Area: Columbia MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	29	17.24	17.24	51.72	13.79	0.00
Population by Geography	112,379	14.07	15.57	52.82	17.54	0.00
Owner-Occupied Housing by Geography	23,081	2.42	10.3	63.43	23.85	0.00
Businesses by Geography	3,918	26.29	18.10	44.00	11.61	0.00
Farms by Geography	132	7.58	9.10	67.41	15.91	0.00
Family Distribution by Income Level	25,939	19.2	18.5	23.21	39.09	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	9,778	12.42	18.62	58.87	10.09	0.00
Median Family Income	= \$34,122	Median Housing Value		= \$66,805		
HUD Adjusted Median Family Income for 1999	= \$49,700	Unemployment Rate (July 1999)		= 1.7%		
Households Below the Poverty Level	= 17.3%					

Source: 1990 U.S. Census and 1999 HUD updated MFI.

The Columbia MO MSA is one of BCNB's AAs. The bank includes the entire MSA in the AA. The AA contains about 97 percent of the bank's deposits, and about 94 percent of the evaluation period loan origination. The AA also contains most of the bank's operations. Eleven of 12 bank branches are in the MSA, and 17 of 18 ATMs are in the MSA.

A community contact characterized the Columbia area as very competitive, and BCNB's competitors include large regional and national banks such as Commerce Bank, Union Planters Bank, Mercantile Bank, and Bank of America. There are also many smaller banks, savings and loans, and credit unions in the MSA. In addition, many institutions outside the MSA compete for lending business in the MSA. During the evaluation period, over 100 companies originated home purchase loans in the MSA, and almost 40 companies originated small business loans in the MSA. Despite the fierce competition, and its small size relative to many of these companies, BCNB ranks first in the MSA among almost all reported loan types. The high rank across loan types reflects BCNB's business strategy of providing a full range of credit, deposit, and other banking services and products to its customers.

A common thread in the community contacts is that Columbia and the surrounding area are growing, they have been for several years, and that trend is expected to continue. The local economy is thriving, and unemployment is low.

Regarding community credit needs, the Consolidated Plan Executive Summary lists rental assistance, public housing rehabilitation, and new construction of affordable units as priorities for renters. The Summary also lists rehabilitation, home

maintenance for the elderly, and home ownership assistance as priorities for home owners.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

The tables cover the entire CRA evaluation period. 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: purchased loans are treated as originations; market rank is based on the number of loans made by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated by the bank as a percentage of the aggregate number of reportable loans originated by all lenders in the MSA/assessment area. The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated 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 market rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of HMDA Home Improvement Loan Originations** - See Table 2.
- Table 4. Geographic Distribution of HMDA Refinance Loan Originations** - See Table 2.
- Table 5. Geographic Distribution of Small Business Loan Originations** - The percentage distribution of the number of small loans (< \$1 million) to businesses originated by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Farm Loan Originations** - The percentage distribution of the number of small loans (< \$500,000) to farms originated by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 7. Borrower Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of HMDA Home Improvement Loan Originations** - See Table 7.
- Table 9. Borrower Distribution of HMDA Refinance Loan Originations** - See Table 7.
- Table 10. Borrower Distribution of Small Business Loan Originations** - Compares the percentage distribution of the number of small loans (< \$1 million) originated by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. The table also presents the percentage distribution of the number of loans originated by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 11. Borrower Distribution of Small Farm Loan Originations** - Compares the percentage distribution of the number of small loans (< \$500 thousand) originated by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. The table also presents the percentage distribution of the number of loans originated by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/assessment area.
- Table 13. Distribution of Branch and ATM Delivery System** - Compares the percentage distribution of the number of the bank's retail branches and

ATMs in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography.



**Table 1. Lending Volume**

LENDING VOLUME		State: MISSOURI				Evaluation Period: JANUARY 01, 1997, TO JANUARY 01, 1999						
MSA/Assessment Area:	% of Total Bank Deposits in Rated Area	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Scope:												
Columbia MSA	97%	2,213	\$191,891	1,599	\$109,748	53	\$2,449	2	\$351	3,867	\$304,439	94%
Limited-Scope:												
Cooper County	3%	195	\$14,286	35	\$1,911	2	\$15	0	\$0	232	\$16,212	6%

**Table 2. Geographic Distribution of Home Purchase Loan Originations**

Geographic Distribution: HOME PURCHASE				State: MISSOURI				Evaluation Period: JANUARY 01, 1997, TO JANUARY 01, 1999								
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% BCNB Loans	% Owner Occ Units	% BCNB Loans	% Owner Occ Units	% BCNB Loans	% Owner Occ Units	% BCNB Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Columbia MSA	2%	3%	10%	16%	63%	55%	24%	26%	1	20%	22%	28%	17%	24%	906	95%
Limited-Scope:																
Cooper County	NA	NA	NA	NA	63%	59%	37%	41%	2	10%	NA	NA	2%	20%	51	5%

(\*) Based on 1997 Aggregate HMDA Data only.

