

# **PUBLIC DISCLOSURE**

July 11, 2022

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Bank Iowa  
RSSD# 187947

1150 Jordan Creek Parkway  
West Des Moines, Iowa 50266

Federal Reserve Bank of Chicago

230 South LaSalle Street  
Chicago, Illinois 60604-1413

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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**INSTITUTION’S CRA RATING**

**Bank Iowa Overall CRA Rating:** Satisfactory

**Performance Test Rating Table**

The following table indicates the performance level of Bank Iowa with respect to the lending, investment, and service tests.

Bank Iowa			
Performance Levels	Performance Tests		
	Lending Test	Investment Test	Service Test
Outstanding			
High Satisfactory	✓		
Low Satisfactory		✓	✓
Needs to Improve			
Substantial Noncompliance			

*\* Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating*

**Summary of Major Factors that Support the Rating**

Lending Test:

- The bank’s lending levels reflect excellent responsiveness to credit needs in its combined assessment area.
- A high percentage of loans were made in the bank’s combined assessment area.
- The geographic distribution of loans reflects good penetration throughout the bank’s assessment areas.
- The distribution of loans reflects, given the product lines offered, good penetration among borrowers of different income levels and to businesses (including farms) of different sizes.

- Lending exhibits a good record of serving credit needs of low-income individuals and areas, and very small businesses and farms.
- The bank makes a relatively high level of community development loans.
- The bank makes limited use of innovative and flexible lending practices in serving assessment area credit needs.

Investment Test:

- The bank makes an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position.
- There is rare use of innovative and/or complex investments to support community development initiatives.
- The bank exhibits adequate responsiveness to credit and community development needs.

Service Test:

- The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals.
- The bank's services do not vary in a way that inconveniences its assessment areas, particularly low- and moderate-income geographies and/or low- and moderate-income individuals; and
- The bank provides an adequate level of community development services.

## BANK IOWA

### DESCRIPTION OF INSTITUTION

Bank Iowa is a wholly-owned subsidiary of Bank Iowa Corporation, both headquartered in West Des Moines, Iowa, with total assets of \$1.8 billion as of March 31, 2022. The bank has two subsidiaries which do not engage in lending or deposit related activities, including Bank Iowa Capital Trust I, and BIC Investments, LLC.

The bank maintains its main office in West Des Moines and a network of 25 branches and 24 cash-only automatic teller machines (ATMs) located throughout the state of Iowa. The bank operates primarily in rural communities throughout the state of Iowa, with the exception of the Des Moines-West Des Moines IA MSA assessment area. Since the previous evaluation, the bank converted all full-service ATMs to cash-only and relocated a branch within the City of Clarinda. The relocation did not result in any material change of the bank's branching network as it was in the same census tract as the previous location. There have been no mergers, acquisitions, or new branch openings/closings since the previous evaluation.

The bank offers a variety of lending products including agricultural loans, commercial loans, residential real estate loans (in-house and secondary market), and consumer closed- and open-end loans. Bank Iowa is primarily a commercial and agricultural lender, as these categories represent 47.6 and 37.0 percent of the loan portfolio, respectively. Furthermore, the bank offers standard, non-complex deposit and savings products including checking, savings and business/commercial checking and savings. Bank Iowa's marketing strategy is mostly focused on building brand awareness and promoting the bank's mortgage, commercial, agricultural and consumer products using both traditional print and modern digital mediums.

Details of the allocation of the bank's loan portfolio are provided in the following table.

<b>Loan Portfolio Composition as of March 31, 2022</b>		
<b>Loan Type</b>	<b>Dollar Volume (\$ in 000s)</b>	<b>% of Portfolio</b>
Commercial	562,601	47.6
Agricultural	437,070	37.0
Residential Real Estate	144,338	12.2
Other	25,401	2.2
Consumer	13,241	1.1
Total	1,182,651	100.0
<i>Note: Percentages may not add to 100.0 percent due to rounding.</i>		

There are no known legal, financial or other factors impeding the bank's ability to help meet the credit needs in its communities.

At its previous evaluation conducted on March 2, 2020, the bank was rated **Satisfactory** under the CRA.

## SCOPE OF THE EXAMINATION

Bank Iowa's CRA performance was evaluated using the Federal Financial Institutions Examination Council's Interagency Large Institution CRA Examination Procedures. The evaluation was performed in the context of information about the bank and its assessment areas, such as asset size, financial condition, market presence of other financial institutions, the combined record of aggregate lenders in the assessment areas, and economic and demographic characteristics.

The retail lending analysis was based on 2020 and 2021 HMDA-reportable loans, primarily home purchase and home refinance due to volume. Home improvement, other purpose lines of credit, other purpose closed/exempt, and loan purpose not applicable loans were not evaluated as the limited volume in each of these categories does not allow for an effective analysis. Multifamily loans were reviewed for the Des-Moines-West Des-Moines, IA MSA for geographic distribution as there was enough volume for analysis; however, this loan purpose was not included in the remaining assessment areas due to low volume. The review also included an analysis of 2020 and 2021 CRA-reportable small business and small farm loans, although more emphasis was put on the bank's performance in 2020 as this was the most recent year in which aggregate of lenders data was available for comparison purposes. While the bank is predominantly a commercial and agricultural lender, when looking at loan portfolio composition and number of loans originated during the two-year retail lending review period, HMDA-reportable loan activity by number was only slightly less than CRA-reportable small business and small farm lending in the full-scope assessment areas. Furthermore, HMDA-reportable loans accounted for 46.0 percent, by dollar, of all loans reviewed for the retail lending portion of this evaluation. As such, HMDA-reportable loan activity was accorded roughly equal weight to CRA-reportable loan activity in the lending analysis. Of note, lending tables for 2021 HMDA-reportable and 2020 CRA-reportable are included in the geographic and borrower distribution sections of this report, while 2020 HMDA-reportable and 2021 CRA-reportable lending data tables can be found in Appendix B and Appendix C, respectively.

The composition of the bank's six delineated assessment areas and the scope of review for each assessment area are shown in the following table. Full-scope assessment areas were selected based on an analysis of the number of bank offices, loans and deposits, demographic factors such as the number of low- and moderate-income families and families with income below the poverty level, and in consideration of when assessment areas were last subject to a full scope review. Since the previous CRA evaluation, Bank Iowa has not changed its assessment area. The bank's Des Moines-West Des Moines MSA assessment area was more heavily weighted than other full scope assessment areas because the population of the assessment area comprised the significant majority of low- and moderate-income families and census tracts, compared to totals for all other full scope assessment areas.

Description of Bank Iowa’s Individual Assessment Areas		
Scope	Assessment Area	Description
Full	Des Moines-West Des Moines, Iowa MSA #19780	Polk, Jasper and Dallas Counties
Limited	Denison, Iowa (Non-MSA)	Crawford County
Limited	Humboldt, Iowa (Non-MSA)	Humboldt and Pocahontas Counties
Full	Lawler, Iowa (Non-MSA)	Chickasaw and Fayette Counties
Limited	Oskaloosa, Iowa (Non-MSA)	Keokuk, Mahaska, Marion, and Wapello Counties
Full	Southwest, Iowa (Non-MSA)	Adams, Fremont, Montgomery, Page, and Taylor Counties

The bank’s performance was evaluated using the following performance standards:

- ***Lending Activity*** – HMDA-reportable and CRA-reportable loans originated within the individual assessment areas from January 1, 2020, through December 31, 2021, were reviewed to determine the bank's responsiveness to credit needs in the bank's assessment area.
- ***Lending in the Assessment Area*** – HMDA-reportable and CRA-reportable loans within the individual assessment areas from January 1, 2020, through December 31, 2021, were reviewed to determine the percentage of loans originated in the assessment area.
- ***Geographic Distribution of Lending in the Assessment Area*** – HMDA-reportable and CRA-reportable loans within the individual assessment areas from January 1, 2020, through December 31, 2021, were reviewed to determine the extent to which the bank makes loans in census tracts of different income levels, including low- and moderate-income tracts.
- ***Lending to Borrowers of Different Incomes and Businesses and Farms of Different Sizes*** – HMDA- reportable and CRA-reportable loans within the individual assessment areas from January 1, 2020, through December 31, 2021, were reviewed to determine the loan distribution among borrowers of different income levels, particularly those considered low- or moderate-income, and to businesses and farms with different revenue sizes.
- ***Community Development Lending*** – The number, dollar volume, innovativeness, and complexity of community development loans originated within the individual assessment areas from March 3, 2020, through July 11, 2022, were reviewed to determine responsiveness to community development needs.
- ***Innovative or Flexible Lending Practices*** – The degree to which the bank uses innovative and flexible lending practices to address the credit needs of low- and moderate-income individuals and geographies, and small businesses and farms, from March 3, 2020, through July 11, 2022.
- ***Investments*** – Qualified investments, grants, and donations made within the individual assessment areas from March 3, 2020, through July 11, 2022, were reviewed to determine the

bank's responsiveness to community development needs. Qualified investments were also evaluated to determine the bank's use of innovative or complex investments.

- *Services* – The distribution of the bank's branch offices, banking services, hours of operation, availability of loan and deposit products, and the extent and innovativeness of community development services were reviewed. The review included community development activities conducted within the individual assessment areas from March 3, 2020, through July 11, 2022.

Six community representatives were contacted to understand the credit needs of full scope assessment areas. The representatives specialized in affordable housing, community services, and economic development. Input provided by the representatives is found in individual assessment area analyses.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

### LENDING TEST

Bank Iowa's performance relative to the lending test is rated **high satisfactory** based on its performance across the combined assessment area. Factors contributing to the rating include: lending levels reflecting excellent responsiveness to assessment area credit needs. A high percentage of loans were made in the bank's assessment areas. The geographic distribution of loans reflects good penetration throughout the assessment areas, including in low- and moderate-income geographies. The distribution of loans reflects, given the product lines offered, good penetration among borrowers of different income levels and businesses and farms of different revenue sizes. The bank exhibits a good record of serving the credit needs of low- and moderate-income individuals and areas, and very small businesses and farms. The bank makes a relatively high level of community development loans and makes limited use of innovative and flexible lending practices in serving individual assessment area credit needs.

#### Level of Lending Activity

The bank's lending levels reflect excellent responsiveness to credit needs in its assessment area, considering the number and amount of home mortgage, small business, and small farm loans in its assessment area.

During the review period, the bank's HMDA-reportable loans and CRA-reportable lending activity comprised 10,373 loans for a total of \$1.1 billion. The level of lending activity was not reviewed at the previous examination as the bank was evaluated under the Intermediate-Small Bank examination procedures, which does not include this factor as part of the review.

The table below presents the bank's lending activity from January 1, 2020, through December 31, 2021.



Summary of Lending Activity January 1, 2020 - December 31, 2021				
Loan Type	#	%	\$(000s)	%
Home Improvement	14	0.1	873	0.1
Home Purchase	961	9.3	167,441	15.0
Multi-Family Housing	60	.6	82,023	7.3
Refinancing	1,422	13.7	268,513	24.0
<b>Total HMDA Loans</b>	<b>2,457</b>	<b>24.0</b>	<b>518,850</b>	<b>46.0</b>
<b>Total Small Business Loans</b>	<b>3,116</b>	<b>30.0</b>	<b>218,449</b>	<b>19.0</b>
<b>Total Small Farm Loans</b>	<b>4,800</b>	<b>46.0</b>	<b>390,453</b>	<b>35.0</b>
<b>Total Loans</b>	<b>10,373</b>	<b>100.0</b>	<b>1,127,752</b>	<b>100.0</b>
<i>Note: Percentages may not total to 100.0 percent due to rounding.</i>				

### Assessment Area Concentration

Bank Iowa made a high percentage of loans in its assessment area. Specifically, Bank Iowa made 82.6 percent of its HMDA- and CRA-reportable loans by number, and 78.0 percent of total loans by dollar volume within its assessment area during the review period. This is comparable to the bank's performance at the previous evaluation, during which time it made 85.8 percent by number, and 78.3 percent by dollar volume, of its HMDA-reportable loans, and small business and farm loans, within the assessment area.

The bank's CRA-reportable small business lending reflects the highest concentration of lending within the assessment area, at 85.3 percent by number and 82.5 percent by dollar volume, during the review period, with CRA-reportable small farm lending being comparable at 84.0 percent by number and 84.2 percent by dollar volume. HMDA-reportable loan activity represents the lowest concentration of lending within the assessment area, at 76.2 percent by number and 71.4 percent by dollar volume.

The following table presents lending inside and outside the assessment area during the review period.

<b>Lending Inside and Outside the Assessment Area January 1, 2020 - December 31, 2021</b>								
Loan Type	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	11	78.6	744	85.2	3	21.4	129	14.8
Home Purchase – Conventional	675	76.1	108,459	67.9	212	23.9	51,253	32.1
Home Purchase – FHA	70	94.6	7,190	93.0	4	5.4	540	7.0
Multi-Family Housing	53	88.3	66,611	81.2	7	11.7	15,411	18.8
Refinancing	1,063	74.8	187,656	69.9	359	25.2	80,857	30.1
<b>Total HMDA Reportable</b>	<b>1,872</b>	<b>76.2</b>	<b>370,659</b>	<b>71.4</b>	<b>585</b>	<b>23.8</b>	<b>148,190</b>	<b>28.6</b>
<b>Total Small Business Reportable</b>	<b>2,659</b>	<b>85.3</b>	<b>180,309</b>	<b>82.5</b>	<b>457</b>	<b>14.7</b>	<b>38,140</b>	<b>17.5</b>
<b>Total Small Farm Reportable</b>	<b>4,034</b>	<b>84.0</b>	<b>328,768</b>	<b>84.2</b>	<b>766</b>	<b>16.0</b>	<b>61,685</b>	<b>15.8</b>
<b>Total Loans</b>	<b>8,565</b>	<b>82.6</b>	<b>879,736</b>	<b>78.0</b>	<b>1,808</b>	<b>17.4</b>	<b>248,015</b>	<b>22.0</b>
<i>Note: Percentages may not total to 100.0 percent due to rounding.</i>								

### Geographic and Borrower Distribution

Bank Iowa lending activities reflect good distribution throughout the assessment area. The bank’s lending activities reflect good distribution, particularly in its assessment areas, of loans among individuals of different income levels and to businesses and farms of different revenue sizes, given the product lines offered by the bank. The bank exhibits a good record of serving the credit needs of low- and moderate-income individuals and businesses and farms with gross annual revenues of \$1 million or less, consistent with safe and sound operations. Furthermore, the bank makes limited use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- or moderate-income individuals or geographies.

Please refer to the individual assessment areas for more information on the geographic and borrower distribution of the bank’s loans.

### Community Development Lending

Bank Iowa makes a relatively high level community development loans. The bank originated 30 loans for approximately \$62.0 million in full scope assessment areas, with total originations of 39 loans for \$95.6 million when including limited-scope and broader statewide/regional areas. The majority of loan dollars, at 60.2 percent, were originated for affordable housing purposes, which given the comments from community representatives in full-scope areas, are an area of increasing need. Community development lending increased significantly since the previous evaluation period, when the bank originated 23 loans in all assessment areas for \$19.9 million; this represents a 379.6 percent increase in total community development loans in the current period, far outpacing the bank’s growth of assets.

Community Development Loans March 3, 2020 through July 11, 2022										
	Affordable Housing		Community Services		Economic Development		Revitalize/Stabilize		Total #	Total \$(000s)
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)		
<b>Full Scope Review</b>										
Des Moines MSA	22	41,827	1	841	0	0	3	9,228	26	51,896
Lawler Non-MSA	0	0	0	0	0	0	0	0	0	0
Southwest Non-MSA	1	199	2	2,860	0	0	1	7,000	4	10,059
<b>Full Total</b>	<b>23</b>	<b>42,026</b>	<b>3</b>	<b>3,701</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>16,228</b>	<b>30</b>	<b>61,955</b>
<b>Limited Scope Review</b>										
Denison Non-MSA	2	562	0	0	0	0	1	180	3	742
Humboldt Non-MSA	0	0	0	0	0	0	0	0	0	0
Oskaloosa Non-MSA	1	2,905	0	0	0	0	0	0	1	2,905
<b>Limited Total</b>	<b>3</b>	<b>3,467</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>180</b>	<b>4</b>	<b>3,647</b>
<b>Other</b>										
Regional	1	12,064	1	2,209	1	15,000	2	763	5	30,036
<b>Grand Total</b>	<b>27</b>	<b>57,557</b>	<b>4</b>	<b>5,910</b>	<b>1</b>	<b>15,000</b>	<b>7</b>	<b>17,171</b>	<b>39</b>	<b>95,638</b>

## INVESTMENT TEST

Bank Iowa performance relative to the Investment Test is **low satisfactory** based on an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. In addition, the bank makes rare use of innovative or complex investments to support community development initiatives and exhibits adequate responsiveness to credit and community development needs.

The bank made or maintained zero qualified investments in full scope assessment and limited-scope areas, with all three investments, equaling nearly two million dollars, being made in the broader statewide/regional area with no purpose, mandate or function of serving the bank's delineated assessment areas. Opportunity for community development investments in all five of the bank's Non-MSA assessment areas is limited, in particular there are no low-income census tracts and a limited number of moderate-income census tracts. Further, in the one assessment area where there is more opportunity, the Des Moines-West Des Moines, IA MSA, there is significant competition from banks with more resources in making qualified community development investments. Previously, the bank had four investments totaling \$1.1 million: a decline in the total number of investments from this evaluation's three total investments, but an increase in the total investment dollars of 70.6 percent.

Community Development Investments March 3, 2020 through July 11, 2022										
	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total #	Total \$
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)		
<b>Full Scope Review</b>										
Des Moines MSA	0	0	0	0	0	0	0	0	0	0
Lawler Non-MSA	0	0	0	0	0	0	0	0	0	0
Southwest Non-MSA	0	0	0	0	0	0	0	0	0	0
<b>Full Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Limited Scope Review</b>										
Denison Non-MSA	0	0	0	0	0	0	0	0	0	0
Humboldt Non-MSA	0	0	0	0	0	0	0	0	0	0
Oskaloosa Non-MSA	0	0	0	0	0	0	0	0	0	0
<b>Limited Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Other</b>										
Regional	0	0	1	1,328	0	0	2	670	3	1,998
<b>Grand Total</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1,328</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>670</b>	<b>3</b>	<b>1,998</b>

The bank also made 55 donations for \$96,680 in full scope assessment areas and 103 donations for \$161,227 in total. Total donations by dollar amount increased 9.1 percent compared to the prior evaluation period. Donations were primarily for community service and revitalization/stabilization purposes.

Community Development Contributions March 3, 2020 through July 11, 2022										
	Affordable Housing		Community Services		Economic Development		Revitalize/ Stabilize		Total #	Total \$
	#	\$	#	\$	#	\$	#	\$		
<b>Full Scope Review</b>										
Des Moines MSA	5	4,750	20	10,605	2	3,750	3	2,000	30	21,105
Lawler Non-MSA	0	0	3	11,250	3	1,500	0	0	6	12,750
Southwest Non-MSA	0	0	14	31,575	3	6,250	2	25,000	19	62,825
<b>Full Total</b>	<b>5</b>	<b>4,750</b>	<b>37</b>	<b>53,430</b>	<b>8</b>	<b>11,500</b>	<b>5</b>	<b>27,000</b>	<b>55</b>	<b>96,680</b>
<b>Limited Scope Review</b>										
Denison Non-MSA	0	0	6	5,376	5	2,300	5	25,800	16	33,476
Humboldt Non-MSA	0	0	7	7,685	2	7,000	1	250	10	14,935
Oskaloosa Non-MSA	0	0	14	9,436	3	3,500	2	2,000	19	14,936
<b>Limited Total</b>	<b>0</b>	<b>0</b>	<b>27</b>	<b>22,497</b>	<b>10</b>	<b>12,800</b>	<b>8</b>	<b>28,050</b>	<b>45</b>	<b>63,347</b>
<b>Other</b>										
Regional	0	0	1	200	1	500	1	500	3	1,200
<b>Grand Total</b>	<b>5</b>	<b>4,750</b>	<b>65</b>	<b>76,127</b>	<b>19</b>	<b>24,800</b>	<b>14</b>	<b>55,550</b>	<b>103</b>	<b>161,227</b>

## SERVICE TEST

Bank Iowa performance relative to the Service Test is **Low Satisfactory** based on the following major factors in the individual assessment areas: delivery systems that are accessible to the bank's geographies and individuals of different income levels in the assessment areas; the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and to low- and moderate-income individuals; services do not vary in a way that inconveniences its assessment areas, particularly in low- and moderate-income geographies and low- and moderate-income individuals; and, the bank provides an adequate level of community development services in the combined assessment area.

## Retail Services

Bank Iowa's retail delivery services are accessible to geographies and individuals of different income levels in its assessment area. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Its services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment area(s), particularly low- or moderate-income geographies or low- or moderate-income individuals.

The bank's retail services are provided through its network of the bank's main office and 25

branches, 24 cash-only ATMs, telephone, on-line, and mobile banking activities. The bank's on-line offerings include the ability to apply for consumer loans or residential real estate mortgages, and to open consumer deposit accounts. All branches offer consumer, mortgage, and commercial products and services. Branches are typically open Monday through Friday from 8:30 or 9:00 a.m. to 4:00 or 5:00 p.m., with some branches open on Saturday from 8:00 a.m. to 12:00 p.m. In addition to branch hours, appointments with lenders for loan applications at the applicant's convenience and internet, phone, and mobile banking services make the bank's products and services accessible to low- and moderate-income individuals and in low- and moderate-income census tracts.

The bank does not operate any branches in low-income census tracts. The bank operates three branches in moderate-income census tracts throughout the combined assessment area, as well as four branch offices within underserved non-metropolitan middle-income census tracts. The bank's remaining branches and the main office are located in either middle- or upper-income census tracts. All of the bank's full-service ATMs were converted to cash-only during the evaluation. Further, the bank did not open a branch or close any branches during the evaluation period.

### **Community Development Services**

Bank Iowa provides an adequate level of community development services.

During the review period, the bank provided 960 hours of community development service in all its assessment areas (including broader statewide and/or regional areas), a notable decrease from its performance at the previous evaluation during which time it provided 4,603 hours. The significant drop in community development services hours was directly caused by the Covid-19 pandemic which limited in person interaction starting in March of 2020, and coincides with the start of the review period for this evaluation. The bank has historically provided a high level of community development service hours in prior evaluations. Community service organizations are where the bank committed the most hours of service, with a significant number of hours also being committed to affordable housing.

The following table presents the bank's community development services throughout its combined assessment area during the review period.

<b>Community Development Services March 3, 2020 through July 11, 2022</b>										
	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize/ Stabilize</b>		<b>Total</b>	
	<b># Events</b>	<b>Hours</b>	<b># Events</b>	<b>Hours</b>	<b># Events</b>	<b>Hours</b>	<b># Events</b>	<b>Hours</b>	<b># Events</b>	<b>Hours</b>
<b>Full Scope Review</b>										
Des Moines MSA	38	70	14	28	39	52	0	0	91	149
Lawler Non-MSA	0	0	1	5	18	20	0	0	19	25
Southwest Non-MSA	17	26	141	262	67	92	0	0	225	379
<b>Full Total</b>	<b>55</b>	<b>96</b>	<b>156</b>	<b>294</b>	<b>124</b>	<b>163</b>	<b>0</b>	<b>0</b>	<b>335</b>	<b>553</b>
<b>Limited Scope Review</b>										
Denison Non-MSA	3	3	31	53	0	0	22	52	56	108
Humboldt Non-MSA	13	20	12	15	0	0	0	0	25	35
Oskaloosa Non-MSA	15	75	23	47	8	116	0	0	46	237
<b>Limited Total</b>	<b>31</b>	<b>98</b>	<b>66</b>	<b>115</b>	<b>8</b>	<b>116</b>	<b>22</b>	<b>52</b>	<b>127</b>	<b>381</b>
<b>Other</b>										
Regional	0	0	0	0	0	0	12	27	12	27
<b>Grand Total</b>	<b>86</b>	<b>194</b>	<b>222</b>	<b>409</b>	<b>132</b>	<b>279</b>	<b>34</b>	<b>79</b>	<b>474</b>	<b>960</b>

**FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

## DES MOINES-WEST DES MOINES, IOWA MSA #19780 - Full Review

### SCOPE OF THE EXAMINATION

Full scope examination procedures were used to evaluate the bank's performance in the Des Moines-West Des Moines, Iowa MSA metropolitan assessment area. The scope is consistent with the scope of the examination described within the institution summary with the exception that there was sufficient HMDA-reportable multifamily loan volume to review for geographic distribution. For further information, refer to the "Scope of Examination" section for details.

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN DES MOINES-WEST DES MOINES, IOWA MSA #19780

The bank maintains a partial Des Moines-West Des Moines, Iowa MSA assessment area that consists of Polk, Jasper and Dallas Counties in their entirety. Based on 2020 FFIEC Census data, the assessment area is comprised of 122 census tracts with the following income composition: nine low-income, 32 moderate-income, 51 middle-income, 29 upper-income, and one unknown-income census tract. The unknown-income census tract is comprised entirely by the Des Moines International airport.

Within the assessment area, the bank operates its main office and five branch offices. One branch in Newton is located in a moderate-income census tract, while the rest are located in either middle-income or upper-income census tracts. There were no branches opened or closed since the previous evaluation.

According to the June 30, 2021, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, Bank Iowa ranked 10th among 48 FDIC-insured financial institutions operating in the assessment area with 1.7 percent of market share. Leaders in market share include Principal Bank (17.2 percent), Wells Fargo Bank (15.8 percent), and Bankers Trust Company (14.6 percent). The 47 banks competing for deposits and loans with Bank Iowa have 183 offices in the assessment area. In 2021, the bank ranked 25th among 425 HMDA reporting institutions; and in 2020, eighth among 145 CRA reporting institutions. The data suggests there is significant competition for loans and deposits in the assessment area.

Additional assessment area demographic information for 2020 is provided in the following table. Please refer to Appendix C for 2021 demographic information.



Assessment Area: 2020 Des Moines-West Des Moines, IA MSA 19780								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	9	7.4	6,000	4.2	1,837	30.6	29,605	20.6
Moderate-income	32	26.2	30,377	21.1	4,615	15.2	24,811	17.2
Middle-income	51	41.8	60,056	41.7	4,016	6.7	31,386	21.8
Upper-income	29	23.8	47,521	33.0	1,421	3.0	58,152	40.4
Unknown-income	1	0.8	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>122</b>	<b>100.0</b>	<b>143,954</b>	<b>100.0</b>	<b>11,889</b>	<b>8.3</b>	<b>143,954</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	11,086	3,902	2.6	35.2	5,840	52.7	1,344	12.1
Moderate-income	53,058	29,757	19.7	56.1	18,795	35.4	4,506	8.5
Middle-income	101,285	65,588	43.3	64.8	28,503	28.1	7,194	7.1
Upper-income	69,306	52,076	34.4	75.1	14,618	21.1	2,612	3.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>234,735</b>	<b>151,323</b>	<b>100.0</b>	<b>64.5</b>	<b>67,756</b>	<b>28.9</b>	<b>15,656</b>	<b>6.7</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,021	3.6	885	3.5	128	5.1	8	2.7
Moderate-income	4,308	15.2	3,889	15.2	389	15.5	30	10.1
Middle-income	13,937	49.0	12,414	48.5	1,356	53.9	167	56.2
Upper-income	9,139	32.2	8,407	32.8	640	25.4	92	31.0
Unknown-income	11	0.0	8	0.0	3	0.1	0	0.0
<b>Total Assessment Area</b>	<b>28,416</b>	<b>100.0</b>	<b>25,603</b>	<b>100.0</b>	<b>2,516</b>	<b>100.0</b>	<b>297</b>	<b>100.0</b>
Percentage of Total Businesses:				90.1		8.9		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4	0.4	3	0.3	1	4.8	0	0.0
Moderate-income	103	11.1	101	11.1	2	9.5	0	0.0
Middle-income	580	62.5	568	62.7	12	57.1	0	0.0
Upper-income	241	26.0	234	25.8	6	28.6	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>928</b>	<b>100.0</b>	<b>906</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
Percentage of Total Farms:				97.6		2.3		0.1

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

## Population Characteristics

The table below presents the population trends for the assessment area, the Des Moines-West Des Moines, IA MSA, Dallas, Jasper and Polk Counties, and the state of Iowa from 2010 to 2015. According to the 2015 U.S. Census Bureau demographic data, the assessment area’s population is 563,987, an increase of 5.7 percent from 2010 which outpaced the population growth of the State of Iowa at 1.5 percent. The most significant population growth, in terms of percentage, was in Dallas County which saw a 13.2 percent increase between 2010 and 2015. According to community representatives, the population increase within Dallas County has only been exacerbated by the pandemic which saw a general trend of people moving from smaller homes out to areas that had larger homes, of which Dallas County has more of. However, Dallas County also offers a variety of housing besides single family homes, such as townhouses and apartments. The school districts in Dallas County, primarily Waukee School District, are also considered highly desirable for families.

<b>Population Change 2010 and 2011-2015</b>			
<b>Area</b>	<b>2010 Population</b>	<b>2011-2015 Population</b>	<b>Percentage Change (%)</b>
Assessment Area	533,617	563,987	5.7
Dallas County	66,135	74,892	13.2
Jasper County	36,842	36,726	-0.3
Polk County	430,640	452,369	5.0
Des Moines-West Des Moines, IA MSA	606,475	637,913	5.2
State of Iowa	3,046,355	3,093,526	1.5
<i>Source: 2010—U.S. Census Bureau: Decennial Census 2011-2015—U.S. Census Bureau American Community Survey</i>			

## Income Characteristics

The following table compares the median family income (MFI) for the assessment area, the Des Moines-West Des Moines, IA MSA, Dallas, Jasper and Polk Counties, and the state of Iowa from 2010 to 2015. According to the 2020 FFIEC Census Data, the assessment area is comprised of 143,954 families, of which 20.6 percent are designated as low-, 17.2 percent are moderate-, 21.8 percent are middle-, and 40.4 percent are upper-income. Only 8.3 percent of families residing within the assessment area live below the poverty line, comparable to the state of Iowa poverty rate of 8.1 percent.

