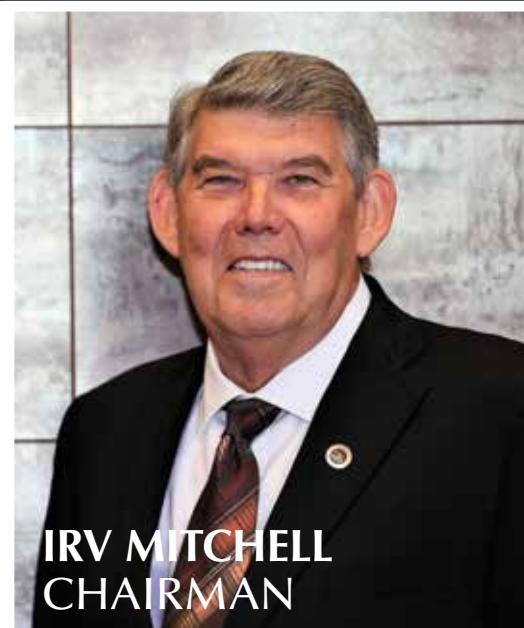
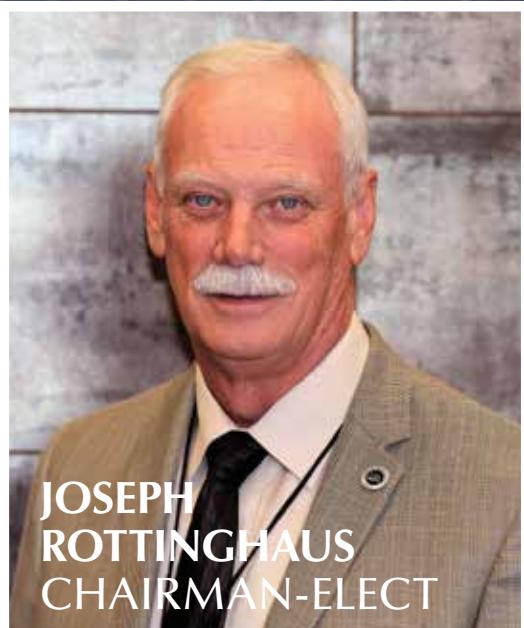


# In Touch

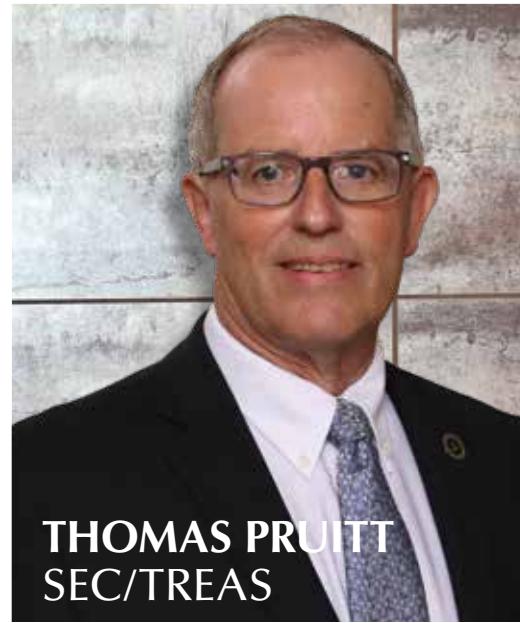
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MY BANK DOES NOT OFFER A MORTGAGE PROGRAM	<input type="checkbox"/> TRUE	<input type="checkbox"/> FALSE
MY BANK NEEDS MORE PRODUCT VARIETY IN OUR CURRENT MORTGAGE LOAN PROGRAM	<input type="checkbox"/> TRUE	<input type="checkbox"/> FALSE
MY BANK DOES NOT HAVE ADEQUATE RESOURCES TO PROCESS AND CLOSE MORTGAGE LOANS	<input type="checkbox"/> TRUE	<input type="checkbox"/> FALSE
MY BANK WANTS MORE FLEXIBILITY IN DETERMINING MORTGAGE PRICING AND FEE INCOME EARNED	<input type="checkbox"/> TRUE	<input type="checkbox"/> FALSE
MY BANK NEEDS ANOTHER INVESTOR TO OFFER THE MOST COMPETITIVE PRICING TO OUR CUSTOMERS	<input type="checkbox"/> TRUE	<input type="checkbox"/> FALSE

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# FLOURISH

BY REBECA ROMERO, ICBA

**"By focusing on the problems we're trying to solve and how those solutions will benefit our customers, we can separate timely initiatives from those that can wait."**

In today's climate, the road ahead feels uncertain. Between growing inflation and fluctuating interest rates, the future may seem more clouded than ever, leaving us to ponder, "Where's the crystal ball when you need it?"

Yet, it doesn't require clairvoyance to chart our path ahead; we can rely on our history and our experiences to map the course. For hundreds of years, community banks have stood strong, adapting to market changes and evolving to serve our communities. Through industry highs and lows, community banks have risen on a foundation of relationship banking and thoughtful preparation.