**Table 3. Geographic Distribution of Home Improvement Loan Originations**

Geographic Distribution: HOME IMPROVEMENT				State: MISSOURI				Evaluation Period: JANUARY 01, 1997, TO JANUARY 01, 1999								
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans	
	% Owner Occ Units	% BCNB Loans	% Owner Occ Units	% BCNB Loans	% Owner Occ Units	% BCNB Loans	% Owner Occ Units	% BCNB Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Columbia MSA	2%	8%	10%	11%	63%	55%	24%	27%	2	17%	27%	26%	17%	12%	99	96%
Limited-Scope:																
Cooper County	NA	NA	NA	NA	63%	25%	37%	75%	4	9%	NA	NA	6%	20%	4	4%

(\*) Based on 1997 Aggregate HMDA Data only.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations**

Geographic Distribution: HOME MORTGAGE REFINANCE																State: MISSOURI		Evaluation Period: JANUARY 01, 1997, TO JANUARY 01, 1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans				
	% Owner Occ Units	% BCNB Loans	% Owner Occ Units	% BCNB Loans	% Owner Occ Units	% BCNB Loans	% Owner Occ Units	% BCNB Loans		Overall	Low	Mod	Mid	Upp	#	% of Total			
Full-Scope:																			
Columbia MSA	2%	1%	10%	6%	63%	59%	24%	34%	1	16%	13%	12%	15%	19%	1,208	90%			
Limited-Scope:																			
Cooper County	NA	NA	NA	NA	63%	65%	37%	35%	3	15%	NA	NA	14%	16%	140	10%			

(\*) Based on 1997 Aggregate HMDA Data only.

**Table 5. Geographic Distribution of Small Business Loan Originations**

Geographic Distribution: SMALL BUSINESS				State: MISSOURI				Evaluation Period: JANUARY 01, 1997, TO JANUARY 01, 1999								
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% BCNB Loans	% of Businesses	% BCNB Loans	% of Businesses	% BCNB Loans	% of Businesses	% BCNB Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Columbia MSA	26%	17%	18%	11%	44%	55%	12%	16%	1	45%	46%	52%	42%	45%	1,599	98%
Limited-Scope:																
Cooper County	NA	NA	NA	NA	42%	63%	58%	37%	7	4%	NA	NA	2%	6%	35	2%

(\*) Based on 1997 Aggregate Small Business Data only.

**Table 6. Geographic Distribution of Small Farm Loan Originations**

Geographic Distribution: SMALL FARM																	State: MISSOURI		Evaluation Period: JANUARY 01, 1997, TO JANUARY 01, 1999			
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans							
	% of Farms	% BCNB Loans	% of Farms	% BCNB Loans	% of Farms	% BCNB Loans	% of Farms	% BCNB Loans		Overall	Low	Mod	Mid	Upp	#	% of Total						
Full-Scope:																						
Columbia MSA	8%	0%	9%	2%	67%	68%	16%	30%	2	27%	0%	100%	27%	20%	53	96%						
Limited-Scope:																						
Cooper County	NA	NA	NA	NA	69%	100%	31%	0%	8	1%	NA	NA	100%	0%	2	4%						

(\*) Based on 1997 Aggregate Small Farm Data only.

**Table 7. Borrower Distribution of Home Purchase Loan Originations**

Borrower Distribution: HMDA HOME PURCHASE																State: MISSOURI		Evaluation Period: JANUARY 01, 1997, TO JANUARY 01, 1999	
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Purchase Loans				
	% of Families	% BCNB Loans*	% of Families	% BCNB Loans*	% of Families	% BCNB Loans*	% of Families	% BCNB Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total			
Full-Scope:																			
Columbia MSA	19%	15%	19%	28%	23%	30%	39%	31%	1	20%	22%	24%	21%	21%	906	95%			
Limited-Scope:																			
Cooper County	14%	2%	17%	22%	21%	30%	49%	46%	2	10%	0%	6%	7%	19%	51	5%			

(\*) As a percentage of loans with borrower income information available. No information was available for 2% of loans originated by BCNB.

(\*\*) Based on 1997 Aggregate HMDA Data only.