The assessment area overall experienced a decrease in MFI between the time periods, with the individual counties comprising the assessment area experiencing a high degree of variance between them. Jasper County saw an increase in MFI at 11.7 percent, while Polk County saw a 3.1 percent decrease in MFI. Dallas County, while seeing only a 1.0 percent increase during the time period, has a significantly higher MFI in 2015 than Jasper or Polk County. All counties in the assessment area have higher MFIs than the state of Iowa.

According to community representatives, the current wage potential in Dallas County is very high given it is primarily white collar with high skill employees. Polk County, where the City of Des Moines is located, continues to try and attract employers that pay higher wages, but there are some limitations of attracting workers given limited affordable housing in the area.

<b>Median Family Income 2006-2010 and 2011-2015</b>			
<b>Area</b>	<b>2006-2010 Median Family Income 2015 Dollars (\$)</b>	<b>2011-2015 Median Family Income 2015 Dollars (\$)</b>	<b>Percentage Change (%)</b>
Assessment Area	76,278	75,932	-0.5
Dallas County	91,492	92,428	1.0
Jasper County	61,508	68,685	11.7
Polk County	76,711	74,335	-3.1
Des Moines-West Des Moines, IA MSA	75,913	75,653	-0.3
State of Iowa	67,302	67,466	0.2
<i>Source: 2006-2010 – U.S. Census Bureau: American Community Survey 2011-2015 – U.S. Census Bureau: American Community Survey</i>			

### Housing Characteristics

The following table presents the recent housing cost burden within the assessment area, the Des Moines-West Des Moines, IA MSA, Dallas, Jasper and Polk Counties, and the state of Iowa. The cost burden is a measure of affordability via a comparative analysis of individuals of different income levels that spend 30.0 percent or more of their income on housing costs.

Renters across all income levels in the assessment area experience this burden at 39.2 percent. Jasper County has significantly lower rates of housing cost burden for low- and moderate-income renters when compared to Dallas and Polk County, as well as the state of Iowa. However, the housing cost burden for homeowners in Jasper County is comparable to Dallas County for both low- and moderate-income owners but not for owners for all income levels where Dallas County has the lowest percentage in the assessment area. This is congruent with the data that shows Dallas County has significantly higher MFI compared to Jasper and Polk Counties, as income is part of the housing cost burden equation. Overall, the housing cost burden for homeowners within the assessment area (16.3 percent) is comparable to the state of Iowa, which has 15.2 percent of all homeowners being burdened by their payments towards housing.

According to FFIEC HMDA loan and application records, home mortgage trends reflect increases in home mortgage activity in recent years across the assessment area’s counties and the broader region. These trends suggest a continued increase in demand for home purchases, driving up home values and indicating that housing cost burden for low-and moderate-income homeowners will remain elevated. According to the 2011-2015 American Community Survey, the assessment area had a median housing value of \$158,609 and median gross rent of \$802. Overall, there are a

total of 234,735 housing units in the assessment area with the majority of housing units being owner-occupied at 64.5 percent, while 28.9 percent are rental units and 6.7 percent are vacant housing units.

Both community representatives noted that the Des Moines-West Des Moines, IA MSA has seen a significant increase in home prices in the past few years, often to the point where affordability is becoming a growing concern for individuals and families. The Des Moines metropolitan area has seen more population growth than the rest of the state over the last decade, which combined with high new construction costs, has meant increased demand with slowly increasing supply.

<b>Housing Cost Burden</b>						
<b>Area</b>	<b>Cost Burden (%) - Renters</b>			<b>Cost Burden (%) – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	79.4	29.7	39.2	68.0	34.4	16.3
Dallas County	80.6	34.2	37.0	60.7	26.5	12.4
Jasper County	62.5	18.2	29.8	59.7	27.9	17.1
Polk County	80.3	29.9	40.1	70.0	36.1	17.0
Des Moines-West Des Moines, IA MSA	78.3	29.4	39.1	66.8	34.0	16.5
State of Iowa	72.2	24.1	38.0	58.9	25.3	15.2
<i>Cost Burden is housing cost that equals 30.0 percent or more of household income</i>						
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy</i>						

### Employment Characteristics

The following table presents the unemployment trends for the assessment area, Dallas, Jasper and Polk Counties, the Des Moines-West Des Moines, IA MSA, and the state of Iowa from 2017 to 2021. Overall, all areas saw an increase in the unemployment rate for the 2020 year, largely due to the Covid-19 pandemic which led some employers to lay off employees. In 2021, while unemployment rates across all areas declined, Dallas County was an outlier at 2.8 percent unemployment relative to the other two counties in the assessment area and the state of Iowa which ranged from 4.2 percent to 4.5 percent unemployment.

A community representative confirmed that Dallas County continues to see lower unemployment rates due to the growing opportunities in the area, including but not limited to the relocation of Des Moines University, the new RecPlex, and the Microsoft Data Center. Another community representative focused on Polk County noted that there was an existing labor supply issue (aligning with the data below), which led to further struggles for employers to fill open positions. However, the representative stated that Iowa’s focus on getting people back to work sooner than other parts of the country seems to have led to a quicker economic recovery.

<b>Unemployment Rates (%)</b>					
<b>Area</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	2.9	2.4	2.6	5.5	4.2
Dallas County	2.1	1.7	1.8	3.5	2.8
Jasper County	3.1	2.6	2.8	5.2	4.3
Polk County	3.0	2.6	2.7	5.9	4.5
Des Moines-West Des Moines, IA MSA	2.9	2.4	2.6	5.4	4.2
State of Iowa	3.1	2.5	2.6	5.1	4.2

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics (LAUS)*

### **Industry Characteristics**

The employment base covers multiple industries with the largest being in financial services and healthcare. Two large healthcare providers, UnityPoint Health Alliance and Mercy One, have multiple hospitals and clinics in the assessment area. Wells Fargo continues to be the largest employer in the region with a large portion of its workforce being dedicated to the home mortgage business. The Des Moines metropolitan area is also home to two large convenience store brands, Kum & Go and Casey’s General Store, which employ a significant amount of people in the area. Further, Amazon has a large distribution and delivery operations center in the area.

### **Community Representatives**

Two community representatives, one located in Polk County and the other focused on Dallas County, were contacted to provide information regarding local economic and demographic conditions. The representatives provided information on housing, employment, and economic development needs within the assessment area. The lack of gap financing for most large-scale projects was identified by both representatives as an area of need. Bank Iowa was identified by one of the representatives as being one of the banks that is responsive to the needs of economic development in the area. Labor shortages were identified as a continued area of concern given the low unemployment rate and fairly robust business climate in the area.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DES MOINES-WEST DES MOINES IOWA MSA**

### **LENDING TEST**

The geographic distribution of loans overall reflects good penetration throughout the assessment area. The distribution of borrowers reflects, given the product lines offered, good penetration among individuals of different income levels and good penetration among businesses and farms of different sizes. Bank Iowa exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses and farms. The bank makes a relatively high level of community development loans and makes use of innovative and flexible lending practices in serving assessment area credit needs. There will be no discussion of home improvement loans as

originations were too low for a meaningful analysis to be conducted and multi-family loans will only be reviewed in the geographic distribution section as the majority of loans were made to borrowers of unknown-income. Finally, when determining performance, the comparison to aggregate lender data was weighted more heavily than the assessment area demographics as it is a better measure of a bank's true performance in relation to external variables.

### **Geographic Distribution of Loans**

The bank's geographic dispersion of loans reflects good penetration throughout the assessment area. Bank Iowa originated HMDA-reportable loans in 80.3 percent of the 122 census tracts in the assessment area in 2021. This figure includes loans in 33.3 percent of the low-income census tracts and 68.7 of the moderate-income census tracts in the assessment area. The bank originated CRA-reportable loans in 59.0 percent of the census tracts in the assessment area; with 33.3 percent of low-income census tracts and 37.5 percent of moderate-income census tracts being penetrated in 2020. There were no conspicuous gaps in HMDA- and CRA-reportable lending across the bank's assessment area.

A detailed discussion of HMDA-reportable and CRA-reportable small business and small farm lending in relation to aggregate and census demographics is provided below.

#### HMDA-Reportable Lending

Bank Iowa's geographic distribution of HMDA-reportable loans reflects good penetration throughout the assessment area.

In 2021, 1.0 percent of Bank Iowa's HMDA-reportable loans were made in low-income census tracts. This performance is comparable to the aggregate at 1.6 percent and slightly below the percentage of owner-occupied units in low-income census tracts at 2.6 percent. Bank Iowa originated 17.3 percent of total HMDA-reportable loans in moderate-income census tracts, performing above the aggregate and slightly below the percentage of owner-occupied units at 13.7 percent and 19.7 percent, respectively. The bank originated 48.4 percent of its HMDA-reportable loans in middle-income census tracts, which was above both the aggregate at 40.1 percent, and the percentage of owner-occupied units in middle-income tracts at 43.3 percent. Finally, the bank originated 33.3 percent of HMDA-reportable loans in upper-income census tracts which was below the aggregate of lenders performance of 44.7 percent and comparable to the percentage of owner-occupied units in those tracts at 34.4 percent.

The bank's distribution of lending across geographies of different income levels in 2020 within HMDA-reportable loans was consistent with the distribution of loans in 2021. Please see Appendix B for 2020 lending tables.

### *Home Purchase Loans*

In 2021, 1.4 percent of Bank Iowa's purchase loans were originated in low-income census tracts. The bank's performance was comparable to the aggregate at 2.0 percent and the percentage of owner-occupied units in low-income census tracts at 2.6 percent. Finding opportunities to lend in low-income census tracts continues to be challenging with 52.7 percent of the housing serving as rental property and 12.1 percent of the properties listed as vacant. The bank originated 16.6 percent of its home purchase loans in moderate-income census tracts, which was comparable to the aggregate at 16.0 percent and slightly below the percentage of owner-occupied units at 19.7 percent. The bank originated 51.7 percent of its loans in middle-income census tracts, which was above the aggregate at 40.4 percent and the percentage of owner-occupied units in middle-income census tracts at 43.3 percent. Finally, the bank originated 30.3 percent of its home purchase loans in upper-income census tracts, which was below the aggregate performance of 41.5 percent and the percentage of owner-occupied units in upper-income census tracts at 34.4 percent.

### *Refinance Loans*

In 2021, Bank Iowa 0.4 percent of refinance loans in low-income census tracts. The bank's performance was comparable to the aggregate at 1.1 percent but below the percentage of owner-occupied units in low-income census tracts at 2.6 percent. Bank Iowa originated 11.8 percent of its refinance loans in moderate-income census tracts which was comparable to the aggregate at 11.4 percent and below the percentage of owner-occupied units in moderate-income census tracts at 19.7 percent. The bank originated 49.3 percent of refinance loans in middle-income census tracts, which was above the 39.9 percent by the aggregate and the 43.3 percent of owner-occupied units in middle-income tracts. Lastly, the bank originated 38.4 percent of refinance loans in upper-income census tracts which was below the aggregate at 47.6 percent and above the percentage of owner-occupied units in those tracts at 34.4 percent.

### *Multi-Family Loans*

In 2021, Bank Iowa originated 4.3 percent of multi-family loans in low-income census tracts. The bank's performance was below the aggregate at 7.9 percent and the percentage of multi-family units in low-income census tracts at 7.1 percent. Bank Iowa originated 78.3 percent of its multi-family loans in moderate-income census tracts which was significantly above the aggregate at 36.8 percent and the percentage of multi-family units in moderate-income census tracts at 21.1 percent. Further, the bank originated 81.0 percent of its multi-family loans by dollar amount in moderate-income census tracts, again well above the aggregate at 23.4 percent, indicating the bank is highly responsive to the need for more affordable housing in moderate income areas. The bank originated 17.4 percent of multi-family loans in middle-income census tracts, which was below the 38.0 percent by the aggregate and the 45.6 percent of multi-family units in middle-income tracts. The bank did not originate any loans for multi-family units in upper-income census tracts.

The bank's distribution of HMDA-reportable loans across geographies of different income levels in 2020 was consistent with the distribution of loans in 2021. The table below presents the geographic distribution of HMDA-reportable loans in the assessment area in 2021. Please refer to Appendix B for geographic distribution data for HMDA-reportable lending in 2020.



Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2021 Des Moines-West Des Moines, IA MSA 19780								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2021			Dollar			
		Count Bank		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	2	1.4	2.0	264	0.8	1.2	2.6
	Moderate	24	16.6	16.0	3,192	9.9	10.0	19.7
	Middle	75	51.7	40.4	15,512	48.0	38.7	43.3
	Upper	44	30.3	41.5	13,360	41.3	50.1	34.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>145</b>	<b>100.0</b>	<b>100.0</b>	<b>32,328</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	1	0.4	1.1	125	0.3	0.6	2.6
	Moderate	27	11.8	11.4	4,538	9.9	6.9	19.7
	Middle	113	49.3	39.9	18,206	39.7	37.1	43.3
	Upper	88	38.4	47.6	22,956	50.1	55.4	34.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>229</b>	<b>100.0</b>	<b>100.0</b>	<b>45,825</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	1.6	0	0.0	1.2	2.6
	Moderate	0	0.0	13.1	0	0.0	10.0	19.7
	Middle	1	50.0	39.5	50	11.1	38.2	43.3
	Upper	1	50.0	45.8	400	88.9	50.5	34.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>450</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	1	4.3	7.9	2,584	5.4	5.3	7.1
	Moderate	18	78.3	36.8	38,513	81.0	23.4	21.1
	Middle	4	17.4	38.0	6,445	13.6	44.8	45.6
	Upper	0	0.0	17.4	0	0.0	26.5	26.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>47,541</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	1.5	0	0.0	0.9	2.6
	Moderate	0	0.0	7.3	0	0.0	4.7	19.7
	Middle	0	0.0	36.8	0	0.0	32.1	43.3
	Upper	0	0.0	54.4	0	0.0	62.4	34.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	1.6	0	0.0	0.8	2.6
	Moderate	0	0.0	13.6	0	0.0	7.5	19.7
	Middle	0	0.0	38.0	0	0.0	35.6	43.3
	Upper	0	0.0	46.8	0	0.0	56.1	34.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	4.5	0	0.0	3.2	2.6
	Moderate	0	0.0	29.5	0	0.0	20.4	19.7
	Middle	0	0.0	43.1	0	0.0	44.3	43.3
	Upper	0	0.0	22.9	0	0.0	32.0	34.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	4	1.0	1.6	2,972	2.4	1.2	2.6
	Moderate	69	17.3	13.7	46,243	36.7	9.7	19.7
	Middle	193	48.4	40.1	40,213	31.9	38.4	43.3
	Upper	133	33.3	44.7	36,716	29.1	50.6	34.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>399</b>	<b>100.0</b>	<b>100.0</b>	<b>126,144</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

CRA-Reportable Lending

*Small Business Loans*

The geographic distribution of small business loans reflects good penetration throughout the assessment area.

In 2020, Bank Iowa originated 1.6 percent of its small business loans in low-income census tracts, comparable to the aggregate at 2.5 percent and below the percentage of total businesses located in low-income census tracts at 3.6 percent. Bank Iowa originated 18.1 percent of its small business loans in moderate-income census tracts which was above the aggregate at 12.3 percent and the percentage of total businesses located in moderate-income census tracts at 15.2 percent. Of note, 28.7 percent of small business loans by dollar amount were originated in moderate-income census tracts, which was significantly above the aggregate at 12.9 percent. Bank Iowa originated 52.7 percent of small business loans in middle-income census tracts, which was above both the aggregate at 47.8 percent and the percentage of businesses in middle-income census tracts at 49.0 percent. Lastly, the bank originated 27.6 percent of small business loans in upper-income census tracts which was below the aggregate of 36.9 percent and the 32.2 percent of small businesses in upper-income census tracts.

The bank’s distribution of small business lending across geographies of different income levels in 2021 was consistent with the distribution of loans in 2020. The table below presents the geographic distribution of small business loans in the assessment area in 2020. Please refer to Appendix C for geographic distribution data for small business lending in 2021.

<b>Geographic Distribution of Small Business Loans</b>								
<b>Assessment Area: 2020 Des Moines-West Des Moines, IA MSA 19780</b>								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Businesses
		2020			2020			
		Count		Agg %	Dollar		Agg \$ %	
Bank #	%	Bank \$ (000s)	\$ %					
Small Business	Low	5	1.6	2.5	1,074	2.8	3.7	3.6
	Moderate	57	18.1	12.3	10,849	28.7	12.9	15.2
	Middle	166	52.7	47.8	16,662	44.1	50.3	49.0
	Upper	87	27.6	36.9	9,228	24.4	32.8	32.2
	Unknown	0	0.0	0.0	0	0.0	0.1	0.0
	Tr Unknown			0.5			0.3	
	<b>Total</b>	<b>315</b>	<b>100.0</b>	<b>100.0</b>	<b>37,813</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

*Small Farm Loans*

The geographic distribution of small farm loans reflects excellent dispersion throughout the assessment area.

In 2020, Bank Iowa originated no small farm loans in low-income census tracts, neither did the aggregate lenders as only 0.4 percent of total farms are located in low-income tracts. Bank Iowa originated 22.5 percent of its small farm loans in moderate-income census tracts which was significantly above the aggregate at 14.9 percent and the percentage of total farms located in moderate-income census tracts at 11.1 percent. Bank Iowa originated 74.8 percent of small farm loans in middle-income census tracts, which was above both the aggregate at 66.9 percent and the percentage of farms in middle-income census tracts at 62.5 percent. Lastly, the bank originated 2.6 percent of small farm loans in upper-income census tracts which was significantly below the aggregate of 17.8 percent and the 26.0 percent of small farms in upper-income census tracts.

The bank’s distribution of small farm lending across geographies of different income levels in 2021 was consistent with the distribution of loans in 2020. The table below presents the geographic distribution of small farm loans in the assessment area in 2020. Please refer to Appendix C for geographic distribution data for small farm lending in 2021.

<b>Geographic Distribution of Small Farm Loans</b>								
<b>Assessment Area: 2020 Des Moines-West Des Moines, IA MSA 19780</b>								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Farms %
		2020			Dollar			
		Count		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Small Farm	Low	0	0.0	0.0	0	0.0	0.0	0.4
	Moderate	34	22.5	14.9	3,200	19.6	13.0	11.1
	Middle	113	74.8	66.9	12,657	77.5	62.9	62.5
	Upper	4	2.6	17.8	473	2.9	23.7	26.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			0.4			0.4	
	<b>Total</b>		<b>151</b>	<b>100.0</b>	<b>100.0</b>	<b>16,330</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

## **Lending to Borrowers of Different Income Levels and Lending to Businesses and Farms of Different Sizes**

Bank Iowa's lending activities reflect a good distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank. The bank's lending to individuals of different income levels was given more weight considering the need for affordable housing in the assessment area, as identified by community representatives.

### HMDA-Reportable Lending

The distribution of HMDA-reportable loans reflects good penetration among individuals of different income levels.

In 2021, Bank Iowa originated 10.0 percent of total HMDA-reportable loans to low-income borrowers. This is above the aggregate at 8.3 percent but significantly below the 20.6 percent of families that are low-income in the assessment area. Bank Iowa originated 15.8 percent of HMDA-reportable loans to moderate-income borrowers, below the aggregate at 18.7 percent and the demographic at 17.2 percent. The bank originated 23.8 percent of HMDA-reportable loans to middle-income borrowers, which was slightly above the aggregate and the percentage of middle-income families within the assessment area at 20.5 percent and 21.8 percent, respectively. Bank Iowa originated 40.1 percent of HMDA-reportable loans to upper-income borrowers, which was above the aggregate at 31.8 percent and comparable to the demographic measure at 40.4 percent. The bank also originated 10.3 percent of its HMDA-reportable loans to borrowers with unknown income, which consist of either commercial entity borrowers with incomes that are not required to be reported on the HMDA LAR or for the purpose of non-owner-occupied rental housing.

The bank's distribution of lending to borrowers of different income levels in 2020 was consistent with the distribution of loans in 2021 for HMDA-reportable loans. Please see Appendix B for 2020 lending tables and exhibits.

### *Home Purchase Loans*

In 2021, Bank Iowa originated 17.9 percent of its home purchase loans to low-income borrowers, which was above the aggregate at 10.7 percent but below the percentage of low-income families within the assessment area at 20.6 percent. The bank originated 18.6 percent of its home purchase loans to moderate-income borrowers, which was below the aggregate at 22.8 percent and comparable to the percentage of moderate-income families at 17.2 percent. The bank originated 20.0 percent of its home purchase loans to middle-income borrowers, which was comparable to the aggregate at 21.1 percent and below the percentage of middle-income families within the assessment area at 21.8 percent. The largest percentage of the bank's home purchase loans, 37.2 percent, was originated to upper-income borrowers, exceeding the aggregate at 26.4 percent and below the demographic of upper-income families in the assessment area at 40.4 percent.

*Refinance Loans*

In 2021, Bank Iowa originated 6.1 percent of its refinance loans to low-income borrowers. The bank's performance is comparable to the aggregate at 6.6 percent but significantly below the 20.6 percent of low-income families in the assessment area. Bank Iowa originated 15.7 percent of its refinance loans to moderate-income borrowers which is comparable to the aggregate at 15.9 percent but below the demographic of moderate-income families at 17.2 percent. The bank originated 27.9 percent of refinance loans to middle-income borrowers, above both the aggregate and demographic performance of 20.2 and 21.8 percent, respectively. Bank Iowa originated its largest percentage of refinance loans to upper-income borrowers at 45.9 percent, exceeding the aggregate and percent of upper-income families in the assessment area at 34.9 percent and 40.4 percent, respectively.

The bank's distribution of HMDA-reportable loans to borrowers of different income levels in 2020 was consistent with the distribution of loans in 2021. The following table presents the borrower distribution of HMDA-reportable loans in the assessment area in 2021. Please refer to Appendix B for borrower distribution data for HMDA-reportable lending in 2020.

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2021 Des Moines-West Des Moines, IA MSA 19780</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2021						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	26	17.9	10.7	3,329	10.3	6.0	20.6
	Moderate	27	18.6	22.8	4,832	14.9	17.5	17.2
	Middle	29	20.0	21.1	6,125	18.9	20.9	21.8
	Upper	54	37.2	26.4	15,329	47.4	35.7	40.4
	Unknown	9	6.2	18.9	2,713	8.4	19.9	0.0
	<b>Total</b>		<b>145</b>	<b>100.0</b>	<b>100.0</b>	<b>32,328</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	14	6.1	6.6	1,329	2.9	3.5	20.6
	Moderate	36	15.7	15.9	5,186	11.3	11.3	17.2
	Middle	64	27.9	20.2	11,500	25.1	17.8	21.8
	Upper	105	45.9	34.9	25,965	56.7	44.1	40.4
	Unknown	10	4.4	22.4	1,846	4.0	23.4	0.0
	<b>Total</b>		<b>229</b>	<b>100.0</b>	<b>100.0</b>	<b>45,825</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	8.0	0	0.0	4.9	20.6
	Moderate	0	0.0	15.7	0	0.0	11.5	17.2
	Middle	0	0.0	23.0	0	0.0	20.8	21.8
	Upper	1	50.0	50.8	400	88.9	58.2	40.4
	Unknown	1	50.0	2.5	50	11.1	4.5	0.0
	<b>Total</b>		<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>450</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	20.6
	Moderate	0	0.0	0.0	0	0.0	0.0	17.2
	Middle	2	8.7	0.8	155	0.3	0.0	21.8
	Upper	0	0.0	0.8	0	0.0	0.1	40.4
	Unknown	21	91.3	98.3	47,386	99.7	99.9	0.0
	<b>Total</b>		<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>47,541</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	5.8	0	0.0	3.6	20.6
	Moderate	0	0.0	12.5	0	0.0	6.9	17.2
	Middle	0	0.0	18.9	0	0.0	13.6	21.8
	Upper	0	0.0	59.9	0	0.0	73.6	40.4
	Unknown	0	0.0	2.9	0	0.0	2.3	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	6.0	0	0.0	2.7	20.6
	Moderate	0	0.0	19.4	0	0.0	13.1	17.2
	Middle	0	0.0	23.8	0	0.0	21.8	21.8
	Upper	0	0.0	42.9	0	0.0	54.1	40.4
	Unknown	0	0.0	7.9	0	0.0	8.3	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.3	0	0.0	0.2	20.6
	Moderate	0	0.0	0.3	0	0.0	0.2	17.2
	Middle	0	0.0	0.7	0	0.0	0.9	21.8
	Upper	0	0.0	0.0	0	0.0	0.0	40.4
	Unknown	0	0.0	98.6	0	0.0	98.8	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	40	10.0	8.3	4,657	3.7	4.3	20.6
	Moderate	63	15.8	18.7	10,017	7.9	13.0	17.2
	Middle	95	23.8	20.5	17,781	14.1	17.7	21.8
	Upper	160	40.1	31.8	41,694	33.1	37.0	40.4
	Unknown	41	10.3	20.7	51,995	41.2	27.9	0.0
	<b>Total</b>		<b>399</b>	<b>100.0</b>	<b>100.0</b>	<b>126,144</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

CRA-Reportable Lending

*Small Business Loans*

The borrower distribution of small business lending reflects excellent penetration among businesses of different sizes.

In 2020, Bank Iowa originated 69.2 percent of its small business loans to businesses reporting annual revenues of \$1 million or less, which was significantly above the aggregate at 40.2 percent but significantly below the percentage of small businesses in the assessment area at 90.1 percent. Of the 218 loans originated to small businesses with revenues less \$1 million, 86.7 percent were in amounts of \$100,000 or less which are typically considered most beneficial to small businesses.

The bank’s distribution of lending to business of different sizes revenue sizes in 2021 was consistent with the distribution of loans in 2020. The table below presents the borrower distribution of small business loans in the assessment area in 2020. Please refer to Appendix C for distribution data by revenue and loan size for small business lending in 2021.

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2020 Des Moines-West Des Moines, IA MSA 19780									
Product Type		Bank & Aggregate Lending Comparison							
		Count		2020				Total Businesses	
		Bank	Agg	Dollar		Agg	%		
	Revenue	#	%	%	\$ 000s	\$ %		\$ %	%
		Small Business	Revenue	\$1 Million or Less	218	69.2	40.2	12,758	
Over \$1 Million	96			30.5	59.8	25,051	66.2	75.6	8.9
Unknown	1			0.3		4	0.0		1.0
<b>Total</b>	<b>315</b>			<b>100.0</b>	<b>100.0</b>	<b>37,813</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Loan Size	\$100,000 or Less		229	72.7	85.9	6,171	16.3	26.9	
	\$100,001 - \$250,000		44	14.0	7.1	7,050	18.6	17.2	
	\$250,001 - \$1 Million		42	13.3	7.0	24,592	65.0	56.0	
	<b>Total</b>		<b>315</b>	<b>100.0</b>	<b>100.0</b>	<b>37,813</b>	<b>100.0</b>	<b>100.0</b>	
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less		189	86.7		4,346	34.1		
	\$100,001 - \$250,000		18	8.3		2,790	21.9		
	\$250,001 - \$1 Million		11	5.0		5,622	44.1		
	<b>Total</b>		<b>218</b>	<b>100.0</b>		<b>12,758</b>	<b>100.0</b>		
Originations & Purchases									
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

*Small Farm Loans*

The distribution of small farm loans reflects excellent penetration among farms of different revenue sizes. The bank originated 92.7 percent of its farm loans to farms with \$1 million in revenue or less. This performance is significantly above the aggregate performance of 57.9 percent

and slightly below the percentage of small farms in the assessment area, at 97.6 percent. Further, 62.9 percent of those were in amounts of \$100,000 or less, which are considered the most beneficial to small farms, indicating the bank’s willingness to meet the credit needs of small farms.

The bank’s distribution of lending to farms of different sizes revenue sizes in 2021 was consistent with the distribution of loans in 2020. The table below presents the borrower distribution of small farms loans in the assessment area in 2020. Please refer to Appendix C for distribution data by revenue and loan size for small farm lending in 2021.

<b>Small Farm Lending By Revenue &amp; Loan Size</b>									
<b>Assessment Area: 2020 Des Moines-West Des Moines, IA MSA 19780</b>									
Product Type		Bank & Aggregate Lending Comparison							
		2020			2020			Total Farms	
		Count		Agg %	Dollar		Agg \$ %		
Bank #	%	Bank \$ 000s	\$ %						
Small Farm	Revenue	\$1 Million or Less	140	92.7	57.9	15,468	94.7	82.7	97.6
		Over \$1 Million	8	5.3	42.1	816	5.0	17.3	2.3
		Unknown	3	2.0		46	0.3		0.1
		<b>Total</b>	<b>151</b>	<b>100.0</b>	<b>100.0</b>	<b>16,330</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	98	64.9	75.5	3,846	23.6	23.4	
		\$100,001 - \$250,000	37	24.5	16.4	6,687	40.9	37.9	
		\$250,001 - \$500,000	16	10.6	8.2	5,797	35.5	38.7	
		<b>Total</b>	<b>151</b>	<b>100.0</b>	<b>100.0</b>	<b>16,330</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	88	62.9		3,484	22.5		
		\$100,001 - \$250,000	37	26.4		6,687	43.2		
\$250,001 - \$500,000		15	10.7		5,297	34.2			
<b>Total</b>		<b>140</b>	<b>100.0</b>		<b>15,468</b>	<b>100.0</b>			
Originations & Purchases									
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									



### Community Development Lending

Bank Iowa makes a relatively high level of community development loans and makes use of innovative and/or flexible lending practices in the communities it serves. During the review period the bank made 26 loans totaling \$51.8 million in the assessment area. When compared to the previous evaluation of 14 loans totaling \$14.2 million, the bank increased the dollar volume of qualified loans by 265.4 percent. The bank has made a concerted effort to increase its community development lending in the Des Moines-West Des Moines, IA MSA assessment area. This assessment area has more opportunities given the proportion of lower income areas and people, compared to its other assessment areas. Of the bank’s qualified community development loans, 22 loans totaling \$41.8 million were made for affordable housing, one loan totaling \$841,000 for community service, and three loans totaling \$9.2 million for revitalization/stabilization purposes. Of the 26 community development loans originated, 18 were new originations totaling \$23.7 million. The remaining eight loans are renewals of credit relationships established prior to the evaluation period.

