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Comptroller of the Currency Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

January 7, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

North American Savings Bank, FSB Charter Number 703927

12498 S US Highway 71 Grandview, MO 64030-1733

Office of the Comptroller of the Currency

7101 College Boulevard Suite 1600 Overland Park, KS 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 OCC utilizes the Wolters Kluwer Financial Services (WKFS) CRA Wiz software to support its analysis of an institution's lending performance. In April 2013, WKFS identified incorrect values, based on the 2010 census data, within CRA Wiz. Specifically, WKFS determined that the demographic distribution data for family and household income had been incorrectly calculated. This, in turn, caused the number and proportion of families and households in each of the four CRA income categories to be incorrectly calculated, which affected the OCC's analysis of residential and consumer loans that were originated and/or purchased by institutions during 2012 and 2013. The CRA Performance Evaluation (CRA PE) of North American Savings Bank, FSB dated January 7, 2013 included the OCC's analysis of residential loans that were originated in 2012. In May 2013, WKFS provided corrected demographic data to the OCC, which subsequently has been validated. The OCC is issuing this amended CRA PE as of September 30, 2013 based on the corrected demographic data supplied by WKFS.

The OCC revised its original analysis of the North American Savings Bank, FSB (NASB) lending based on the corrected family and household income data provided by WKFS. This updated analysis did not result in a change to NASB's Lending Test rating, and did not result in a change to NASB's Overall CRA rating.

The following table indicates the performance level of **North American Savings Bank, FSB** (NASB or Bank) with respect to the Lending, Investment, and Service Tests:

	North American Savings Bank, FSB Performance Tests		
Performance Levels	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			Х
Low Satisfactory	Х		
Needs to Improve		Х	
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:

- Lending levels reflect adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans in the Kansas City metropolitan area (MA) reflects adequate penetration throughout the assessment areas.
- The distribution of borrowers reflects adequate penetration among customers of different income levels.

- The level of qualified investments and donations is poor.
- Delivery systems are readily accessible to all portions of the Bank's Kansas City MA assessment area. NASB did not provide any community development services during the evaluation period.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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 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.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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.

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, home equity 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 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 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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

Low-Income: Individual 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 MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. 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 Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

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

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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) and the Thrift Financial Reporting (TFR) 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 One 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.

Description of Institution

NASB is a \$1.2 billion intrastate financial institution headquartered in Grandview, Missouri. NASB is a wholly owned subsidiary of NASB Financial, Inc., a one-bank holding company also headquartered in Grandview, Missouri.

NASB is a full-service savings institution that offers both retail and commercial banking services. The primary lending focus is residential real estate lending. As of September 30, 2012, NASB's loan portfolio, by dollar volume, consisted of 55 percent residential real estate and 45 percent commercial loans. Net loans represented 74 percent of total assets. Net tier one capital was \$171 million.

NASB operates nine branches in the state of Missouri. Eight branches are in the Kansas City MA, and one branch is located in the St. Joseph MA. In addition, the Bank has three loan production offices in Missouri. The Kansas City MA is part of a multi-state metropolitan statistical area (MSA) that includes the state of Kansas.

There are no legal, financial, or other factors that impede the Bank's ability to help meet credit needs in its assessment areas. NASB received a "Satisfactory" rating at its last CRA examination dated October 31, 2008.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The CRA PE of NASB dated January 7, 2013 included an analysis of residential loans that the institution originated in 2012. The CRA PE was originally finalized and issued on March 1, 2013, prior to the OCC learning of the data errors in CRA Wiz. Accordingly, after securing corrected demographic data from WKFS, the OCC re-analyzed NASB's CRA performance.

The evaluation period for the Lending Test (excluding community development (CD) loans) is January 1, 2009 to December 31, 2012.

For the CD loans, Investment Test, and Service Test, the evaluation period is from January 1, 2009 to January 7, 2013. The Investment Test included a review of investments and donations originated in the Bank's AAs that meet the definition of CD investments. The Service Test included a review of retail services provided in the Bank's assessment areas. NASB did not provide any CD loans or services during the evaluation period.

Our analysis did not include multi-family loans since only one loan was originated during the evaluation period. In addition, NASB did not originate any small business or small farm loans during the evaluation period.

