



## **PUBLIC DISCLOSURE**

June 29, 2022

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The First National Bank in Creston  
Charter Number: 12636

101 West Adams  
Creston, IA 50801

Office of the Comptroller of the Currency

13710 FNB Parkway  
Suite 110  
Omaha, NE 68154-5298

Note: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

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

**The lending test is rated:** Satisfactory.

The major factors that support this rating include:

- First National Bank in Creston's (FNB or bank) loan-to-deposit ratio (LTD) is reasonable when considering the bank's size, financial condition, and the credit needs of its assessment area (AA).
- Management originates and purchases a substantial majority of its loans to customers located in the bank's AA.
- FNB's distribution of loans to farms of different sizes is satisfactory.
- FNB's geographic distribution of loans to census tracts (CTs) of different income levels is satisfactory.
- There were no complaints regarding the bank's performance in meeting the credit needs of its AA.
- While the bank was not required to perform under the Community development (CD) Test, they selected to have their CD activities reviewed for consideration of an Outstanding rating. CD activities represent excellent responsiveness to AA needs and opportunities.

## Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. FNB's average LTD ratio was 74 percent for the 20 quarters from March 31, 2019 to December 31, 2021. The ratio ranged from a quarterly low of 70 percent and a quarterly high of 80 percent.

FNB's average LTD ratio is comparable to the average LTD ratio of other community banks operating in FNB's AA. The average quarterly LTD ratio for competitor banks was 69 percent for the 20 quarters from March 31, 2019 to December 31, 2021. The ratio ranged from an average quarterly low of 63 percent to an average quarterly high of 79 percent.

## Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA.

The bank originated and purchased 80 percent of its loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total #</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total \$(000s)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
Agricultural Loans	16	80.0	4	20.0	20	1,812	94.7	102	5.3	1,914
<b>Total</b>	<b>16</b>	<b>80.0</b>	<b>4</b>	<b>20.0</b>	<b>20</b>	<b>1,812</b>	<b>94.7</b>	<b>102</b>	<b>5.3</b>	<b>1,914</b>

## Description of Institution

FNB is a \$420 million bank headquartered in Creston, Iowa. Creston is the county seat for Union County with a population of about 8,000. The bank is owned by Northwest Financial Corp., a two-bank holding company headquartered in Arnolds Park, Iowa. As of December 31, 2021, Northwest Financial Corp. had total assets of \$243 million.

FNB has four locations - two in Creston, one in Afton, and one in Shenandoah, Iowa. All four locations have drive-up facilities. The bank offers a total of six automated teller machines (ATM) in Creston and Shenandoah, of which two are deposit-taking. The bank completed a merger with Century Bank in Shenandoah, Iowa in April 2020.

FNB's primary business focus is consistent with the traditional community bank model. The bank offers a full range of credit products within its AA, including agricultural, commercial, home mortgage, and consumer loans. As of December 31, 2021, the bank reported \$133 million in agricultural loans, \$63 million in commercial loans, \$47 million in home mortgage loans, and \$7 million in consumer loans.

There are no legal or financial impediments limiting the bank's ability to help meet community credit needs. FNB obtained an "Outstanding" rating at the last CRA examination dated September 19, 2016.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

FNB was evaluated under the Small Bank examination procedures, which include a Lending Test for the State of Iowa. The Lending Test evaluates the bank's record of meeting the credit needs of its AA through its lending activities. The Small Bank examination procedures do not include the Community Development (CD) Test. However, FNB opted to submit their CD activities for consideration of an Outstanding rating. The CD Test evaluates the bank's record of responding to the CD needs of its AA through CD lending and providing qualified investments, donations, and services.

The Lending Test covers FNB's performance from January 1, 2019 to December 31, 2021. The Lending Test evaluated agricultural loans originated during the evaluation period for the State of Iowa. This loan type was determined to be the primary loan product originated by FNB during the evaluation period. To evaluate lending performance, a sample of the primary product agricultural loans originated and purchased during the evaluation period.

The following table summarizes the percentage of loan originations by loan type over the evaluation period.

<b>Loan Originations</b>		
<b>Loan Type</b>	<b>% by Number</b>	<b>% by Dollar</b>
Agricultural	43%	55%
Commercial	19%	28%
Home Mortgage	8%	12%
Consumer	30%	5%

Source: Bank-provided loan origination reports; 2019-2021

The CD Test covers FNB’s performance from January 1, 2017 to December 31, 2021. The OCC’s review included all CD loans, investments, donations, and services submitted by FNB management to ensure they met the regulatory definition of CD. The OCC excluded some items submitted for consideration that did not meet the definition or purpose of CD.