Market shifts mean we must come back to those basics today, focusing on our strengths and what we can do to continue to excel. What sets us apart? How can we best demonstrate our commitment to our communities in the products and services we offer? Examining our strategic initiatives through this lens will help us ensure we aren't simply reacting to a sense of urgency but proactively preparing for what lies ahead.

And we wouldn't be community banks if we didn't approach our businesses from a customer-first mentality. Fortunately, we have access to technological tools that enable data to tell our success stories. We have information on customer preferences, behaviors and needs, which, in turn, allows us to make strategic decisions about how to prioritize our efforts and get real success stories out into the mainstream.

But with everything in life, we can't do it all. We need to prioritize as we enter budget discussions over the next few months. Our banks, customers and communities will benefit when we align objectives with the potential solutions or

opportunities that will make the most impact. By focusing on the problems we're trying to solve and how those solutions will benefit our customers, we can separate timely initiatives from those that can wait.

As you read this month's budget issue, we hope you uncover ICBA resources to support you in your planning. From courses with Community Banker University to our ThinkTECH initiatives to Bancard's Payments Strategy Guide and the ICBA Tell Your Story Marketing and Communications toolkit, we strive to provide solutions to help you address this post-pandemic society of instant gratification and digital transformation in a thoughtful, strategic manner.

It's no surprise that uncertain times lie ahead, but I can confidently say that community banks will continue to thrive with ICBA by their side. I don't need a crystal ball to tell me that, though, because as they say, the best predictor of the future is past behavior, and for community banks, our steadfast history bears repeating for the customers and communities that continue to depend on us. \*

## Where I'll be this month

Like you, I'll be kicking off our budget processes at ICBA, and with that spirit of fresh opportunities in mind, I'll be dropping my oldest daughter off at college, and my youngest will be starting high school.



Connect with Rebeca on Twitter  
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# INDEPENDENT BANKER PORTFOLIO MANAGEMENT



BY JIM REBER, ICBA SECURITIES



## Bonds with bounce

Floater are gaining popularity. Again.

The financial press, economic commentators and social media sites have used a collection of terms this year that convey a certain image of market values for investment securities: "Plummet," "Underwater," "Leaking oil," and "Nosedive." I think you get the picture.

Community bankers have come to grips with the notion of their bond portfolios being — ahem — "submerged" in a number of ways. Most of these thoughts and actions are quite logical and, from a safety and soundness perspective, responsible.

Asset/liability risk postures are still suggesting higher net interest margins. Liquidity, in the sense of the availability of short-term assets on demand, is still plentiful. Many banks are prepared for deposit runoff if that ever happens. And then, there is once again the notion that floating rate assets can actually be a salvation from a yield and price stability point of view.

## Reward may be returning

This column, in many cases, reflects what your correspondent hears from community bankers at conventions, seminars and old-fashioned discussions. It has been a number of years since adjustable-rate bonds have appeared in this space, mainly because they have had yields or prices almost impossible for investors to like. More recently, using the outbreak of the COVID-19 pandemic as a starting point, portfolio managers were almost forced to buy fixed-rate investments to stabilize their shrinking ("plunging?") net interest margins. This very column's headline in December 2020 was "The One Percenters," and it went through the progression of what it took for an investment

to yield 1.0% to maturity. Trust me when I say it was not a money-market equivalent.

Now, as several rate hikes are behind us and more are likely on the way, even the shortest securities are approaching yield respectability. The remainder of this column will discuss several of the more popular options, with the hope that you can find one or more that may be suitable for your own bank's portfolio. Do we dare to say "buoyant"?

## Most adjustable

The most rate-sensitive, and therefore price-stable, investments have these standard features:

- Visible, liquid money-market index
- Short reset periods
- High or no interest rate caps, both periodic and life
- Near-term first reset date

Each of these is built into Small Business Administration (SBA) 7(a) pools. A further sweetener is that SBAs are full faith and credit instruments and 0% risk-weighted. It's possible to buy these to effectively yield the prime rate minus 2.4%, which is the same as saying fed funds plus 0.6%. That may not sound exciting until one considers that it's conceivable the net yield could be approaching 3% a few quarters from now. Another enticement is the market values of 7(a)s are remarkably stable. Most pricing models project that they would be down only about 2%, even in a high-rate shock environment.

It must be said that many of these pools can come to market with high premium prices of 10 points or more, which absolutely creates prepayment risk to the investor. There are ways to

manage this exposure beyond the scope of this column, which your brokers can explain. Still, it's safe to say 2022 is built for a bond like an SBA 7(a).

## Also in the discussion

Mortgage-backed securities (MBS) come in several different adjustable-rate models. Among the more popular are collateralized mortgage obligation (CMO) floaters. These have some of the characteristics of an SBA, in that there are no periodic caps, and they float based on money-market indices, such as the secured overnight financing rate (SOFR). One comment is that they have very low priority to cash flows, so their prepayments and average lives can fluctuate wildly. Most investors don't mind, as CMO floaters' appeal is their quick reaction to rate changes. Be careful of those lifetime caps, however: They could be in the 4.0% range, which means their market values will lose some ground in higher rate scenarios.