Data Integrity

We verified the accuracy of 2009-2012 HMDA reportable loans. Our review found that this data is accurate and reliable. We also evaluated CD investment information and retail services during the examination.

Selection of Areas for Full Scope Review

We performed a full scope review in the Kansas City MA assessment area (AA). This AA includes 99 percent of HMDA loans by both number and dollar volume. In addition, eight of the nine branches are in this AA. The St. Joseph AA received a limited scope review. Refer to the table in Appendix A for more information.

Ratings

The Bank's overall rating is based primarily on the area that received a full scope review. Therefore, ratings are based on CRA performance in the Kansas City MA.

Other

We conducted two community contacts during our examination with affordable housing organizations in the Kansas City MA. Identified community needs are financial literacy training and education for home purchase and small business loans. Credit needs include affordable housing and home improvement loans.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank or Federal savings association's (bank's) CRA rating, respectively, 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.

The OCC did not identify evidence of discriminatory or other illegal credit practices with respect to NASB.

Further, section 1025 of the Dodd–Frank Wall Street Reform and Consumer Protection Act (Pub. L. 111-203) assigns to the CFPB exclusive examination authority, and primary enforcement authority, to ensure compliance by banks with Federal consumer financial laws, if the bank has more than \$10 billion in assets. The CFPB has not provided the OCC with any information about, or other evidence of, discriminatory or other illegal credit practices relative to NASB with respect to the Federal consumer financial laws.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full Scope Reviews

The Bank's performance under the lending test is rated "Low Satisfactory." Based on the full scope review, the Bank's performance in the Kansas City MA is adequate.

Lending Activity

Refer to Table 1, Lending Volume, in Appendix C for the facts and data used to evaluate the Bank's lending activity.

Lending levels reflect adequate responsiveness in relation to area credit needs and the Bank's deposit market share. NASB has a deposit market share of 1.92 percent, which ranks eighth in the Kansas City AA as of June 30, 2011. Based on 2011 peer mortgage data, the Bank's market share for home purchase and home refinance loans is 1.67 percent (14th) and 0.84 percent (21st), respectively. The market share for home improvement loans is not significant. Competition is strong with over 350 lenders in the AA.

NASB's deposit market share as of June 30, 2012 is 1.93 percent, which ranks tenth in the Kansas City AA. 2012 peer mortgage data is not available.

The Bank's primary HMDA loan product during the evaluation period is home refinance loans, which represent 54 percent of mortgage loans. Home purchase loans represent 46 percent of mortgage loans originated during the period.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Kansas City MA AA is adequate.

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases in 2009-2011. This information is based on 2000 census data. For 2012, performance is evaluated based on 2010 census data and discussed in narrative below.

Primary weight is given to performance compared to all lenders in the AA. This information is detailed in tables below.

Home Purchase

The geographic distribution of home purchase loans originated and/or purchased during 2009-2011 is adequate compared to the aggregate performance of all lenders in the Kansas City MA AA. Performance in both low- and moderate-income tracts is adequate. Refer to the table below for detail.

Home Purchase		
Geography	% Bank Loans	All Lenders –
Classification	(2009-2011)	2011 peer data
Low	0.34	0.53
Moderate	6.89	7.28
Middle	39.50	44.10
Upper	53.27	48.10

During 2012, NASB originated 1.21 percent and 7.63 percent of home purchase loans in low- and moderate-income tracts, respectively. Peer data for 2012 is not available for comparison.

NASB's performance compared to demographics is detailed in Appendix C tables. This shows poor performance in both low- and moderate-income census tracts for 2009-2011. Performance in 2012 also is poor.

Home Improvement

The geographic distribution of home improvement loans originated and/or purchased during 2009-2011 is adequate compared to the aggregate performance of all lenders in the Kansas City MA AA. Performance in moderate-income tracts is adequate.

NASB did not make any loans in low-income tracts during the evaluation period. This is mitigated by the fact that 47 percent of housing units in these tracts are rental and 16 percent are vacant. Refer to the table below for detail.

Home Improvement		
Geography	% Bank Loans	All Lenders –
Classification	(2009-2011)	2011 peer data
Low	0	2.08
Moderate	5.00	8.22
Middle	35.00	45.62
Upper	60.00	44.07

During 2012, NASB originated ten home improvement loans. None were located in low-or moderate-income census tracts. Peer data for 2012 is not available for comparison.