The table below presents the bank’s community development loans in the assessment area during the review period.

Qualified Community Development Loans by Purpose March 3, 2020 – July 11, 2022										
AA Name	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Total #	Total \$(000s)
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)		
Des Moines-West Des Moines, Iowa MSA #19780	22	41,827	1	841	0	0	3	9,228	26	51,896

### INVESTMENT TEST

Bank Iowa’s record of performance in this assessment area demonstrates an adequate level of qualified investments and donations in the assessment area, although rarely in a leadership position. These investments demonstrate the rare use of innovative or complex qualified investments and provide adequate responsiveness to the credit and community development needs of the assessment area.

During the evaluation period, Bank Iowa did not make any qualified investments, which reflects a slight decrease in performance in the assessment area at the previous evaluation where it made one investment totaling \$375,000. There is significant competition for qualified community development investments in the Des Moines-West Des Moines MSA, and this evaluation is the first for the bank under the FFIEC Large Financial Institution Evaluation, which evaluates investments as a separate component from lending and services.

The bank made a total of 30 qualified donations worth \$21,105 in the current evaluation period. The donations were made to organizations that serve a variety of purposes including those focused on affordable housing, community service, and economic development. When compared to the previous evaluation of 20 qualified donations totaling \$12,515, the bank increased the number of donations by 50.0 percent, and increased the dollar amount by 68.7 percent.

The table below presents the bank’s community development donations during the review period.

Qualified Community Development Donations by Purpose March 3, 2020 – July 11, 2022										
AA Name	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Total #	Total \$
	#	\$	#	\$	#	\$	#	\$		
Des Moines-West Des Moines, Iowa MSA #19780	5	4,750	20	10,605	2	3,750	3	2,000	30	21,105

**SERVICE TEST**

Bank Iowa’s retail delivery services are accessible to the bank’s geographies and individuals of different income levels in its assessment area. Its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Its services do not vary in a way that inconveniences its assessment area, particularly low- or moderate-income geographies or low- or moderate-income individuals. Bank Iowa provides an adequate level of community development services in the assessment area.

**Retail Services**

The bank’s delivery systems are accessible to geographies and individuals of different income levels in its assessment area. The bank operates its main office and five branch offices and five cash-only ATMs in the assessment area. There is one office located in a moderate-income census tract, three are located in middle-income census tracts and two in upper-income census tracts. Alternative delivery systems include phone, internet, and mobile banking.

To the extent changes have been made, the bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals. During the review period, the bank did not open or close any branch offices.

The bank’s services do not vary in a way that inconveniences its assessment area, particularly low- or moderate-income geographies or individuals. Offices in the assessment area generally have standard hours of Monday through Friday with extended drive-up hours, while a few of the branches offer limited hours on Saturday mornings. Applications for loan and deposit products are accepted at each location. Additionally, mortgage applications are accepted online through the bank’s website.

**Community Development Services**

Bank Iowa provides an adequate level of community development services. The bank provided 149 hours of volunteer financial services during the current review period; a significant decrease compared to the previous evaluation’s 648 hours. However, as mentioned in the Community Development Services portion of this evaluation, the Covid-19 pandemic limited the ability of all financial institutions to provide in person services, which is the most common mode of providing community development services. The services were performed at a number of organizations, however organizations dedicated to affordable housing accounted for nearly half of all community development services.

Qualified Community Development Services by Purpose March 3, 2020 – July 11, 2022					
AA Name	Affordable Housing	Community Services	Economic Development	Revitalize and Stabilize	Total Hours
	Hours	Hours	Hours	Hours	
Des Moines-West Des Moines, Iowa MSA #19780	70	28	52	0	149

## LAWLER, IOWA NON-MSA - Full Review

### SCOPE OF THE EXAMINATION

Full-scope examination procedures were used to evaluate the bank's performance in the Lawler, Iowa Non-MSA assessment area. The scope is consistent with the scope of the examination described within the institution summary. For further information, refer to the "Scope of Examination" section for details.

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN LAWLER, IOWA NON-MSA

The Lawler, Iowa Non-MSA assessment area consists of Chickasaw and Fayette Counties in their entireties. The assessment area remains unchanged since the previous examination. Based on 2020 FFIEC Census data, the assessment area is comprised of 11 census tracts with one moderate-income census tract and 10 middle-income census tracts. There are no low-, upper-, or unknown-income census tracts in the assessment area; nor are there any distressed or underserved middle-income census tracts in the assessment area.

Within the assessment area, the bank operates four branch offices, all of which are located in middle-income census tracts. There were no branches opened or closed since the previous evaluation.

According to the June 30, 2021, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, Bank Iowa ranked second among 17 FDIC-insured financial institutions operating in the assessment area with 17.3 percent of market share. The leader in market share is Fidelity Bank & Trust (18.3 percent). Other leaders include Bank 1st (12.5 percent), and Community Bank of Oelwein (8.9 percent). The 16 banks competing for deposits and loans with Bank Iowa have 22 offices in the assessment area; Bank Iowa has the most branches in the assessment area. In 2021, the bank ranked fourth among 96 HMDA reporting institutions and in 2020, first among 37 CRA reporting institutions. The bank has a significant presence in the assessment area, by both branches and lending.

Additional assessment area demographic information is provided in the following table. Please refer to Appendix C for 2021 demographic information.

Assessment Area: 2020 Lawler, IA Non MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,717	19.1
Moderate-income	1	9.1	823	9.1	60	7.3	2,009	22.3
Middle-income	10	90.9	8,173	90.9	547	6.7	1,978	22.0
Upper-income	0	0.0	0	0.0	0	0.0	3,292	36.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>11</b>	<b>100.0</b>	<b>8,996</b>	<b>100.0</b>	<b>607</b>	<b>6.7</b>	<b>8,996</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	1,476	810	7.6	54.9	446	30.2	220	14.9
Middle-income	13,736	9,780	92.4	71.2	2,832	20.6	1,124	8.2
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>15,212</b>	<b>10,590</b>	<b>100.0</b>	<b>69.6</b>	<b>3,278</b>	<b>21.5</b>	<b>1,344</b>	<b>8.8</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	84	5.3	83	5.7	1	0.8	0	0.0
Middle-income	1,515	94.7	1,365	94.3	117	99.2	33	100.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>1,599</b>	<b>100.0</b>	<b>1,448</b>	<b>100.0</b>	<b>118</b>	<b>100.0</b>	<b>33</b>	<b>100.0</b>
	Percentage of Total Businesses:			90.6		7.4		2.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	6	1.3	6	1.3	0	0.0	0	0.0
Middle-income	458	98.7	451	98.7	6	100.0	1	100.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>464</b>	<b>100.0</b>	<b>457</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
	Percentage of Total Farms:			98.5		1.3		0.2

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

## Population Characteristics

The table below presents the population trends for the assessment area, Chickasaw and Fayette Counties, all Non-MSA Iowa counties and the state of Iowa from 2010 to 2015. According to the 2015 U.S. Census Bureau demographic data, the assessment area’s population is 32,833, a decrease of 1.5 percent from 2010, which was below the population growth of the state of Iowa at 1.5 percent, but comparable to the rest of Non-MSA counties in the state of Iowa which saw a decrease of 0.9. Both counties that comprise the assessment area saw relatively even decreases in population. According to community representatives, the long-term population declines may recently slow or even reverse the decline, as the Covid-19 pandemic led to an increase in people seeking out rural areas for domicile.

Population Change 2010 and 2011-2015			
Area	2010 Population	2011-2015 Population	Percentage Change (%)
Assessment Area	33,319	32,833	-1.5
Chickasaw County, IA	12,439	12,244	-1.6
Fayette County, IA	20,880	20,589	-1.4
Non MSA Iowa	1,261,493	1,250,756	-0.9
State of Iowa	3,046,355	3,093,526	1.5
<i>Source: 2010—U.S. Census Bureau: Decennial Census 2011-2015—U.S. Census Bureau American Community Survey</i>			

## Income Characteristics

The following table compares the median family income for the assessment area, Chickasaw and Fayette Counties, all Non-MSA Iowa counties and the state of Iowa from 2010 to 2015. According to the 2020 FFIEC Census Data, the assessment area is comprised of 8,996 families, of which 19.1 percent are designated as low-, 22.3 percent are moderate-, 22.0 percent are middle-, and 36.6 percent are upper-income. Further, 6.7 percent of families residing within the assessment area live below the poverty line, which is comparable to the state of Iowa poverty rate of 8.1 percent.

The assessment area overall experienced an increase in MFIs between the two time periods, however the individual counties comprising the assessment area had a high degree of variance between them. Chickasaw County saw an increase in MFI at 11.7 percent while Fayette County saw a 0.7 percent decrease in MFI. Chickasaw County’s significant growth in MFI also far outpaced the Non MSA counties in the state of Iowa, as well as the entirety of the state of Iowa which both saw increases between 0.2 percent to 0.7 percent, respectively.

According to a community representative, Fayette County continues to be on the low end of the median family income relative to other areas of the state of Iowa. However, the majority of families with lower-incomes remain ineligible to qualify for federal or state assistance programs.

<b>Median Family Income 2006-2010 and 2011-2015</b>			
<b>Area</b>	<b>2006-2010 Median Family Income 2015 Dollars (\$)</b>	<b>2011-2015 Median Family Income 2015 Dollars (\$)</b>	<b>Percentage Change (%)</b>
Assessment Area	56,338	59,119	4.9
Chickasaw County, IA	55,025	61,472	11.7
Fayette County, IA	57,308	56,935	-0.7
Non MSA Iowa	61,224	61,681	0.7
State of Iowa	67,302	67,466	0.2
<i>Source: 2006-2010 – U.S. Census Bureau: American Community Survey 2011-2015 – U.S. Census Bureau: American Community Survey</i>			

### Housing Characteristics

The following table presents the recent housing cost burden within the assessment area, Chickasaw and Fayette Counties, all Non-MSA Iowa counties and the state of Iowa. The cost burden is a measure of affordability via a comparative analysis of individuals of different income levels that spend 30.0 percent or more of their income on housing costs.

Renters across all income levels in the assessment area experience this burden at 37.2 percent which is above the non-MSA counties of Iowa at 32.4 but in line with the state of Iowa at 38.0. Chickasaw County has significantly lower rates of housing cost burden for low- and moderate-income renters when compared to Fayette County, as well as the state of Iowa. However, the housing cost burden for homeowners between Chickasaw and Fayette Counties is mixed as the percentage of low-income owners burdened in Chickasaw County is significantly lower than in Fayette County, with the reverse being the case when looking at the percentage of moderate-income borrowers where Fayette County has significantly fewer owners burdened compared Chickasaw County. Overall, the housing cost burden for homeowners within the assessment area (13.8 percent) is comparable to the state of Iowa which has 15.2 percent of all homeowners being burdened by their payments towards housing.

According to FFIEC HMDA loan and application records, home mortgage trends reflect increases in home mortgage activity in recent years across the assessment area counties and the broader region. These trends suggest a continued increase in demand for home purchases, driving up home values and further indicating that housing cost burden for low-and moderate-income homeowners will remain elevated. According to the 2011-2015 American Community Survey, the assessment area had a median housing value of \$93,411 and median gross rent of \$554, both of which are lower than the Iowa Non-MSA values of \$102,454 and \$592, respectively. Overall, there are a total of 15,212 housing units in the assessment area with the majority of housing units being

owner-occupied at 69.6 percent, while 21.5 percent are rental units and 8.8 percent are vacant housing units.

Both community representatives noted their housing stock is low, and notably in Fayette County, nearly a third of all current housing was built over 100 years ago. Local organizations have tried to step in and look for ways to build more supply. One representative stated that any lower-income housing in Fayette would likely be filled quickly.

Housing Cost Burden						
Area	Cost Burden (%) - Renters			Cost Burden (%) - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	75.7	14.8	37.2	48.1	21.3	13.8
Chickasaw County, IA	67.6	7.6	30.3	42.5	28.7	13.2
Fayette County, IA	78.9	17.3	40.7	51.5	16.1	14.2
Non MSA Iowa	65.2	16.3	32.4	55.7	20.9	14.7
State of Iowa	72.2	24.1	38.0	58.9	25.3	15.2

*Cost Burden is housing cost that equals 30.0 percent or more of household income*

*Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy*

### Employment Characteristics

The following table presents the unemployment trends for the assessment area, Chickasaw and Fayette Counties, all Non-MSA Iowa counties and the state of Iowa from 2017 to 2021. Overall, all areas saw an increase in the unemployment rate for the 2020 year, largely due to the Covid-19 pandemic which led some employers to lay off employees. In 2021, Chickasaw County has the lowest unemployment rate at 3.6 percent relative to Fayette County, all non-MSA counties in Iowa, and the state of Iowa which ranged from 4.1 percent to 4.7 percent unemployment.

Both community representatives noted the assessment area counties continue to have difficulty in attracting employees. The pandemic did not help existing population loss and may have increased retirements in a workforce with an already high level of retirements. The other representative noted that in some fields, like manufacturing, employers may increasingly rely on automation to keep plants running given the lack of available workers.



<b>Unemployment Rates (%)</b>					
<b>Area</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	3.4	2.9	3.1	5.0	4.3
Chickasaw County, IA	3.1	2.7	2.7	4.6	3.6
Fayette County, IA	3.6	3.0	3.4	5.3	4.7
Non MSA Iowa	3.2	2.6	2.7	4.8	4.1
State of Iowa	3.1	2.5	2.6	5.1	4.2
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics (LAUS)</i>					

### **Industry Characteristics**

The employment base covers multiple industries with the largest being in manufacturing and healthcare. One community contact stated that Fayette County’s county services is one of the larger employers in the area, along with healthcare companies Mercy One and Gunderson Palmer. At the manufacturing level, there are large employers like Rupp, Ashley Industrial Molding, and East Penn, which is one of the more recent additions to the large employer pool.

### **Community Representatives**

Two community representatives were contacted to provide information regarding local economic and demographic conditions. The representatives provided information on housing, employment, and economic development needs within the assessment area. One representative stated that most local banks seem to be focused on the agricultural industry. The other representative stated that banks do a good job of giving small businesses loans, and also provide a good deal of involvement in economic development via services like being a member of the board of directors. One representative did note that bank’s themselves also seem to face challenges in recruiting and hiring branch employees.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LAWLER, IOWA NON-MSA**

### **LENDING TEST**

The geographic distribution of loans overall reflects adequate penetration throughout the assessment area. The distribution of borrowers reflects, given the product lines offered, good penetration among individuals of different income levels and to businesses and farms of different sizes. Bank Iowa exhibits an adequate record of serving the credit needs of low-income individuals and very small businesses and farms. The bank makes a poor level of community development loans, and low level use of innovative and flexible lending practices in serving assessment area credit needs. There will be no discussion of home improvement or multifamily

loans as originations were too low for a meaningful analysis to be conducted. Finally, when determining performance, the comparison to aggregate lender figures was weighted more heavily than the assessment area demographics as it is a better measure of a bank's true performance relative to external variables such as market conditions.

### **Geographic Distribution of Loans**

The bank's geographic dispersion of loans reflects adequate penetration throughout the assessment area. Bank Iowa originated HMDA-reportable loans in 63.6 percent of the 11 census tracts in the assessment area in 2021. The bank did not originate a HMDA-reportable loan in the sole moderate-income census tract within the assessment. The bank originated CRA-reportable loans in 81.8 percent of the census tracts in the assessment area and did not originate a CRA-reportable loan in the sole moderate-income census tract in 2020. There were no conspicuous gaps in HMDA- and CRA-reportable lending across the bank's assessment area.

A detailed discussion of HMDA-reportable and CRA-Reportable small business and small farm lending in relation to aggregate and census demographics is provided below.

#### HMDA-Reportable Lending

Bank Iowa's geographic distribution of HMDA-reportable loans reflects poor penetration throughout the assessment area.

In 2021, Bank Iowa did not originate a HMDA-reportable loan in the one moderate-income census tract. This performance is below the aggregate at 10.9 percent and the percentage of owner-occupied units in low-income census tracts at 7.6 percent. Bank Iowa originated all of its HMDA-reportable loans in moderate-income census tracts, performing above the aggregate and the percentage of owner-occupied units at 89.1 percent and 92.4 percent, respectively. There are no low- or upper-income census tracts in the assessment area.

The bank's distribution of lending across geographies of different income levels in 2020 within HMDA-reportable loans was consistent with the distribution of loans in 2021. Please see Appendix B for 2020 lending tables and exhibits.

#### *Home Purchase Loans*

The bank originated none of its home purchase loans in moderate-income census tracts, which was below the aggregate at 12.4 percent as well as the percentage of owner-occupied units at 7.6 percent. The bank originated all of its home purchase loans in middle-income census tracts, which was above the aggregate at 87.6 percent and the percentage of owner-occupied units in middle-income census tracts at 92.4 percent.

*Refinance Loans*

The bank originated none of its refinance loans in moderate-income census tracts, which was below the aggregate at 7.1 percent and the percentage of owner-occupied units at 7.6 percent. The bank originated all of its refinance loans in middle-income census tracts, which was above the aggregate at 92.9 percent and the percentage of owner-occupied units in middle-income census tracts at 92.4 percent.

The bank's distribution of HMDA-reportable loans across geographies of different income levels in 2020 was consistent with the distribution of loans in 2021. The following table presents the geographic distribution of HMDA-reportable loans in the assessment area in 2021. Please refer to Appendix B for geographic distribution data for HMDA-reportable lending in 2020.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2021 Lawler, IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2021						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$ (000s)	%	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	12.4	0	0.0	9.1	7.6
	Middle	20	100.0	87.6	2,838	100.0	90.9	92.4
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>2,838</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	7.1	0	0.0	4.9	7.6
	Middle	36	100.0	92.9	4,462	100.0	95.1	92.4
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>4,462</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	20.0	0	0.0	14.4	7.6
	Middle	0	0.0	80.0	0	0.0	85.6	92.4
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	<b>Multi-Family</b> 0.0
	Moderate	0	0.0	30.8	0	0.0	68.3	13.2
	Middle	0	0.0	69.2	0	0.0	31.7	86.8
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	12.5	0	0.0	11.6	7.6
	Middle	0	0.0	87.5	0	0.0	88.4	92.4
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	18.5	0	0.0	13.2	7.6
	Middle	0	0.0	81.5	0	0.0	86.8	92.4
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	20.0	0	0.0	18.8	7.6
	Middle	0	0.0	80.0	0	0.0	81.2	92.4
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	10.9	0	0.0	9.5	7.6
	Middle	56	100.0	89.1	7,300	100.0	90.5	92.4
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>56</b>	<b>100.0</b>	<b>100.0</b>	<b>7,300</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2016 FFIEC Census Data  
*Note: Percentages may not add to 100.0 percent due to rounding*

CRA-Reportable Lending

*Small Business Loans*

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area.

In 2020, Bank Iowa originated none of its small business loans in moderate-income census tracts, however this is comparable to the aggregate at 1.7 percent and below the percentage of total businesses located in moderate- income census tracts at 5.3 percent. All of the bank’s small business loans were originated in middle-income census tracts, where the vast majority of loans by aggregate of lenders were also made at 96.9 percent, and where 94.7 percent of all small businesses are located. This indicates that there are few small business lending opportunities in the sole moderate-income tract within the assessment area.

The bank’s distribution of small business lending across geographies of different income levels in 2021 was consistent with the distribution of loans in 2020. The table below presents the geographic distribution of small business loans in the assessment area in 2020. Please refer to Appendix C for geographic distribution data for small business lending in 2021.

<b>Geographic Distribution of Small Business Loans</b>								
<b>Assessment Area: 2020 Lawler, IA Non MSA</b>								
	Tract Income Levels	<b>Bank &amp; Aggregate Lending Comparison</b>						<b>Total Businesses</b>
		<b>2020</b>						
		<b>Count</b>		<b>Dollar</b>				
		<b>Bank</b>	<b>Agg</b>	<b>Bank</b>	<b>Agg</b>			
		<b>#</b>	<b>%</b>	<b>%</b>	<b>\$ (000s)</b>	<b>\$ %</b>	<b>\$ %</b>	<b>%</b>
Small Business	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	1.7	0	0.0	1.0	5.3
	Middle	138	100.0	96.9	8,118	100.0	96.7	94.7
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			1.4			2.3	
	<b>Total</b>		<b>138</b>	<b>100.0</b>	<b>100.0</b>	<b>8,118</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

*Small Farm Loans*

The geographic distribution of small farm loans reflects adequate dispersion throughout the assessment area. Only a limited analysis was conducted as neither the bank, nor any other CRA-

reporters in the assessment area originated a small farm loan in the sole moderate-income census tract. This is understandable given only 1.3 percent of farms in the assessment area are located in this tract.

The bank’s distribution of small farm lending across geographies of different income levels in 2021 was consistent with the distribution of loans in 2020. The table below presents the geographic distribution of small farm loans in the assessment area in 2020. Please refer to Appendix C for geographic distribution data for small farm lending in 2021.

<b>Geographic Distribution of Small Farm Loans</b>								
<b>Assessment Area: 2020 Lawler, IA Non MSA</b>								
	<b>Tract Income Levels</b>	<b>Bank &amp; Aggregate Lending Comparison</b>					<b>Total Farms</b>	
		<b>2020</b>			<b>Dollar</b>			
		<b>Count</b>		<b>Agg</b>	<b>Bank</b>			<b>Agg</b>
		<b>#</b>	<b>%</b>	<b>%</b>	<b>\$ (000s)</b>	<b>\$ %</b>	<b>\$ %</b>	<b>%</b>
<b>Small Farm</b>	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	1.3
	Middle	181	100.0	100.0	17,039	100.0	100.0	98.7
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			0.0			0.0	
	<b>Total</b>		<b>181</b>	<b>100.0</b>	<b>100.0</b>	<b>17,039</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

## **Lending to Borrowers of Different Income Levels and Lending to Businesses and Farms of Different Sizes**

Bank Iowa's lending activities reflect a good distribution of loans among individuals of different income levels and to businesses of different sizes, and excellent distribution of loans to farms of different sizes, given the product lines offered by the bank.

### HMDA-Reportable Lending

The distribution of HMDA-reportable loans reflects good penetration among individuals of different income levels.

In 2021, Bank Iowa originated 5.4 percent of total HMDA-reportable loans to low-income borrowers. This is below the aggregate at 11.7 percent and significantly below the 19.1 percent of families that are low-income in the assessment area. Bank Iowa originated 25.0 percent of HMDA-reportable loans to moderate-income borrowers, this is comparable to the aggregate at 23.8 percent and above the demographic at 22.3 percent. The bank originated 25.0 percent of HMDA-reportable loans to middle-income borrowers, which was slightly above the aggregate and the percentage of middle-income families within the assessment area at 21.4 percent and 22.0 percent, respectively. Bank Iowa originated 35.7 percent of HMDA-reportable loans to upper-income borrowers, which was above the aggregate at 29.3 percent but comparable to the demographic measure at 36.6 percent.

The bank's distribution of lending to borrowers of different income levels in 2020 was consistent with the distribution of loans in 2021 for HMDA-reportable loans. Please see Appendix B for 2020 lending tables and exhibits.

### *Home Purchase Loans*

In 2021, Bank Iowa originated 10.0 percent of its home purchase loans to low-income borrowers, which was below the aggregate at 15.7 percent and significantly below the percentage of low-income families within the assessment area at 19.1 percent. The largest percentage of the bank's home purchase loans, 40.0 percent, was to moderate-income borrowers, which was above the aggregate at 32.9 percent and significantly above the percentage of moderate-income families at 22.3 percent. The bank originated 15.0 percent of its home purchase loans to middle-income borrowers, which was comparable to the aggregate at 15.7 percent and below the percentage of middle-income families within the assessment area at 22.0 percent. The bank originated 30.0 percent to upper-income borrowers, exceeding the aggregate at 22.5 percent and below the demographic of upper-income families in the assessment area at 36.6 percent.

### *Refinance Loans*

In 2021, Bank Iowa originated 2.8 percent of its refinance loans to low-income borrowers. The bank's performance is below the aggregate at 8.6 percent and significantly below the 19.1 percent

of low-income families in the assessment area. Bank Iowa originated 16.7 percent of its refinance loans to moderate-income borrowers which is above the aggregate at 14.5 percent but below the demographic of moderate-income families at 22.3 percent. The bank originated 30.6 percent of refinance loans to middle-income borrowers, above both the aggregate and demographic performance of 26.4 and 22.0 percent, respectively. Bank Iowa originated its largest percentage of refinance loans to upper-income borrowers at 38.9 percent, comparable to the aggregate and percent of upper-income families in the assessment area at 37.5 percent and 36.6 percent, respectively.

The bank's distribution of HMDA-reportable loans to borrowers of different income levels in 2020 was consistent with the distribution of loans in 2021. The table below presents the borrower distribution of HMDA-reportable loans in the assessment area in 2021. Please refer to Appendix B for borrower distribution data for HMDA-reportable lending in 2020.



<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2021 Lawler, IA Non MSA</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2021						
		Count Bank		Agg	Dollar Bank		Agg	
#	%	%	\$(000s)	\$ %	\$ %			
Home Purchase	Low	2	10.0	15.7	136	4.8	9.1	19.1
	Moderate	8	40.0	32.9	959	33.8	27.2	22.3
	Middle	3	15.0	15.7	647	22.8	18.6	22.0
	Upper	6	30.0	22.5	1,053	37.1	32.8	36.6
	Unknown	1	5.0	13.1	42	1.5	12.4	0.0
	<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>2,838</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	1	2.8	8.6	85	1.9	4.3	19.1
	Moderate	6	16.7	14.5	394	8.8	9.4	22.3
	Middle	11	30.6	26.4	1,272	28.5	23.9	22.0
	Upper	14	38.9	37.5	2,122	47.6	48.5	36.6
	Unknown	4	11.1	13.1	588	13.2	13.9	0.0
	<b>Total</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>4,462</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	15.0	0	0.0	9.2	19.1
	Moderate	0	0.0	30.0	0	0.0	17.2	22.3
	Middle	0	0.0	22.5	0	0.0	23.8	22.0
	Upper	0	0.0	32.5	0	0.0	49.8	36.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	19.1
	Moderate	0	0.0	0.0	0	0.0	0.0	22.3
	Middle	0	0.0	0.0	0	0.0	0.0	22.0
	Upper	0	0.0	0.0	0	0.0	0.0	36.6
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	12.5	0	0.0	22.9	19.1
	Moderate	0	0.0	25.0	0	0.0	14.1	22.3
	Middle	0	0.0	25.0	0	0.0	16.6	22.0
	Upper	0	0.0	37.5	0	0.0	46.3	36.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	19.1
	Moderate	0	0.0	33.3	0	0.0	26.5	22.3
	Middle	0	0.0	44.4	0	0.0	35.6	22.0
	Upper	0	0.0	18.5	0	0.0	35.1	36.6
	Unknown	0	0.0	3.7	0	0.0	2.8	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	19.1
	Moderate	0	0.0	0.0	0	0.0	0.0	22.3
	Middle	0	0.0	0.0	0	0.0	0.0	22.0
	Upper	0	0.0	0.0	0	0.0	0.0	36.6
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	3	5.4	11.7	221	3.0	6.2	19.1
	Moderate	14	25.0	23.8	1,354	18.5	17.0	22.3
	Middle	14	25.0	21.4	1,919	26.3	20.8	22.0
	Upper	20	35.7	29.3	3,176	43.5	39.6	36.6
	Unknown	5	8.9	13.7	630	8.6	16.4	0.0
	<b>Total</b>	<b>56</b>	<b>100.0</b>	<b>100.0</b>	<b>7,300</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

CRA-Reportable Lending

*Small Business Loans*

The borrower distribution of small business lending reflects good penetration among businesses of different sizes.

In 2020, Bank Iowa originated 65.9 percent of its small business loans to businesses reporting annual revenues of \$1 million or less, which was above the aggregate at 53.6 percent. The percentage of small business loans originated was significantly below the percentage of small business in the assessment area at 90.6 percent. Of the 138 loans originated to small businesses with revenues less \$1 million, 86.2 percent were in amounts of \$100,000 or less which are typically considered most beneficial to small businesses.

The bank’s distribution of lending to business of different revenue sizes in 2021 to businesses reporting annual revenues of \$1 million or less, was significantly higher (84.3 percent) than in 2020, and comparable to the percentage of small businesses in the assessment area (91.0 percent). This further supports the conclusion regarding the bank’s performance in the assessment area. The table below presents the borrower distribution of small business loans in the assessment area in 2020. Please refer to Appendix C for distribution data by revenue and loan size for small business lending in 2021.

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2020 Lawler, IA Non MSA									
Product Type		Bank & Aggregate Lending Comparison							
		Count			Dollar			Total Businesses	
		Bank		Agg	Bank		Agg		
		#	%	%	\$ 000s	\$ %	\$ %	%	
Small Business	Revenue	\$1 Million or Less	91	65.9	53.6	3,280	40.4	33.0	90.6
		Over \$1 Million	46	33.3	46.4	4,826	59.4	67.0	7.4
		Unknown	1	0.7		12	0.1		2.1
		<b>Total</b>	<b>138</b>	<b>100.0</b>	<b>100.0</b>	<b>8,118</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	119	86.2	90.9	3,491	43.0	46.6	
		\$100,001 - \$250,000	12	8.7	5.5	1,990	24.5	20.8	
		\$250,001 - \$1 Million	7	5.1	3.6	2,637	32.5	32.6	
		<b>Total</b>	<b>138</b>	<b>100.0</b>	<b>100.0</b>	<b>8,118</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	86	94.5		2,151	65.6		
		\$100,001 - \$250,000	3	3.3		521	15.9		
		\$250,001 - \$1 Million	2	2.2		608	18.5		
		<b>Total</b>	<b>91</b>	<b>100.0</b>		<b>3,280</b>	<b>100.0</b>		
	Originations & Purchases								
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

*Small Farm Loans*

The distribution of small farm loans reflects excellent penetration among farms of different revenue sizes. The bank originated 91.2 percent of its farm loans to farms with \$1 million in revenue or less. This performance is significantly above the aggregate performance of 70.5 percent and below the percentage of small farms in the assessment area, at 98.5 percent. Further, 69.1 percent of those were in amounts of \$100,000 or less, which are typically considered the most beneficial to small farms, indicating the bank’s willingness to meet the credit needs of small farms.