Commercial MBS, such as Freddie Mac's "Ks," also come in floating rate structures. Their indices are often SOFR, and they also have no periodic caps. Because Freddie Ks are collateralized by multifamily projects, they, too, can see very inconsistent cash flow if some of the larger properties experience prepayments. Again, like CMOs, these usually come to market with little or no premium, so the early payoffs may not hurt the yields. You'll want to pay attention to the lifetime caps on these as well.

All told, the expected path of monetary policy in 2022 should bode well for money-market alternatives, both for price

stability and yield. Bonds that are submerged could be nicely complemented by short-duration instruments. Floaters may just be the answer to restore some levity to your investment portfolio. \*

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## ICBA Securities names new directors

ICBA Securities recently added these leadership bankers to its board of directors: Tommy Bates, Legends Bank, Clarksville, Tenn.; Blake Heid, First Option Bank, Paola, Kan.; Craig Wanichek, Summit Bank, Eugene, Ore.; and Aza Bittinger, Community Bankers Association of Ohio, Columbus, Ohio.



*Jim Reber is president and CEO of ICBA Securities, ICBA's institutional, fixed-income broker-dealer for community banks. He can be reached at [jreber@icbasecurities.com](mailto:jreber@icbasecurities.com).*



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# BRUSHING UP ON DISCLOSURES FOR ARMs

BY WILLIAM J. SHOWALTER, CRCM, CRP, SENIOR CONSULTANT  
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**N**ow that interest rates are beginning to move up, many bankers are blowing the dust off their adjustable-rate mortgage (ARM) loan offerings. Interest rates for fixed-rate loans have been so low for quite some time, which made them much more appealing to mortgage loan customers. But now, with rates starting to increase, the lower initial rates of ARM loans are beginning to look more appealing, at least to some borrowers.

The problem is that many of us are so out of practice making ARMs that we need a refresher to remind us what to do. This article serves as a primer to help us re-learn how to meet disclosure requirements for ARM loans.

## Different types of ARMs

When we think of an adjustable-rate mortgage, the first thing that comes to mind is likely the classic loan with an interest rate that can change at some regular interval based on the movement of some external index. There is a wide variety of initial periods for which the rate is fixed and later intervals for rate changes over the life of the loan. Common initial fixed periods are one, three, five, seven, or 10 years, while probably the most common interval for later rate changes is one year.

But that is not where the variety of ARMs ends. The Official Staff Commentary on Regulation Z discusses a number of other loan structures considered variable-rate transactions subject to the ARM disclosure requirements. These additional loan structures are:

- Renewable balloon-payment loans where the creditor is both unconditionally obligated to renew the balloon-payment loan at the consumer's option (or is obligated to renew subject to conditions within the consumer's control) and has the option of increasing the interest rate at the time of renewal.
- Preferred-rate loans where the terms of the legal obligation provide that the initial underlying rate is fixed but will increase upon the occurrence of some event (e.g., an employee leaving the employ of the creditor or an automatic payment arrangement being ended) and the note reflects the preferred rate (though a number of the ARM disclosures are not required for preferred-rate loans).

- "Price-level-adjusted mortgages" or other indexed mortgages that have a fixed rate of interest but provide periodic adjustments to payments, and the loan balance reflects changes in an index measuring prices or inflation (again, a number of the ARM disclosures are not required for price-level-adjusted loans).

It is important to note that graduated-payment mortgages and step-rate transactions without a variable-rate feature are not considered variable-rate transactions under Regulation Z. This is likely because changes over the loan are known at the outset — specified payment and/or interest rate increases.

## Application disclosures

Two ARM disclosures must be given to applicants for such loans when an application form is provided or before the consumer pays a non-refundable fee, whichever is earlier. There is an exception that allows the disclosures to be delivered or placed in the mail no later than three business days following receipt of a consumer's application when the application reaches the creditor by telephone or through an intermediary agent or broker.

For an application accessed by the consumer in electronic form — including an online application portal — the required ARM disclosures may be provided to the consumer in electronic form on or with the application.

These two early ARM disclosures are:

- The booklet titled Consumer Handbook on Adjustable Rate Mortgages (CHARM booklet), or a suitable substitute; and
- A loan program disclosure for each variable-rate program in which the consumer expresses an interest (each comprised of 12 specified pieces of information about the ARM program).

## TRID disclosures

The Loan Estimate (LE) and Closing Disclosure (CD) require additional disclosures for ARMs. The LE must be provided to an applicant no later than the third business day after their application is received by the lender, while the CD must be provided no later than three business days before consummation.

(There are also situations permitting or requiring these disclosures to be revised, but that's a subject for another time.)