NASB's performance compared to demographics, as detailed in Appendix C tables, shows poor performance in moderate-income census tracts for 2009-2011. No loans were made in low-income tracts. Performance in 2012 also is poor as no loans were made in low- or moderate-income tracts.

Home Refinance

The geographic distribution of home refinance loans originated and/or purchased during 2009-2011 is adequate compared to the aggregate performance of all lenders in the Kansas City MA AA. Performance in both low- and moderate-income tracts is adequate. Refer to the table below for detail.

Home Refinance		
Geography	% Bank Loans	All Lenders –
Classification	(2009-2011)	2011 peer data
Low	0.28	0.43
Moderate	2.91	4.62
Middle	29.10	37.51
Upper	67.70	57.44

During 2012, NASB originated 0.98 percent and 4.09 percent of home refinance loans in low- and moderate-income tracts, respectively. Peer data for 2012 is not available for comparison.

NASB's performance compared to demographics, as detailed in Appendix C tables, shows poor performance in both low- and moderate-income census tracts for 2009-2011. Performance in 2012 also is poor.

Lending Gap Analysis

Our geographic distribution analysis included a review for lending gaps, particularly in low- and moderate-income areas. We did not identify any unexplained gaps in the Kansas City AA.

Inside/Outside Ratio

We performed an analysis of the inside/outside ratio at the Bank level. Information includes Bank originations and purchases only.

An adequate percentage of loans are made in the Bank's AAs. For all HMDA lending combined, the Bank originated 19 percent (by number) and 14 percent (by dollar) within the AAs. This performance is adequate given the Bank's business strategy that defines the institution as a regional lender. NASB serves the Springfield, Missouri market, which does not have any branch offices. In addition, the Bank serves a nationwide market through its Internet lending channel that serves all 50 states and the District of Columbia.

For home purchase loans, 29 percent (by number) and 23 percent (by dollar) were originated within the AAs. Home improvement loans originated within the AAs totaled 22 percent (by number) and 17 percent (by dollar). The percentage of home refinance loans within the AAs were 14 percent (by number) and 11 percent (by dollar).

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans is adequate.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the Bank's home mortgage loan originations and purchases in 2009-2011. This information is based on 2000 census data. The percentage of families below poverty is 6.18 percent.

For 2012, performance is evaluated based on 2010 census data and discussed in the narrative below. The percentage of families below poverty is 8.04 percent.

Primary weight is given to performance compared to all lenders in the AA. This information is detailed in tables below.

Home Purchase

The borrower distribution of home purchase loans originated and/or purchased during 2009-2011 is adequate compared to the aggregate performance of all lenders in the Kansas City MA AA. The percentage of loans to low-income borrowers is adequate. Performance to moderate-income borrowers is excellent and exceeds the percentage of loans made by all lenders in the AA.

Home Purchase		
Borrower	% Bank Loans	All Lenders –
Income Level	(2009-2011)	2011 peer data
Low	14.01	15.68
Moderate	28.82	26.10
Middle	23.40	25.08
Upper	33.78	33.13

During 2012, NASB originated 14.21 percent and 25.09 percent of home purchase loans to low- and moderate-income borrowers, respectively. Peer data for 2012 is not available for comparison.

NASB's performance compared to demographics is detailed in Appendix C tables. This shows excellent performance to both low- and moderate-income borrowers for 2009-2011. Consideration is given to the percent of families below poverty in the evaluation of performance to low-income borrowers. Performance in 2012 is also excellent.

Home Improvement

The overall borrower distribution of home improvement loans originated and/or purchased during 2009-2011 is adequate compared to the aggregate performance of all lenders in the Kansas City MA AA. The percentage of loans to low-income borrowers is poor. The percentage of loans to moderate-income borrowers is excellent.

Home Improvement		
Borrower	% Bank Loans	All Lenders –
Income Level	(2009-2011)	2011 peer data
Low	5.00	10.44
Moderate	20.00	19.39
Middle	30.00	24.28
Upper	45.00	45.89

During 2012, NASB originated 10 percent of home improvement loans to moderate-income borrowers; none was to low-income borrowers. Peer data for 2012 is not available for comparison.