The bank’s distribution of lending to farms of different sizes revenue sizes in 2021 to farms reporting annual revenues of \$1 million or less, was consistent with that in 2020, however of those 89.1 percent were in amounts of \$100,000 or less, an improvement over the prior year. This further supports the conclusion regarding the bank’s performance in the assessment area. The table below presents the borrower distribution of small farm loans in the assessment area in 2020. Please refer to Appendix C for distribution data by revenue and loan size for small farm lending in 2021.

Small Farm Lending By Revenue & Loan Size									
Assessment Area: 2020 Lawler, IA Non MSA									
Product Type		Bank & Aggregate Lending Comparison							
		2020			2020			Total Farms	
		Count		Agg %	Dollar		Agg \$ %		
Bank #	%	Bank \$ 000s	\$ %						
Small Farm	Revenue	\$1 Million or Less	165	91.2	70.5	14,451	84.8	77.8	98.5
		Over \$1 Million	16	8.8	29.5	2,588	15.2	22.2	1.3
		Unknown	0	0.0		0	0.0		0.2
		<b>Total</b>	<b>181</b>	<b>100.0</b>	<b>100.0</b>	<b>17,039</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	121	66.9	76.8	4,182	24.5	26.4	
		\$100,001 - \$250,000	42	23.2	15.7	6,954	40.8	37.5	
		\$250,001 - \$500,000	18	9.9	7.6	5,903	34.6	36.1	
		<b>Total</b>	<b>181</b>	<b>100.0</b>	<b>100.0</b>	<b>17,039</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	114	69.1		3,841	26.6		
		\$100,001 - \$250,000	38	23.0		6,207	43.0		
		\$250,001 - \$500,000	13	7.9		4,403	30.5		
		<b>Total</b>	<b>165</b>	<b>100.0</b>		<b>14,451</b>	<b>100.0</b>		
Originations & Purchases									
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

### Community Development Lending

Bank Iowa makes a low level community development loans and makes little use of innovative and/or flexible lending practices in the communities it serves. During the review period the bank did not originate any community development loans. However, this was the bank’s first evaluation as a CRA Reporter, which does not allow the bank to submit CRA-reportable loans that could have been evaluated for community development previously when the bank was still an Intermediate-Small Bank. Previously the bank had made one loan in the amount of \$20,000 in this assessment area.

### INVESTMENT TEST

Bank Iowa’s record of performance in this assessment area demonstrates an adequate level of qualified investments and donations in the assessment area, although rarely in a leadership position. These investments demonstrate the rare use of innovative or complex qualified investments and provide adequate responsiveness to the credit and community development needs of the assessment area.

During the evaluation period, Bank Iowa did not make any qualified investments, which is consistent with its performance in the assessment area at the previous evaluation where it also did not make any qualified investments in the assessment area. The assessment area has limited opportunity for qualified investments as there is only one moderate-income tract, and no distressed and/or underserved middle-income census tracts. Further, one of the community representatives noted financial institutions are addressing the financial needs of Fayette County, which is where the moderate-income census tract is located.

The bank made a total of six qualified donations worth \$12,750 in the current evaluation period. The donations, by dollar amount, were made to primarily community service organizations. When compared to the previous evaluation of 26 qualified donations totaling \$27,580, the bank decreased the dollar amount of donations by 53.7 percent.

The table below presents the bank’s community development donations during the review period.

Qualified Community Development Donations by Purpose March 3, 2020 – July 11, 2022										
AA Name	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Total #	Total \$
	#	\$	#	\$	#	\$	#	\$		
Lawler, Iowa Non-MSA	0	0	3	11,250	3	1,500	0	0	6	12,750

## **SERVICE TEST**

Bank Iowa's retail delivery services are accessible to the bank's geographies and individuals of different income levels in its assessment area. Its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies or to low- or moderate-income individuals. Its services do not vary in a way that inconveniences its assessment area, particularly moderate-income geographies or low- or moderate-income individuals. Bank Iowa provides an adequate level of community development services in the assessment area.

### **Retail Services**

Bank Iowa's retail delivery services are accessible to geographies and individuals of different income levels in its assessment area. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies or to low- or moderate-income individuals. Its services, including business hours do not vary in a way that inconveniences its assessment area, particularly moderate-income geographies or low- or moderate-income individuals.

The bank operates four offices and three cash-only ATMs in the assessment area. All branches are located in middle-income census tracts. During the review period, the bank did not open or close any branches. Offices in the assessment area generally have standard hours of 8:00 a.m. to 4:00 p.m., Monday through Thursday, 8:00 a.m. to 5:00 p.m. on Fridays, and closed on Saturdays. Applications for loan and deposit products are accepted at each location. Additionally, mortgage applications are accepted online through the bank's website.

### **Community Development Services**

Bank Iowa provides an adequate level of community development services. The bank provided 25 hours of volunteer financial services during the current review period; a substantial decrease compared to the previous evaluation's 67 hours. However, as previously noted throughout this performance evaluation, the ability of all financial institutions to provide in person community development services was severely limited by the Covid-19 pandemic. The services were performed at a number of organizations but primarily those who focused on economic development.

Qualified Community Development Services by Purpose March 3, 2020 – July 11, 2022					
AA Name	Affordable Housing	Community Services	Economic Development	Revitalize and Stabilize	Total Hours
	Hours	Hours	Hours	Hours	
Lawler, Iowa Non-MSA	0	5	20	0	25

## SOUTHWEST IOWA NON-MSA - Full Review

### SCOPE OF THE EXAMINATION

Full scope examination procedures were used to evaluate the bank's performance in the Southwest, Iowa Non-MSA assessment area. The scope is consistent with the scope of the examination described within the institution summary. For further information, refer to the "Scope of Examination" section for details.

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN SOUTHWEST IOWA NON-MSA

The Southwest Iowa Non-MSA assessment area consists of Adams, Fremont, Montgomery, Page, and Taylor Counties in their entireties. The assessment area remains unchanged since the previous examination. Based on 2020 FFIEC Census data, the assessment area is comprised of 18 census tracts with four moderate-income and 14 middle-income census tracts. There are no low-, upper-, or unknown census tracts in the assessment area. The FFIEC has designated two census tracts (9501.00 and 9502.00) in Adams County as distressed (population loss) and underserved (remote rural). In addition, one census tract (1803.00) in Taylor County is designated as underserved (remote rural).

Within the assessment area, the bank operates six branch offices and eight cash-only ATMs. Two branches are located in moderate-income census tracts, while the other four are located in middle-income census tracts. There were no branches opened or closed since the previous evaluation, however the bank did relocate its branch within Clarinda in June of 2020. Both the prior branch and the new (relocated) branch are in a middle-income census tract.

According to the June 30, 2021, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, Bank Iowa ranked first among 15 FDIC-insured financial institutions operating in the assessment area with 23.0 percent of market share. Other leaders in market share include Great Western Bank (17.2 percent), PCSB Bank (13.5 percent), and Houghton State Bank (8.9 percent). The 14 banks competing for deposits and loans with Bank Iowa have 28 offices in the assessment area. In 2021, the bank ranked first among 125 HMDA reporting institutions and in 2020, first among 46 CRA reporting institutions. The bank has a significant presence in the assessment area, by both branches and lending.

Additional assessment area demographic information is provided in the following table. Please refer to Appendix C for 2021 demographic information.

Assessment Area: 2020 Southwest, IA Non MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	2,683	22.1
Moderate-income	4	22.2	2,706	22.3	604	22.3	2,237	18.4
Middle-income	14	77.8	9,450	77.7	736	7.8	3,086	25.4
Upper-income	0	0.0	0	0.0	0	0.0	4,150	34.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>18</b>	<b>100.0</b>	<b>12,156</b>	<b>100.0</b>	<b>1,340</b>	<b>11.0</b>	<b>12,156</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	5,125	2,721	20.4	53.1	1,715	33.5	689	13.4
Middle-income	15,777	10,588	79.6	67.1	3,296	20.9	1,893	12.0
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>20,902</b>	<b>13,309</b>	<b>100.0</b>	<b>63.7</b>	<b>5,011</b>	<b>24.0</b>	<b>2,582</b>	<b>12.4</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	511	24.3	459	24.1	41	29.1	11	18.3
Middle-income	1,596	75.7	1,447	75.9	100	70.9	49	81.7
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>2,107</b>	<b>100.0</b>	<b>1,906</b>	<b>100.0</b>	<b>141</b>	<b>100.0</b>	<b>60</b>	<b>100.0</b>
	Percentage of Total Businesses:			90.5		6.7		2.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	71	10.9	69	10.7	2	33.3	0	0.0
Middle-income	583	89.1	578	89.3	4	66.7	1	100.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>654</b>	<b>100.0</b>	<b>647</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
	Percentage of Total Farms:			98.9		0.9		0.2

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding



### Population Characteristics

The table below presents the population trends for the assessment area, the individual counties that comprise the assessment area, all Non-MSA counties in the state of Iowa, and the state of Iowa from 2010 to 2015. According to the 2015 U.S. Census Bureau demographic data, the assessment area’s population is 43,336, a decrease of 2.5 percent from 2010, which is below the positive population growth of the state of Iowa at 1.5 percent. The most significant population decrease, in terms of percentage, was in Fremont County which saw a 4.5 percent decrease between 2010 and 2015. None of the individual counties that comprise the assessment area saw positive population growth during the time period. One community representative noted that the area includes some sparsely populated counties (confirmed by the table below), more entry level job opportunities, a limited job pool, and difficulty in attracting new employers.

<b>Population Change 2010 and 2011-2015</b>			
<b>Area</b>	<b>2010 Population</b>	<b>2011-2015 Population</b>	<b>Percentage Change (%)</b>
Assessment Area	44,459	43,336	-2.5
Adams County, IA	4,029	3,892	-3.4
Fremont County, IA	7,441	7,106	-4.5
Montgomery County, IA	10,740	10,465	-2.6
Page County, IA	15,932	15,660	-1.7
Taylor County, IA	6,317	6,213	-1.6
Non-MSA Iowa	1,261,493	1,250,756	-0.9
State Iowa	3,046,355	3,093,526	1.5
<i>Source: 2010—U.S. Census Bureau: Decennial Census 2011-2015—U.S. Census Bureau American Community Survey</i>			

### Income Characteristics

The following table compares the median family income for the assessment area, the individual counties that comprise the assessment area, all Non-MSA counties in the state of Iowa, and the state of Iowa from 2010 to 2015. According to the 2020 FFIEC Census Data, the assessment area is comprised of 12,156 families, of which 22.1 percent are designated as low-, 18.4 percent are moderate-, 25.4 percent are middle-, and 34.1 percent are upper-income. The area does have a higher rate of families living below the poverty line relative to its other assessment areas as 11.0 percent of families live below the poverty line, which is above the state of Iowa poverty rate of 8.1 percent.

The assessment area overall experienced a small increase in MFIs between the two time periods, with the individual counties comprising the assessment area experiencing a high degree of variance between them. Page County saw the highest increase in MFI at 5.3 percent while Montgomery County saw a 1.8 percent decrease in MFI. All counties, with the exception of Fremont County, have MFIs below both the state of Iowa, as well as the lower all Non-MSA counties in Iowa level.

According to community representatives, the wage potential within the assessment area is high, in particular due to the demand of Pella Corp, one of the largest national manufacturers of windows. Pella offers a range of well-paying jobs from production to management and is looking to significantly increase its production capacity.

<b>Median Family Income 2006-2010 and 2011-2015</b>			
<b>Area</b>	<b>2006-2010 Median Family Income 2015 Dollars (\$)</b>	<b>2011-2015 Median Family Income 2015 Dollars (\$)</b>	<b>Percentage Change (%)</b>
Assessment Area	56,914	57,361	0.8
Adams County, IA	57,477	58,659	2.1
Fremont County, IA	64,925	65,109	0.3
Montgomery County, IA	55,095	54,088	-1.8
Page County, IA	57,487	60,519	5.3
Taylor County, IA	52,440	54,128	3.2
Non-MSA Iowa	61,224	61,681	0.7
State of Iowa	67,302	67,466	0.2
<i>Source: 2006-2010 — U.S. Census Bureau: American Community Survey 2011-2015 — U.S. Census Bureau: American Community Survey</i>			

### Housing Characteristics

The following table presents the recent housing cost burden within the assessment area, the individual counties that comprise the assessment area, all Non-MSA counties in the state of Iowa and the state of Iowa. The cost burden is a measure of affordability via a comparative analysis of individuals of different income levels that spend 30.0 percent or more of their income on housing costs.

Renters across all income levels in the assessment area experience this burden at 33.7 percent which is below the state of Iowa level of 38.0. Adams County has significantly lower rates of housing cost burden for low- and moderate-income renters when compared to the other counties within the assessment area, as well as the state of Iowa. Montgomery County is unique in that it has the highest percentage of low-income renters experiencing housing cost burden at 74.1 percent (relative to other counties within the assessment area) while having the lowest level of moderate-income borrowers experiencing housing cost burden at 6.6 percent.

The variance for housing cost burden for homeowners between counties in the assessment area, the state of Iowa and the Non-MSA counties in the state is fairly small. Fremont County has the highest percentage of low-income homeowners experiencing housing cost burden while Taylor County has the highest percentage of moderate-income homeowners experience housing cost burden. Overall, the housing cost burden for homeowners within the assessment area (13.4 percent) is comparable to the state of Iowa which has 15.2 percent of all homeowners being

burdened by their payments towards housing.

According to 2020 and 2021 FFIEC HMDA loan and application records, home mortgage trends reflect increases in home mortgage activity in recent years across the assessment area counties and the broader region. These trends suggest a continued increase in demand for home purchases and refinances, driving up home values and further indicating that housing cost burden for low- and moderate-income homeowners will remain elevated. According to the 2020 FFIEC Census Data, the assessment area had a median housing value of \$82,693 and median gross rent of \$588. Overall, there are a total of 20,902 housing units in the assessment area with the majority of housing units being owner-occupied at 63.7 percent, while 24.0 percent are rental units and 12.4 percent are vacant housing units.

A community representative focused on providing affordable housing stated that while most housing for lower-income families and individuals was at capacity, there was rarely waiting lists for families to get housing. The other community representative noted that several of the housing developments have had local banks playing a major role in providing financing, and have been a major partner in trying to increase housing supply.

<b>Housing Cost Burden</b>						
<b>Area</b>	<b>Cost Burden (%) - Renters</b>			<b>Cost Burden (%) – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	68.2	12.7	33.7	51.7	13.6	13.4
Adams County, IA	39.3	10.5	18.6	53.5	15.5	14.6
Fremont County, IA	64.2	14.8	30.5	58.2	13.2	12.6
Montgomery County, IA	74.1	6.6	37.1	53.8	14.1	14.9
Page County, IA	73.6	17.6	38.5	43.6	11.1	10.9
Taylor County, IA	55.8	12.3	25.5	56.8	17.4	16.9
Non MSA Iowa	65.2	16.3	32.4	55.7	20.9	14.7
State of Iowa	72.2	24.1	38.0	58.9	25.3	15.2

*Cost Burden is housing cost that equals 30.0 percent or more of household income*

*Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy*

### **Employment Characteristics**

The following table presents the unemployment trends for the assessment area, the individual counties that comprise assessment area, all Non-MSA counties in the state of Iowa, and the state of Iowa from 2017 to 2021. Overall, all areas saw an increase in the unemployment rate for the 2020 year, largely due to the Covid-19 pandemic which let some employers to lay off employees. In 2021, all counties within the assessment had unemployment rates below the state of Iowa at 4.2 percent.

A community representative stated that the local economy appears to be strong as there are large employers such as Pella Corp that employ a good share of people in the area.

Unemployment Rates (%)					
Area	2017	2018	2019	2020	2021
Assessment Area	3.0	2.2	2.3	4.1	3.6
Adams County, IA	2.3	1.9	1.7	3.7	3.0
Fremont County, IA	2.6	1.9	2.6	3.0	2.9
Montgomery County, IA	3.1	2.4	2.5	4.6	4.1
Page County, IA	3.8	2.5	2.4	4.9	4.1
Taylor County, IA	2.2	2.0	1.8	3.6	3.1
Non-MSA Iowa	3.2	2.6	2.7	4.8	4.1
State of Iowa	3.1	2.5	2.6	5.1	4.2

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics (LAUS)*

### Industry Characteristics

As previously mentioned, the local economy is dominated by a few large employers, Pella Corp. being the largest and looking to expand. Further, the area is primarily rural and focused on agriculture, which has recently seen historically high yields in the area. An ethanol plant was recently given a large investment to expand its operations, which a community representative stated could add over 200 jobs.

### Community Representatives

Two community representatives were contacted to provide information regarding local economic and demographic conditions. The representatives provided information on housing, employment, and economic development needs within the assessment area. A representative stated that there is limited competition in the area between banks, and that overall, there is a collaborative environment with local bank leaders being active in the community. For example, local banks are working together and providing assistance for affordable housing projects in the assessment area. The representatives confirmed what the above environmental factors tables show: while the area has experienced an overall decrease in population, seen throughout most of rural Iowa, the local economy is stable with a few larger employers that often have many job postings, ranging from entry level to management.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTHWEST IOWA NON-MSA

The geographic distribution of loans overall reflects good penetration throughout the assessment area. The distribution of borrowers reflects, given the product lines offered, excellent penetration among individuals of different income levels, and to businesses and farms of different sizes. Bank Iowa exhibits a good record of serving the credit needs of low-income individuals and very small businesses and farms. The bank is a leader level in making community development loans, and the bank makes use of innovative and flexible lending practices in serving assessment area credit needs. There will be no discussion of home improvement or multifamily loans as originations

were too low for a meaningful analysis to be conducted. Finally, when determining performance, the comparison to aggregate lender figures was weighted more heavily than the assessment area demographics as it is a better measure of a bank's true performance relative to external variables such as market conditions.

## Geographic Distribution of Loans

### LENDING TEST

The bank's geographic dispersion of loans reflects adequate penetration throughout the assessment area. Bank Iowa originated HMDA-reportable loans in 83.3 percent of the 18 census tracts in the assessment area in 2021. The bank originated HMDA-reportable loans in the one of the four moderate-income census tracts within the assessment. In 2020, the bank originated CRA-reportable loans in all of the census tracts in the assessment area. There were no conspicuous gaps in HMDA- and CRA-reportable lending across the bank's assessment area.

A detailed discussion of HMDA-reportable and CRA-Reportable small business and small farm lending in relation to aggregate and census demographics is provided below.

#### HMDA-Reportable Lending

Bank Iowa's geographic distribution of HMDA-reportable loans reflects good penetration throughout the assessment area.

In 2021, Bank Iowa originated 15.0 percent of its HMDA-reportable loans in moderate-income census tracts. This performance is slightly below the aggregate at 17.7 percent and below the percentage of owner-occupied units in moderate-income census tracts at 20.4 percent. Bank Iowa originated 85.0 percent of its HMDA-reportable loans in middle-income census tracts, again performing comparable to the aggregate at 82.2 percent but above the percentage of owner-occupied units at 79.6 percent. There are no low- or upper-income census tracts in the assessment area.

The bank's distribution of lending across geographies of different income levels in 2020 within HMDA-reportable loans was consistent with the distribution of loans in 2021. Please see Appendix B for 2020 lending tables and exhibits.

#### *Home Purchase Loans*

The bank originated 24.8 percent its home purchase loans in moderate-income census tracts, which was slightly above both the aggregate at 22.8 percent and the percentage of owner-occupied units at 20.4 percent. The bank originated the majority (75.2 percent) of its home purchase loans in middle-income census tracts, which was slightly below the aggregate at 77.0 percent and below percentage of owner-occupied units in middle-income census tracts at 79.6 percent.

*Refinance Loans*

The bank originated 4.1 percent of its refinance loans in moderate-income census tracts, which was below the aggregate at 10.9 percent and the percentage of owner-occupied units at 20.4 percent. The majority (95.9 percent) of the bank's refinance loans were in middle-income census tracts, which was above the aggregate at 89.1 percent and the percentage of owner-occupied units in middle-income census tracts at 79.6 percent.

The bank's distribution of HMDA-reportable loans across geographies of different income levels in 2020 was consistent with the distribution of loans in 2021. The table below presents the geographic distribution of HMDA-reportable loans in the assessment area in 2021. Please refer to Appendix B for geographic distribution data for HMDA-reportable lending in 2020.

Geographic Distribution of HMDA Reportable Loans							
Assessment Area: 2021 Southwest, IA Non MSA							
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units
		2021					
		Count Bank	Agg	Dollar Bank	Agg		
		#	%	%	\$ (000s)	\$ %	\$ %
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	25	24.8	22.8	2,398	19.0	20.4
	Middle	76	75.2	77.0	10,193	81.0	79.6
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	0.2	0	0.0	0.1
	<b>Total</b>	<b>101</b>	<b>100.0</b>	<b>100.0</b>	<b>12,591</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	4	4.1	10.9	453	3.6	20.4
	Middle	93	95.9	89.1	12,257	96.4	79.6
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>	<b>97</b>	<b>100.0</b>	<b>100.0</b>	<b>12,710</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	25.0	0	0.0	20.4
	Middle	0	0.0	75.0	0	0.0	79.6
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	1	50.0	33.3	345	45.8	31.9
	Middle	1	50.0	66.7	408	54.2	68.1
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>753</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	40.0	0	0.0	20.4
	Middle	0	0.0	60.0	0	0.0	79.6
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	27.8	0	0.0	20.4
	Middle	0	0.0	72.2	0	0.0	79.6
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	16.7	0	0.0	20.4
	Middle	0	0.0	83.3	0	0.0	79.6
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	30	15.0	17.7	3,196	12.3	20.4
	Middle	170	85.0	82.2	22,857	87.7	79.6
	Upper	0	0.0	0.0	0	0.0	0.0
	Unknown	0	0.0	0.1	0	0.0	0.1
	<b>Total</b>	<b>200</b>	<b>100.0</b>	<b>100.0</b>	<b>26,053</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2016 FFIEC Census Data  
*Note: Percentages may not add to 100.0 percent due to rounding*

CRA-Reportable Lending

*Small Business Loans*

The geographic distribution of small business loans reflects good penetration throughout the assessment area.

In 2020, Bank Iowa originated 18.5 percent of its small business loans in moderate-income census tracts, which is slightly below both the aggregate at 21.4 percent and the percentage of total businesses located in moderate- income census tracts at 24.3 percent. Most of the bank’s small business loans (81.5 percent) were originated in middle-income census tracts, where the majority of loans by aggregate of lenders were also made (77.5 percent), and where 75.7 percent of all small businesses are located.

The bank’s distribution of small business lending across geographies of different income levels in 2021 was consistent with the distribution of loans in 2020. The table below presents the geographic distribution of small business loans in the assessment area in 2020. Please refer to Appendix C for geographic distribution data for small business lending in 2021.

<b>Geographic Distribution of Small Business Loans</b>								
<b>Assessment Area: 2020 Southwest, IA Non MSA</b>								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Businesses
		2020			2020			
		Count		Agg %	Dollar		Agg \$ %	
Bank #	%	Bank \$ (000s)	\$ %					
Small Business	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	57	18.5	21.4	2,794	16.2	13.7	24.3
	Middle	251	81.5	77.5	14,465	83.8	85.7	75.7
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			1.1			0.6	
	<b>Total</b>	<b>308</b>	<b>100.0</b>	<b>100.0</b>	<b>17,259</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

*Small Farm Loans*

The geographic distribution of small farm loans reflects good dispersion throughout the assessment area. In 2020, Bank Iowa originated 5.0 percent of its small farm loans in moderate-income census tracts, which is slightly below the aggregate at 6.7 percent and below the percentage of total farms located in moderate- income census tracts at 10.9 percent. Most of the bank’s small farm loans (95.0 percent) were originated in middle-income census tracts, where the vast majority



of loans by aggregate of lenders were also made (93.3 percent), and where 89.1 percent of all farm businesses are located.

The bank’s distribution of small farm lending across geographies of different income levels in 2021 was consistent with the distribution of loans in 2020. The table below presents the geographic distribution of small farm loans in the assessment area in 2020. Please refer to Appendix C for geographic distribution data for small farm lending in 2021.

<b>Geographic Distribution of Small Farm Loans</b>								
<b>Assessment Area: 2020 Southwest, IA Non MSA</b>								
	<b>Tract Income Levels</b>	<b>Bank &amp; Aggregate Lending Comparison</b>					<b>Total Farms</b>	
		<b>2020</b>						
		<b>Count</b>		<b>Agg</b>	<b>Dollar</b>			<b>Agg</b>
		<b>Bank</b>	<b>%</b>	<b>%</b>	<b>Bank</b>	<b>Agg</b>	<b>%</b>	
		<b>#</b>	<b>%</b>	<b>%</b>	<b>\$ (000s)</b>	<b>\$ %</b>	<b>\$ %</b>	<b>%</b>
<b>Small Farm</b>	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	24	5.0	6.7	1,778	3.2	4.4	10.9
	Middle	459	95.0	93.3	53,129	96.8	95.6	89.1
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			0.0			0.0	
	<b>Total</b>		<b>483</b>	<b>100.0</b>	<b>100.0</b>	<b>54,907</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

## **Lending to Borrowers of Different Income Levels and Lending to Businesses and Farms of Different Sizes**

Bank Iowa's lending activities reflect an excellent distribution of loans among individuals of different income levels and to businesses (including farms) of different sizes, given the product lines offered by the bank.

### HMDA-Reportable Lending

The distribution of HMDA-reportable loans reflects excellent penetration among individuals of different income levels.

In 2021, Bank Iowa originated 7.0 percent of total HMDA-reportable loans to low-income borrowers. This is slightly below the aggregate at 9.3 percent and significantly below the 22.1 percent of families that are low-income in the assessment area. Bank Iowa originated 30.0 percent of HMDA-reportable loans to moderate-income borrowers, above the aggregate at 22.3 percent and significantly above the percentage of families in those tracts at 18.4 percent. The bank originated 17.0 percent of HMDA-reportable loans to middle-income borrowers, which was comparable to the aggregate at 20.0 percent and below the percentage of middle-income families within the assessment area at 25.4 percent. Bank Iowa originated 38.5 percent of HMDA-reportable loans to upper-income borrowers, which was above the aggregate at 28.3 percent but only slightly above the demographic measure at 34.1 percent.

The bank's distribution of lending to borrowers of different income levels in 2020 was consistent with the distribution of loans in 2021 for HMDA-reportable loans. Please see Appendix B for 2020 lending tables and exhibits.

### *Home Purchase Loans*

In 2021, Bank Iowa originated 10.9 percent of its home purchase loans to low-income borrowers, which was slightly below the aggregate at 12.2 percent and below the percentage of low-income families within the assessment area at 22.1 percent. The bank originated 35.6 percent of its home purchase loans to moderate-income borrowers, which was significantly above the aggregate at 25.6 percent and the percentage of moderate-income families at 18.4 percent. The bank originated 12.9 percent of its home purchase loans to middle-income borrowers, which was below the aggregate at 19.3 percent and the percentage of middle-income families within the assessment area at 25.4 percent. Finally, 33.7 percent of the bank's home purchase loans were originated to upper-income borrowers, exceeding the aggregate at 21.7 percent but comparable to the demographic of upper-income families in the assessment area at 34.1 percent.

### *Refinance Loans*

In 2021, Bank Iowa originated 3.1 percent of its refinance loans to low-income borrowers. The bank's performance is below the aggregate at 6.0 percent and significantly below the 22.1 percent

of low-income families in the assessment area. Bank Iowa originated 24.7 percent of its refinance loans to moderate-income borrowers which is significantly above the aggregate at 18.7 percent and the demographic of moderate-income families at 18.4 percent. The bank originated 21.6 percent of refinance loans to middle-income borrowers, which was comparable to both the aggregate and demographic performance of 21.4 and 25.4 percent, respectively. Bank Iowa originated its largest percentage of refinance loans to upper-income borrowers at 44.3 percent, exceeding the aggregate and percent of upper-income families in the assessment area at 35.3 percent and 34.1 percent, respectively.

The bank's distribution of HMDA-reportable loans to borrowers of different income levels in 2020 was consistent with the distribution of loans in 2021. The table below presents the borrower distribution of HMDA-reportable loans in the assessment area in 2021. Please refer to Appendix B for borrower distribution data for HMDA-reportable lending in 2020.