The particular TRID (TILA-RESPA Integrated Disclosures) items impacted by a loan being an ARM are:

- **"Interest Rate" in the "Loan Terms" section** — If the interest rate at consummation is not known, the rate disclosed must be the fully-indexed rate, which means the interest rate calculated using the index value and margin at the time of consummation. The lender also should disclose "Yes" to the question, "Can this amount increase after closing?" In addition, disclose the frequency of interest rate adjustments, the date when the interest rate may first adjust, the maximum interest rate, and the first date when the interest rate can reach the maximum interest rate, followed by a reference to the Adjustable Interest Rate (AIR) Table (discussed below).
- **"Monthly Principal & Interest Payment" in the "Loan Terms" section** — If the initial periodic payment is not known because it will be based on an interest rate at consummation that is not known at the time the LE must be provided; for example, if it is based on an external index that may fluctuate before consummation, this disclosure must be based on the fully-indexed rate disclosed above. The lender also should disclose "Yes" to the question, "Can this amount increase after closing?" In addition, disclose the scheduled frequency of adjustments to the periodic principal and interest payment, the due date of the first adjusted principal and interest payment, the maximum possible periodic principal and interest payment, and the date when the periodic principal and interest payment may first equal the maximum principal and interest payment.
- **"Principal & Interest" payment in the "Projected Payments" section** — The table of payments (principal and interest, mortgage insurance, etc.) will include more than one column due to the possible (projected) changes in the interest rate, up to a maximum of four columns. The maximum principal and interest payment amounts (in each column) are determined by assuming that the interest rate in effect throughout the loan term is the maximum possible interest rate, and the minimum amounts are determined by assuming that the interest rate in effect throughout the loan term is the minimum possible interest rate. If the ARM has a negative amortization feature, the maximum payment amounts must reflect this feature, as spelled out in Regulation Z.
- **"Adjustable Interest Rate (AIR) Table"** — An ARM must disclose a separate table in the "Closing Cost Details" section on the LE and the "Additional Information About This Loan" section on the CD, under the heading "Adjustable Interest Rate (AIR) Table," that contains specified information about the index and margin, increases in the interest rate, initial interest rate, minimum and maximum interest rate, frequency of adjustments, and limits on interest rate changes.
- **"Annual Percentage Rate (APR)" and "Total Interest Percentage (TIP)" in the "Comparisons" section on the LE and the Loan Calculations section on the CD** — Calculation of both of these values must account for variations in the interest rate permitted for the ARM.

## Interest rate/payment change notices

The creditor, assignee, or servicer of an ARM secured by a borrower's principal dwelling must provide consumers with

written notices in connection with the adjustment of interest rates in accordance with the loan contract that results in a corresponding adjustment to the payment. These notices must be separate from any other disclosures or notices.

There are exemptions for the following: ARMs with a term of one year or less; first interest rate adjustment to an ARM if the first payment at the adjusted level is due within 210 days after consummation and the new interest rate disclosed at consummation was not an estimate; or when the lender/servicer is subject to the Fair Debt Collection Practices Act (FDCPA) for the particular loan and the customer has sent a notice to cease communications.

The content for these change notices is spelled out in Regulation Z, and the timing depends on whether the rate/payment change is the first to occur for the ARM loan or a subsequent change.

The initial adjustment notice must be provided to consumers at least 210 — but no more than 240 — days before the first payment at the adjusted level is due. If the first payment at the adjusted level is due within the first 210 days after consummation, the disclosures must be provided at consummation.

All subsequent adjustment notices generally must be provided to consumers at least 60 — but no more than 120 — days before the first payment at the adjusted level is due. The disclosures must be provided to consumers at least 25 — but no more than 120 — days before the first payment at the adjusted level is due for ARMs with uniformly scheduled interest rate adjustments occurring every 60 days or more frequently and for ARMs originated prior to Jan. 10, 2015, in which the loan contract requires the adjusted interest rate and payment to be calculated based on the index figure available as of a date that is less than 45 days before the adjustment date.

## Periodic statements

If your bank has taken advantage of the "coupon book" exception from periodic statements for mortgage loans with fixed rates, you will have to begin producing periodic statements when you begin originating ARMs. Or you will need to expand your statement output as more of the bank's loan production shifts to ARMs from fixed-rate loans (if you still want to use the coupon books exception for your fixed-rate lending).

## Conclusion

If your institution is like many community banks and has not been making ARMs for some time, you likely have some work to do to ramp ARM lending back up. Systems and disclosures need to be updated and/or activated. Disclosures need to be procured or prepared. Staff needs to be trained, at least some refresher training. Good luck re-ARMing up. \*



William J. Showalter, CRCM, CRP, is a Senior Consultant with Young & Associates, Inc. ([www.younginc.com](http://www.younginc.com)), with over 35 years of experience in compliance consulting, advising and assisting financial institutions on consumer compliance and compliance management issues. He also develops and conducts compliance training programs for individual banks and their trade associations and has authored or co-authored numerous compliance publications and articles. Bill can be reached at (330) 678-0524 or [wshowalter@younginc.com](mailto:wshowalter@younginc.com).

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**1900**  
122 Years

**First State Bank**  
Ransom

**1898**  
124 Years

**Peoples Bank & Trust Co.**  
McPherson

**1929**  
93 Years

**Farmers State Bank**  
Fairview

## October

**1896**  
126 Years

**Elk State Bank**  
Clyde

**1906**  
116 Years

**Argentine Federal Savings**  
Overland Park

**1903**  
119 Years

**Haviland State Bank**  
Haviland

**1910**  
112 Years

**Union State Bank**  
Olsburg

**1906**  
116 Years

**Stockgrowers State Bank**  
Maple Hill

**1984**  
38 Years

**Community National Bank**  
Seneca

**1906**  
116 Years

**Grant County Bank**  
Ulysses

**1988**  
34 Years

**Bankers' Bank of Kansas**  
Wichita

**1906**  
116 Years

**Bank of Commerce & Trust Co.**  
Wellington

**1992**  
30 Years

**The Trust Company**  
Manhattan

## ANNOUNCEMENTS

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**T**he Trust Company of Kansas welcomes Mandi Plunk as Trust Officer for their Wichita team. Mandi Plunk joined The Trust Company of Kansas (TCK) Wichita office on June 27, 2022. She will work closely with Vice President & Trust Officer Paul Fowler on the day-to-day administration of his client relationships.

Mandi comes to us with 13 years of finance and trust experience, supplying thorough support to clients and coworkers. Her ability to thrive while tackling multiple projects and her passion for boosting company morale make her a great addition to the TCK team. Mandi recently completed Cannon Financial Institute Trust School I & II and will continue to expand her knowledge and expertise in financial planning, estate planning, taxes, and fiduciary investment management to serve TCK's valued clients. \*

# BANK TRAINING WEBINARS



**4-OCT** Chapter 7 & 13 Consumer Bankruptcies: Special Rules, Cramdowns & Risks

**5-OCT** Reg E & the Electronic Fund Transfer Act

**6-OCT** Are Safe Deposit Boxes on the Way Out?

**11-OCT** Call Report Loan Classifications

**12-OCT** Images, Video, Audio: What's New & Next for Social Media Platforms?

**13-OCT** Preparing for Examination Under the Mortgage Servicing Rules

**18-OCT** Traditional & Roth IRA Part 2: Distributions, Taxation, Withholding & Penalties

**19-OCT** Handling Reg E Disputes Confidently & Compliantly

**20-OCT** New Proposed Regulatory Policy on CRE Loan Accommodations & Workouts

**25-OCT** Handling Court-Ordered Accounts: Estates, Guardianships, Conservatorships & Bankruptcy

**26-OCT** Ability to Repay: Qualified Mortgages & TILA RESPA Disclosures

**27-OCT** Robbery Basics & Beyond

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**1-NOV** Performance-Based Compensation Strategies for Banks

**2-NOV** Job-Specific BSA Training for Lenders

**3-NOV** SAR Filing Requirements: When, How & Why

**8-NOV** Form 1099 Reporting: Third-Party Vendors, Foreclosures, Debt Forgiveness & More

**9-NOV** IRS Reporting, B Notices, Fines & Penalty Letters

**9-NOV** Financial Exploitation & Elder Fraud

**10-NOV** Preparing for FedNow: Technology, Products, Services & More

**15-NOV** Mortgage Lending Compliance Overview

**16-NOV** Social Media: Paid, Owned, Earned

**17-NOV** BSA Essentials for the Board & Senior Management

**29-NOV** Best Practices for Performing Quality-Control Loan Reviews



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# Products and Services Reference List

**Each asterisk (\*)** represents an agreement for a specific endorsed product with that company. Not all products that these companies offer are endorsed by CBA. To see a detailed list and explanation of endorsements, visit CBA online at cbak.com.

Keep in mind that the services provided by each company on this list may only be a sampling of the many services they offer. By their CBA Associate Membership, these companies have shown their commitment to serving community banks. Please

look to these companies first, whenever possible, to meet your banking needs.

The following CBA Associate Members are ready to serve you when you need them. Please keep this list handy, and the next time you're looking for a specific service, you'll know where to look first! Remember, this is just a sampling of what each company provides.

## ABSTRACTING

**Security 1st Title**  
Wichita, KS ..... 316-267-8371

## ACCOUNTING/TAX RETURNS

**Allen, Gibbs & Houlak, LC**  
Wichita, KS ..... 316-267-7231  
**The Fullinwider Firm, LLC**  
Liberty, MO ..... 816-781-6939  
**Varney & Associates, CPAs, LLC**  
Manhattan, KS ..... 785-537-2202

## ACH

**\*SHAZAM**  
Johnston, IA ..... 515-288-2828

## ADVERTISING SPECIALTIES

**\*Works24**  
Brian, Edmond, OK ..... 800-460-4653

## ALARMS & SECURITY PRODUCTS

**Federal Protection**  
Springfield, MO ..... 800-299-5400  
**Opplicher Banking Systems, Inc.**  
Lenexa, KS ..... 800-487-7875

## ASSET LIABILITY MANAGEMENT

**\*Financial Management Services, Inc. (FMSI)**  
Chuck, Overland Park, KS ..... 913-955-3355  
**QwickRate**  
Marietta, GA ..... 800-285-8626