NASB's performance compared to demographics, as detailed in Appendix C tables, shows adequate performance to low-income borrowers considering the percentage of families below poverty. Performance to moderate-income borrowers is excellent and exceeds demographics in 2009-2011. Performance in 2012 is poor to moderate-income borrowers. NASB did not make any home improvement loans to low-income borrowers in 2012.

Home Refinance

The overall borrower distribution of home refinance loans originated and/or purchased during 2009-2011 is adequate compared to the aggregate performance of all lenders in the Kansas City MA AA. The percentage of loans to low-income borrowers is adequate. The percentage of loans to moderate-income borrowers is good.

Home Refinance		
Borrower	% Bank Loans	All Lenders –
Income Level	(2009-2011)	2011 peer data
Low	4.08	6.92
Moderate	12.77	17.13
Middle	24.35	26.47
Upper	58.80	49.48

During 2012, NASB originated 2.75 percent and 15.69 percent of home refinance loans to low- and moderate-income borrowers, respectively. Peer data for 2012 is not available for comparison.

NASB's performance compared to demographics, as detailed in Appendix C tables, shows adequate performance to low-income borrowers considering the percentage of families below poverty. Performance to moderate-income borrowers is also adequate for 2009-2011. Performance in 2012 is poor to low-income borrowers and adequate to moderate-income borrowers.

Community Development Lending

Refer to Table 1, Lending Volume, in Appendix C for the facts and data used to evaluate the Bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

NASB did not originate any community development loans during the evaluation period.

Product Innovation and Flexibility

NASB participates in the Good Neighbor FHA Loan program. In order to qualify, the property must be located in a low- or moderate-income (LMI) geography or applicants must meet LMI income requirements. Benefits to the borrower include a 50 basis point lender credit that may be used to pay for closing costs or an interest rate reduction, and fee waivers (e.g. underwriting, processing). During the evaluation period, the Bank originated 37 loans totaling \$5.1 million. This loan program helps meet affordable housing needs in the AA. The impact on the lending test rating is positive.

NASB offers various other flexible loan products (e.g. FHA, VA) and participates in the Missouri Housing Development Commission's (MHDC) first-time homebuyer program. The MHDC program offers assistance with closing and down payment costs. The program also offers a lower interest rate for those that qualify. However, these programs do not impact the lending test rating since they are not targeted to LMI individuals or geographies.

Conclusions for Areas Receiving Limited Scope Reviews

Based on a limited scope review, the Bank's performance under the lending test in the St. Joseph MA is not inconsistent with the Bank's overall "Low Satisfactory" performance under the lending test. Refer to Tables 1 through 13 in Appendix C for the facts and data that support these conclusions for 2009-2011.

Primary weight is given to performance compared to all lenders in the AA. Primary weight is given to refinance loans since they represent 78 percent of home mortgage loans during 2009-2012. There are no low-income geographies in the St. Joseph AA.

Home Refinance		
Geography	% Bank Loans	All Lenders –
Classification	(2009-2011)	2011 peer data
Moderate	3.23	5.84
Middle	32.26	46.92
Upper	64.52	47.24

Home Refinance

Borrower	% Bank Loans	All Lenders –
Income Level	(2009-2011)	2011 peer data
Low	13.79	6.68
Moderate	13.79	19.62
Middle	10.34	25.68
Upper	62.07	48.02

During 2012, NASB originated 11 home mortgage loans; nine were refinance loans. None of the refinance loans was in moderate-income census tracts or to low- or moderate-income borrowers.

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INVESTMENT TEST

Conclusions for Areas Receiving Full Scope Reviews

The Bank's performance under the investment test is rated "Needs to Improve." Based on a full scope review, the Bank's performance in the Kansas City MA AA is poor.

Refer to Table 14 in Appendix C for the facts and data used to evaluate the Bank's level of qualified investments.

Qualified investments for the AA total \$294 thousand in donations made during the review period. Ninety-nine percent of the dollar volume and 95 percent of the number of donations were to area organizations that provide targeted services for LMI individuals and families. A majority of the dollars (69 percent) were to a scholarship fund set up by NASB to assist LMI students with costs associated with going to college. Remaining donations helped provide independent living services, food, shelter, and emergency assistance with rent, utilities, etc.