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2021 Southwest, IA Non MSA</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		Bank		Agg		Dollar		
		Count	%	Count	%	Count	%	
		#	%	%	\$(000s)	\$ %	\$ %	%
Home Purchase	Low	11	10.9	12.2	821	6.5	7.5	22.1
	Moderate	36	35.6	25.6	3,537	28.1	19.7	18.4
	Middle	13	12.9	19.3	1,724	13.7	21.6	25.4
	Upper	34	33.7	21.7	5,551	44.1	29.8	34.1
	Unknown	7	6.9	21.2	957	7.6	21.4	0.0
	<b>Total</b>	<b>101</b>	<b>100.0</b>	<b>100.0</b>	<b>12,591</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	3	3.1	6.0	231	1.8	3.3	22.1
	Moderate	24	24.7	18.7	2,433	19.1	13.5	18.4
	Middle	21	21.6	21.4	2,836	22.3	19.6	25.4
	Upper	43	44.3	35.3	6,219	48.9	41.0	34.1
	Unknown	6	6.2	18.7	991	7.8	22.7	0.0
	<b>Total</b>	<b>97</b>	<b>100.0</b>	<b>100.0</b>	<b>12,710</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	22.1
	Moderate	0	0.0	20.0	0	0.0	21.1	18.4
	Middle	0	0.0	35.0	0	0.0	35.4	25.4
	Upper	0	0.0	35.0	0	0.0	33.4	34.1
	Unknown	0	0.0	10.0	0	0.0	10.1	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	22.1
	Moderate	0	0.0	0.0	0	0.0	0.0	18.4
	Middle	0	0.0	0.0	0	0.0	0.0	25.4
	Upper	0	0.0	0.0	0	0.0	0.0	34.1
	Unknown	2	100.0	100.0	753	100.0	100.0	0.0
	<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>753</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	20.0	0	0.0	17.7	22.1
	Moderate	0	0.0	0.0	0	0.0	0.0	18.4
	Middle	0	0.0	20.0	0	0.0	24.4	25.4
	Upper	0	0.0	60.0	0	0.0	58.0	34.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	22.2	0	0.0	14.0	22.1
	Moderate	0	0.0	33.3	0	0.0	41.3	18.4
	Middle	0	0.0	0.0	0	0.0	0.0	25.4
	Upper	0	0.0	44.4	0	0.0	44.7	34.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	22.1
	Moderate	0	0.0	0.0	0	0.0	0.0	18.4
	Middle	0	0.0	0.0	0	0.0	0.0	25.4
	Upper	0	0.0	0.0	0	0.0	0.0	34.1
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	14	7.0	9.3	1,052	4.0	5.6	22.1
	Moderate	60	30.0	22.3	5,970	22.9	16.9	18.4
	Middle	34	17.0	20.0	4,559	17.5	20.4	25.4
	Upper	77	38.5	28.3	11,770	45.2	34.8	34.1
	Unknown	15	7.5	20.1	2,701	10.4	22.4	0.0
	<b>Total</b>	<b>200</b>	<b>100.0</b>	<b>100.0</b>	<b>26,053</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2016 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

CRA-Reportable Lending

*Small Business Loans*

The borrower distribution of small business lending reflects excellent penetration among businesses of different sizes.

In 2020, Bank Iowa originated 87.0 percent of its small business loans to businesses reporting annual revenues of \$1 million or less, which was significantly above the aggregate at 58.1 percent. The percentage of small business loans originated was comparable to the percentage of small business in the assessment area at 90.5 percent. Of the 308 loans originated to small businesses with revenues less \$1 million, 89.2 percent were in amounts of \$100,000 or less which are typically considered most responsive to the needs of small businesses.

The bank’s distribution of lending to businesses of different revenue sizes in 2021 was consistent with the distribution of loans in 2020. The table below presents the borrower distribution of small business loans in the assessment area in 2020. Please refer to Appendix C for distribution data by revenue and loan size for small business lending in 2021.

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2020 Southwest, IA Non MSA									
Product Type		Bank & Aggregate Lending Comparison							
		2020			2020			Total Businesses	
		Count		Agg	Dollar		Agg		
		Bank	%	%	Bank	Agg	%	%	
		#	%	%	\$ 000s	\$ %	\$ %	%	
Small Business	Revenue	\$1 Million or Less	268	87.0	58.1	12,314	71.3	44.5	90.5
		Over \$1 Million	31	10.1	41.9	4,080	23.6	55.5	6.7
		Unknown	9	2.9		865	5.0		2.8
		<b>Total</b>	<b>308</b>	<b>100.0</b>	<b>100.0</b>	<b>17,259</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	263	85.4	86.3	7,243	42.0	34.2	
		\$100,001 - \$250,000	31	10.1	8.3	4,730	27.4	24.0	
		\$250,001 - \$1 Million	14	4.5	5.4	5,286	30.6	41.8	
		<b>Total</b>	<b>308</b>	<b>100.0</b>	<b>100.0</b>	<b>17,259</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	239	89.2		6,412	52.1		
		\$100,001 - \$250,000	22	8.2		3,245	26.4		
\$250,001 - \$1 Million		7	2.6		2,657	21.6			
<b>Total</b>		<b>268</b>	<b>100.0</b>		<b>12,314</b>	<b>100.0</b>			

Originations & Purchases  
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

*Small Farm Loans*

The distribution of small farm loans reflects excellent penetration among farms of different revenue sizes. The bank originated 90.5 percent of its farm loans to farms with \$1 million in revenue or less. This performance is significantly above the aggregate performance of 71.6 percent

but below the percentage of small farms in the assessment area, at 98.9 percent. Further, 63.2 percent of those loans to businesses with \$1 million or less in revenue were in amounts of \$100,000 or less, which are considered the most beneficial to small farms, indicating the bank’s willingness to meet the credit needs of small farms. The following table presents the bank’s borrower distribution of small farm loans in 2020.

The bank’s distribution of lending to farms of different sizes revenue sizes in 2021 was consistent with the distribution of loans in 2020. The table below presents the borrower distribution of small farm loans in the assessment area in 2020. Please refer to Appendix C for distribution data by revenue and loan size for small farm lending in 2021.

<b>Small Farm Lending By Revenue &amp; Loan Size</b>									
<b>Assessment Area: 2020 Southwest, IA Non MSA</b>									
Product Type		Bank & Aggregate Lending Comparison							
		Count			Dollar			Total Farms	
		2020		2020		2020			
Bank	Agg	Bank	Agg	Bank	Agg				
		#	%	%	\$ 000s	\$ %	\$ %	%	
Small Farm	Revenue	\$1 Million or Less	437	90.5	71.6	48,804	88.9	84.8	98.9
		Over \$1 Million	43	8.9	28.4	6,092	11.1	15.2	0.9
		Unknown	3	0.6		11	0.0		0.2
		<b>Total</b>	<b>483</b>	<b>100.0</b>	<b>100.0</b>	<b>54,907</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	308	63.8	72.2	11,346	20.7	23.7	
		\$100,001 - \$250,000	111	23.0	17.8	19,070	34.7	34.3	
		\$250,001 - \$500,000	64	13.3	10.0	24,491	44.6	42.0	
		<b>Total</b>	<b>483</b>	<b>100.0</b>	<b>100.0</b>	<b>54,907</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	276	63.2		9,955	20.4		
		\$100,001 - \$250,000	105	24.0		17,919	36.7		
		\$250,001 - \$500,000	56	12.8		20,930	42.9		
		<b>Total</b>	<b>437</b>	<b>100.0</b>		<b>48,804</b>	<b>100.0</b>		
Originations & Purchases									
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

### Community Development Lending

Bank Iowa is a leader in making community development loans and makes use of innovative and/or flexible lending practices in the communities it serves. During the review period the bank made four such loans totaling more than \$10.0 million in the assessment area. When compared to the previous evaluation of two loans totaling \$70,032, the bank significantly increased the number and dollar volume. Of the bank’s qualified community development loans, one loan totaling \$7.0 million was made for revitalization and stabilization purposes; this loan was responsive in that it was to the central healthcare provider in the area, near a large moderate-income census tract.

The table below presents the bank’s community development loans in the assessment area during the review period.

Qualified Community Development Loans by Purpose March 3, 2020 – July 11, 2022										
AA Name	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Total #	Total \$(000s)
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)		
Southwest, IA Non-MSA	1	199	2	2,860	0	0	1	7,000	4	10,059

### INVESTMENT TEST

Bank Iowa’s record of performance in this assessment area demonstrates an adequate level of qualified investments and donations in the assessment area, although rarely in a leadership position. These investments demonstrate the rare use of innovative or complex qualified investments and provide adequate responsiveness to the credit and community development needs of the assessment area.

During the evaluation period, Bank Iowa did not make any qualified investments, which is below its performance in the assessment area at the previous evaluation where it made two investments totaling \$465,000.

The bank made a total of 19 qualified donations worth \$62,825 in the current evaluation period. The donations were made primarily to organizations that focus on community service and revitalization/stabilization. When compared to the previous evaluation of 31 qualified donations totaling \$16,997, the bank increased the dollar amount by 269.9 percent.

The table below presents the bank’s community development donations during the review period.

Qualified Community Development Donations by Purpose March 3, 2020 – July 11, 2022										
AA Name	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Total #	Total \$
	#	\$	#	\$	#	\$	#	\$		
Southwest, IA Non-MSA	0	0	14	31,575	3	6,250	2	25,000	19	62,825

## SERVICE TEST

Bank Iowa’s retail delivery services are readily accessible to the bank’s geographies and individuals of different income levels in its assessment area. Its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies or to low- or moderate-income individuals. Its services do not vary in a way that inconveniences its assessment area, particularly moderate-income geographies or low- or moderate-income individuals. Bank Iowa provides a relatively high level of community development services in the assessment area.

### Retail Services

Bank Iowa retail delivery services are readily accessible to geographies and individuals of different income levels in its assessment area. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals. Its services do not vary in a way that inconveniences its assessment area, particularly moderate-income geographies or low- or moderate-income individuals.

The bank operates six offices and eight cash-only ATMs in the assessment area. There are two offices located in moderate-income census tracts, with the remaining four being located in middle-income census tracts. Alternative delivery systems include phone, internet banking and mobile banking. During the review period, the bank did not close or open any branches in the assessment area.

The bank’s services do not vary in a way that inconveniences its assessment area, particularly moderate-income geographies or low- or moderate-income individuals. Offices in the assessment area generally have standard hours of 9:00 a.m. to 5:00 p.m., Monday through Thursday, 9:00 to 6:00 p.m. on Fridays, and 9:00 a.m. to 12:00 p.m. on Saturdays, with extended drive-up hours. Applications for loan and deposit products are accepted at each location. Additionally, mortgage applications are accepted online through the bank’s website.



### Community Development Services

Bank Iowa provides a relatively high level of community development services. The bank provided 379 hours of volunteer financial services during the current review period. While this represents a significant decrease compared to the previous evaluations total of 1,938 hours, given the circumstances of the Covid-19 pandemic, the bank still managed to provide a noteworthy level of community development service hours. The majority of service hours were with community service organizations.

Qualified Community Development Services by Purpose March 3, 2020 – July 11, 2022					
AA Name	Affordable Housing	Community Services	Economic Development	Revitalize and Stabilize	Total Hours
	Hours	Hours	Hours	Hours	
Southwest, IA Non-MSA	26	262	92	0	379

## DENISON, IOWA NON-MSA - Limited Review

### SCOPE OF THE EXAMINATION

The scope for this assessment area is consistent with the scope presented in the overall section of the Performance Evaluation.

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN DENISON, IOWA NON-MSA

The Denison, Iowa Non-MSA assessment area consists of Crawford County in its entirety. The assessment area remains unchanged since the previous examination. Based on 2020 FFIEC Census data, the census tract composition includes five middle-income tracts. No low-, moderate-, or upper-income census tracts are located in the assessment area. The FFIEC has designated all five census tracts (701.00, 702.00, 703.00, 704.00, and 705.00) in Crawford County as underserved (remote rural) middle-income geographies.

Within the assessment area, the bank operates four branches in Charter Oak, Denison, Manilla, and Schleswig. All four branches are accompanied by a cash-only ATM. Finally, the bank operates a standalone cash-only ATM in Schleswig. There were no branches opened or closed since the previous evaluation.

According to the June 30, 2021, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, Bank Iowa ranked first among seven FDIC-insured financial institutions operating in the assessment area with 27.5 percent of market share. Other leaders in market share include United Bank of Iowa (26.8 percent) and Crawford County Trust and Savings Bank (24.2 percent). The six banks competing for deposits and loans with Bank Iowa have 10 offices in the assessment area. In 2021, the bank ranked third among 57 HMDA reporting institutions and in 2020, second among 27 CRA reporting institutions.

Additional demographic information about the assessment area is provided in the following table.

Assessment Area: 2020 Denison, IA Non MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,091	24.5
Moderate-income	0	0.0	0	0.0	0	0.0	806	18.1
Middle-income	5	100.0	4,449	100.0	622	14.0	933	21.0
Upper-income	0	0.0	0	0.0	0	0.0	1,619	36.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>5</b>	<b>100.0</b>	<b>4,449</b>	<b>100.0</b>	<b>622</b>	<b>14.0</b>	<b>4,449</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	6,981	4,774	100.0	68.4	1,581	22.6	626	9.0
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>6,981</b>	<b>4,774</b>	<b>100.0</b>	<b>68.4</b>	<b>1,581</b>	<b>22.6</b>	<b>626</b>	<b>9.0</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0	0.0	0	0.0	0	0.0	
Moderate-income	0	0	0.0	0	0.0	0	0.0	
Middle-income	790	717	100.0	58	100.0	15	100.0	
Upper-income	0	0	0.0	0	0.0	0	0.0	
Unknown-income	0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>790</b>	<b>717</b>	<b>100.0</b>	<b>58</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>	
	Percentage of Total Businesses:			90.8		7.3		1.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0	0.0	0	0.0	0	0.0	
Moderate-income	0	0	0.0	0	0.0	0	0.0	
Middle-income	195	195	100.0	0	0.0	0	0.0	
Upper-income	0	0	0.0	0	0.0	0	0.0	
Unknown-income	0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>195</b>	<b>195</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	
	Percentage of Total Farms:			100.0		0.0		0.0

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
Note: Percentages may not add to 100.0 percent due to rounding

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Denison, IA Non-MSA	Consistent	Consistent	Consistent

**LENDING TEST**

The institution's lending performance in the area is consistent with the institution's lending performance overall.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2021 Denison, IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2021						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	31	100.0	100.0	2,808	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>2,808</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	32	100.0	100.0	3,336	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>32</b>	<b>100.0</b>	<b>100.0</b>	<b>3,336</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	3	100.0	100.0	743	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>743</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	0.0	0	0.0	0.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	0.0	0	0.0	0.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	66	100.0	100.0	6,887	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>66</b>	<b>100.0</b>	<b>100.0</b>	<b>6,887</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2016 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Business Loans								
Assessment Area: 2020 Denison, IA Non MSA								
	Tract Income Levels	Bank & Aggregate Lending Comparison					Total Businesses	
		2020						
		Count		Agg	Dollar			Agg
		Bank			Bank	Agg		
#	%	%	\$ (000s)	\$ %	\$ %	%		
Small Business	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	160	100.0	99.6	10,043	100.0	99.8	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			0.4			0.2	
	<b>Total</b>	<b>160</b>	<b>100.0</b>	<b>100.0</b>	<b>10,043</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Farm Loans								
Assessment Area: 2020 Denison, IA Non MSA								
	Tract Income Levels	Bank & Aggregate Lending Comparison					Total Farms	
		2020						
		Count		Agg	Dollar			Agg
		Bank			Bank	Agg		
#	%	%	\$ (000s)	\$ %	\$ %	%		
Small Farm	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	245	100.0	100.0	27,186	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			0.0			0.0	
	<b>Total</b>	<b>245</b>	<b>100.0</b>	<b>100.0</b>	<b>27,186</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2021 Denison, IA Non MSA</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2021						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	5	16.1	10.9	344	12.2	6.9	24.5
	Moderate	9	29.0	34.6	671	23.9	28.9	18.1
	Middle	11	35.5	26.9	1,299	46.3	26.9	21.0
	Upper	4	12.9	23.1	424	15.1	31.0	36.4
	Unknown	2	6.5	4.5	71	2.5	6.3	0.0
	<b>Total</b>		<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>2,808</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	5	15.6	12.0	341	10.2	6.9	24.5
	Moderate	4	12.5	20.8	333	10.0	18.2	18.1
	Middle	10	31.3	24.6	1,004	30.1	21.3	21.0
	Upper	11	34.4	34.4	1,462	43.8	43.1	36.4
	Unknown	2	6.3	8.2	196	5.9	10.5	0.0
	<b>Total</b>		<b>32</b>	<b>100.0</b>	<b>100.0</b>	<b>3,336</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	24.5
	Moderate	0	0.0	66.7	0	0.0	65.0	18.1
	Middle	0	0.0	0.0	0	0.0	0.0	21.0
	Upper	0	0.0	0.0	0	0.0	0.0	36.4
	Unknown	0	0.0	33.3	0	0.0	35.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	24.5
	Moderate	0	0.0	16.7	0	0.0	17.0	18.1
	Middle	0	0.0	0.0	0	0.0	0.0	21.0
	Upper	0	0.0	0.0	0	0.0	0.0	36.4
	Unknown	3	100.0	83.3	743	100.0	83.0	0.0
	<b>Total</b>		<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>743</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	24.5
	Moderate	0	0.0	0.0	0	0.0	0.0	18.1
	Middle	0	0.0	0.0	0	0.0	0.0	21.0
	Upper	0	0.0	0.0	0	0.0	0.0	36.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	20.0	0	0.0	26.3	24.5
	Moderate	0	0.0	40.0	0	0.0	40.6	18.1
	Middle	0	0.0	40.0	0	0.0	33.1	21.0
	Upper	0	0.0	0.0	0	0.0	0.0	36.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	24.5
	Moderate	0	0.0	0.0	0	0.0	0.0	18.1
	Middle	0	0.0	0.0	0	0.0	0.0	21.0
	Upper	0	0.0	0.0	0	0.0	0.0	36.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>
HMDA Totals	Low	10	15.2	11.3	685	9.9	6.9	24.5
	Moderate	13	19.7	27.5	1,004	14.6	23.0	18.1
	Middle	21	31.8	25.2	2,303	33.4	23.0	21.0
	Upper	15	22.7	28.0	1,885	27.4	36.0	36.4
	Unknown	7	10.6	7.9	1,011	14.7	11.1	0.0
	<b>Total</b>		<b>66</b>	<b>100.0</b>	<b>100.0</b>	<b>6,887</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2016 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2020 Denison, IA Non MSA									
Product Type		Bank & Aggregate Lending Comparison							
		2020							
		Count		Agg %	Dollar		Agg \$ %	Total Businesses %	
Bank #	%	Bank \$ 000s	\$ %						
Small Business	Revenue	\$1 Million or Less	117	73.1	52.5	4,769	47.5	42.7	90.8
		Over \$1 Million	43	26.9	47.5	5,274	52.5	57.3	7.3
		Unknown	0	0.0		0	0.0		1.9
		<b>Total</b>	<b>160</b>	<b>100.0</b>	<b>100.0</b>	<b>10,043</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	136	85.0	89.7	4,121	41.0	41.3	
		\$100,001 - \$250,000	17	10.6	6.5	2,595	25.8	19.9	
		\$250,001 - \$1 Million	7	4.4	3.8	3,327	33.1	38.8	
		<b>Total</b>	<b>160</b>	<b>100.0</b>	<b>100.0</b>	<b>10,043</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	107	91.5		2,454	51.5		
		\$100,001 - \$250,000	8	6.8		1,228	25.7		
		\$250,001 - \$1 Million	2	1.7		1,087	22.8		
		<b>Total</b>	<b>117</b>	<b>100.0</b>		<b>4,769</b>	<b>100.0</b>		

Originations & Purchases  
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

Small Farm Lending By Revenue & Loan Size									
Assessment Area: 2020 Denison, IA Non MSA									
Product Type		Bank & Aggregate Lending Comparison							
		2020							
		Count		Agg %	Dollar		Agg \$ %	Total Farms %	
Bank #	%	Bank \$ 000s	\$ %						
Small Farm	Revenue	\$1 Million or Less	217	88.6	65.8	22,935	84.4	70.6	100.0
		Over \$1 Million	26	10.6	34.2	4,095	15.1	29.4	0.0
		Unknown	2	0.8		156	0.6		0.0
		<b>Total</b>	<b>245</b>	<b>100.0</b>	<b>100.0</b>	<b>27,186</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	159	64.9	68.5	5,502	20.2	20.5	
		\$100,001 - \$250,000	49	20.0	18.2	8,290	30.5	30.4	
		\$250,001 - \$500,000	37	15.1	13.4	13,394	49.3	49.1	
		<b>Total</b>	<b>245</b>	<b>100.0</b>	<b>100.0</b>	<b>27,186</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	145	66.8		5,041	22.0		
		\$100,001 - \$250,000	40	18.4		6,646	29.0		
		\$250,001 - \$500,000	32	14.7		11,248	49.0		
		<b>Total</b>	<b>217</b>	<b>100.0</b>		<b>22,935</b>	<b>100.0</b>		

Originations & Purchases  
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*



Qualified Community Development Loans by Purpose March 3, 2020 – July 11, 2022										
AA Name	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Total #	Total \$(000s)
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)		
Denison, IA Non-MSA	2	562	0	0	0	0	1	180	3	742

**INVESTMENT TEST**

The bank’s investment performance in the assessment area is consistent with its overall performance. The bank did not make any qualified investments in the assessment area.

Qualified Community Development Donations by Purpose March 3, 2020 – July 11, 2022										
AA Name	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Total #	Total \$
	#	\$	#	\$	#	\$	#	\$		
Denison, IA Non-MSA	0	0	6	5,376	5	2,300	5	25,800	16	33,476

**SERVICE TEST**

The bank’s service performance in the assessment area is consistent with its overall performance.

Qualified Community Development Services by Purpose March 3, 2020 – July 11, 2022					
AA Name	Affordable Housing	Community Services	Economic Development	Revitalize and Stabilize	Total Hours
	Hours	Hours	Hours	Hours	
Denison, IA Non-MSA	3	53	0	52	108

## HUMBOLDT, IOWA NON-MSA - Limited Review

### SCOPE OF THE EXAMINATION

The scope for this assessment area is consistent with the scope presented in the overall section of the Performance Evaluation.

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN HUMBOLDT, IOWA NON-MSA

The Humboldt, Iowa Non-MSA assessment area consists of Humboldt and Pocahontas Counties in their entirety. The assessment area remains unchanged since the previous examination. Based on 2020 FFIEC Census data, the census tract composition includes seven middle-income tracts. No low-, moderate-, or upper-income census tracts are located in the assessment area. The FFIEC has designated all three census tracts (7801.00, 7802.00, and 7803.00) in Pocahontas County as distressed (due to population loss) and underserved (due to remote rural nature of the tracts).

Within the assessment area, the bank operates three branches in Gilmore City and Humboldt. The branches are accompanied by cash-only ATMs. There were no branches opened or closed since the previous evaluation.

According to the June 30, 2021, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, Bank Iowa ranked first among ten FDIC-insured financial institutions operating in the assessment area with 26.9 percent of market share. Other leaders in market share include Availa Bank (13.2 percent), U.S. Bank (11.2 percent), and Northwest Bank (10.9 percent). The nine banks competing for deposits and loans with Bank Iowa have 14 offices in the assessment area. In 2021, the bank ranked second among 73 HMDA reporting institutions; and in 2020, first among 34 CRA reporting institutions.

Additional demographic information about the assessment area is provided in the following table.

Assessment Area: 2020 Humboldt, IA Non MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,007	21.4
Moderate-income	0	0.0	0	0.0	0	0.0	891	19.0
Middle-income	7	100.0	4,698	100.0	405	8.6	998	21.2
Upper-income	0	0.0	0	0.0	0	0.0	1,802	38.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>7</b>	<b>100.0</b>	<b>4,698</b>	<b>100.0</b>	<b>405</b>	<b>8.6</b>	<b>4,698</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	8,434	5,498	100.0	65.2	1,889	22.4	1,047	12.4
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>8,434</b>	<b>5,498</b>	<b>100.0</b>	<b>65.2</b>	<b>1,889</b>	<b>22.4</b>	<b>1,047</b>	<b>12.4</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0	0.0	0	0.0	0	0.0	
Moderate-income	0	0	0.0	0	0.0	0	0.0	
Middle-income	940	843	100.0	71	100.0	26	100.0	
Upper-income	0	0	0.0	0	0.0	0	0.0	
Unknown-income	0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>940</b>	<b>843</b>	<b>100.0</b>	<b>71</b>	<b>100.0</b>	<b>26</b>	<b>100.0</b>	
	Percentage of Total Businesses:			89.7		7.6		2.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0	0.0	0	0.0	0	0.0	
Moderate-income	0	0	0.0	0	0.0	0	0.0	
Middle-income	371	368	100.0	3	100.0	0	0.0	
Upper-income	0	0	0.0	0	0.0	0	0.0	
Unknown-income	0	0	0.0	0	0.0	0	0.0	
<b>Total Assessment Area</b>	<b>371</b>	<b>368</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	
	Percentage of Total Farms:			99.2		0.8		0.0

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Humboldt, Iowa Non-MSA	Below	Consistent	Consistent

**LENDING TEST**

The institution's lending performance in the area is below with the institution's lending performance overall; however, it does not change the rating for the institution.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2021 Humboldt, IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2021						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	26	100.0	100.0	2,798	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>2,798</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	13	100.0	99.4	1,793	100.0	99.9	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.6	0	0.0	0.1	0.0
	<b>Total</b>		<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>1,793</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	1	100.0	100.0	141	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>141</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	40	100.0	99.8	4,731	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.2	0	0.0	0.0	0.0
	<b>Total</b>		<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>4,731</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2016 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

<b>Geographic Distribution of Small Business Loans</b>								
<b>Assessment Area: 2020 Humboldt, IA Non MSA</b>								
	<b>Tract Income Levels</b>	<b>Bank &amp; Aggregate Lending Comparison</b>					<b>Total Businesses</b>	
		<b>2020</b>						
		<b>Count</b>		<b>Agg</b>	<b>Dollar</b>			<b>Agg</b>
		<b>Bank</b>			<b>Bank</b>	<b>Agg</b>		
<b>#</b>	<b>%</b>	<b>%</b>	<b>\$ (000s)</b>	<b>\$ %</b>	<b>\$ %</b>	<b>%</b>		
Small Business	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	129	100.0	99.4	9,134	100.0	99.5	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			0.6			0.5	
	<b>Total</b>	<b>129</b>	<b>100.0</b>	<b>100.0</b>	<b>9,134</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

<b>Geographic Distribution of Small Farm Loans</b>								
<b>Assessment Area: 2020 Humboldt, IA Non MSA</b>								
	<b>Tract Income Levels</b>	<b>Bank &amp; Aggregate Lending Comparison</b>					<b>Total Farms</b>	
		<b>2020</b>						
		<b>Count</b>		<b>Agg</b>	<b>Dollar</b>			<b>Agg</b>
		<b>Bank</b>			<b>Bank</b>	<b>Agg</b>		
<b>#</b>	<b>%</b>	<b>%</b>	<b>\$ (000s)</b>	<b>\$ %</b>	<b>\$ %</b>	<b>%</b>		
Small Farm	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	148	100.0	100.0	15,537	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			0.0			0.0	
	<b>Total</b>	<b>148</b>	<b>100.0</b>	<b>100.0</b>	<b>15,537</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2021 Humboldt, IA Non MSA</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2021						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	3	11.5	8.4	310	11.1	4.2	21.4
	Moderate	9	34.6	26.0	836	29.9	20.1	19.0
	Middle	6	23.1	22.0	595	21.3	19.8	21.2
	Upper	4	15.4	28.2	590	21.1	40.1	38.4
	Unknown	4	15.4	15.4	467	16.7	15.8	0.0
	<b>Total</b>		<b>26</b>	<b>100.0</b>	<b>100.0</b>	<b>2,798</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	6.7	0	0.0	3.1	21.4
	Moderate	1	7.7	15.9	80	4.5	10.9	19.0
	Middle	7	53.8	26.2	933	52.0	23.3	21.2
	Upper	5	38.5	37.2	780	43.5	44.5	38.4
	Unknown	0	0.0	14.0	0	0.0	18.1	0.0
	<b>Total</b>		<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>1,793</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	8.7	0	0.0	3.4	21.4
	Moderate	0	0.0	26.1	0	0.0	22.8	19.0
	Middle	0	0.0	21.7	0	0.0	22.7	21.2
	Upper	0	0.0	39.1	0	0.0	46.9	38.4
	Unknown	0	0.0	4.3	0	0.0	4.3	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	21.4
	Moderate	0	0.0	0.0	0	0.0	0.0	19.0
	Middle	0	0.0	0.0	0	0.0	0.0	21.2
	Upper	0	0.0	0.0	0	0.0	0.0	38.4
	Unknown	1	100.0	100.0	141	100.0	100.0	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>141</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	8.0	0	0.0	5.5	21.4
	Moderate	0	0.0	20.0	0	0.0	27.7	19.0
	Middle	0	0.0	28.0	0	0.0	23.0	21.2
	Upper	0	0.0	44.0	0	0.0	43.8	38.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	21.4
	Moderate	0	0.0	0.0	0	0.0	0.0	19.0
	Middle	0	0.0	0.0	0	0.0	0.0	21.2
	Upper	0	0.0	100.0	0	0.0	100.0	38.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	21.4
	Moderate	0	0.0	0.0	0	0.0	0.0	19.0
	Middle	0	0.0	0.0	0	0.0	0.0	21.2
	Upper	0	0.0	0.0	0	0.0	0.0	38.4
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	3	7.5	7.5	310	6.6	3.6	21.4
	Moderate	10	25.0	21.2	916	19.4	15.6	19.0
	Middle	13	32.5	23.2	1,528	32.3	20.0	21.2
	Upper	9	22.5	32.5	1,370	29.0	39.8	38.4
	Unknown	5	12.5	15.5	607	12.8	21.0	0.0
	<b>Total</b>		<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>4,731</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2020 Humboldt, IA Non MSA									
Product Type		Bank & Aggregate Lending Comparison							
		2020							
		Count		Agg %	Dollar		Agg \$ %	Total Businesses %	
Bank #	%	Bank \$ 000s	\$ %						
Small Business	Revenue	\$1 Million or Less	80	62.0	45.8	3,103	34.0	37.2	89.7
		Over \$1 Million	48	37.2	54.2	6,027	66.0	62.8	7.6
		Unknown	1	0.8		4	0.0		2.8
		<b>Total</b>	<b>129</b>	<b>100.0</b>	<b>100.0</b>	<b>9,134</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	108	83.7	86.6	3,336	36.5	33.7	
		\$100,001 - \$250,000	12	9.3	8.2	1,799	19.7	21.6	
		\$250,001 - \$1 Million	9	7.0	5.2	3,999	43.8	44.8	
		<b>Total</b>	<b>129</b>	<b>100.0</b>	<b>100.0</b>	<b>9,134</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	76	95.0		2,093	67.5		
		\$100,001 - \$250,000	2	2.5		385	12.4		
		\$250,001 - \$1 Million	2	2.5		625	20.1		
		<b>Total</b>	<b>80</b>	<b>100.0</b>		<b>3,103</b>	<b>100.0</b>		

Originations & Purchases  
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

Small Farm Lending By Revenue & Loan Size									
Assessment Area: 2020 Humboldt, IA Non MSA									
Product Type		Bank & Aggregate Lending Comparison							
		2020							
		Count		Agg %	Dollar		Agg \$ %	Total Farms %	
Bank #	%	Bank \$ 000s	\$ %						
Small Farm	Revenue	\$1 Million or Less	118	79.7	70.5	11,462	73.8	75.6	99.2
		Over \$1 Million	21	14.2	29.5	3,233	20.8	24.4	0.8
		Unknown	9	6.1		842	5.4		0.0
		<b>Total</b>	<b>148</b>	<b>100.0</b>	<b>100.0</b>	<b>15,537</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	95	64.2	66.9	2,757	17.7	21.2	
		\$100,001 - \$250,000	35	23.6	21.2	6,580	42.4	36.2	
		\$250,001 - \$500,000	18	12.2	11.9	6,200	39.9	42.5	
		<b>Total</b>	<b>148</b>	<b>100.0</b>	<b>100.0</b>	<b>15,537</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	78	66.1		2,096	18.3		
		\$100,001 - \$250,000	27	22.9		5,091	44.4		
		\$250,001 - \$500,000	13	11.0		4,275	37.3		
		<b>Total</b>	<b>118</b>	<b>100.0</b>		<b>11,462</b>	<b>100.0</b>		

Originations & Purchases  
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*



Qualified Community Development Loans by Purpose March 3, 2020 – July 11, 2022										
AA Name	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Total #	Total \$(000s)
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)		
Humboldt, Iowa Non-MSA	0	0	0	0	0	0	0	0	0	0

**INVESTMENT TEST**

The bank’s investment performance in the assessment area is consistent with its overall performance. The bank did not make any qualified investments during the review period.