## ATM EQUIPMENT (NEW/USED)

**Federal Protection**  
Springfield, MO ..... 800-299-5400  
**Opplicher Banking Systems, Inc.**  
Lenexa, KS ..... 800-487-7875

## AUCTION

**Purple Wave**  
Manhattan, KS ..... 785-537-7653

## BACK ROOM SERVICE

**Modern Banking Systems**  
Ralston, NE ..... 800-592-7500

## BALANCE SHEET CONSULTING

**\*Financial Management Services, Inc. (FMSI)**  
Chuck, Overland Park, KS ..... 913-955-3355

## BANK OPERATIONS

**The Baker Group**  
Oklahoma City, OK ..... 800-937-2257  
**QwickRate**  
Marietta, GA ..... 800-285-8626

## BANK/PEER PERFORMANCE

**QwickRate**  
Marietta, GA ..... 800-285-8626

## BANKRUPTCY

**Hinkle Law Firm**  
Wichita, KS ..... 316-267-2000  
**Spencer Fane LLP**  
Overland Park, KS ..... 800-526-6529

## BANK STOCK LOANS & LOAN OVERLINES

**Commerce Bank**  
Kansas City, MO ..... 800-821-2182  
**\*S&P Global**  
Stacy, Charlottesville, VA ..... 434-951-4419

## BOND ACCOUNTING

**First Bankers Banc Securities**  
Overland Park, KS ..... 913-469-5400  
**\*ICBA Securities Corporation**  
Jim, Memphis, TN ..... 800-422-6442

## COMPLIANCE ASSISTANCE/REVIEWS

**\*Advanced Business Solutions (ABS)**  
Sandy, Olathe, KS ..... 913-731-6007

**Allen, Gibbs & Houlak, LC**  
Wichita, KS ..... 316-267-7231

**\*BHG Bank Group**  
Tom, Syracuse, NY ..... 315-372-4510

**\*MPA Systems**  
David, Fort Worth, TX ..... 888-233-1584

**Purple Wave**  
Manhattan, KS ..... 785-313-2094

**Varney & Associates, CPAs, LLC**  
Manhattan, KS ..... 785-537-2202

**Young & Associates, Inc.**  
Kent, OH ..... 800-525-9775

## CONSULTING

**Abrigo**  
Raleigh, NC ..... 919-851-7474

**\*Bank Compensation Consulting (BCC)**  
Rich, Plano, TX ..... 303-482-1844

**Young & Associates, Inc.**  
Kent, OH ..... 800-525-9775

## CORRESPONDENT SERVICES

**Commerce Bank**  
Kansas City, MO ..... 800-821-2182  
**First National Bank of Hutchinson**  
Hutchinson, KS ..... 800-293-0683

## CORE SERVICES

**Data Center Inc. (DCI)**  
Hutchinson, KS ..... 620-694-6800  
**Modern Banking Systems**  
Ralston, NE ..... 800-592-7500  
**\*SHAZAM**  
Bill M. Johnston, IA ..... 515-306-8012

## CREDIT AND PORTFOLIO RISK MANAGEMENT

**Abrigo**  
Raleigh, NC ..... 919-851-7474  
**Young & Associates, Inc.**  
Kent, OH ..... 800-525-9775

## Credit Card Program

**\*ICBA Bancard & TCM Bank**  
Heather, Washington, DC ..... 800-242-4770

## CREDIT SUPPORT

**\*Advanced Business Solutions (ABS)**  
Sandy, Olathe, KS ..... 913-731-6007

## DATA PROCESSING

**Data Center Inc. (DCI)**  
Hutchinson, KS ..... 620-694-6800  
**Modern Banking Systems**  
Ralston, NE ..... 800-592-7500

## DEBIT/ATM CARD SERVICES

**\*ICBA Bancard/TCM Bank**  
Heather, Washington, DC ..... 800-242-4770  
**\*SHAZAM**  
Matt M. Johnston, IA ..... 515-480-5767

## DEBT COLLECTION

**Hinkle Law Firm**  
Wichita, KS ..... 316-267-2000

## DIGITAL LENDING

**\*BHG Bank Group**  
Tom, Syracuse, NY ..... 315-372-4510

## DIRECTORS AND OFFICERS INS.

### \*Travelers

Danielle, St. Louis, MO ..... 800-255-5072

### \*UNICO Group, Inc.

Diana, Lenexa, KS ..... 800-755-0048

## DIRECTORS EXAMS

### Allen, Gibbs & Houlik, LC

Wichita, KS ..... 316-267-7231

### The Fullinwider Firm, LLC

Liberty, MO ..... 816-781-6939

### Varney & Associates, CPAs, LLC

Manhattan, KS ..... 785-537-2202

## DISASTER RECOVERY FACILITY PROGRAM

### \*MPA Systems

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## ELECTRONIC SERVICES

### Fitech Payments

Fort Worth, TX ..... 682-201-5551

## EMERGENCY FACILITIES/MODULAR BANK BUILDINGS FOR LEASE

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## EMPLOYEE AND EXEC. BENEFITS

### \*Bank Compensation Consulting (BCC)

Rich, Plano, TX ..... 303-482-1844

### Woner, Reeder & Girard, P.A.

Topeka, KS ..... 785-235-5330

## ESCROWS

### Security 1st Title

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## FINANCIAL INST. BOND

### \*Travelers

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### \*UNICO Group, Inc.