Conclusions for Area Receiving Limited Scope Reviews

Based on a limited-scope review, the Bank's performance under the investment test in the St. Joseph MA is not inconsistent with the Bank's overall "Needs to Improve" performance under the investment test.

SERVICE TEST

Conclusions for Areas Receiving Full Scope Reviews

The Bank's performance under the Service Test is rated "High Satisfactory." Based on a full scope review, the Bank's performance in the Kansas City MA AA is good.

Retail Banking Services

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the Bank's branch delivery system and branch openings and closings.

NASB's service delivery systems are readily accessible to all portions of its AAs. The percentage of branches and ATMs in low- and moderate-income geographies exceeds demographics. Eight branches are located in the Kansas City AA. All are in the state of Missouri. One is in a low-income census tract and four are in moderate-income tracts.

There is no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and individuals.

NASB did not open or close any branches during the evaluation period.

Community Development Services

NASB did not provide any community development services during the evaluation period. This had a negative impact on the service test rating.

Conclusions for Areas Receiving Limited Scope Reviews

Based on a limited scope review, the Bank's performance under the Service Test in the St. Joseph MA is weaker than the Bank's overall "High Satisfactory" performance under the Service Test. Performance in this AA is adequate with one branch located in a middle-income census tract.

Refer to Table 15 in Appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

The following table identifies the 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").

Time Period Reviewed	Lending Test (excludes CD Loans): 1/1/2009 to 12/31/2012 Investment and Service Tests and CD Loans: 1/1/2009 to 1/7/2013	
Financial Institution		Products Reviewed
North American Savings Bank, FSB Grandview, Missouri		Home Mortgage Loans, Qualified Investments, and Retail Services
Affiliate(s)	Affiliate Relationship	Products Reviewed
None List of Assessment Areas and Type of	f Examination	
Assessment Area	Type of Exam	Other Information
Kansas City MA #28140 St Joseph MA #41140	Full Scope Limited Scope	

Appendix B: Market Profiles for Full Scope Areas

Kansas City, MO-KS MA #28140

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	470	9.57	25.11	37.87	24.89	2.55
Population by Geography	1,627,081	5.24	19.65	45.51	29.58	0.02
Owner-Occupied Housing by Geography	433,173	3.27	15.95	46.99	33.79	0.00
Business by Geography	109,497	3.46	15.44	42.20	37.86	1.02
Farms by Geography	2,974	1.11	8.04	54.77	35.84	0.24
Family Distribution by Income Level	429,648	18.15	18.46	23.48	39.91	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	157,279	9.64	30.24	46.48	13.64	0.00
Median Family Income HUD Adjusted Median Family Income for Households Below Poverty Level	or 2011	55,031 72,300 8%	Median Housing Unemployment Census)	g Value Rate (2000 US	107,934 2.29%	

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

Source: 2000 US Census and 2011 HUD updated MFI

The Kansas City MA is part of a multi-state metropolitan statistical area (MSA) that includes the state of Kansas. The Kansas City AA includes the counties of Cass, Clay, Jackson, and Platte in Missouri; and Johnson and Wyandotte in Kansas. Low- and moderate-income tracts are predominantly located in Jackson and Wyandotte counties. The delineation of the AA complies with the regulation and does not arbitrarily exclude any low- and moderate-income areas. The Kansas City AA has 470 census tracts, which are designated 9.57 percent low-income, 25.11 percent moderate-income, 37.87 percent middle income, and 24.89 percent upper-income. The remaining 2.55 percent of tracts have no income designation.

The economic conditions in the AA are forecasted to increase in 2013 with improvements in growth, personal income, and employment. The December 2012 unemployment rate for the Kansas City MA and State of Missouri is 6.4 percent and 6.7 percent, respectively. The 2012 national average unemployment rate is 8.1 percent. Varied employment industries in Kansas City include telecommunications, manufacturing, health care, financial services, engineering, and agribusiness. Major employers include Ford, H&R Block, AT&T, DST Systems, Hallmark Cards, Cerner, Sprint Corporation, and government agencies.

We conducted two community contacts during our examination with affordable housing organizations in the Kansas City MA. Identified community needs are financial literacy training and education for home purchase and small business loans. Credit needs include affordable housing and home improvement loans.