**Table 8. Borrower Distribution of Home Improvement Loan Originations**

Borrower Distribution: HOME IMPROVEMENT				State: MISSOURI				Evaluation Period: JANUARY 01, 1997 TO JANUARY 01, 1999								
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Improvement Loans	
	% of Families	% BCNB Loans*	% of Families	% BCNB Loans*	% of Families	% BCNB Loans*	% of Families	% BCNB Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Columbia MSA	19%	19%	19%	23%	23%	19%	39%	39%	2	17%	35%	18%	8%	15%	99	96%
Limited-Scope:																
Cooper County	14%	0%	17%	0%	21%	0%	49%	100%	4	9%	0%	0%	0%	15%	4	4%

(\*) As a percentage of loans with borrower income information available. No information was available for 4% of loans originated by BCNB.

(\*\*) Based on 1997 Aggregate HMDA Data only.



**Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations**

Borrower Distribution: HOME MORTGAGE REFINANCE				State: MISSOURI				Evaluation Period: JANUARY 01, 1997, TO JANUARY 01, 1999								
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans	
	% of Families	% BCNB Loans*	% of Families	% BCNB Loans*	% of Families	% BCNB Loans*	% of Families	% BCNB Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Columbia MSA	19%	5%	19%	14%	23%	25%	39%	55%	1	16%	16%	15%	15%	20%	1,208	90%
Limited-Scope:																
Cooper County	14%	0%	17%	9%	21%	26%	49%	65%	3	15%	0%	0%	28%	15%	140	10%

(\*) As a percentage of loans with borrower income information available. No information was available for 3% of loans originated by BCNB.

(\*\*) Based on 1997 Aggregate HMDA Data only.

**Table 10. Borrower Distribution of Small Business Loan Originations**

Borrower Distribution: SMALL BUSINESS			State: MISSOURI			Evaluation Period: JANUARY 01, 1997, TO JANUARY 01, 1999					
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Business Loans		
	% of Businesses*	% BCNB Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Columbia MSA	74%	89%	52%	84%	10%	6%	45%	58%	1,599	98%	\$69
Limited-Scope:											
Cooper County	77%	100%	100%	91%	3%	6%	4%	7%	35	2%	\$55

(\*) As a percentage of businesses with known revenues.

(\*\*) As a percentage of loans with revenue information available. No information was available for 0% of loans originated by BCNB.

(\*\*\*) The market consists of all other Small Business reporters in BCNB's assessment area and is based on 1997 Aggregate Small Business Data only.

(\*\*\*\*) Based on 1997 Aggregate Small Business Data only.

**Table 11. Borrower Distribution of Small Farm Loan Originations**

Borrower Distribution: SMALL FARM			State: MISSOURI			Evaluation Period: JANUARY 01, 1997, TO JANUARY 01, 1999					
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans		
	% of Farms*	% BCNB Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Columbia MSA	91%	98%	100%	83%	13%	4%	27%	30%	53	96%	\$46
Limited-Scope:											
Cooper County	93%	100%	100%	100%	0%	0%	1%	1%	2	4%	\$8

(\*) As a percentage of farms with known revenues.

(\*\*) As a percentage of loans with revenue information available. No information was available for 0% of loans originated by BCNB.

(\*\*\*) The market consists of all other Small Farm reporters in BCNB's assessment area and is based on 1997 Aggregate Small Farm Data only.

(\*\*\*\*) Based on 1997 Aggregate Small Farm Data only.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS									
			State: MISSOURI		Evaluation Period: JANUARY 01, 1997, TO JANUARY 01, 1999				
MSA/Assessment Areas:	Prior Period Investments*			Current Period Investments			Total Investments		
	#	\$ (000's)	%**	#	\$ (000's)	%**	#	\$ (000's)	% of Total \$'s
Full-Scope:									
Columbia MSA	2	\$42	34%	12	\$81	66%	14	\$123	100%
Limited-Scope:									
Cooper County	0	\$0	0%	0	\$0	0%	0	\$0	0%

(\*) "Prior Period Investments" means investments made in a previous evaluation period that remain outstanding.

(\*\*) Percentage of the dollars invested in that MSA/Assessment Area that are prior period investments or current period investments.

**Table 13. Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM				State: MISSOURI				Evaluation Period: JANUARY 01, 1997, TO JANUARY 01, 1999									
MSA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total BCNB Deposits	# of BCNB Branches	% of Total BCNB Branches	Location of Branches by Income of Geographies				# of BCNB ATMs	% of Total BCNB ATMs	Location of ATMs by Income of Geographies				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
Columbia MSA	97%	11	92%	36%	18%	46%	0%	17	94%	29%	24%	47%	0%	14%	16%	53%	17%
Limited-Scope:																	
Cooper County	3%	1	8%	NA	NA	0%	100%	1	6%	NA	NA	0%	100%	NA	NA	64%	36%