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

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

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

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank’s or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution’s lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## State Rating

### State of Iowa

**CRA rating for the State of Iowa:** Outstanding.

**The Lending Test is rated:** Satisfactory.

The major factors that support this rating include:

- The distribution of loans to farms of different income levels is reasonable.
- The distribution of loans to CTs of different income levels is reasonable.
- FNB's CD activities demonstrated excellent responsiveness to the CD needs and opportunities in the AA. FNB's CD activities positively impacted their CRA rating.

### Description of Institution's Operations in Iowa

FNB operates one AA in the State of Iowa. The AA consists of fifteen census tracts between Union County (4 CTs), Adair County (1 CT), Fremont County (1 CT), Page County (6 CTs), Ringgold (1 CT), Adams County (1 CT), and Taylor County (1 CT). Both Creston branches, the Creston deposit-taking ATM, and the Afton branch are in Union County. FNB Creston reported approximately \$264 million in deposits in Union County as of June 30, 2021, representing 74 percent of FNB Creston's total deposits as of that date. The Shenandoah branch and deposit-taking ATM are located in Page County. Deposits in Page County account for the remaining 26 percent of total deposits, or \$93 million. According to the FDIC market share information as of June 30, 2021, FNB Creston had the largest market share within their AA of 16.7 percent. Competition in the AA is moderate. As of June 30, 2020, there were 20 institutions operating 47 branches.

The AA includes two moderate-income, 13 middle-income, and no low- or upper-income tracts. Of the fifteen CTs in the AA, there are three designated as remote rural and underserved (CT 9501 Adams County, 9501 Ringgold County, and 9602 Adair County) and one designated as distressed (CT 9501 in Adams County). The AA had an estimated population of 38 thousand according to the 2015 ACS U.S. Census. The population included 10 thousand families and 16 thousand households. Approximately 20 percent of families are low-income, 20 percent are moderate-income, 25 percent are middle-income, and 35 percent are upper-income. The median family income was \$61,681, and nine percent of families lived below the poverty level.

The OCC relied on community representatives to gain additional insight of the AA to conduct the examination. The community contacts described the local agricultural economy as strong and expanding due to high commodity prices. The sources indicate the primary credit need in the AA is agricultural loans for land acquisition and operations and explained that competition is high to meet these needs due to the quantity and variety of funding sources currently available.

Table A – Demographic Information of the Assessment Area						
Assessment Area: State of Iowa AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	15	0.0	13.3	86.7	0.0	0.0
Population by Geography	38,141	0.0	12.3	87.7	0.0	0.0
Housing Units by Geography	18,348	0.0	13.0	87.0	0.0	0.0
Owner-Occupied Units by Geography	11,675	0.0	10.6	89.4	0.0	0.0
Occupied Rental Units by Geography	4,274	0.0	20.0	80.0	0.0	0.0
Vacant Units by Geography	2,399	0.0	12.3	87.7	0.0	0.0
Businesses by Geography	3,231	0.0	13.6	86.4	0.0	0.0
Farms by Geography	853	0.0	7.9	92.1	0.0	0.0
Family Distribution by Income Level	10,200	19.8	19.5	25.2	35.5	0.0
Household Distribution by Income Level	15,949	24.9	17.3	19.6	38.1	0.0
Median Family Income Non-MSAs - IA		\$61,681	Median Housing Value			\$87,791
			Median Gross Rent			\$580
			Families Below Poverty Level			9.3%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Iowa

FNB operates one AA in the State of Iowa. The rating for the State of Iowa is based solely on a full-scope review of this area.

## Conclusions in Respect to Performance Tests in Iowa

### LENDING TEST

The bank’s performance under the Lending Test in Iowa is rated Satisfactory.

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

FNB exhibits reasonable geographic distribution of loans in the State of Iowa AA. The AA has zero low-income CTs and two moderate-income CTs.

#### *Small Loans to Farms*

The geographic distribution of farm loans originated or purchased in the AA is reasonable. Five percent of FNB’s farm loans were made to farms in moderate-income CTs, compared to eight percent of farms within the AA located in moderate-income CTs and five percent aggregate market data. The bank’s

performance is comparable to both demographic and aggregate market data and reflects reasonable distribution to lending to low-to-moderate income (LMI) CTs.

Refer to Table S in the state of Iowa section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

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

The bank exhibits a reasonable distribution of loans to farms of different sizes, given the product lines offered by the bank.

#### ***Small Loans to Farms***

The distribution of loans to farms of different sizes is satisfactory with FNB originating 80 percent (by number) of these loans to farms with gross annual revenues (GAR) of \$1 million or less. Although this is below the demographic of 98 percent, it is above the aggregate market loans reported by other financial institutions in the area of 71 percent.

The loan sample of 20 agricultural loans contained two loans (10 percent) in which revenue information was not available. Using the loan size as a proxy, it may be reasonable to assume that the two loans in which revenue information was not available were also made to small farms with GAR of \$1 million or less. Furthermore, the AA is only served by three large institutions which would meet the regulatory reporting requirements that are captured in the aggregate market information. The AA is primarily served by community banks under the reporting threshold along with other lending institutions such as credit unions and Farm Credit. Therefore, it is reasonable to conclude that the aggregate market percentage is understated and not reflective of the level of lending to small farms in the AA. Therefore, the OCC placed more reliance on the demographic percentage. The bank's performance is comparable to demographic data and reflects reasonable distribution of lending to small farms.

Refer to Table T in the state of Iowa section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

### **Responses to Complaints**

There were no complaints related to FNB's CRA performance in the State of Iowa during the evaluation period.

### **Community Development Test**

FNB is not subject to the Community Development (CD) Test under the Small Bank exam procedures. However, FNB opted to have their CD activities evaluated for consideration of an Outstanding rating.

The bank exhibits excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA. Performance related to CD activities had a positive effect on the bank's rating in the state.



**Number and Amount of Community Development Loans**

Refer to the Community Development Loans table below for the facts and data used to evaluate the bank’s level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000’s)	% of Total \$
State of Iowa AA	991	100	\$24,515	100

The level of CD loans within the State reflects excellent responsiveness. Management originated 991 CD loans totaling \$24.5 million in the State of Iowa during the evaluation period. The majority of qualifying CD loans helped retain jobs and were originated under the SBA Paycheck Protection Program in response to the COVID-19 pandemic.

**Number and Amount of Qualified Investments**

The level of CD investments within the State reflects adequate responsiveness. FNB received credit for 13 investments totaling \$4.052 million. Investments included a number of municipal bonds that helped revitalize and stabilize a designated disaster area, as well as bonds issued by local community colleges that helped promote economic development by providing funding for new jobs training certificates primarily focused for LMI individuals.

Management made 58 qualified donations totaling \$99 thousand during the evaluation period. The donations primarily supported a variety of organizations that provide community services and affordable housing to assist LMI individuals in the bank’s AA. Notable donations included \$60 thousand that was donated by FNB’s holding company to local community school districts throughout the AA whose student bodies are primarily comprised of LMI individuals.

<i>Qualified Investments</i>										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
State of Iowa AA	0	0	66	2,570	66	100	2,570	100	0	0
Outside of AA	0	0	5	1,581	5	100	1,581	100	0	0

\* *Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.*

\*\* *Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.*

\* *'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.*

The Qualified Investment Table, shown above, set forth the information and data used to evaluate the bank's level of qualified CD investments. These tables include all CD investment, including prior period investments that remain outstanding as of the examination date.

### **Extent to Which the Bank Provides Community Development Services**

FNB's level of CD services within the State reflects adequate responsiveness. Bank employees provided 139.5 service hours to four qualified CD organizations during the evaluation period. Examples of CD services provided by management include:

- One employee serves as a board member for an organization that provides affordable housing for elderly, disabled, and LMI individuals.
- One employee serves as a board member for an organization that works to revitalize and stabilize the city to encourage economic growth.
- One employee serves as a board member for an organization that builds affordable housing.

## **Appendix A: Scope of Examination**

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

<b>Time Period Reviewed:</b>	01/01/17 to 12/31/21	
<b>Bank Products Reviewed:</b>	Farm loans Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Northwest Financial Corp.	Holding Company	Qualified investments/donations
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
State: Iowa		
Iowa	Full-scope	Includes all of Union County, and parts of Adair, Fremont, Page, Ringgold, Adams, and Taylor counties in Iowa.

## Appendix B: Summary of MMSA and State Ratings

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RATINGS First National Bank in Creston			
Overall Bank:	Lending Test Rating	CD Test Rating(*)	Overall Rating
First National Bank in Creston	Satisfactory	Outstanding	Outstanding
MMSA or State:			
State of Iowa	Satisfactory	Outstanding	Outstanding

(\*) FNB was assessed under Small Bank exam procedures and opted to have their CD activities evaluated under the Community Development Test for consideration of an Outstanding rating.

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

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

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

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

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

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

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

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

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

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

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

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

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

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

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



## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography** **2019-21**

Assessment Area:	Total Loans to Farms			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
State of IA AA	20	\$2,043	100	0.0	0.0	0.0	7.9	5.0	4.7	92.1	95.0	95.3	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	20	\$2,043	100	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>7.9</b>	<b>5.0</b>	<b>4.7</b>	<b>92.1</b>	<b>95.0</b>	<b>95.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** **2019-21**

Assessment Area:	Total Loans to Farms			Farms with Revenues <= IMM			Farms with Revenues > IMM			Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
State of IA AA	20	2,043	100	511	97.9	80.0	71.4	0.9	10.0	1.2	10.0		
<b>Total</b>	20	2,043	100	<b>511</b>	<b>97.9</b>	<b>80.0</b>	<b>71.4</b>	<b>0.9</b>	<b>10.0</b>	<b>1.2</b>	<b>10.0</b>		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%