Content of Standardized 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 as originations/purchases and market share is the number of loans originated and purchased by the Bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

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

- Table 1.Lending Volume Presents the number and dollar amount of reportable loans originated
and purchased by the Bank over the evaluation period by MA/assessment area.
Community development loans to statewide or regional entities or made outside the Bank's
assessment area may receive positive CRA consideration.
- Table 1.Other Products Presents the number and dollar amount of any unreported category of
loans originated and purchased by the Bank over the evaluation period by MA/assessment
area. Examples include consumer loans or other data that a bank may provide, at its option,
concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2.Geographic Distribution of Home Purchase Loans 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 market share
information based on the most recent aggregate market data available.
- **Table 3.Geographic Distribution of Home Improvement Loans** See Table 2.
- Table 4.
 Geographic Distribution of Home Mortgage Refinance Loans See Table 2.
- Table 5.Geographic Distribution of Multifamily Loans Compares the percentage distribution
of the number of multifamily loans originated and purchased by the Bank in low-,
moderate-, middle-, and upper-income geographies to the percentage distribution of
multifamily housing units throughout those geographies. The table also presents market
share information based on the most recent aggregate market data available.
- Table 6.Geographic Distribution of Small Loans to Businesses The percentage distribution of
the number of small loans (less than or equal to \$1 million) to businesses 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)
throughout those geographies. The table also presents market share information based on

the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the Bank's assessment area.

- Table 7.Geographic Distribution of Small Loans to Farms The percentage distribution of the
number of small loans (less than or equal to \$500,000) to farms originated and purchased
by the Bank in low-, moderate-, middle-, and upper-income geographies compared to the
percentage distribution of farms (regardless of revenue size) throughout those geographies.
The table also presents market share information based on the most recent aggregate
market data available. Because small farm data are not available for geographic areas
smaller than counties, it may be necessary to use geographic areas larger than the Bank's
assessment area.
- Table 8.Borrower Distribution of Home Purchase Loans 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 MA/assessment area. The table also presents market share information based on the
most recent aggregate market data available.
- Table 9.Borrower Distribution of Home Improvement Loans See Table 8.
- Table 10.Borrower Distribution of Refinance Loans See Table 8.
- Table 11.Borrower Distribution of Small Loans to Businesses Compares the percentage
distribution of the number of small loans (less than or equal to \$1 million) originated and
purchased 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. In addition, the table
presents the percentage distribution of the number of loans originated and purchased 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 12. Borrower Distribution of Small Loans to Farms** Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased 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. In addition, the table presents the percentage distribution of the number of loans originated and purchased 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 13.** Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the Bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.

- **Table 14. Qualified Investments** Presents the number and dollar amount of qualified investments made by the Bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the Bank's financial reporting system. A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the assessment area.
- Table 15.Distribution of Branch Delivery System and Branch Openings/Closings Compares the
percentage distribution of the number of the Bank's branches in low-, moderate-, middle-,
and upper-income geographies to the percentage of the population within each geography
in each MA/AA. The table also presents data on branch openings and closings in each
MA/AA.

Tables 6, 7, 11,12, and 13 are not applicable.

					Table 1. Lendin	ng Volume						
LENDING VOLUME			Geography: MI	SSOURI	Evalu	ation Period:	JANUARY 1, 20	009 TO DECEM	BER 31, 2011			
	% of Rated Area Loans	Home Morto	jage	Small Loans t	o Businesses	Small Loans	s to Farms	Community D Loans ^{**}	evelopment	Total Reporte	ed Loans	% of Rated Area Deposits
Assessment Area (2011): (#) in MA/AA*		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	in MA/AA ^{***}
Full Review:	<u>.</u>		· · ·				•		· · ·			
NASB MO-KS AA	98.99	3,905	749,119	0	0	0	0	0	0	3,905	749,119	87.46
Limited Review:												
NASB - St Joseph AA	1.01	40	7,028	0	0	0	0	0	0	40	7,028	12.54

^{*} Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area. ** The evaluation period for Community Development Loans is from January 01, 2009 to January 7, 2013. *** Deposit Data as of June 30, 2012. Rated Area refers to state, multi-state MA, or institution, as appropriate.