Qualified Community Development Donations by Purpose March 3, 2020 – July 11, 2022										
AA Name	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Total #	Total \$
	#	\$	#	\$	#	\$	#	\$		
Humboldt, Iowa Non-MSA	0	0	7	7,685	2	7,000	1	250	10	14,935

**SERVICE TEST**

The bank’s service performance in the assessment area is consistent with its overall performance.

Qualified Community Development Services by Purpose March 3, 2020 – July 11, 2022					
AA Name	Affordable Housing	Community Services	Economic Development	Revitalize and Stabilize	Total Hours
	Hours	Hours	Hours	Hours	
Humboldt, Iowa Non-MSA	20	15	0	0	35

## OSKALOOSA, IOWA NON-MSA - Limited Review

### SCOPE OF THE EXAMINATION

The scope for this assessment area is consistent with the scope presented in the overall section of the Performance Evaluation.

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN OSKALOOSA, IOWA NON-MSA

The Oskaloosa, Iowa Non-MSA assessment area consists of Keokuk, Mahaska, Marion, and Wapello Counties in their entireties. Based on 2020 FFIEC Census data, the census tract composition includes six moderate-income, 21 middle-income, and three upper-income census tracts. No low-income census tracts are located in the assessment area. The FFIEC has designated all four census tracts in Keokuk County underserved (remote rural) middle-income geographies.

Within the assessment area, the bank operates three branches in Fremont, Oskaloosa and Pella. All branches are accompanied by cash-only ATMs. There were no branches opened or closed since the previous evaluation.

According to the June 30, 2021, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, Bank Iowa ranked sixth among 17 FDIC-insured financial institutions operating in the assessment area with 5.9 percent of market share. Leaders in market share include Marian County State Bank (21.3 percent), MidWestOne Bank (17.1 percent), and South Ottumwa Savings Bank (11.5 percent). The 16 banks competing for deposits and loans with Bank Iowa have 37 offices in the assessment area. In 2021, the bank ranked tenth among 172 HMDA reporting institutions and in 2020, first among 60 CRA reporting institutions.

Additional demographic information about the assessment area is provided in the following table.

Assessment Area: 2020 Oskaloosa, IA Non MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	5,627	20.9
Moderate-income	6	20.0	3,910	14.5	807	20.6	4,937	18.3
Middle-income	21	70.0	19,075	70.8	1,709	9.0	6,250	23.2
Upper-income	3	10.0	3,957	14.7	233	5.9	10,128	37.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>30</b>	<b>100.0</b>	<b>26,942</b>	<b>100.0</b>	<b>2,749</b>	<b>10.2</b>	<b>26,942</b>	<b>100.0</b>
Housing Units by Tract	Housing Types by Tract							
	Owner-Occupied		Rental		Vacant			
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	7,444	4,048	13.5	54.4	2,559	34.4	837	11.2
Middle-income	31,197	21,420	71.6	68.7	7,298	23.4	2,479	7.9
Upper-income	6,020	4,460	14.9	74.1	1,056	17.5	504	8.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>44,661</b>	<b>29,928</b>	<b>100.0</b>	<b>67.0</b>	<b>10,913</b>	<b>24.4</b>	<b>3,820</b>	<b>8.6</b>
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	740	16.5	677	16.5	56	17.3	7	12.3
Middle-income	3,036	67.5	2,759	67.0	232	71.6	45	78.9
Upper-income	720	16.0	679	16.5	36	11.1	5	8.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>4,496</b>	<b>100.0</b>	<b>4,115</b>	<b>100.0</b>	<b>324</b>	<b>100.0</b>	<b>57</b>	<b>100.0</b>
Percentage of Total Businesses:			91.5		7.2		1.3	
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	3	0.4	3	0.4	0	0.0	0	0.0
Middle-income	616	85.7	608	85.5	5	100.0	3	100.0
Upper-income	100	13.9	100	14.1	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>719</b>	<b>100.0</b>	<b>711</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>
Percentage of Total Farms:			98.9		0.7		0.4	
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Oskaloosa, IA Non-MSA	Consistent	Consistent	Consistent

**LENDING TEST**

The institution's Lending performance in the area is consistent with the institution's lending performance overall.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2021 Oskaloosa, IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2021						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	12.4	0	0.0	7.2	13.5
	Middle	31	70.5	67.6	4,069	71.2	66.9	71.6
	Upper	13	29.5	19.9	1,648	28.8	25.8	14.9
	Unknown	0	0.0	0.1	0	0.0	0.0	0.0
	<b>Total</b>		<b>44</b>	<b>100.0</b>	<b>100.0</b>	<b>5,716</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	5.5	0	0.0	3.1	13.5
	Middle	40	72.7	70.7	6,241	69.7	67.2	71.6
	Upper	15	27.3	23.8	2,711	30.3	29.7	14.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>55</b>	<b>100.0</b>	<b>100.0</b>	<b>8,953</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	3.6	0	0.0	2.8	13.5
	Middle	1	100.0	78.3	20	100.0	79.6	71.6
	Upper	0	0.0	18.1	0	0.0	17.7	14.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	1	14.3	10.7	257	9.6	3.3	25.2
	Middle	6	85.7	75.0	2,410	90.4	92.5	62.7
	Upper	0	0.0	14.3	0	0.0	4.2	12.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>2,667</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	7.7	0	0.0	11.5	13.5
	Middle	0	0.0	71.8	0	0.0	77.1	71.6
	Upper	0	0.0	20.5	0	0.0	11.4	14.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	13.5
	Middle	0	0.0	76.0	0	0.0	71.4	71.6
	Upper	0	0.0	24.0	0	0.0	28.6	14.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	17.6	0	0.0	11.7	13.5
	Middle	0	0.0	54.9	0	0.0	53.7	71.6
	Upper	0	0.0	27.5	0	0.0	34.6	14.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	1	0.9	8.6	257	1.5	5.0	13.5
	Middle	78	72.9	69.4	12,740	73.4	68.9	71.6
	Upper	28	26.2	21.9	4,359	25.1	26.2	14.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>107</b>	<b>100.0</b>	<b>100.0</b>	<b>17,356</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of Small Business Loans								
Assessment Area: 2020 Oskaloosa, IA Non MSA								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Businesses
		2020						
		Count		Agg	Dollar		Agg	
		Bank			Bank	Agg		
#	%	%	\$ (000s)	\$ %	\$ %	%		
Small Business	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	1	0.5	9.1	7	0.1	8.6	16.5
	Middle	179	87.7	74.1	11,273	84.2	78.9	67.5
	Upper	24	11.8	15.6	2,107	15.7	11.4	16.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			1.2			1.1	
	<b>Total</b>	<b>204</b>	<b>100.0</b>	<b>100.0</b>	<b>13,387</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Farm Loans								
Assessment Area: 2020 Oskaloosa, IA Non MSA								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Farms
		2020						
		Count		Agg	Dollar		Agg	
		Bank			Bank	Agg		
#	%	%	\$ (000s)	\$ %	\$ %	%		
Small Farm	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.1	0	0.0	0.1	0.4
	Middle	262	93.2	87.7	23,374	92.7	88.9	85.7
	Upper	19	6.8	12.2	1,847	7.3	11.0	13.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			0.0			0.0	
	<b>Total</b>	<b>281</b>	<b>100.0</b>	<b>100.0</b>	<b>25,221</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2021 Oskaloosa, IA Non MSA</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2021						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	2	4.5	8.8	99	1.7	4.7	20.9
	Moderate	10	22.7	29.1	1,032	18.1	21.4	18.3
	Middle	11	25.0	23.4	1,561	27.3	23.9	23.2
	Upper	14	31.8	27.5	2,153	37.7	37.8	37.6
	Unknown	7	15.9	11.3	871	15.2	12.3	0.0
	<b>Total</b>		<b>44</b>	<b>100.0</b>	<b>100.0</b>	<b>5,716</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	6	10.9	6.9	436	4.9	3.4	20.9
	Moderate	8	14.5	18.7	775	8.7	13.2	18.3
	Middle	13	23.6	21.5	1,955	21.8	18.5	23.2
	Upper	24	43.6	40.3	5,337	59.6	48.0	37.6
	Unknown	4	7.3	12.6	449	5.0	17.0	0.0
	<b>Total</b>		<b>55</b>	<b>100.0</b>	<b>100.0</b>	<b>8,953</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	4.8	0	0.0	2.4	20.9
	Moderate	0	0.0	22.9	0	0.0	16.1	18.3
	Middle	0	0.0	25.3	0	0.0	21.0	23.2
	Upper	0	0.0	41.0	0	0.0	57.0	37.6
	Unknown	1	100.0	6.0	20	100.0	3.3	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	20.9
	Moderate	0	0.0	0.0	0	0.0	0.0	18.3
	Middle	0	0.0	0.0	0	0.0	0.0	23.2
	Upper	0	0.0	3.6	0	0.0	1.2	37.6
	Unknown	7	100.0	96.4	2,667	100.0	98.8	0.0
	<b>Total</b>		<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>2,667</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	7.7	0	0.0	6.4	20.9
	Moderate	0	0.0	10.3	0	0.0	6.5	18.3
	Middle	0	0.0	38.5	0	0.0	27.6	23.2
	Upper	0	0.0	38.5	0	0.0	49.4	37.6
	Unknown	0	0.0	5.1	0	0.0	10.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	4.0	0	0.0	0.8	20.9
	Moderate	0	0.0	16.0	0	0.0	8.4	18.3
	Middle	0	0.0	28.0	0	0.0	21.0	23.2
	Upper	0	0.0	44.0	0	0.0	59.5	37.6
	Unknown	0	0.0	8.0	0	0.0	10.3	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	20.9
	Moderate	0	0.0	2.0	0	0.0	0.8	18.3
	Middle	0	0.0	0.0	0	0.0	0.0	23.2
	Upper	0	0.0	0.0	0	0.0	0.0	37.6
	Unknown	0	0.0	98.0	0	0.0	99.2	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	8	7.5	7.4	535	3.1	3.7	20.9
	Moderate	18	16.8	22.6	1,808	10.4	15.6	18.3
	Middle	24	22.4	22.1	3,516	20.3	19.5	23.2
	Upper	38	35.5	34.0	7,490	43.2	40.3	37.6
	Unknown	19	17.8	13.8	4,007	23.1	20.9	0.0
	<b>Total</b>		<b>107</b>	<b>100.0</b>	<b>100.0</b>	<b>17,356</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2020 Oskaloosa, IA Non MSA									
Product Type		Bank & Aggregate Lending Comparison							
		2020							
		Count		Agg %	Dollar		Agg \$ %	Total Businesses %	
Bank #	%	Bank \$ 000s	\$ %						
Small Business	Revenue	\$1 Million or Less	160	78.4	56.3	7,597	56.7	45.5	91.5
		Over \$1 Million	44	21.6	43.7	5,790	43.3	54.5	7.2
		Unknown	0	0.0		0	0.0		1.3
		<b>Total</b>	<b>204</b>	<b>100.0</b>	<b>100.0</b>	<b>13,387</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	171	83.8	88.4	5,449	40.7	40.5	
		\$100,001 - \$250,000	24	11.8	7.4	4,198	31.4	22.6	
		\$250,001 - \$1 Million	9	4.4	4.2	3,740	27.9	36.8	
		<b>Total</b>	<b>204</b>	<b>100.0</b>	<b>100.0</b>	<b>13,387</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	144	90.0		4,005	52.7		
		\$100,001 - \$250,000	12	7.5		2,075	27.3		
		\$250,001 - \$1 Million	4	2.5		1,517	20.0		
		<b>Total</b>	<b>160</b>	<b>100.0</b>		<b>7,597</b>	<b>100.0</b>		

Originations & Purchases  
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

Small Farm Lending By Revenue & Loan Size									
Assessment Area: 2020 Oskaloosa, IA Non MSA									
Product Type		Bank & Aggregate Lending Comparison							
		2020							
		Count		Agg %	Dollar		Agg \$ %	Total Farms %	
Bank #	%	Bank \$ 000s	\$ %						
Small Farm	Revenue	\$1 Million or Less	249	88.6	72.9	21,559	85.5	84.4	98.9
		Over \$1 Million	32	11.4	27.1	3,662	14.5	15.6	0.7
		Unknown	0	0.0		0	0.0		0.4
		<b>Total</b>	<b>281</b>	<b>100.0</b>	<b>100.0</b>	<b>25,221</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	197	70.1	72.7	6,808	27.0	24.4	
		\$100,001 - \$250,000	62	22.1	17.5	10,363	41.1	34.4	
		\$250,001 - \$500,000	22	7.8	9.8	8,050	31.9	41.2	
		<b>Total</b>	<b>281</b>	<b>100.0</b>	<b>100.0</b>	<b>25,221</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	178	71.5		5,770	26.8		
		\$100,001 - \$250,000	52	20.9		8,866	41.1		
		\$250,001 - \$500,000	19	7.6		6,923	32.1		
		<b>Total</b>	<b>249</b>	<b>100.0</b>		<b>21,559</b>	<b>100.0</b>		

Originations & Purchases  
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*



Qualified Community Development Loans by Purpose March 3, 2020 – July 11, 2022										
AA Name	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Total #	Total \$(000s)
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)		
Oskaloosa, IA Non-MSA	1	2,905	0	0	0	0	0	0	1	2,905

### INVESTMENT TEST

The bank’s investment performance in the assessment area is consistent with its overall performance. The bank did not make any qualified investments during the review period.

Qualified Community Development Donations by Purpose March 3, 2020 – July 11, 2022										
AA Name	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Total #	Total \$
	#	\$	#	\$	#	\$	#	\$		
Oskaloosa, IA Non-MSA	0	0	14	9,436	3	3,500	2	2,000	19	14,936

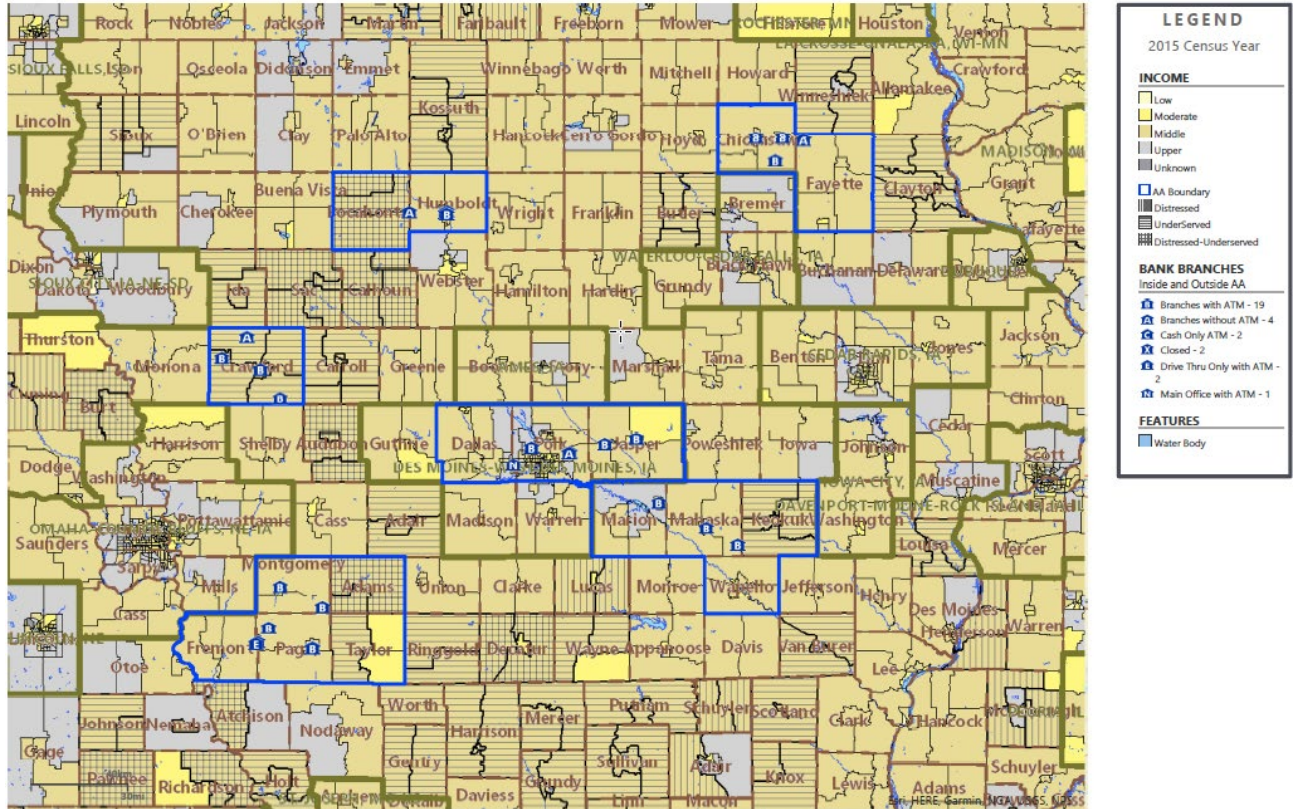
### SERVICE TEST

The bank’s service performance in the assessment area is consistent with its overall performance. .

Qualified Community Development Services by Purpose March 3, 2020 – July 11, 2022					
AA Name	Affordable Housing	Community Services	Economic Development	Revitalize and Stabilize	Total Hours
	Hours	Hours	Hours	Hours	
Oskaloosa, IA Non-MSA	75	47	116	0	237

### APPENDIX A – Maps of Assessment Area

**Bank Iowa 187947**  
Combined Assessment Area



**APPENDIX B – 2020 HDMA Geographic and Borrower Distribution**

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Des Moines-West Des Moines, IA MSA 19780								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		2020		2020				
		Count		Dollar		Agg		
		Bank	Agg	Bank	Agg			
		#	%	\$ (000s)	\$ %	\$ %		
Home Purchase	Low	3	2.1	1.7	303	1.1	0.9	2.6
	Moderate	34	23.8	15.1	3,361	11.7	9.6	19.7
	Middle	57	39.9	40.3	11,167	38.8	38.3	43.3
	Upper	49	34.3	42.9	13,928	48.4	51.2	34.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>143</b>	<b>100.0</b>	<b>100.0</b>	<b>28,759</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	2	0.6	0.7	223	0.3	0.4	2.6
	Moderate	31	10.0	7.4	4,398	6.4	4.3	19.7
	Middle	123	39.5	37.8	23,286	34.0	34.7	43.3
	Upper	155	49.8	54.1	40,503	59.2	60.6	34.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>311</b>	<b>100.0</b>	<b>100.0</b>	<b>68,411</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	2.0	0	0.0	1.6	2.6
	Moderate	0	0.0	11.6	0	0.0	7.4	19.7
	Middle	1	100.0	39.9	31	100.0	36.5	43.3
	Upper	0	0.0	46.5	0	0.0	54.5	34.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	1	16.7	8.2	1,888	25.2	3.8	7.1
	Moderate	3	50.0	25.3	4,658	62.2	7.4	21.1
	Middle	2	33.3	39.2	938	12.5	30.5	45.6
	Upper	0	0.0	27.3	0	0.0	58.3	26.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>7,484</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.9	0	0.0	0.4	2.6
	Moderate	0	0.0	6.9	0	0.0	5.2	19.7
	Middle	0	0.0	35.2	0	0.0	29.8	43.3
	Upper	0	0.0	56.9	0	0.0	64.7	34.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	2.1	0	0.0	1.2	2.6
	Moderate	0	0.0	13.0	0	0.0	7.1	19.7
	Middle	0	0.0	40.2	0	0.0	36.9	43.3
	Upper	0	0.0	44.7	0	0.0	54.8	34.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	2.6	0	0.0	1.4	2.6
	Moderate	0	0.0	28.3	0	0.0	19.2	19.7
	Middle	0	0.0	41.3	0	0.0	40.3	43.3
	Upper	0	0.0	27.8	0	0.0	39.0	34.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	6	1.3	1.2	2,414	2.3	0.9	2.6
	Moderate	68	14.8	10.9	12,417	11.9	6.7	19.7
	Middle	183	39.7	38.8	35,421	33.8	35.6	43.3
	Upper	204	44.3	49.0	54,432	52.0	56.8	34.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>461</b>	<b>100.0</b>	<b>100.0</b>	<b>104,684</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2016 FFIEC Census Data  
*Note: Percentages may not add to 100.0 percent due to rounding*

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2020 Des Moines-West Des Moines, IA MSA 19780</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison					Families by Family Income %	
		2020			Dollar			
		Count Bank	Agg	Dollar Bank	Agg			
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	17	11.9	10.6	1,924	6.7	6.2	20.6
	Moderate	26	18.2	23.7	4,955	17.2	18.7	17.2
	Middle	31	21.7	23.0	6,339	22.0	22.8	21.8
	Upper	61	42.7	28.9	14,155	49.2	38.0	40.4
	Unknown	8	5.6	13.9	1,386	4.8	14.3	0.0
	<b>Total</b>		<b>143</b>	<b>100.0</b>	<b>100.0</b>	<b>28,759</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	12	3.9	3.8	1,045	1.5	1.9	20.6
	Moderate	36	11.6	12.8	4,999	7.3	8.6	17.2
	Middle	70	22.5	20.8	13,038	19.1	17.9	21.8
	Upper	173	55.6	45.1	44,680	65.3	53.3	40.4
	Unknown	20	6.4	17.5	4,649	6.8	18.3	0.0
	<b>Total</b>		<b>311</b>	<b>100.0</b>	<b>100.0</b>	<b>68,411</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	5.9	0	0.0	3.1	20.6
	Moderate	0	0.0	14.2	0	0.0	9.1	17.2
	Middle	0	0.0	22.6	0	0.0	15.6	21.8
	Upper	0	0.0	51.8	0	0.0	58.3	40.4
	Unknown	1	100.0	5.5	31	100.0	13.9	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	20.6
	Moderate	0	0.0	0.8	0	0.0	0.0	17.2
	Middle	0	0.0	1.6	0	0.0	0.0	21.8
	Upper	0	0.0	3.3	0	0.0	1.3	40.4
	Unknown	6	100.0	94.3	7,484	100.0	98.7	0.0
	<b>Total</b>		<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>7,484</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	5.6	0	0.0	2.7	20.6
	Moderate	0	0.0	12.0	0	0.0	7.9	17.2
	Middle	0	0.0	21.3	0	0.0	14.1	21.8
	Upper	0	0.0	58.7	0	0.0	72.9	40.4
	Unknown	0	0.0	2.5	0	0.0	2.4	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	8.3	0	0.0	3.5	20.6
	Moderate	0	0.0	19.7	0	0.0	14.6	17.2
	Middle	0	0.0	23.1	0	0.0	20.0	21.8
	Upper	0	0.0	46.6	0	0.0	59.0	40.4
	Unknown	0	0.0	2.3	0	0.0	2.8	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	20.6
	Moderate	0	0.0	0.0	0	0.0	0.0	17.2
	Middle	0	0.0	0.1	0	0.0	0.2	21.8
	Upper	0	0.0	0.0	0	0.0	0.0	40.4
	Unknown	0	0.0	99.9	0	0.0	99.8	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	29	6.3	6.4	2,969	2.8	3.2	20.6
	Moderate	62	13.4	16.7	9,954	9.5	11.2	17.2
	Middle	101	21.9	21.3	19,376	18.5	17.6	21.8
	Upper	234	50.8	38.5	58,835	56.2	42.5	40.4
	Unknown	35	7.6	17.1	13,550	12.9	25.5	0.0
	<b>Total</b>		<b>461</b>	<b>100.0</b>	<b>100.0</b>	<b>104,684</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2016 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Lawler, IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2020			Dollar			
		Count Bank	Agg	Dollar Bank	Agg	Owner Occupied		
		#	%	%	\$ (000s)	\$ %	\$ %	% of Units
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	12.4	0	0.0	9.0	7.6
	Middle	19	100.0	87.6	2,668	100.0	91.0	92.4
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>2,668</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	7.5	0	0.0	5.5	7.6
	Middle	46	100.0	92.5	6,636	100.0	94.5	92.4
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>46</b>	<b>100.0</b>	<b>100.0</b>	<b>6,636</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	10.4	0	0.0	7.5	7.6
	Middle	0	0.0	89.6	0	0.0	92.5	92.4
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	6.3	0	0.0	1.5	13.2
	Middle	0	0.0	93.8	0	0.0	98.5	86.8
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	9.5	0	0.0	9.4	7.6
	Middle	0	0.0	90.5	0	0.0	90.6	92.4
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	9.1	0	0.0	2.9	7.6
	Middle	0	0.0	90.9	0	0.0	97.1	92.4
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	20.0	0	0.0	20.0	7.6
	Middle	0	0.0	80.0	0	0.0	80.0	92.4
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	9.8	0	0.0	6.9	7.6
	Middle	65	100.0	90.2	9,304	100.0	93.1	92.4
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>65</b>	<b>100.0</b>	<b>100.0</b>	<b>9,304</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2016 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2020 Lawler, IA Non MSA</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2020						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	3	15.8	16.4	305	11.4	7.7	19.1
	Moderate	4	21.1	28.8	360	13.5	21.7	22.3
	Middle	6	31.6	18.4	977	36.6	19.0	22.0
	Upper	4	21.1	23.9	788	29.5	37.3	36.6
	Unknown	2	10.5	12.4	237	8.9	14.3	0.0
	<b>Total</b>		<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>2,668</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	3.5	0	0.0	2.2	19.1
	Moderate	12	26.1	18.8	1,310	19.7	12.4	22.3
	Middle	10	21.7	23.2	1,125	17.0	18.0	22.0
	Upper	21	45.7	40.6	3,648	55.0	48.2	36.6
	Unknown	3	6.5	13.8	553	8.3	19.3	0.0
	<b>Total</b>		<b>46</b>	<b>100.0</b>	<b>100.0</b>	<b>6,636</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	8.3	0	0.0	8.2	19.1
	Moderate	0	0.0	22.9	0	0.0	17.3	22.3
	Middle	0	0.0	16.7	0	0.0	13.1	22.0
	Upper	0	0.0	50.0	0	0.0	60.4	36.6
	Unknown	0	0.0	2.1	0	0.0	1.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	19.1
	Moderate	0	0.0	6.3	0	0.0	1.9	22.3
	Middle	0	0.0	0.0	0	0.0	0.0	22.0
	Upper	0	0.0	18.8	0	0.0	14.5	36.6
	Unknown	0	0.0	75.0	0	0.0	83.7	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	11.9	0	0.0	10.1	19.1
	Moderate	0	0.0	19.0	0	0.0	19.9	22.3
	Middle	0	0.0	28.6	0	0.0	28.0	22.0
	Upper	0	0.0	38.1	0	0.0	38.0	36.6
	Unknown	0	0.0	2.4	0	0.0	4.1	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	22.7	0	0.0	7.6	19.1
	Moderate	0	0.0	22.7	0	0.0	9.0	22.3
	Middle	0	0.0	9.1	0	0.0	12.9	22.0
	Upper	0	0.0	45.5	0	0.0	70.4	36.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	19.1
	Moderate	0	0.0	0.0	0	0.0	0.0	22.3
	Middle	0	0.0	0.0	0	0.0	0.0	22.0
	Upper	0	0.0	0.0	0	0.0	0.0	36.6
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	3	4.6	9.4	305	3.3	4.5	19.1
	Moderate	16	24.6	22.5	1,670	17.9	15.7	22.3
	Middle	16	24.6	20.3	2,102	22.6	17.8	22.0
	Upper	25	38.5	33.9	4,437	47.7	43.4	36.6
	Unknown	5	7.7	13.8	790	8.5	18.5	0.0
	<b>Total</b>		<b>65</b>	<b>100.0</b>	<b>100.0</b>	<b>9,304</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of HMDA Reportable Loans									
Assessment Area: 2020 Southwest, IA Non MSA									
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units	
		2020							
		Count Bank		Agg	Dollar Bank		Agg		
		#	%	%	\$ (000s)	\$ %	\$ %		
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0	
	Moderate	20	17.9	21.0	1,696	14.9	17.3	20.4	
	Middle	92	82.1	79.0	9,691	85.1	82.7	79.6	
	Upper	0	0.0	0.0	0	0.0	0.0	0.0	
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0	
	<b>Total</b>		<b>112</b>	<b>100.0</b>	<b>100.0</b>	<b>11,387</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0	
	Moderate	12	14.3	17.4	1,133	10.1	13.9	20.4	
	Middle	72	85.7	82.6	10,138	89.9	86.1	79.6	
	Upper	0	0.0	0.0	0	0.0	0.0	0.0	
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0	
	<b>Total</b>		<b>84</b>	<b>100.0</b>	<b>100.0</b>	<b>11,272</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0	
	Moderate	0	0.0	11.1	0	0.0	16.4	20.4	
	Middle	3	100.0	83.3	131	100.0	64.7	79.6	
	Upper	0	0.0	0.0	0	0.0	0.0	0.0	
	Unknown	0	0.0	5.6	0	0.0	18.9	0.0	
	<b>Total</b>		<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>131</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0	
	Moderate	0	0.0	25.0	0	0.0	13.1		31.9
	Middle	0	0.0	75.0	0	0.0	86.9		68.1
	Upper	0	0.0	0.0	0	0.0	0.0		0.0
	Unknown	0	0.0	0.0	0	0.0	0.0		0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>		<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0	
	Moderate	0	0.0	12.5	0	0.0	6.3	20.4	
	Middle	0	0.0	87.5	0	0.0	93.7	79.6	
	Upper	0	0.0	0.0	0	0.0	0.0	0.0	
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0	
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0	
	Moderate	0	0.0	30.0	0	0.0	22.9	20.4	
	Middle	0	0.0	70.0	0	0.0	77.1	79.6	
	Upper	0	0.0	0.0	0	0.0	0.0	0.0	
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0	
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0	
	Moderate	0	0.0	28.6	0	0.0	15.0	20.4	
	Middle	0	0.0	71.4	0	0.0	85.0	79.6	
	Upper	0	0.0	0.0	0	0.0	0.0	0.0	
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0	
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0	
	Moderate	32	16.1	19.5	2,829	12.4	15.5	20.4	
	Middle	167	83.9	80.4	19,961	87.6	84.4	79.6	
	Upper	0	0.0	0.0	0	0.0	0.0	0.0	
	Unknown	0	0.0	0.1	0	0.0	0.1	0.0	
	<b>Total</b>		<b>199</b>	<b>100.0</b>	<b>100.0</b>	<b>22,790</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases									
2016 FFIEC Census Data									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2020 Southwest, IA Non MSA</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2020			2020			
		Count Bank		Agg %	Dollar Bank		Agg %	
		#	%	%	\$(000s)	\$ %	\$ %	%
Home Purchase	Low	14	12.5	12.2	940	8.3	7.0	22.1
	Moderate	35	31.3	26.3	2,603	22.9	21.2	18.4
	Middle	19	17.0	18.4	1,905	16.7	18.4	25.4
	Upper	33	29.5	23.2	4,854	42.6	34.8	34.1
	Unknown	11	9.8	19.9	1,085	9.5	18.6	0.0
	<b>Total</b>		<b>112</b>	<b>100.0</b>	<b>100.0</b>	<b>11,387</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	6	7.1	5.4	204	1.8	2.4	22.1
	Moderate	11	13.1	15.1	1,136	10.1	10.2	18.4
	Middle	24	28.6	23.5	2,605	23.1	20.1	25.4
	Upper	35	41.7	35.4	6,441	57.1	43.8	34.1
	Unknown	8	9.5	20.5	885	7.9	23.5	0.0
	<b>Total</b>		<b>84</b>	<b>100.0</b>	<b>100.0</b>	<b>11,272</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	1	33.3	16.7	11	8.4	5.0	22.1
	Moderate	0	0.0	5.6	0	0.0	2.0	18.4
	Middle	0	0.0	33.3	0	0.0	34.9	25.4
	Upper	2	66.7	44.4	120	91.6	58.1	34.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>131</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	22.1
	Moderate	0	0.0	0.0	0	0.0	0.0	18.4
	Middle	0	0.0	0.0	0	0.0	0.0	25.4
	Upper	0	0.0	0.0	0	0.0	0.0	34.1
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	25.0	0	0.0	12.0	22.1
	Moderate	0	0.0	12.5	0	0.0	53.7	18.4
	Middle	0	0.0	25.0	0	0.0	14.1	25.4
	Upper	0	0.0	37.5	0	0.0	20.2	34.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	30.0	0	0.0	15.0	22.1
	Moderate	0	0.0	30.0	0	0.0	17.5	18.4
	Middle	0	0.0	20.0	0	0.0	36.6	25.4
	Upper	0	0.0	20.0	0	0.0	30.9	34.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	22.1
	Moderate	0	0.0	0.0	0	0.0	0.0	18.4
	Middle	0	0.0	0.0	0	0.0	0.0	25.4
	Upper	0	0.0	0.0	0	0.0	0.0	34.1
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	21	10.6	9.4	1,155	5.1	4.6	22.1
	Moderate	46	23.1	20.5	3,739	16.4	15.2	18.4
	Middle	43	21.6	20.4	4,510	19.8	18.7	25.4
	Upper	70	35.2	28.2	11,416	50.1	37.8	34.1
	Unknown	19	9.5	21.4	1,970	8.6	23.7	0.0
	<b>Total</b>		<b>199</b>	<b>100.0</b>	<b>100.0</b>	<b>22,790</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding



Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Denison, IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		Count		Dollar				
		Bank	Agg	Bank	Agg	Agg		
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	27	100.0	100.0	2,565	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>2,565</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	54	100.0	100.0	5,655	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>54</b>	<b>100.0</b>	<b>100.0</b>	<b>5,655</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	1	100.0	100.0	60	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>60</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	<b>Multi-Family</b>
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	1	100.0	100.0	560	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>560</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	83	100.0	100.0	8,840	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>83</b>	<b>100.0</b>	<b>100.0</b>	<b>8,840</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases  
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2020 Denison, IA Non MSA</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2020						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	3	11.1	9.0	236	9.2	5.8	24.5
	Moderate	12	44.4	37.2	770	30.0	27.0	18.1
	Middle	7	25.9	26.2	798	31.1	27.3	21.0
	Upper	3	11.1	22.8	618	24.1	34.1	36.4
	Unknown	2	7.4	4.8	143	5.6	5.8	0.0
	<b>Total</b>		<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>2,565</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	9	16.7	7.4	552	9.8	4.0	24.5
	Moderate	8	14.8	15.4	823	14.5	13.1	18.1
	Middle	12	22.2	22.9	1,203	21.3	22.1	21.0
	Upper	18	33.3	42.9	2,157	38.1	48.4	36.4
	Unknown	7	13.0	11.4	921	16.3	12.5	0.0
	<b>Total</b>		<b>54</b>	<b>100.0</b>	<b>100.0</b>	<b>5,655</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	24.5
	Moderate	0	0.0	0.0	0	0.0	0.0	18.1
	Middle	0	0.0	42.9	0	0.0	25.6	21.0
	Upper	1	100.0	42.9	60	100.0	53.9	36.4
	Unknown	0	0.0	14.3	0	0.0	20.5	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>60</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	24.5
	Moderate	0	0.0	0.0	0	0.0	0.0	18.1
	Middle	0	0.0	11.1	0	0.0	2.4	21.0
	Upper	0	0.0	22.2	0	0.0	5.9	36.4
	Unknown	1	100.0	66.7	560	100.0	91.7	0.0
	<b>Total</b>		<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>560</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	24.5
	Moderate	0	0.0	25.0	0	0.0	50.9	18.1
	Middle	0	0.0	50.0	0	0.0	36.4	21.0
	Upper	0	0.0	25.0	0	0.0	12.7	36.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	25.0	0	0.0	8.8	24.5
	Moderate	0	0.0	25.0	0	0.0	7.1	18.1
	Middle	0	0.0	25.0	0	0.0	19.9	21.0
	Upper	0	0.0	25.0	0	0.0	64.2	36.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	24.5
	Moderate	0	0.0	0.0	0	0.0	0.0	18.1
	Middle	0	0.0	0.0	0	0.0	0.0	21.0
	Upper	0	0.0	0.0	0	0.0	0.0	36.4
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	12	14.5	7.5	788	8.9	4.4	24.5
	Moderate	20	24.1	23.2	1,593	18.0	17.6	18.1
	Middle	19	22.9	23.7	2,000	22.6	22.6	21.0
	Upper	22	26.5	32.1	2,835	32.1	39.0	36.4
	Unknown	10	12.0	13.4	1,624	18.4	16.5	0.0
	<b>Total</b>		<b>83</b>	<b>100.0</b>	<b>100.0</b>	<b>8,840</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Humboldt, IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2020						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	27	100.0	100.0	4,028	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>4,028</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	33	100.0	100.0	4,975	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>33</b>	<b>100.0</b>	<b>100.0</b>	<b>4,975</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	
	Middle	2	100.0	100.0	273	100.0	100.0	
	Upper	0	0.0	0.0	0	0.0	0.0	
	Unknown	0	0.0	0.0	0	0.0	0.0	
	<b>Total</b>		<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>273</b>	<b>100.0</b>	
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	100.0	0	0.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	62	100.0	100.0	9,275	100.0	100.0	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>62</b>	<b>100.0</b>	<b>100.0</b>	<b>9,275</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2020 Humboldt, IA Non MSA</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2020						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	4	14.8	14.2	303	7.5	8.9	21.4
	Moderate	3	11.1	24.2	263	6.5	19.0	19.0
	Middle	8	29.6	24.7	1,002	24.9	23.2	21.2
	Upper	11	40.7	28.8	2,369	58.8	41.0	38.4
	Unknown	1	3.7	8.2	90	2.2	7.9	0.0
	<b>Total</b>		<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>4,028</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	1.7	0	0.0	0.5	21.4
	Moderate	4	12.1	15.8	401	8.1	10.2	19.0
	Middle	5	15.2	22.5	434	8.7	17.5	21.2
	Upper	23	69.7	50.8	4,077	81.9	61.9	38.4
	Unknown	1	3.0	9.2	63	1.3	9.9	0.0
	<b>Total</b>		<b>33</b>	<b>100.0</b>	<b>100.0</b>	<b>4,975</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	21.4
	Moderate	0	0.0	0.0	0	0.0	0.0	19.0
	Middle	0	0.0	69.2	0	0.0	72.6	21.2
	Upper	0	0.0	30.8	0	0.0	27.4	38.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	21.4
	Moderate	0	0.0	0.0	0	0.0	0.0	19.0
	Middle	0	0.0	0.0	0	0.0	0.0	21.2
	Upper	0	0.0	0.0	0	0.0	0.0	38.4
	Unknown	2	100.0	100.0	273	100.0	100.0	0.0
	<b>Total</b>		<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>273</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	16.1	0	0.0	19.6	21.4
	Moderate	0	0.0	16.1	0	0.0	13.8	19.0
	Middle	0	0.0	19.4	0	0.0	16.6	21.2
	Upper	0	0.0	48.4	0	0.0	50.0	38.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	21.4
	Moderate	0	0.0	20.0	0	0.0	24.2	19.0
	Middle	0	0.0	40.0	0	0.0	17.6	21.2
	Upper	0	0.0	40.0	0	0.0	58.2	38.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	21.4
	Moderate	0	0.0	0.0	0	0.0	0.0	19.0
	Middle	0	0.0	0.0	0	0.0	0.0	21.2
	Upper	0	0.0	0.0	0	0.0	0.0	38.4
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	4	6.5	7.7	303	3.3	4.4	21.4
	Moderate	7	11.3	18.7	664	7.2	13.8	19.0
	Middle	13	21.0	24.0	1,435	15.5	20.1	21.2
	Upper	34	54.8	39.6	6,446	69.5	51.7	38.4
	Unknown	4	6.5	10.0	426	4.6	10.0	0.0
	<b>Total</b>		<b>62</b>	<b>100.0</b>	<b>100.0</b>	<b>9,275</b>	<b>100.0</b>	<b>100.0</b>
Originations & Purchases								
2016 FFIEC Census Data								
Note: Percentages may not add to 100.0 percent due to rounding								

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Oskaloosa, IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2020						
		Count Bank		Agg	Dollar Bank		Agg	
#	%	%	\$ (000s)	\$ %	\$ %			
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	1	2.0	9.3	56	0.8	5.2	13.5
	Middle	36	72.0	69.5	5,494	76.7	66.5	71.6
	Upper	13	26.0	21.2	1,614	22.5	28.2	14.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>50</b>	<b>100.0</b>	<b>100.0</b>	<b>7,164</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	2	2.7	5.9	434	3.2	3.3	13.5
	Middle	56	76.7	67.6	10,052	73.8	63.1	71.6
	Upper	15	20.5	26.5	3,144	23.1	33.6	14.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>73</b>	<b>100.0</b>	<b>100.0</b>	<b>13,629</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	7.4	0	0.0	5.4	13.5
	Middle	3	100.0	66.4	52	100.0	64.7	71.6
	Upper	0	0.0	26.2	0	0.0	29.9	14.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>52</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	<b>Multi-Family</b> 0.0
	Moderate	0	0.0	5.6	0	0.0	0.9	25.2
	Middle	8	100.0	88.9	6,450	100.0	98.4	62.7
	Upper	0	0.0	5.6	0	0.0	0.7	12.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>6,450</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	9.8	0	0.0	9.0	13.5
	Middle	0	0.0	73.2	0	0.0	76.0	71.6
	Upper	0	0.0	17.1	0	0.0	15.1	14.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	11.1	0	0.0	8.2	13.5
	Middle	0	0.0	58.3	0	0.0	54.6	71.6
	Upper	0	0.0	30.6	0	0.0	37.1	14.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	17.8	0	0.0	10.8	13.5
	Middle	0	0.0	67.8	0	0.0	72.9	71.6
	Upper	0	0.0	14.4	0	0.0	16.4	14.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	3	2.2	7.8	490	1.8	4.2	13.5
	Middle	103	76.9	68.4	22,048	80.8	65.5	71.6
	Upper	28	20.9	23.8	4,758	17.4	30.3	14.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>	<b>134</b>	<b>100.0</b>	<b>100.0</b>	<b>27,296</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

<b>Borrower Distribution of HMDA Reportable Loans</b>								
<b>Assessment Area: 2020 Oskaloosa, IA Non MSA</b>								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison					Families by Family Income %	
		2020			Dollar			
		Count Bank	Agg	Dollar Bank	Agg			
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	2	4.0	9.3	53	0.7	4.6	20.9
	Moderate	8	16.0	29.1	730	10.2	21.6	18.3
	Middle	11	22.0	23.4	1,275	17.8	22.0	23.2
	Upper	18	36.0	27.7	2,673	37.3	40.5	37.6
	Unknown	11	22.0	10.5	2,433	34.0	11.4	0.0
	<b>Total</b>		<b>50</b>	<b>100.0</b>	<b>100.0</b>	<b>7,164</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	3	4.1	4.3	309	2.3	1.6	20.9
	Moderate	5	6.8	14.6	574	4.2	8.7	18.3
	Middle	14	19.2	24.6	2,537	18.6	20.5	23.2
	Upper	44	60.3	43.4	9,032	66.3	53.3	37.6
	Unknown	7	9.6	13.1	1,178	8.6	15.9	0.0
	<b>Total</b>		<b>73</b>	<b>100.0</b>	<b>100.0</b>	<b>13,629</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	6.6	0	0.0	3.7	20.9
	Moderate	1	33.3	18.9	12	23.1	15.0	18.3
	Middle	1	33.3	24.6	25	48.1	26.4	23.2
	Upper	0	0.0	45.1	0	0.0	47.0	37.6
	Unknown	1	33.3	4.9	15	28.8	7.8	0.0
	<b>Total</b>		<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>52</b>	<b>100.0</b>	<b>100.0</b>
Multi-Family	Low	0	0.0	5.6	0	0.0	0.3	20.9
	Moderate	0	0.0	0.0	0	0.0	0.0	18.3
	Middle	0	0.0	0.0	0	0.0	0.0	23.2
	Upper	1	12.5	5.6	270	4.2	2.4	37.6
	Unknown	7	87.5	88.9	6,180	95.8	97.3	0.0
	<b>Total</b>		<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>6,450</b>	<b>100.0</b>	<b>100.0</b>
Other Purpose LOC	Low	0	0.0	9.8	0	0.0	8.1	20.9
	Moderate	0	0.0	26.8	0	0.0	20.4	18.3
	Middle	0	0.0	19.5	0	0.0	16.9	23.2
	Upper	0	0.0	36.6	0	0.0	50.1	37.6
	Unknown	0	0.0	7.3	0	0.0	4.5	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Other Purpose Closed/Exempt	Low	0	0.0	5.6	0	0.0	0.7	20.9
	Moderate	0	0.0	25.0	0	0.0	33.7	18.3
	Middle	0	0.0	27.8	0	0.0	23.0	23.2
	Upper	0	0.0	41.7	0	0.0	42.5	37.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	20.9
	Moderate	0	0.0	0.0	0	0.0	0.0	18.3
	Middle	0	0.0	0.0	0	0.0	0.0	23.2
	Upper	0	0.0	0.0	0	0.0	0.0	37.6
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	<b>Total</b>		<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
HMDA Totals	Low	5	3.7	6.4	362	1.3	2.8	20.9
	Moderate	14	10.4	20.4	1,316	4.8	13.8	18.3
	Middle	26	19.4	23.3	3,838	14.1	20.4	23.2
	Upper	63	47.0	35.6	11,974	43.9	45.9	37.6
	Unknown	26	19.4	14.3	9,806	35.9	17.1	0.0
	<b>Total</b>		<b>134</b>	<b>100.0</b>	<b>100.0</b>	<b>27,296</b>	<b>100.0</b>	<b>100.0</b>

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

**APPENDIX C – 2021 Demographic & CRA Geographic and Borrower Distribution**

Assessment Area: 2021 Des Moines-West Des Moines, IA MSA 19780								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	9	7.4	6,000	4.2	1,837	30.6	29,605	20.6
Moderate-income	32	26.2	30,377	21.1	4,615	15.2	24,811	17.2
Middle-income	51	41.8	60,056	41.7	4,016	6.7	31,386	21.8
Upper-income	29	23.8	47,521	33.0	1,421	3.0	58,152	40.4
Unknown-income	1	0.8	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>122</b>	<b>100.0</b>	<b>143,954</b>	<b>100.0</b>	<b>11,889</b>	<b>8.3</b>	<b>143,954</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	11,086	3,902	2.6	35.2	5,840	52.7	1,344	12.1
Moderate-income	53,058	29,757	19.7	56.1	18,795	35.4	4,506	8.5
Middle-income	101,285	65,588	43.3	64.8	28,503	28.1	7,194	7.1
Upper-income	69,306	52,076	34.4	75.1	14,618	21.1	2,612	3.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>234,735</b>	<b>151,323</b>	<b>100.0</b>	<b>64.5</b>	<b>67,756</b>	<b>28.9</b>	<b>15,656</b>	<b>6.7</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	%
Low-income	1,002	3.6	873	3.4	121	4.9	8	2.6
Moderate-income	4,243	15.1	3,829	15.1	382	15.6	32	10.5
Middle-income	13,771	49.1	12,298	48.6	1,300	53.1	173	56.5
Upper-income	9,034	32.2	8,300	32.8	641	26.2	93	30.4
Unknown-income	8	0.0	6	0.0	2	0.1	0	0.0
<b>Total Assessment Area</b>	<b>28,058</b>	<b>100.0</b>	<b>25,306</b>	<b>100.0</b>	<b>2,446</b>	<b>100.0</b>	<b>306</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>90.2</b>		<b>8.7</b>		<b>1.1</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	%
Low-income	3	0.3	3	0.3	0	0.0	0	0.0
Moderate-income	103	11.5	101	11.5	2	11.1	0	0.0
Middle-income	554	61.9	543	62.0	11	61.1	0	0.0
Upper-income	235	26.3	229	26.1	5	27.8	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>895</b>	<b>100.0</b>	<b>876</b>	<b>100.0</b>	<b>18</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
	<b>Percentage of Total Farms:</b>			<b>97.9</b>		<b>2.0</b>		<b>0.1</b>
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

<b>Geographic Distribution of Small Business Loans</b>						
<b>Assessment Area: 2021 Des Moines-West Des Moines, IA MSA 19780</b>						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2021 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	3	1.0	751	2.5	3.6
	Moderate	55	18.7	6,568	22.2	15.1
	Middle	141	48.0	13,215	44.6	49.1
	Upper	95	32.3	9,079	30.7	32.2
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>294</b>	<b>100.0</b>	<b>29,613</b>	<b>100.0</b>	<b>100.0</b>
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

<b>Geographic Distribution of Small Farm Loans</b>						
<b>Assessment Area: 2021 Des Moines-West Des Moines, IA MSA 19780</b>						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2021 Dollar Bank		Total Farms
		#	%	\$ 000s	\$ %	%
Small Farm	Low	0	0.0	0	0.0	0.3
	Moderate	51	20.1	3,576	20.5	11.5
	Middle	190	74.8	12,624	72.2	61.9
	Upper	13	5.1	1,278	7.3	26.3
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>254</b>	<b>100.0</b>	<b>17,478</b>	<b>100.0</b>	<b>100.0</b>
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						



<b>Small Business Lending By Revenue &amp; Loan Size</b>						
<b>Assessment Area: 2021 Des Moines-West Des Moines, IA MSA 19780</b>						
Product Type		Bank & Demographic Comparison				
		2021		2021		Total Businesses
#	%	\$ 000s	\$ %	%	%	
						Small Business Revenue
Over \$1 Million	48	16.3	13,235	44.7	8.7	
Unknown	0	0.0	0	0.0	1.1	
<b>Total</b>	<b>294</b>	<b>100.0</b>	<b>29,613</b>	<b>100.0</b>	<b>100.0</b>	
Small Business Loan Size	\$100,000 or Less	231	78.6	5,582	18.8	
	\$100,001 - \$250,000	30	10.2	4,906	16.6	
	\$250,001 - \$1 Million	33	11.2	19,125	64.6	
	<b>Total</b>	<b>294</b>	<b>100.0</b>	<b>29,613</b>	<b>100.0</b>	
Small Business Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	214	87.0	4,704	28.7	
	\$100,001 - \$250,000	16	6.5	2,434	14.9	
	\$250,001 - \$1 Million	16	6.5	9,240	56.4	
	<b>Total</b>	<b>246</b>	<b>100.0</b>	<b>16,378</b>	<b>100.0</b>	

Originations & Purchases  
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

<b>Small Farm Lending By Revenue &amp; Loan Size</b>						
<b>Assessment Area: 2021 Des Moines-West Des Moines, IA MSA 19780</b>						
Product Type		Bank & Demographic Comparison				
		2021		2021		Total Farms
#	%	\$ 000s	\$ %	%	%	
						Small Farm Revenue
Over \$1 Million	14	5.5	2,128	12.2	2.0	
Unknown	0	0.0	0	0.0	0.1	
<b>Total</b>	<b>254</b>	<b>100.0</b>	<b>17,478</b>	<b>100.0</b>	<b>100.0</b>	
Small Farm Loan Size	\$100,000 or Less	205	80.7	5,479	31.3	
	\$100,001 - \$250,000	31	12.2	5,503	31.5	
	\$250,001 - \$500,000	18	7.1	6,496	37.2	
	<b>Total</b>	<b>254</b>	<b>100.0</b>	<b>17,478</b>	<b>100.0</b>	
Small Farm Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	196	81.7	4,898	31.9	
	\$100,001 - \$250,000	29	12.1	5,156	33.6	
	\$250,001 - \$500,000	15	6.3	5,296	34.5	
	<b>Total</b>	<b>240</b>	<b>100.0</b>	<b>15,350</b>	<b>100.0</b>	

Originations & Purchases  
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

Assessment Area: 2021 Lawler, IA Non MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,717	19.1
Moderate-income	1	9.1	823	9.1	60	7.3	2,009	22.3
Middle-income	10	90.9	8,173	90.9	547	6.7	1,978	22.0
Upper-income	0	0.0	0	0.0	0	0.0	3,292	36.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>11</b>	<b>100.0</b>	<b>8,996</b>	<b>100.0</b>	<b>607</b>	<b>6.7</b>	<b>8,996</b>	<b>100.0</b>
Housing Units by Tract	Housing Types by Tract							
	Owner-Occupied		Rental		Vacant			
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1,476	810	7.6	54.9	446	30.2	220	14.9
Middle-income	13,736	9,780	92.4	71.2	2,832	20.6	1,124	8.2
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>15,212</b>	<b>10,590</b>	<b>100.0</b>	<b>69.6</b>	<b>3,278</b>	<b>21.5</b>	<b>1,344</b>	<b>8.8</b>
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	89	5.6	89	6.2	0	0.0	0	0.0
Middle-income	1,492	94.4	1,350	93.8	109	100.0	33	100.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>1,581</b>	<b>100.0</b>	<b>1,439</b>	<b>100.0</b>	<b>109</b>	<b>100.0</b>	<b>33</b>	<b>100.0</b>
Percentage of Total Businesses:			91.0		6.9		2.1	
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	6	1.4	6	1.4	0	0.0	0	0.0
Middle-income	431	98.6	426	98.6	4	100.0	1	100.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>437</b>	<b>100.0</b>	<b>432</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
Percentage of Total Farms:			98.9		0.9		0.2	
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

<b>Geographic Distribution of Small Business Loans</b>						
<b>Assessment Area: 2021 Lawler, IA Non MSA</b>						
	<b>Tract Income Levels</b>	<b>Bank &amp; Demographic Comparison</b>				
		<b>Count Bank</b>		<b>Dollar Bank</b>		<b>Total Businesses</b>
		<b>#</b>	<b>%</b>	<b>\$ 000s</b>	<b>\$ %</b>	<b>%</b>
<b>Small Business</b>	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	5.6
	Middle	153	100.0	9,614	100.0	94.4
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>153</b>	<b>100.0</b>	<b>9,614</b>	<b>100.0</b>	<b>100.0</b>

2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

<b>Geographic Distribution of Small Farm Loans</b>						
<b>Assessment Area: 2021 Lawler, IA Non MSA</b>						
	<b>Tract Income Levels</b>	<b>Bank &amp; Demographic Comparison</b>				
		<b>Count Bank</b>		<b>Dollar Bank</b>		<b>Total Farms</b>
		<b>#</b>	<b>%</b>	<b>\$ 000s</b>	<b>\$ %</b>	<b>%</b>
<b>Small Farm</b>	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	1.4
	Middle	389	100.0	18,450	100.0	98.6
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>389</b>	<b>100.0</b>	<b>18,450</b>	<b>100.0</b>	<b>100.0</b>

2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

Small Business Lending By Revenue & Loan Size								
Assessment Area: 2021 Lawler, IA Non MSA								
Product Type		Bank & Demographic Comparison						
		2021		2021		Total Businesses		
Revenue	Loan Size	Count Bank		Dollar Bank			%	
		#	%	\$ 000s	\$ %			
Small Business	Revenue	\$1 Million or Less	129	84.3	4,400	45.8	91.0	
		Over \$1 Million	19	12.4	4,735	49.3	6.9	
		Unknown	5	3.3	479	5.0	2.1	
		<b>Total</b>	<b>153</b>	<b>100.0</b>	<b>9,614</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size	\$100,000 or Less	133	86.9	2,933	30.5		
		\$100,001 - \$250,000	12	7.8	1,978	20.6		
		\$250,001 - \$1 Million	8	5.2	4,703	48.9		
		<b>Total</b>	<b>153</b>	<b>100.0</b>	<b>9,614</b>	<b>100.0</b>		
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	118	91.5	2,199	50.0		
		\$100,001 - \$250,000	9	7.0	1,426	32.4		
		\$250,001 - \$1 Million	2	1.6	775	17.6		
		<b>Total</b>	<b>129</b>	<b>100.0</b>	<b>4,400</b>	<b>100.0</b>		

Originations & Purchases  
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

Small Farm Lending By Revenue & Loan Size								
Assessment Area: 2021 Lawler, IA Non MSA								
Product Type		Bank & Demographic Comparison						
		2021		2021		Total Farms		
Revenue	Loan Size	Count Bank		Dollar Bank			%	
		#	%	\$ 000s	\$ %			
Small Farm	Revenue	\$1 Million or Less	366	94.1	16,693	90.5	98.9	
		Over \$1 Million	17	4.4	1,686	9.1	0.9	
		Unknown	6	1.5	71	0.4	0.2	
		<b>Total</b>	<b>389</b>	<b>100.0</b>	<b>18,450</b>	<b>100.0</b>	<b>100.0</b>	
	Loan Size	\$100,000 or Less	345	88.7	8,685	47.1		
		\$100,001 - \$250,000	33	8.5	5,889	31.9		
		\$250,001 - \$500,000	11	2.8	3,876	21.0		
		<b>Total</b>	<b>389</b>	<b>100.0</b>	<b>18,450</b>	<b>100.0</b>		
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	326	89.1	8,275	49.6		
		\$100,001 - \$250,000	32	8.7	5,689	34.1		
		\$250,001 - \$500,000	8	2.2	2,729	16.3		
		<b>Total</b>	<b>366</b>	<b>100.0</b>	<b>16,693</b>	<b>100.0</b>		

Originations & Purchases  
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS

Assessment Area: 2021 Southwest, IA Non MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	2,683	22.1
Moderate-income	4	22.2	2,706	22.3	604	22.3	2,237	18.4
Middle-income	14	77.8	9,450	77.7	736	7.8	3,086	25.4
Upper-income	0	0.0	0	0.0	0	0.0	4,150	34.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>18</b>	<b>100.0</b>	<b>12,156</b>	<b>100.0</b>	<b>1,340</b>	<b>11.0</b>	<b>12,156</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	5,125	2,721	20.4	53.1	1,715	33.5	689	13.4
Middle-income	15,777	10,588	79.6	67.1	3,296	20.9	1,893	12.0
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>20,902</b>	<b>13,309</b>	<b>100.0</b>	<b>63.7</b>	<b>5,011</b>	<b>24.0</b>	<b>2,582</b>	<b>12.4</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0	0.0	0	0.0	0	0.0	
Moderate-income	508	454	24.6	24.3	43	30.5	11	19.3
Middle-income	1,559	1,415	75.4	75.7	98	69.5	46	80.7
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>2,067</b>	<b>1,869</b>	<b>100.0</b>	<b>100.0</b>	<b>141</b>	<b>100.0</b>	<b>57</b>	<b>100.0</b>
	Percentage of Total Businesses:		90.4		6.8		2.8	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0	0.0	0	0.0	0	0.0	
Moderate-income	64	62	10.0	9.8	2	40.0	0	0.0
Middle-income	575	571	90.0	90.2	3	60.0	1	100.0
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>639</b>	<b>633</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
	Percentage of Total Farms:		99.1		0.8		0.2	
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

<b>Geographic Distribution of Small Business Loans</b>						
<b>Assessment Area: 2021 Southwest, IA Non MSA</b>						
	<b>Tract Income Levels</b>	<b>Bank &amp; Demographic Comparison</b>				
		<b>Count Bank</b>		<b>Dollar Bank</b>		<b>Total Businesses</b>
		<b>#</b>	<b>%</b>	<b>\$ 000s</b>	<b>\$ %</b>	<b>%</b>
<b>Small Business</b>	Low	0	0.0	0	0.0	0.0
	Moderate	48	12.6	1,565	8.9	24.6
	Middle	334	87.4	16,008	91.1	75.4
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>382</b>	<b>100.0</b>	<b>17,573</b>	<b>100.0</b>	<b>100.0</b>
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

<b>Geographic Distribution of Small Farm Loans</b>						
<b>Assessment Area: 2021 Southwest, IA Non MSA</b>						
	<b>Tract Income Levels</b>	<b>Bank &amp; Demographic Comparison</b>				
		<b>Count Bank</b>		<b>Dollar Bank</b>		<b>Total Farms</b>
		<b>#</b>	<b>%</b>	<b>\$ 000s</b>	<b>\$ %</b>	<b>%</b>
<b>Small Farm</b>	Low	0	0.0	0	0.0	0.0
	Moderate	35	4.1	2,640	4.0	10.0
	Middle	828	95.9	63,642	96.0	90.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>863</b>	<b>100.0</b>	<b>66,282</b>	<b>100.0</b>	<b>100.0</b>
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

<b>Small Business Lending By Revenue &amp; Loan Size</b>							
<b>Assessment Area: 2021 Southwest, IA Non MSA</b>							
Product Type		Bank & Demographic Comparison					
		Count Bank		Dollar Bank		Total Businesses	
		#	%	\$ 000s	\$ %	%	
Small Business	Revenue	\$1 Million or Less	322	84.3	11,534	65.6	90.4
		Over \$1 Million	30	7.9	3,368	19.2	6.8
		Unknown	30	7.9	2,671	15.2	2.8
		<b>Total</b>	<b>382</b>	<b>100.0</b>	<b>17,573</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	349	91.4	8,401	47.8	
		\$100,001 - \$250,000	20	5.2	3,436	19.6	
		\$250,001 - \$1 Million	13	3.4	5,736	32.6	
		<b>Total</b>	<b>382</b>	<b>100.0</b>	<b>17,573</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	304	94.4	6,538	56.7	
		\$100,001 - \$250,000	11	3.4	1,811	15.7	
		\$250,001 - \$1 Million	7	2.2	3,185	27.6	
		<b>Total</b>	<b>322</b>	<b>100.0</b>	<b>11,534</b>	<b>100.0</b>	
Originations & Purchases							
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

<b>Small Farm Lending By Revenue &amp; Loan Size</b>							
<b>Assessment Area: 2021 Southwest, IA Non MSA</b>							
Product Type		Bank & Demographic Comparison					
		Count Bank		Dollar Bank		Total Farms	
		#	%	\$ 000s	\$ %	%	
Small Farm	Revenue	\$1 Million or Less	755	87.5	52,641	79.4	99.1
		Over \$1 Million	68	7.9	12,978	19.6	0.8
		Unknown	40	4.6	663	1.0	0.2
		<b>Total</b>	<b>863</b>	<b>100.0</b>	<b>66,282</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	684	79.3	18,398	27.8	
		\$100,001 - \$250,000	96	11.1	16,592	25.0	
		\$250,001 - \$500,000	83	9.6	31,292	47.2	
		<b>Total</b>	<b>863</b>	<b>100.0</b>	<b>66,282</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	608	80.5	16,094	30.6	
		\$100,001 - \$250,000	87	11.5	14,807	28.1	
		\$250,001 - \$500,000	60	7.9	21,740	41.3	
		<b>Total</b>	<b>755</b>	<b>100.0</b>	<b>52,641</b>	<b>100.0</b>	
Originations & Purchases							
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Assessment Area: 2021 Denison, IA Non MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,091	24.5
Moderate-income	0	0.0	0	0.0	0	0.0	806	18.1
Middle-income	5	100.0	4,449	100.0	622	14.0	933	21.0
Upper-income	0	0.0	0	0.0	0	0.0	1,619	36.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>5</b>	<b>100.0</b>	<b>4,449</b>	<b>100.0</b>	<b>622</b>	<b>14.0</b>	<b>4,449</b>	<b>100.0</b>
Housing Units by Tract	Housing Types by Tract							
	Owner-Occupied		Rental		Vacant			
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	6,981	100.0	4,774	68.4	1,581	22.6	626	9.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>6,981</b>	<b>100.0</b>	<b>4,774</b>	<b>68.4</b>	<b>1,581</b>	<b>22.6</b>	<b>626</b>	<b>9.0</b>
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	786	100.0	713	100.0	56	100.0	17	100.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>786</b>	<b>100.0</b>	<b>713</b>	<b>100.0</b>	<b>56</b>	<b>100.0</b>	<b>17</b>	<b>100.0</b>
Percentage of Total Businesses:				90.7		7.1		2.2
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	187	100.0	187	100.0	0	0.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>187</b>	<b>100.0</b>	<b>187</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				100.0		0.0		0.0

2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding



<b>Geographic Distribution of Small Business Loans</b>						
<b>Assessment Area: 2021 Denison, IA Non MSA</b>						
	<b>Tract Income Levels</b>	<b>Bank &amp; Demographic Comparison</b>				
		<b>Count Bank</b>		<b>2021 Dollar Bank</b>		<b>Total Businesses</b>
		<b>#</b>	<b>%</b>	<b>\$ 000s</b>	<b>\$ %</b>	<b>%</b>
Small Business	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	199	100.0	10,316	100.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>199</b>	<b>100.0</b>	<b>10,316</b>	<b>100.0</b>	<b>100.0</b>
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

<b>Geographic Distribution of Small Farm Loans</b>						
<b>Assessment Area: 2021 Denison, IA Non MSA</b>						
	<b>Tract Income Levels</b>	<b>Bank &amp; Demographic Comparison</b>				
		<b>Count Bank</b>		<b>2021 Dollar Bank</b>		<b>Total Farms</b>
		<b>#</b>	<b>%</b>	<b>\$ 000s</b>	<b>\$ %</b>	<b>%</b>
Small Farm	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	353	100.0	22,647	100.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>353</b>	<b>100.0</b>	<b>22,647</b>	<b>100.0</b>	<b>100.0</b>
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

<b>Small Business Lending By Revenue &amp; Loan Size</b>								
<b>Assessment Area: 2021 Denison, IA Non MSA</b>								
Product Type		Bank & Demographic Comparison						
		2021		2021		Total Businesses		
#	%	\$ 000s	\$ %	%	%			
						Small Business	Revenue	\$1 Million or Less
Over \$1 Million	31	15.6	3,720	36.1	7.1			
Unknown	1	0.5	70	0.7	2.2			
<b>Total</b>	<b>199</b>	<b>100.0</b>	<b>10,316</b>	<b>100.0</b>	<b>100.0</b>			
Loan Size	\$100,000 or Less	176	88.4	5,279	51.2			
	\$100,001 - \$250,000	20	10.1	3,627	35.2			
	\$250,001 - \$1 Million	3	1.5	1,410	13.7			
	<b>Total</b>	<b>199</b>	<b>100.0</b>	<b>10,316</b>	<b>100.0</b>			
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	154	92.2	3,680	56.4			
	\$100,001 - \$250,000	11	6.6	2,009	30.8			
	\$250,001 - \$1 Million	2	1.2	837	12.8			
	<b>Total</b>	<b>167</b>	<b>100.0</b>	<b>6,526</b>	<b>100.0</b>			

Originations & Purchases  
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

<b>Small Farm Lending By Revenue &amp; Loan Size</b>								
<b>Assessment Area: 2021 Denison, IA Non MSA</b>								
Product Type		Bank & Demographic Comparison						
		2021		2021		Total Farms		
#	%	\$ 000s	\$ %	%	%			
						Small Farm	Revenue	\$1 Million or Less
Over \$1 Million	12	3.4	1,617	7.1	0.0			
Unknown	0	0.0	0	0.0	0.0			
<b>Total</b>	<b>353</b>	<b>100.0</b>	<b>22,647</b>	<b>100.0</b>	<b>100.0</b>			
Loan Size	\$100,000 or Less	291	82.4	7,734	34.2			
	\$100,001 - \$250,000	38	10.8	6,521	28.8			
	\$250,001 - \$500,000	24	6.8	8,392	37.1			
	<b>Total</b>	<b>353</b>	<b>100.0</b>	<b>22,647</b>	<b>100.0</b>			
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	283	83.0	7,416	35.3			
	\$100,001 - \$250,000	36	10.6	6,086	28.9			
	\$250,001 - \$500,000	22	6.5	7,528	35.8			
	<b>Total</b>	<b>341</b>	<b>100.0</b>	<b>21,030</b>	<b>100.0</b>			

Originations & Purchases  
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

Assessment Area: 2021 Humboldt, IA Non MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,007	21.4
Moderate-income	0	0.0	0	0.0	0	0.0	891	19.0
Middle-income	7	100.0	4,698	100.0	405	8.6	998	21.2
Upper-income	0	0.0	0	0.0	0	0.0	1,802	38.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>7</b>	<b>100.0</b>	<b>4,698</b>	<b>100.0</b>	<b>405</b>	<b>8.6</b>	<b>4,698</b>	<b>100.0</b>
Housing Units by Tract	Housing Types by Tract							
	Owner-Occupied		Rental		Vacant			
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	8,434	5,498	100.0	65.2	1,889	22.4	1,047	12.4
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>8,434</b>	<b>5,498</b>	<b>100.0</b>	<b>65.2</b>	<b>1,889</b>	<b>22.4</b>	<b>1,047</b>	<b>12.4</b>
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	935	100.0	831	100.0	78	100.0	26	100.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>935</b>	<b>100.0</b>	<b>831</b>	<b>100.0</b>	<b>78</b>	<b>100.0</b>	<b>26</b>	<b>100.0</b>
Percentage of Total Businesses:				88.9		8.3		2.8
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	354	100.0	351	100.0	3	100.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>354</b>	<b>100.0</b>	<b>351</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				99.2		0.8		0.0
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

<b>Geographic Distribution of Small Business Loans</b>						
<b>Assessment Area: 2021 Humboldt, IA Non MSA</b>						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2021 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	156	100.0	6,208	100.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>156</b>	<b>100.0</b>	<b>6,208</b>	<b>100.0</b>	<b>100.0</b>
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

<b>Geographic Distribution of Small Farm Loans</b>						
<b>Assessment Area: 2021 Humboldt, IA Non MSA</b>						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2021 Dollar Bank		Total Farms
		#	%	\$ 000s	\$ %	%
Small Farm	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	272	100.0	19,045	100.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>272</b>	<b>100.0</b>	<b>19,045</b>	<b>100.0</b>	<b>100.0</b>
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

<b>Small Business Lending By Revenue &amp; Loan Size</b>							
<b>Assessment Area: 2021 Humboldt, IA Non MSA</b>							
Product Type		Bank & Demographic Comparison					
		Count Bank		Dollar Bank		Total Businesses	
		#	%	\$ 000s	\$ %	%	
Small Business	Revenue	\$1 Million or Less	130	83.3	3,835	61.8	88.9
		Over \$1 Million	21	13.5	2,259	36.4	8.3
		Unknown	5	3.2	114	1.8	2.8
		<b>Total</b>	<b>156</b>	<b>100.0</b>	<b>6,208</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	146	93.6	3,151	50.8	
		\$100,001 - \$250,000	7	4.5	1,082	17.4	
		\$250,001 - \$1 Million	3	1.9	1,975	31.8	
		<b>Total</b>	<b>156</b>	<b>100.0</b>	<b>6,208</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	127	97.7	2,406	62.7	
		\$100,001 - \$250,000	1	0.8	104	2.7	
		\$250,001 - \$1 Million	2	1.5	1,325	34.6	
		<b>Total</b>	<b>130</b>	<b>100.0</b>	<b>3,835</b>	<b>100.0</b>	
Originations & Purchases							
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

<b>Small Farm Lending By Revenue &amp; Loan Size</b>							
<b>Assessment Area: 2021 Humboldt, IA Non MSA</b>							
Product Type		Bank & Demographic Comparison					
		Count Bank		Dollar Bank		Total Farms	
		#	%	\$ 000s	\$ %	%	
Small Farm	Revenue	\$1 Million or Less	245	90.1	14,420	75.7	99.2
		Over \$1 Million	23	8.5	3,906	20.5	0.8
		Unknown	4	1.5	719	3.8	0.0
		<b>Total</b>	<b>272</b>	<b>100.0</b>	<b>19,045</b>	<b>100.0</b>	<b>100.0</b>
	Loan Size	\$100,000 or Less	221	81.3	5,189	27.2	
		\$100,001 - \$250,000	27	9.9	5,141	27.0	
		\$250,001 - \$500,000	24	8.8	8,715	45.8	
		<b>Total</b>	<b>272</b>	<b>100.0</b>	<b>19,045</b>	<b>100.0</b>	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	206	84.1	4,600	31.9	
		\$100,001 - \$250,000	22	9.0	4,240	29.4	
		\$250,001 - \$500,000	17	6.9	5,580	38.7	
		<b>Total</b>	<b>245</b>	<b>100.0</b>	<b>14,420</b>	<b>100.0</b>	
Originations & Purchases							
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Assessment Area: 2021 Oskaloosa, IA Non MSA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	5,627	20.9
Moderate-income	6	20.0	3,910	14.5	807	20.6	4,937	18.3
Middle-income	21	70.0	19,075	70.8	1,709	9.0	6,250	23.2
Upper-income	3	10.0	3,957	14.7	233	5.9	10,128	37.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>30</b>	<b>100.0</b>	<b>26,942</b>	<b>100.0</b>	<b>2,749</b>	<b>10.2</b>	<b>26,942</b>	<b>100.0</b>
Housing Units by Tract	Housing Types by Tract							
	Owner-Occupied		Rental		Vacant			
	#	%	%	#	%	#	%	
Low-income	0	0	0.0	0	0.0	0	0.0	0
Moderate-income	7,444	4,048	13.5	54.4	2,559	34.4	837	11.2
Middle-income	31,197	21,420	71.6	68.7	7,298	23.4	2,479	7.9
Upper-income	6,020	4,460	14.9	74.1	1,056	17.5	504	8.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>44,661</b>	<b>29,928</b>	<b>100.0</b>	<b>67.0</b>	<b>10,913</b>	<b>24.4</b>	<b>3,820</b>	<b>8.6</b>
Total Businesses by Tract	Businesses by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	728	16.5	665	16.5	55	17.4	8	12.7
Middle-income	2,973	67.6	2,698	67.1	225	71.2	50	79.4
Upper-income	700	15.9	659	16.4	36	11.4	5	7.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>4,401</b>	<b>100.0</b>	<b>4,022</b>	<b>100.0</b>	<b>316</b>	<b>100.0</b>	<b>63</b>	<b>100.0</b>
Percentage of Total Businesses:			91.4		7.2		1.4	
Total Farms by Tract	Farms by Tract & Revenue Size							
	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	3	0.4	3	0.4	0	0.0	0	0.0
Middle-income	585	85.8	577	85.6	5	100.0	3	100.0
Upper-income	94	13.8	94	13.9	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>682</b>	<b>100.0</b>	<b>674</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>
Percentage of Total Farms:			98.8		0.7		0.4	
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

<b>Geographic Distribution of Small Business Loans</b>						
<b>Assessment Area: 2021 Oskaloosa, IA Non MSA</b>						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2021 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	0	0.0	0	0.0	0.0
	Moderate	1	0.5	345	3.1	16.5
	Middle	190	86.0	10,287	91.6	67.6
	Upper	30	13.6	599	5.3	15.9
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>221</b>	<b>100.0</b>	<b>11,231</b>	<b>100.0</b>	<b>100.0</b>
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

<b>Geographic Distribution of Small Farm Loans</b>						
<b>Assessment Area: 2021 Oskaloosa, IA Non MSA</b>						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2021 Dollar Bank		Total Farms
		#	%	\$ 000s	\$ %	%
Small Farm	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.4
	Middle	389	94.0	26,151	91.3	85.8
	Upper	25	6.0	2,495	8.7	13.8
	Unknown	0	0.0	0	0.0	0.0
	<b>Total</b>	<b>414</b>	<b>100.0</b>	<b>28,646</b>	<b>100.0</b>	<b>100.0</b>
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

<b>Small Business Lending By Revenue &amp; Loan Size</b>							
<b>Assessment Area: 2021 Oskaloosa, IA Non MSA</b>							
Product Type		Bank & Demographic Comparison					
		2021		2021		Total Businesses	
#	%	\$ 000s	\$ %	%	%		
						Small Business	Revenue
Over \$1 Million	35	15.8	4,081	36.3	7.2		
Unknown	0	0.0	0	0.0	1.4		
<b>Total</b>	<b>221</b>	<b>100.0</b>	<b>11,231</b>	<b>100.0</b>	<b>100.0</b>		
Loan Size	\$100,000 or Less	194	87.8	5,007	44.6		
	\$100,001 - \$250,000	21	9.5	3,427	30.5		
	\$250,001 - \$1 Million	6	2.7	2,797	24.9		
	<b>Total</b>	<b>221</b>	<b>100.0</b>	<b>11,231</b>	<b>100.0</b>		
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	170	91.4	3,848	53.8		
	\$100,001 - \$250,000	13	7.0	2,130	29.8		
	\$250,001 - \$1 Million	3	1.6	1,172	16.4		
	<b>Total</b>	<b>186</b>	<b>100.0</b>	<b>7,150</b>	<b>100.0</b>		

Originations & Purchases  
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*

<b>Small Farm Lending By Revenue &amp; Loan Size</b>							
<b>Assessment Area: 2021 Oskaloosa, IA Non MSA</b>							
Product Type		Bank & Demographic Comparison					
		2021		2021		Total Farms	
#	%	\$ 000s	\$ %	%	%		
						Small Farm	Revenue
Over \$1 Million	27	6.5	2,019	7.0	0.7		
Unknown	0	0.0	0	0.0	0.4		
<b>Total</b>	<b>414</b>	<b>100.0</b>	<b>28,646</b>	<b>100.0</b>	<b>100.0</b>		
Loan Size	\$100,000 or Less	340	82.1	9,191	32.1		
	\$100,001 - \$250,000	43	10.4	7,796	27.2		
	\$250,001 - \$500,000	31	7.5	11,659	40.7		
	<b>Total</b>	<b>414</b>	<b>100.0</b>	<b>28,646</b>	<b>100.0</b>		
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	317	81.9	7,842	29.5		
	\$100,001 - \$250,000	39	10.1	7,126	26.8		
	\$250,001 - \$500,000	31	8.0	11,659	43.8		
	<b>Total</b>	<b>387</b>	<b>100.0</b>	<b>26,627</b>	<b>100.0</b>		

Originations & Purchases  
2021 FFIEC Census Data & 2021 Dun & Bradstreet information according to 2015 ACS  
*Note: Percentages may not add to 100.0 percent due to rounding*



**APPENDIX D – Scope of Examination**

SCOPE OF EXAMINATION			
<b>TIME PERIOD REVIEWED</b>		Lending: January 1, 2020 to December 31, 2021 Community Development Activity: March 3, 2020 to July 11, 2022	
<b>FINANCIAL INSTITUTION</b>		<b>PRODUCTS REVIEWED</b>	
Bank Iowa		HMDA-Reportable Loans CRA-Reportable Loans	
<b>AFFILIATE(S)</b>	<b>AFFILIATE RELATIONSHIP</b>	<b>PRODUCTS REVIEWED</b>	
None	None	None	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
<ol style="list-style-type: none"> <li>1. Des Moines-West Des Moines, Iowa MSA #19780</li> <li>2. Lawler, Iowa Non-MSA</li> <li>3. Southwest, Iowa Non-MSA</li> </ol>	Full scope	N/A	N/A
<ol style="list-style-type: none"> <li>1. Denison, Iowa Non-MSA</li> <li>2. Humboldt, Iowa Non-MSA</li> <li>3. Oskaloosa, Iowa Non-MSA</li> </ol>	Limited scope review	N/A	N/A

## APPENDIX E – Glossary

**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.

**Affordability ratio:** To determine housing affordability, the affordability ratio is calculated by dividing median household income by median housing value. This ratio allows the comparison of housing affordability across assessment areas and/or communities. An area with a high ratio generally has more affordable housing than an area with a low ratio.

**Aggregate lending:** The number of loans originated and purchased by all lenders subject to reporting requirements as a percentage of the aggregate number of loans originated and purchased by all lenders in the MSA/assessment area.

**American Community Survey Data (ACS):** The American Community Survey (ACS) data is based on a nationwide survey designed to provide local communities with reliable and timely demographic, social, economic, and housing data each year. The Census Bureau first released data for geographies of all sizes in 2010. This data is known as the “five-year estimate data.” The five-year estimate data is used by the FFIEC as the base file for data used in conjunction with consumer compliance and CRA examinations.<sup>1</sup>

**Area Median Income (AMI):** AMI means –

1. The median family income for the MSA, if a person or geography is located in an MSA, or for the metropolitan division, if a person or geography is located in an MSA that has been subdivided into metropolitan divisions; or
2. The statewide nonmetropolitan median family income if a person or geography is located outside an MSA.

**Assessment area:** Assessment area means a geographic area delineated in accordance with section 228.41

**Automated teller machine (ATM):** An automated teller machine means an automated, unstaffed banking facility owned or operated by, or operated exclusively for, the bank at which deposits are received, cash dispersed or money lent.

**Bank:** Bank means a state member as that term is defined in section 3(d)(2) of the Federal Deposit Insurance Act (12 USC 1813(d)(2)), except as provided in section 228.11(c)(3), and includes an uninsured state branch (other than a limited branch) of a foreign bank described in section 228.11(c)(2).

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<sup>1</sup> Source: FFIEC press release dated October 19, 2011.

**Branch:** Branch refers to a staffed banking facility approved as a branch, whether shared or unshared, including, for example, a mini-branch in a grocery store or a branch operated in conjunction with any other local business or nonprofit organization.

**Census tract:** Small subdivisions of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. They 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.

**Combined Statistical Area (CSAs):** Adjacent metropolitan statistical areas/metropolitan divisions (MSA/MDs) and micropolitan statistical areas may be combined into larger Combined Statistical Areas based on social and economic ties as well as commuting patterns. The ties used as the basis for CSAs are not as strong as the ties used to support MSA/MD and micropolitan statistical area designations; however, they do bind the larger area together and may be particularly useful for regional planning authorities and the private sector. Under Regulation BB, assessment areas may be presented under a Combined Statistical Area heading; however, all analysis is conducted on the basis of median income figures for MSA/MDs and the applicable state-wide non metropolitan median income figure.

**Community Development:** The financial supervisory agencies have adopted the following definition for community development:

1. Affordable housing, including for multi-family housing, for low- and moderate-income households;
2. Community services tailored to meet the needs of low- and moderate-income individuals;
3. 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
4. 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 definitions of community development. Activities that revitalize or stabilize:

- 1) Low- or moderate-income geographies;
- 2) Designated disaster areas; or
- 3) 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 or 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 services including the needs of low- and moderate-income individuals.

**Community Development Loan:** A community development loan means a loan that:

- 1) Has as its primary purpose community development; and
- 2) Except in the case of a wholesale or limited purpose bank –
  - a. Has not been reported or collected by the bank or an affiliate for consideration in the bank’s assessment as a home mortgage, small business, small farm, or consumer loan, unless it is a multi-family housing loan (as described in the regulation implementing the Home Mortgage Disclosure Act); and
  - b. Benefits the bank’s assessment area(s) or a broader statewide or regional area that includes the bank’s assessment area(s).

**Community Development Service:** A community development service means a service that:

- 1) Has as its primary purpose community development; and
- 2) Is related to the provision of financial services.

**Consumer loan:** 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 of loans: motor vehicle, credit card, other consumer secured loan, includes loans for home improvement purposes not secured by a dwelling, and other consumer unsecured loan, includes loans for home improvement purposes not secured.

**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 household and no wife present) or “female householder” (a family with a female householder and no husband present).

**Fair market rent:** Fair market rents (FMRs) are gross rent estimates. They include the shelter rent plus the cost of all tenant-paid utilities, except telephones, cable or satellite television service, and internet service. HUD sets FMRs to assure that a sufficient supply of rental housing is available to their program participants. To accomplish this objective, FMRs must be both high enough to permit a selection of units and neighborhoods and low enough to serve as many low-income families as possible. The level at which FMRs are set is expressed as a percentile point within the rent distribution of standard-quality rental housing units. The current definition used is the 40th percentile rent, the dollar amount below which 40 percent of the standard-quality rental housing

units are rented. The 40th percentile rent is drawn from the distribution of rents of all units occupied by recent movers (renter households who moved to their present residence within the past 15 months). HUD is required to ensure that FMRs exclude non-market rental housing in their computation. Therefore, HUD excludes all units falling below a specified rent level determined from public housing rents in HUD's program databases as likely to be either assisted housing or otherwise at a below-market rent, and units less than two years old.

**Full review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and amount of qualified investments) and qualitative factors (for example, innovativeness, complexity and responsiveness).

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

**Home Mortgage Disclosure Act:** The statute that requires certain mortgage lenders that do business or have banking offices in metropolitan statistical areas to file annual summary reports of their mortgage lending activity. The reports include data such as the race, gender and income of the applicant(s) and the disposition of the application(s) (for example, approved, denied, and withdrawn).

**Home mortgage loans:** Are defined in conformance with the definitions of home mortgage activity under the Home Mortgage Disclosure Act and include closed end mortgage loans secured by a dwelling and open-end lines of credit secured by a dwelling. This includes loans for home purchase, refinancing and loans for multi-family housing. It does not include loans for home improvement purposes that are not secured by a dwelling.

**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.

**Income Level:** Income level means:

- 1) Low-income – an individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a census tract;
- 2) Moderate-income – an 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 census tract;
- 3) Middle-income – an 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 census tract; and
- 4) Upper-income – an 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 census tract.

*Additional Guidance: .12(m) Income Level: The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level).*

**Limited-purpose bank:** This term refers to a bank that offers only a narrow product line such as credit card or motor vehicle loans to a regional or broader market and for which a designation as a limited-purpose bank is in effect, in accordance with section 228.25(b).

**Limited review:** Performance under the Lending, Investment and Services test is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, amount of investments and branch office distribution).

**Loan location:** Under this definition, a loan is located as follows:

- 1) Consumer loan is located in the census tract where the borrower resides;
- 2) Home mortgage loan is located in the census tract where the property to which the loan relates is located;
- 3) Small business and small farm loan is located in the census tract where the main business facility or farm is located or where the loan proceeds have been applied as indicated by the borrower.

**Loan product office (LPO):** This term refers to a staffed facility, other than a branch, that is open to the public and that provides lending-related services, such as loan information and applications.

**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 (HUD) 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:** A metropolitan statistical area (**MSA**) or a metropolitan division (**MD**) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a single core population of at least 2.5 million may be divided into MDs. A metropolitan statistical area that crosses into two or more bordering states is called a multistate metropolitan statistical area.

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

**Nonmetropolitan area:** This term refers to any area that is not located in a metropolitan statistical area or metropolitan division. Micropolitan statistical areas are included in the definition of a nonmetropolitan area; a micropolitan statistical area has an urban core population of at least 10,000 but less than 50,000.

**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:** This term refers to any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated area:** This term refers to a state or multistate metropolitan area. For institutions with domestic branch offices in one state only, the institution's CRA rating is the state's rating. If the institution maintains domestic branch offices in more than one state, the institution will receive a rating for each state in which those branch offices are located. If the institution maintains domestic branch offices in at least two states in a multistate metropolitan statistical area, the institution will receive a rating for the multistate metropolitan area.

**Small Bank:** This term refers to a bank that as of December 31 of either of the prior two calendar years, had assets of less than \$1.252 billion. Intermediate small bank means a small bank with assets of at least \$313 million as of December 31 of both of the prior two calendar years and less than \$1.252 billion as of December 31 of either of the prior two calendar years.

*Annual Adjustment: The dollar figures in paragraph (u)(1) of this section shall be adjusted annually and published by the Board, based on the year-to-year change in the average of the Consumer Price Index for Urban Wage Earners and Clerical Workers, not seasonally adjusted, for each 12-month period ending in November, with rounding to the nearest million.*

**Small Business Loan:** This term refers to a loan that is included in "loans to small businesses" as defined in the instructions for preparation of the Consolidated Report of Condition and Income. The loans have original amounts of \$1 million or less and are either secured nonfarm, nonresidential properties or are classified as commercial and industrial loans.

**Small Farm Loan:** This term refers to a loan that is included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income. These loans have original amounts of \$500 thousand or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

**Wholesale Bank:** This term refers to a bank that is not in the business of extending home

mortgage, small business, small farm or consumer loans to retail customers, and for which a designation as a wholesale bank is in effect, in accordance with section 228.25(b).