Diana, Lenexa, KS ..... 800-755-0048

## HUMAN RESOURCES

### \*UNICO Group, Inc.

Kansas City, KS ..... 800-755-0048

## INFORMATION TECHNOLOGY

### CalTech

Olathe, KS ..... 325-947-5550

### Computer Services, Inc. (CSI)

Paducah, KY ..... 800-545-4274

### Kansas Bankers Technologies

Salina, KS ..... 888-752-8435

### RESULTS Technology

Overland Park, KS ..... 877-435-8877

### Varney & Associates, CPAs, LLC

Manhattan, KS ..... 785-537-2202

## INSURANCE — BANK

### \*Bank Compensation Consulting (BCC)

Rich, Plano, TX ..... 303-482-1844

### \*Travelers

Danielle, St. Louis, MO ..... 800-255-5072

### \*UNICO Group, Inc.

Diana, Lenexa, KS ..... 800-755-0048

## INSURANCE PRODUCTS

### Producers XL

Salina, KS ..... 800-541-6705

## INTEREST RATE RISK SERVICE

### \*Financial Management Services Inc. (FMSI)

Chuck, Overland Park, KS ..... 913-955-3355

### \*ICBA Securities Corporation

Jim, Memphis, TN ..... 800-422-6442

## INTERNAL AUDIT

### \*Advanced Business Solutions (ABS)

Sandy, Olathe, KS ..... 913-731-6007

### The Fullinwider Firm, LLC

Liberty, MO ..... 816-781-6939

## INTERNET BANKING

### Data Center Inc. (DCI)

Hutchinson, KS ..... 620-694-6800

### \*ICBA Bancard/TCM Bank

Heather, Arlington, VA ..... 800-242-4770

## INTERNET WORLD WIDE WEB

### Opplicher Banking Systems, Inc.

Lenexa, KS ..... 800-487-7875

## INVESTMENTS

### Central States Capital Markets

Kansas City, MO ..... 800-851-6459

### Commerce Bank

Kansas City, MO ..... 800-821-2182

### \*Financial Management Services Inc. (FMSI)

Chuck, Overland Park, KS ..... 913-955-3355

### First Bankers Banc Securities

Overland Park, KS ..... 913-469-5400

### \*ICBA Securities Corporation

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Paducah, KY	800-545-4274
Kansas Bankers Technologies	
Salina, KS	888-752-8435
RESULTS Technology	
Overland Park, KS	877-435-8877

## LEGAL SERVICES

Hinkle Law Firm	
Wichita, KS	316-267-2000
Spencer Fane LLP	
Overland Park, KS	800-526-6529
Woner, Reeder & Girard, P.A.	
Topeka, KS	785-235-5333

## LENDING

*BHG Bank Group	
Tom, Syracuse, NY	315-372-4510
Bankers Healthcare Group	
Syracuse, NY	866-588-7910

## LOAN COLLECTIONS AND WORKOUTS

Spencer Fane LLP	
Overland Park, KS	800-526-6529
Woner, Reeder & Girard, P.A.	
Topeka, KS	785-235-5330

## LONG RANGE PLANNING

The Capital Corporation, LLC	
Overland Park, KS	913-498-8188
Varney & Associates, CPAs, LLC	
Manhattan, KS	785-537-2202

## MARKETING

Harland Clarke	
Newton, KS	800-322-0818
*SHAZAM	
Johnston, IA	515-288-2828
*Works24	
Brian, Edmond, OK	800-460-4653

## MERCHANT PROCESSING

*SHAZAM	
Johnston, IA	515-288-2828

## MERCHANT SERVICES

Fitech Payments	
Fort Worth, TX	682-201-5551

## MERGERS/ACQUISITIONS

The Capital Corporation, LLC	
Overland Park, KS	913-498-8188
Spencer Fane LLP	
Overland Park, KS	800-526-6529

## NETWORK SECURITY

Kansas Bankers Technologies	
Salina, KS	888-752-8435

## PAYMENTS

Fitech Payments	
Fort Worth, TX	682-201-5551
*ICBA Bancard	
Heather, Washington, DC	800-242-4770

## PORTFOLIO MANAGEMENT

Central States Capital Markets	
Kansas City, MO	800-851-6459
*Financial Management Services Inc. (FMSI)	
Chuck, Overland Park, KS	913-955-3355

## PROMOTIONAL PRODUCTS

Harland Clarke	
Newton, KS	800-322-0818

## RETIREMENT PLANNING

Central States Capital Markets	
Kansas City, MO	800-851-6459
First Bankers Banc Securities	
Overland Park, KS	913-469-5400

## SECONDARY MORTGAGE MARKET

LENDING	
FHLBank Topeka	

Topeka, KS	800-933-2988
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## SECURITY MONITORING

Federal Protection	
Springfield, MO	800-299-5400

## SUPPLEMENTAL HEALTH INSURANCE

*UNICO Group, Inc.	
Diana, Lenexa, KS	800-755-0048

## TECHNOLOGY SERVICES

CalTech	
Olathe, KS	325-947-5530
Computer Services, Inc. (CSI)	
Paducah, KY	800-545-4274
Kansas Bankers Technologies	
Salina, KS	888-752-8435
RESULTS Technology	
Overland Park, KS	877-435-8877
QwickRate	
Marietta, GA	800-285-8626
*S&P Global	
Stacy, Charlottesville, VA	434-951-4419

## TELECOMMUNICATIONS CONSULTING

Verge Network Solutions, Inc.	
Oklahoma City, OK	405-782-8420

## TELECOMMUNICATIONS SERVICES

Verge Network Solutions, Inc.	
Oklahoma City, OK	405-782-8420

## TELECOMMUNICATIONS SYSTEMS

Verge Network Solutions, Inc.	
Oklahoma City, OK	405-782-8420

## TITLE INSURANCE

Security 1st Title	
Wichita, KS	316-267-8371

## WEBSITE DEVELOPMENT

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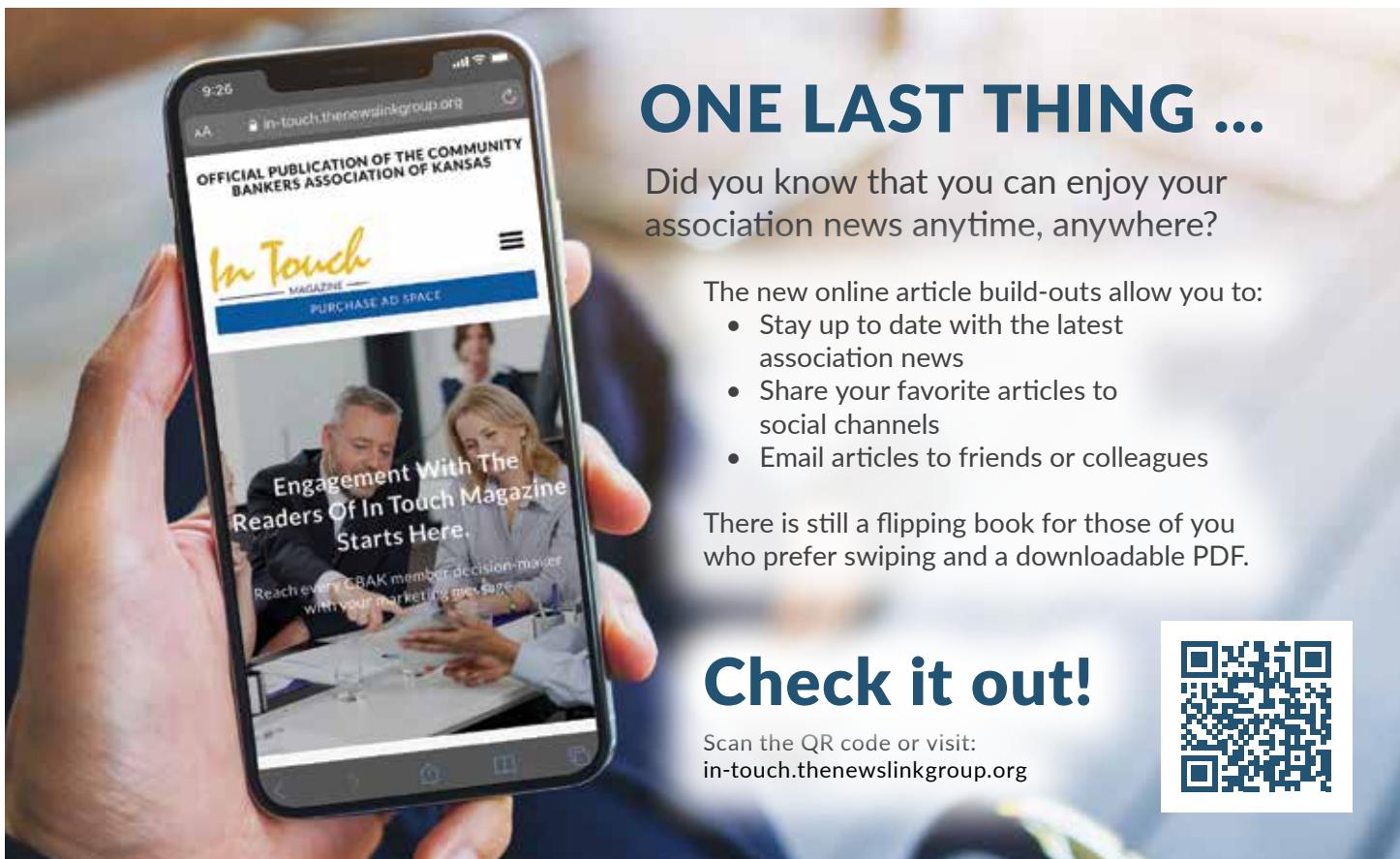
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