				Table 2	a. Geographic	Distribution of	Home Purchase	e Loans						
Geographic Distribution: HO	ME PURCHASE			Geography:	MISSOURI	E	Evaluation Per	riod: Januar'	Y 1, 2009 TO [DECEMBER 3	1, 2011			
	Total Home Purchas Loans ssessment Area: # % of			ncome aphies	Moderate Geogra			Income aphies	Upper- Geogr	Income aphies	Aggrega	ite HMDA Lo Inco	ending (%) b me [*]	y Tract
Assessment Area:			% Owner Occ Units ^{***}	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
NASB MO-KS AA	1,757	99.49	3.27	0.34	15.95	6.89	46.99	39.50	33.79	53.27	0.53	7.28	44.10	48.10
Limited Review:														
NASB - St Joseph AA	9	0.51	0.00	0.00	11.16	0.00	56.31	33.33	32.53	66.67	0.00	5.25	54.26	40.49

^{*} Based on 2011 Peer Mortgage Data (USPR) * Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area. ** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information. *** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

					abic 5a. Ocogra			Content Louns						
Geographic Distribution: H	IOME IMPROV	EMENT		Geo	ography: MISS	OURI	Evalua	ation Period: J	ANUARY 1, 20	009 TO DECEM	MBER 31, 201	1		
	Total H Improveme		Low-Ir Geogr	ncome aphies	Moderate Geogra			Income aphies		Income aphies	Aggregate	HMDA Lendir	ng (%) by Trad	ct Income*
Assessment Area:	Total ^{**} Occ		% Owner Occ Units***	% BANK Loans ^{****}	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
NASB MO-KS AA	20	100.00	3.27	0.00	15.95	5.00	46.99	35.00	33.79	60.00	2.08	8.22	45.62	44.07
Limited Review:														
NASB - St Joseph AA	0	0.00	0.00	0.00	11.16	0.00	56.31	0.00	32.53	0.00	0.00	15.00	43.33	41.67

Table 3a. Geographic Distribution of Home Improvement Loans

^{*} Based on 2011 Peer Mortgage Data (USPR) * Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area. ** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information. *** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

					<u> </u>	Distribution of I						11		
Geographic Distribution: H	sessment Area: Total Home Low-In Mortgage Refinance Loans			Geographies		e-Income raphies	Middle	uation Period: Income aphies	Upper-	2009 TO DECE Income raphies		ate HMDA Le Incoi	ending (%) by me [*]	y Tract
Assessment Area: Re	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Ирр
Full Review:														
NASB MO-KS AA	2,127	98.56	3.27	0.28	15.95	2.91	46.99	29.10	33.79	67.70	0.43	4.62	37.51	57.44
Limited Review:														
NASB - St Joseph AA	31	1.44	0.00	0.00	11.16	3.23	56.31	32.26	32.53	64.52	0.00	5.84	46.92	47.2

Table 1a Coographic Distribution of Llama Mortgoga Defina .

^{*} Based on 2011 Peer Mortgage Data (USPR) * Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area. ** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information. *** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

					Table 5a. Ge	ographic Distrib	ution of Multifa	mily Loans						
Geographic Distribution:	MULTIFAMILY			Geography:	MISSOURI		Evaluation Pe	e riod : JANUAR	Y 1, 2009 TO [DECEMBER 31	, 2011			
	Assessment Area: # % 0			ncome aphies		te-Income raphies		Income aphies		Income aphies	Aggreg	ate HMDA Le Inco	ending (%) by me [*]	y Tract
Assessment Area:	#	% of Total ^{**}	% of MF Units ^{***}	% BANK Loans ^{****}	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:							L	•						
NASB MO-KS AA	1	100.00	7.06	0.00	27.80	0.00	46.03	100.00	19.11	0.00	4.83	31.72	48.28	15.17
Limited Review:							•	•		•				
NASB - St Joseph AA	0	0.00	0.00	0.00	29.78	0.00	27.72	0.00	42.49	0.00	0.00	35.71	28.57	35.71

^{*} Based on 2011 Peer Mortgage Data (USPR) ** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area. *** Percentage of Multi-Family Units is the number of multi-family units in a particular geography divided by the number of multi-family housing units in the area based on 2000 Census information. **** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

[Table 8a. Borrowe	r Distribution of	Home Purchase	e Loans						
Borrower Distribution: HO	ME PURCHASE			Geograph	y: MISSOURI	E	valuation Peri	od: JANUARY	1, 2009 TO DE	CEMBER 31, 2	011			
	Total Home P Loans		Low-Income	e Borrowers	Moderate Borro		Middle-Incom	e Borrowers	Upper-Incom	e Borrowers		Aggregate Le	ending Data*	
Assessment Area:	#	% of Total ^{**}	% Families ^{**}			% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Ирр
Full Review:	•								1					
NASB MO-KS AA	1,757	99.49	18.15	14.01	18.46	28.82	23.48	23.40	39.91	33.78	15.68	26.10	25.08	33.13
Limited Review:														
NASB - St Joseph AA	9	0.51	18.84	11.11	18.51	22.22	23.20	11.11	39.44	55.56	12.03	32.03	22.66	33.29

<sup>Based on 2011 Peer Mortgage Data (USPR)
Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
Percentage of Families is based on the 2000 Census information.
As a percentage of loans with borrower income information available. No information was available for 1.2% of loans originated and purchased by BANK.
Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)</sup>

				Та	able 9a. Borrov	ver Distribution	of Home Improv	vement Loans						
Borrower Distribution: H	ome improveme	INT		Geogra	aphy: MISSOU	IRI	Evaluation	n Period: JANL	JARY 1, 2009 T	O DECEMBER	31, 2011			
				e Borrowers		e-Income owers	Middle-Incom	ne Borrowers	Upper-Incom	e Borrowers		Aggregate Le	ending Data*	
Assessment Area:	#		% Families ^{***}	% % BANK amilies*** Loans ^{****} Fa		% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Ирр
Full Review:														
NASB MO-KS AA	20	100.00	18.15	5.00	18.46	20.00	23.48	30.00	39.91	45.00	10.44	19.39	24.28	45.89
Limited Review:														
NASB - St Joseph AA	0	0.00	18.84	0.00	18.51	0.00	23.20	0.00	39.44	0.00	12.38	21.90	19.05	46.67

Based on 2011 Peer Mortgage Data (USPR)
 Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
 Percentage of Families is based on the 2000 Census information.
 As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.
 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

	Refinance Loans			ne Borrowers		e-Income	Middle-Incom	e Borrowers	Upper-Incom	e Borrowers		Aggregate Le	ending Data*	
Assessment Area:	#	% of Total ^{**}	% Families ^{**}	% BANK amilies** Loans**** I		% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
NASB MO-KS AA	2,127	98.56	18.15	4.08	18.46	12.77	23.48	24.35	39.91	58.80	6.92	17.13	26.47	49.48
													·	
Limited Review:														
NASB - St Joseph AA	31	1.44	18.84	13.79	18.51	13.79	23.20	10.34	39.44	62.07	6.68	19.62	25.68	48.02

Based on 2011 Peer Mortgage Data (USPR)
 Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
 Percentage of Families is based on the 2000 Census information.
 As a percentage of loans with borrower income information available. No information was available for 13.4% of loans originated and purchased by BANK.
 ³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

				Table 14. Qualified Inves	stments				
QUALIFIED INVESTMENTS		Geo	graphy: MISSOURI	Evaluat	tion Period: JANUAR	RY 1, 2009 TO JANUARY 1	7, 2013		
	Prior Period	d Investments*	Current Perio	d Investments		Total Investments		Unfunded Co	ommitments**
Assessment Area:	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
NASB MO-KS AA	0	0	21	294	21	294	100.00	0	С
Limited Review:									
NASB - St Joseph AA	0	0	0	0	0	0	0.00	0	C

 ^{&#}x27;Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.
 ''Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

	Deposits			Branch	es				Brar	ich Openir	igs/Closing	S			Popul	ation	
Assessment Area:	% of Rated	# of BANK	BANK Rated Income of Geographies (%)						# of	Net cha		ation of Bra or -)	anches	% of Pop	oulation with	nin Each Ge	ography
	KaleuDAINKKaleuAreaBrancheAreaDepositssBranchein AAs in AA		Low	Mod	Mid	Upp	Branch Opening s	Branch Closings	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Full Review:																	
NASB MO-KS AA	87.46	8	88.89	12.50	50.00	25.00	12.50	0	0	0	0	0	0	5.24	19.65	45.51	29.58
Limited Review:	•							•						•		I	
NASB - St Joseph AA	12.54	1	11.11	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	15.42	51.51	33.07

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings