



BANK IOWA PROPOSAL
New Hampton Community School District

July 15, 2022

A Letter from our President and CEO

Dear New Hampton Community School District,

Thank you for allowing Bank Iowa to demonstrate just how excited we are to work with New Hampton School District. Your mission to providing a well-rounded quality education for all learners in the district is beyond admirable, and no doubt requires intensive financial competency.

The bright minds and generous spirits at Bank Iowa would be honored to join yours in the execution of your mission. It's our promise to provide the kind of strategic financial guidance, as well as practical day-to-day services, that ensures smart, innovative, and efficient execution of your mission well into the future.

From the beginning, Bank Iowa has been a community bank. This means the success of people in the places we live, work and play are prioritized over the success of the bank. Continuing to work with New Hampton Community School District would be an incredible way to keep on proving that the outcomes of a community-centric bank beat those of profit-centric megabanks every time.

It's important for me to share with you that Bank Iowa decisions are made locally. Our team members live in the communities where they work. They invest their time, energy and money to help make the places we all call home better places.

As our friends, neighbors and local businesses have grown, we've grown right along with them. It's about being able to talk to our customers, not just in the office, but also at a school board meeting, little league game or retirement potluck. I believe that's exactly what it means to be a community bank. And it's what separates Bank Iowa from every other bank in our markets.

I look forward to our expanding our partnership with the New Hampton Community School District. Don't hesitate to give me a call if you have any questions after reviewing the enclosed response.

Best of luck in your search for a bank partner.



E: jplagge@bankiowa.bank

O: [\(515\) 226-2422](tel:(515)226-2422)

Executive Summary:

With appreciation for the opportunity to be of service to you, Bank Iowa respectfully submits this enclosed proposal as a response to New Hampton Community School District's request for Banking Services.

Why Bank Iowa?

Banking is at its best when it is person-to-person and close to home. That is why we empower our people to make decisions through a decentralized, collaborative process that allows our local team members to operate in the best interests of our clients, who also happen to be our neighbors.

Our resources equip us with the power to deliver the services and technology of a large bank. It is noted that Bank Iowa's present legal lending limit is approximately \$27 million to one borrower and \$45 million to related borrowers if the borrowing entities differ. We have also been successful in finding reputable participating banks if a borrower's credit needs exceed those amounts.

At the same time, we continue to operate as a community bank, staying true to our rural roots and family ownership. We readily work with the Small Business Administration (SBA) to provide credit needs to start-ups and expanding businesses and are especially proud of our proactive stance in helping young and beginning farmers.

Partnership

We firmly believe that we are only as strong as the communities and clients we serve. We know that when our communities and clients thrive, we thrive along with them. This belief dates back more than 100 years, and the value and firm belief in partnership will always be our approach and a part of who we are. All of our team members are encouraged to demonstrate Bank Iowa's commitment to the local community by volunteering time and financial resources to countless community projects and activities that enhance the quality of life for all of us.

Scope of Services

We believe that New Hampton Community School District's requirements are fully supported by our set of products and services. The pages that follow will give you an overview of the terms of our Treasury Management Services Proposal.

Customer Service

Bank Iowa is dedicated to servicing our clients and through our team of tenured professionals that will continue to lead the Bank's continual focus on service excellence:

- Cindy Zeien, Retail Branch Manager
- Katy Kuehn, Regional Retail Branch Manager
- Michael Tomlonovic, Treasury Management Service Associate

- Mark K Phillips, Vice President, Treasury Management
- Brian Carolan, Regional President

Conclusion

We look forward to the possibility of continuing our relationship with New Hampton Community School District's (the District) and are confident in our ability to meet and exceed your expectations.

Bank Iowa Servicing Team

Cindy Zeien

Cindy Zeien is the Branch Manager of Bank Iowa in New Hampton, and has been with Bank Iowa since December of 2004. Cindy is a native of New Hampton and a graduate of New Hampton Community High School. Prior to her appointment as Branch Manager, Cindy served as a Teller for Bank Iowa. Cindy is active member of the New Hampton community and donates her time supporting Northeast Iowa Food Bank.

E: czeien@bankiowa.bank

O: [\(641\) 394-6800](tel:(641)394-6800)

Location: New Hampton

Katy Kuehn

Katy Kuehn is the Regional Retail Branch Manager of Bank Iowa in Lawler and has been with Bank Iowa since September of 2012. Katy is a native of New Hampton and a graduate of New Hampton High School. Prior to her appointment as Regional Retail Branch Manager, Katy served as a teller and deposit operations specialist for Bank Iowa. Currently along with Bank Iowa, Katy has been serving in the Air National Guard since 2007 as a logistics planner based out of the 132d Wing in Des Moines, IA. Katy is an active member of the New Hampton community and donates her time supporting The Chickasaw County Veterans Affairs Commission

E: kkuehn@bankiowa.bank

O: [\(563\) 482-7010](tel:(563)482-7010)

Location: Lawler

Michael Tomlonovic

Michael is Bank Iowa's Treasury Management Specialist and joined Bank Iowa in 2021 bringing with him almost a decade of banking experience. Michael assists Treasury Management clients in day-to-day tasks to help ensure a seamless process. Michael has a passion for international travel and the importance of thinking globally, while keeping a community focus. Michael is a graduate of Loras College and is involved in his local Jasper County community, as well as volunteering with the St. Thomas Moore Center in Panora, IA.

E: mtomlonovic@bankiowa.bank

O: [\(515\) 226-2497](tel:(515)226-2497)

Location: West Des Moines

Mark K Phillips

As Vice President of Treasury Management Services for Bank Iowa, Mark is responsible for the direction, sales, and support of treasury management services for the entire bank's business clients. (Treasury Management is how organizations, businesses or corporations manage their operational cash flow by using financial services products to collect, disburse, protect, and manage their cash.) Mark has over 15 years of banking experience and has been with Bank Iowa for the last five years. A farm kid and native of Williams, Iowa, Mark is a graduate of Central College and active member of the Des Moines community serving as Board Chair for the Iowa Center for Economic Success and the Institute for Community Alliance.

E: mkphillips@bankiowa.bank

O: [\(515\) 273-2907](tel:(515)273-2907)

Location: West Des Moines

Brian Carolan

Brian Carolan is the Regional President of Bank Iowa based out of Lawler, and has been with the bank since June of 2013. Prior to that he worked in Des Moines for a large national bank in many different roles. Brian is a native of Waucoma, graduating from Turkey Valley High School in 2000, and attended UNI for Business Management. Brian and his family live south of New Hampton and enjoys being an active member of the New Hampton community serving on area boards and organizations.

E: bcarolan@bankiowa.bank

O: [\(563\) 482-7003](tel:(563)482-7003)

Location: Lawler / New Hampton / Waucoma / Fredericksburg

About Bank Iowa

23 Communities Growing Through Bank Iowa

When Bank Iowa founders Donald Duncan, J. Robert Duncan and Harry Barr first got together, it wasn't because they wanted to start a bank. They were starting an aviation company. And that's exactly what they did - in Clarinda, Iowa, more than a half century ago. It was from that entrepreneurial ambition and smart business leadership that one of Iowa's most successful banks would flourish. And it is that same spirit that helps us understand the real needs of today's businesses, farmers, families, and entrepreneurs across Iowa.

Bank Iowa remains family-owned, which means our employees are empowered to serve our customers as they would their family members. The entrepreneurial ambitions and smart business leadership that founded our bank is alive and well within our people. We understand your challenges because we live, work, and play right where you do.

100+ Products and Counting

Our Passion Started for Lending and Has Expanded Over the Years to Offer Hundreds of Banking Services

2 Families

Have Maintained Ownership from the Beginning

Local Decision Making

Banking is at its best when it's close to home. That's why we empower our people to make decisions through a decentralized process that allows our local lenders to act in the best interests of their neighbors.

Our resources equip us with the power to deliver the services and technology of a large bank. At the same time, we continue to operate as a community bank, staying true to our rural roots and family ownership.

\$1.8 billion+

in Assets

280+ Employees

Across the State of Iowa

26 Offices

In 23 Iowa Communities

\$2M Donated

to Local Organizations

10% Growth

Over the Past Year

Making it Happen through Commercial Lending

Countless goals have been reached with the help of Bank Iowa's lending hands. We have seen firsthand how the ambitions of our community members impact the entire region. If you have a dream for your business, come share it with us.

1,000+ Years of Lending Experience

We employ the most knowledgeable lenders in the state who not only tout 1,000+ years of combined lending experience, but also understand entrepreneurship and have deep relationships with our clients.

Checking Accounts

Small business checking, business checking, commercial checking, public/government accounts, and interest checking accounts.

Loans

Commercial real estate, lines of credit, construction, term, working capital, small business, and agriculture loans.

More Features for Growing Businesses

Sweep accounts, online/mobile banking, ACH, overdraft privileges, CDs, safe deposit boxes, night depository, official checks, wire transfers, trust services, Zero Balance Accounts, and merchant card processing.

PROPOSER'S QUALIFICATIONS

A. QUALIFICATIONS

1. To be eligible to submit a proposal, a bank must meet the following qualifications:
 - a. Be federally or State of Iowa chartered bank.
 - We are a State chartered bank, Bank Iowa's FDIC Certificate number is 14521.
 - b. Be federally insured.
 - We are federally insured.
 - c. Have a Community Reinvestment Act (CRA) rating of "Satisfactory" or higher.
 - Our current CRA rating is Satisfactory, see Appendices.
 - d. Have at least one full-service branch located within the New Hampton Community School District.
 - For a list of our locations in the school district, see Appendices.
 - e. Provide evidence of compliance with the provisions of Chapter 12C of the Code of Iowa or any successor statute.
 - Our financial institution has multiple public fund relationships and those funds are held in accounts in accordance to the Chapter 12C Code of Iowa.

B. ITEMS TO BE SUBMITTED WITH BID

1. An overview of the banking services available at branch or headquarters that would serve as the primary facility for the District's account.
 - Personal Banking services: Bank Iowa checking, sensible checking, interest checking, prestige checking, debit cards, bill pay, money market savings, regular savings, health savings, and IRAs.
 - Checking Accounts: Small business checking, business checking, commercial checking, public/government, and interest checking accounts.
 - Loans: Commercial real estate, line of credits, construction, term, working capital, small business and agriculture loans.
 - More Features for Growing Businesses: Sweep accounts, online/mobile banking, online statements, ACH, overdraft privileges, remote deposit capture, identify theft services, CDs, safe deposit boxes, night depository, official checks, wire transfers, trust services, merchant card processing, and gift and prepaid cards.
2. The physical location and the hours of availability of the branch or headquarters that would serve as the primary facility of the School District's Account.
 - The main servicing branch would be the main branch in New Hampton located at 606 W Milwaukee St, PO Box 307, New Hampton, IA 50659. The lobby hours are Monday to Thursday from 8:00 AM to 4:00 PM and Friday from 8:00 AM to 5:00 PM, for the complete list of locations see Appendices.

3. Other branches in the District and a 30 miles radius of the District that would handle parts of the District's account.
 - For a complete listing of our locations, see Appendices.
4. Branches in the District and a 30 miles radius of the District that would be available for cashing payroll and accounts payable checks.
 - For a complete listing of our locations, see Appendices.
5. The names of the principal executive of the primary facility for the district's account and also the primary contact person for the District if your bank is selected as the District's depository.
 - Our local team in New Hampton is Brian Carolan, Regional President, Katy Kuehn, Regional Retail Banking Manager, and Cindy Zeien, Retail Branch Manager, for further team member information, see Appendices.

Treasury Management Scope of Services:

1. Automated Clearing House (ACH) Services

The District expects to receive notification of an ACH debit or credit via online bank access. The District is interested in using the ACH network for direct deposit payroll transactions and direct vendor payments. Please address the following:

- Describe your ACH direct deposit payroll capabilities.
 - Automated Clearing House (ACH) transactions can be originated with Bank Iowa. By using the ACH services, it allows the organization to collect or disburse funds in an efficient and effective way. For example, direct deposit can be setup for part time or full-time staff to reduce the time to cash checks, or an ACH transaction can be setup for one time or reoccurring donations. This allows the organization to collect donations in a timely manner and generate efficient reporting to reflect the donation(s). Ongoing training and client support is provided by the bank.
- What is your current volume of transmissions?
 - 6-month avg.
 - \$52,140,230.40
 - Avg. 936 files/mo.
 - 2022
 - \$328,175,606.75 sent
 - 6048 total files
- What options do you offer for reporting ACH receipts to the customer?
 - Through our online banking reporting system clients are able to pull reports for previous files submitted with detailed information for each recipient. Clients are also able to establish and send email alerts/notifications to recipients.
- Through what media can you accept instructions for making ACH payments or originating ACH debits?
 - Once a client submits a file through online banking, they will email the file amount, settlement date, and file confirmation number to our ACH team; media used is internet and email. In the event of discrepancies, we will call the listed person on the ACH agreement to verify the file before it is processed and released; the media used is phone.
- Other pertinent information.

- ACH Positive Pay: This is an additional service that the district may want to add in order to prevent unauthorized ACH items debiting the account. This service allows the district to self-define a list of approved ACH debits, each day Bank Iowa will present exceptions for ACH debits outside the list and allow the district to review and determine if Bank Iowa should return the debit(s). If this is a service the district wants to add we will assist in implementing this service.
- **Wire Transfer Services:**
 - Incoming wire transfers will be accepted by the financial institution and credited to the School District's account on the date the wire transfer is received.
 - All outgoing wires can be initiated via online banking, called in, or faxed in to one of our listed team members where they will review the wire instructions over the phone. Our team member will complete our internal wire request form and submit to our wire department, where one team member inputs the information and another team member reviews and processes. If a secondary level of approval is requested by the client we can accommodate that request.
 - All incoming wires are processed and credited to the identified account the same day they are received.
 - Dual control can be established for outgoing wires

Availability of Funds

Please provide a current corporate availability schedule? What is your normal ledger cut-off for posting deposited unencoded items? What are times and locations where a final daily deposit will be accepted?

- If deposited in the branch between Monday to Thursday 5:00 PM Central Standard Time (CST) and Friday until 5:30 PM CST the funds will be 100% available, see Appendices.

Stop Payments

The School District desires the ability to initiate online stop payments, as well as immediate acknowledgement that the stop payment was accepted by the bank's system.

- Stop payments can be completed through online banking and are effective when processed. Stops can be placed on a single item or a range of checks, and are valid for 6 months from the date of the stop payment is placed. A physical confirmation document is mailed to the customer.

Returned Check Processing

The School District requires that all items returned for insufficient funds be processed for payment a second time. The School District averages 2 returned checks a month.

- The bank can accommodate this request.

Website Access

The School District requires the banking institution to be accessible through a website. Please provide details of your website including features available.

- Clients can access their accounts via Bank Iowa's website, www.bankiowa.bank that meets TLS 1.2 standards. Each user has a unique Login ID and is required to complete an electronic verification process. Through this service, authorized personnel are able to review transaction activity, view check images, transfer funds between accounts, place stop payments, originate ACH files, access remote deposit, generate transaction reports, and review monthly statements and positive pay exception items.

Account Reconciliation

- The School District desires computerized, detailed paid check information that will

integrate with our financial software system (Software Unlimited) for the disbursement account. The School District would like to automatically download to paid check information that would match against checks issued through our accounting system.

- The bank can accommodate this request.

Account Analysis

- The cut-off date for statement purposes for School District bank accounts will be the last banking business day of each month. Describe the normal delivery date for business cycle statements.
 - Online eStatements are available within 1 to 2 business days following the statement cycle at no cost. Paper statements arrive within 7 to 10 business days following statement cycle.

Imaging

The School District requires that front and back images of paid checks be included in the monthly statements. Any additional information that the financial institution wishes to share regarding imaging capabilities may be included in a narrative response within this section.

- Check images, both front and back, and deposited items, both front and back, can be viewed via online banking. Statements can include check images, front and back.

Positive Pay

Describe your bank's positive pay processing including information transfer requirements and charges.

- Positive Pay reduces fraud by validating checks presented to your account by matching items against your issued check file. When the district issues checks, they would upload check files within our secure online banking system. The next business day the district will be provided a list of exceptions and will be allowed to review the items and make pay or return decisions.
- Fees are as follows:
 - Monthly fee: \$100/month
 - Per reviewed item: \$0.08
 - Per returned item: \$5.00

Conversion/Transition

Describe a conversion plan to transfer banking services of the District to your financial institution. What lead time do you expect will be necessary? Indicate your plans for educating and training School District employees in the use of your systems.

- The District and the bank currently have a partnership and our goal is to continue this relationship while providing education on new services and additional accounts as needed. Therefore, we commit to our team being available for in person or over the phone training of our online banking systems and any new services implemented for all staff members who will be utilizing our banking services. If the bank needs to open additional services and/or new accounts for the district, this can be done within 1 month so that we allow the other account and/or services to close down and get the new ones opened so that we avoid any business interruption. The bank will set a meeting schedule with the district so that we are meeting throughout the year where we review needs, services, and provide best practices for the district to review for their banking needs.

New Hampton Community School District Base Bid for General Depository

Please answer all of the following questions. An affirmative answer or statement will be inferred as a commitment by the institution to provide services.

- | | <u>YES</u> | <u>NO</u> |
|--|--------------|-----------|
| 1. Numbered deposit slips (2-part carbonless) will be provided at no cost to the School District. If no, please indicate the cost. \$___ | X | ---- |
| 2. All fees will be waived including: | | |
| a. ACH transfers. | X | ---- |
| b. Stop payment order. | X | ---- |
| c. Collection of insufficient fund checks. | X | ---- |
| d. Inadvertent overdraft status. | X | ---- |
| e. Wire transfers. | X | ---- |
| 3. Will your institution provide all necessary bags and keys to access night deposit boxes at no cost to the School District? | X | ---- |
| 4. Will your institution initiate payroll direct deposit at no cost to the School District? | X | ---- |
| 5. Will your institution apply daily interest earned to all applicable bank accounts monthly? If yes, interest rate as of 7-15-2022 _____% | 0.79% | ---- |

The undersigned institution agrees to all conditions as set forth in this proposal unless otherwise noted:

Name of Institution: _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Fax: _____ E-Mail: _____

Signed: _____

Title: _____ Date: _____

Appendices

- Appendix A: Copy of our Community Reinvestment Act rating
- Appendix B: Branch locations in the District
- Appendix C: Team Member information
- Appendix D: Availability Schedule, Reg CC

PUBLIC DISCLOSURE

March 2, 2020

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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BANK'S CRA RATING

Bank Iowa is rated: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

Bank Iowa is meeting the credit needs of its community based on an analysis of lending and community development activities. The loan-to-deposit ratio is reasonable given the bank's size, financial condition and assessment area credit needs. A majority of loans and other lending related activities are in the assessment area. The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. Loan distribution reflects reasonable penetration among individuals of different income levels and businesses and farms of different sizes. Neither Bank Iowa nor this Reserve Bank received any CRA-related complaints since the previous evaluation.

The bank's community development performance demonstrates adequate responsiveness to the needs of its assessment area through community development loans, qualified investments and donations, and community development services. This performance is appropriate considering the bank's capacity, need, and availability of such opportunities for community development within the assessment area.

SCOPE OF EXAMINATION

Bank Iowa's CRA performance was evaluated using the Intermediate Small Institution Examination Procedures issued by the Federal Financial Institutions Examination Council (FFIEC). The evaluation was performed within the context of information about the institution and its assessment areas such as asset size, financial condition, competition, and economic and demographic characteristics.

The bank maintains six delineated assessment areas and is chartered in the Des Moines-West Des Moines, Iowa (IA) Metropolitan Statistical Area (MSA) #19780. The remaining five assessment areas are all located in Non-MSA Iowa and consist of Denison, Humboldt, Lawler, Oskaloosa, and Southwest Iowa Assessment Areas. For this evaluation, the Des Moines-West Des Moines MSA, Oskaloosa Non-MSA and Southwest Iowa Non-MSA assessment areas were selected for full-scope reviews based on lending volume, retail network, and analysis at previous evaluations. The remaining assessment areas were evaluated as limited scope reviews and were evaluated for consistency with the bank's performance in the full review assessment areas. The bank's performance in the limited review assessment areas did not affect the overall rating. The bank's Oskaloosa Non-MSA and Southwest Iowa Non-MSA assessment areas have been revised since the previous evaluation dated July 31, 2017.

Loan products reviewed include Home Mortgage Disclosure Act (HMDA) reportable loans, small business, and small farm loans. These products are considered the bank's primary business lines based on volume by number and dollar amount. The bank's level of community development activities were also evaluated. HMDA-reportable lending performance received the most weight, given the volume of total originations (by number) within the evaluation period. Small business and small farm lending were given equal weight in the evaluation.

Performance within the designated assessment areas was evaluated using Intermediate-Small Bank examination procedures based on the following performance criteria:

- ***Loan-to-Deposit Ratio*** – A 10-quarter average loan-to-deposit ratio ending December 31, 2019 was calculated for the bank and compared to a sample of local competitors;
- ***Lending in the Assessment Area*** – The bank's HMDA-reportable loans originated from January 1, 2017 to December 31, 2018 and samples of small business and small farm loans originated from January 1, 2018 to December 31, 2018, were reviewed to determine the percentage of loans originated within the assessment area;
- ***Geographic Distribution of Lending in the Assessment Area*** – The bank's HMDA-reportable loans originated from January 1, 2017 to December 31, 2018 and samples of small business and small farm loans originated within the assessment area, from January 1, 2018 to December 31, 2018, were analyzed to determine the extent to which the bank is making loans in geographies of different income levels, particularly those designated as low- and moderate-income;
- ***Lending to Borrowers of Different Income and to Businesses and Farms of Different Sizes*** – The bank's HMDA-reportable loans originated from January 1, 2017 to December 31, 2018 and samples of small business and small farm loans originated within the assessment area, from January 1, 2018 to December 31, 2018, were reviewed to determine the distribution among borrowers of different income levels, particularly those considered low- or moderate-income, and to businesses and farms with different revenue sizes;
- ***Response to Substantiated Complaints*** – Complaints were reviewed to determine if any were related to the bank's record of helping to meet community credit needs and its responses to any received were evaluated for appropriateness; and
- ***Community Development Activities*** – The bank's responsiveness to community development needs through community development loans, qualified investments and donations, and community development services, from August 1, 2017 – March 2, 2020 were reviewed considering the capacity, need, and availability of such opportunities within the assessment area.

In addition, seven community representatives were contacted in connection with this examination to provide information regarding local economic and socio-economic conditions in the assessment area. Organizations representing economic development and affordable housing were contacted.

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 \$1.4 billion as of September 30, 2019. The bank maintains its main office in West Des Moines and a network of 26 branches and 25 automatic teller machines (ATMs) (six full-service and 19 cash-only) located throughout the State of Iowa. Since the previous evaluation, the bank converted a loan production office into a branch office on December 18, 2017. Subsequently, it relocated that branch and its cash-only ATM to another location (on April 8, 2019) within the same middle-income census tract in Pella, Iowa which is located within the Oskaloosa Non-MSA assessment area. In addition, since the previous evaluation, the bank acquired a branch and standalone cash-only ATM within the Oskaloosa Non-MSA assessment area.

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 loans. Bank Iowa is primarily an agricultural and commercial lender, as these categories represent 46.6 and 34.6 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.

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

Composition of Loan Portfolio as of September 30, 2019		
Loan Type	Dollar Volume (\$ in 000s)	% of Portfolio
Residential Real Estate	135,742	13.9
Commercial	338,888	34.6
Agricultural	456,903	46.6
Consumer	12,978	1.3
Other	35,023	3.6
Total Loans	979,534	100.0
<i>Note: Percentages may not total to 100.0 percent due to rounding</i>		
<i>Source: National Exam Database</i>		

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

The bank was rated Satisfactory under the CRA at its previous evaluation conducted on July 31, 2017.

DESCRIPTION OF ASSESSMENT AREA

The bank’s combined assessment area includes six individual assessment areas throughout the State of Iowa, all comprised of whole counties. Details on the bank’s assessment areas are included in the table below. The bank’s Oskaloosa Non-MSA assessment area has changed since the previous evaluation, which is discussed in detail within the assessment area review. In 2019, Jasper County was added to the Des Moines-West Des Moines, Iowa MSA. For the purposes of this evaluation, because the lending test includes activity prior to this changed designation, the lending test will include Jasper County in the Oskaloosa, Iowa Non-MSA assessment area; however, Jasper County community development activities conducted in 2019 will be included in the Des Moines-West Des Moines, Iowa MSA assessment area’s community development test. In addition, branch offices and ATMs in Jasper County will be reflected in the Oskaloosa, Iowa Non-MSA for this evaluation and will be reflected in the Des Moines-West Des Moines, Iowa MSA in future evaluations.

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

According to the 2018 FFIEC Census Data, the combined assessment area consists of 193 census tracts in total. Of those 193 census tracts, 51 are designated as low- or moderate-income (10 low- and 41 moderate-income), representing 26.4 percent of all tracts in the combined assessment area. These low- and moderate-income census tracts are home to 42,181 families, representing 21.0 percent of all families in the assessment area. According to the FFIEC, there are 15 distressed or underserved middle-income census tracts within the combined assessment area, the details of each are presented in the individual assessment area presentations. Finally, one census tract is designated as unknown-income.

A total of 330,925 housing units are located in the assessment area, of which 75,132 (22.7 percent) are located in low- and moderate-income census tracts. In the low-income tracts, 38.8 percent of housing units are owner-occupied while in moderate-income tracts 55.4 percent are owner-occupied. This indicates there are ample opportunities for home ownership in these tracts. Additionally, businesses and farms with \$1 million or less in total annual revenue represent 89.7 and 98.5 percent, respectively, of all businesses and farms in the assessment area. This data suggests that credit opportunities are available to borrowers of different income levels and businesses and farms of different revenue levels throughout the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

Bank Iowa’s performance relative to the lending test is rated Satisfactory. The loan-to-deposit ratio is reasonable given the bank’s size, financial condition and assessment area credit needs. A majority of loans and other lending-related activities are in the assessment area. The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. In addition, loan distribution reflects reasonable penetration among individuals of different income levels, including low- and moderate-income, and businesses and farms of different sizes.

Loan-to-Deposit Ratio

Bank Iowa’s loan-to-deposit (LTD) ratio is reasonable given the bank’s size, financial condition, and assessment area credit needs. Since the previous evaluation, Bank Iowa’s LTD has gradually increased from 78.4 percent to 81.3 percent, indicating the bank’s additional willingness to lend and meet the credit needs of the assessment area. Overall, the bank’s LTD ratio was comparable to mainly of its local competitors over the same 10-quarter period. The following table compares the bank’s LTD ratio to its local competitors.

Comparative Loan-to-Deposit Ratios	
Institution	Loan-to-Deposit Ratio (%)
	10 – Quarter Average
Bank Iowa	81.3
Competitors	
Community State Bank	86.5
Crawford County Trust and Savings Bank	87.1
Houghton State Bank	79.9
Iowa State Bank	56.9
Marion County State Bank	85.1
Midwest Heritage Bank FSB	93.8
PCSB Bank	74.9
Peoples Bank	88.4
South Ottumwa Savings Bank	64.4
West Bank	87.7

Assessment Area Concentration

During the evaluation period, Bank Iowa originated a majority of loans in the assessment area. Among the three product lines reviewed, the bank originated between 83.9 percent and 91.1 by number within the assessment area and 74.0 percent to 87.6 percent by dollar volume. Ultimately, the percentage of HMDA-reportable, small business, and small farm originations within the assessment area indicates the bank is actively serving the credit needs of the community.

The following table summarizes Bank Iowa’s lending inside and outside its assessment area for HMDA-reportable loans from January 1, 2017 to December 31, 2018, and small business and small farm loans from January 1, 2018 to December 31, 2018.

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	4	57.1	112	43.1	3	42.9	148	56.9
Home Purchase - Conventional	262	83.7	33,568	81.6	51	16.3	7,573	18.4
Home Purchase - FHA	43	93.5	3,591	89.6	3	6.5	418	10.4
Multi-Family Housing	7	63.6	1,758	30.9	4	36.4	3,925	69.1
Other Purpose Closed-End	1	50.0	107	48.2	1	50.0	115	51.8
Refinancing	106	84.8	11,637	67.3	19	15.2	5,663	32.7
Total HMDA related	423	83.9	50,773	74.0	81	16.1	17,842	26.0
Small Business related	133	91.1	13,389	87.6	13	8.9	1,897	12.4
Small Farm related	135	87.1	15,278	86.9	20	12.9	2,309	13.1
Total Loans	691	85.8	79,440	78.3	114	14.2	22,048	21.7

Note: Percentages may not total 100.0 percent due to rounding

Geographic and Borrower Distribution

The bank’s geographic distribution of loans reflects reasonable distribution throughout the assessment areas, including low- and moderate-income geographies. In addition, the borrower distribution reflects a reasonable penetration among individuals of different income levels, including low- and moderate-income individuals, and businesses and farms of different sizes. The specifics of the bank’s lending in each assessment area and relevant demographics are discussed in the individual assessment area sections.

Response to Complaints

Neither the bank nor this Reserve Bank received any CRA-related complaints since the previous examination.

COMMUNITY DEVELOPMENT TEST

Bank Iowa's performance relative to the community development test is rated Satisfactory. The bank's community development performance demonstrates adequate responsiveness to the needs of the assessment area through community development loans, qualified investments and donations, and community development services, as appropriate, considering the bank's capacity and the availability of such opportunities for community development in the bank's assessment area.

Lending, Investment, and Service Activities

During the evaluation period, Bank Iowa originated 23 qualified loans with a total of \$19.9 million toward community services, affordable housing, and revitalization and stabilization activities within its assessment area. Community development lending slightly decreased by dollar volume since the previous evaluation where the bank made 23 qualified loans totaling \$23.3 million. Additional details of community development lending performance can be found in the individual assessment area discussions.

During the evaluation period, there were two new investments totaling \$465,000 and two qualified investments from the previous evaluation period with an outstanding balance of \$705,268; review-period qualified investments total \$1.2 million. This represents a decrease, as the bank had investments totaling \$3.7 million at the previous evaluation. Qualified investments were primarily for the community development purposes of community service and revitalization or stabilization of low- or moderate-income, or distressed or underserved geographies.

Donations for community development purposes totaled 137 donations for \$147,700. This is an increase from 81 donations totaling \$110,706 at the previous evaluation. The bank provided contributions to organizations which support affordable housing, small business and economic development, revitalization and stabilization of distressed or underserved geographies, and community services tailored to meet the needs of low- and moderate-income individuals and households in the bank's assessment areas.

During the evaluation period bank staff provided approximately 4,603 hours of community development services since the prior evaluation. A majority of the total number of service hours, were dedicated to organizations with a community service focus. Benefitting from these services were organizations that received financial planning or resource allocation services as well as programs that target low- and moderate-income individuals throughout the bank's assessment areas. Bank employees served as board members or committee members for several of these organizations. During the prior evaluation the bank's qualified community development service hours totaled 2,514. Additional information with respect to the bank's community development services is found within the full review assessment area section.

Community Development Activities								
August 1, 2017 – March 2, 2020								
Assessment Area	Loans		Investments		Donations		Services	
	#	\$	#	\$	#	\$	#	Hours
Full Review								
DSM-West DSM MSA	14	14,200,290	1	375,000	20	12,515	163	648
Oskaloosa Non-MSA	2	498,756	0	0	14	9,678	251	839
Southwest IA Non-MSA	2	70,032	2	465,000	31	16,997	349	1,938
Limited Review								
Denison Non-MSA	3	4,132,472	1	330,268	32	74,560	77	440
Humboldt Non-MSA	1	1,017,600	0	0	14	6,370	92	671
Lawler Non-MSA	1	20,000	0	0	26	27,580	53	67
Regional Impact								
Total Qualified	23	19,939,150	4	1,170,628	137	147,700	985	4,603

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 EXAMINATION

Full scope examination procedures were used to evaluate the bank’s performance in the Des Moines-West Des Moines, Iowa 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 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 and Dallas Counties in their entireties. The assessment area is unchanged since the previous evaluation and is comprised of 113 census tracts. Based on 2018 FFIEC Census data, the census tract composition includes 10 low-income, 29 moderate-income, 46 middle-income, 27 upper-income, and one unknown census tract are located in the assessment area.

As shown in the Census Tract Designation Changes table below, there were changes in the distribution of census tracts by income since the previous evaluation.

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). The income data used to calculate geographic income designations changed between 2016 and 2017. Lending activity performed in 2017 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015.

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	2016 Designations (#)	2018 Designations (#)	Net Change (#)
Low	8	10	2
Moderate	30	29	-1
Middle	45	46	1
Upper	29	27	-2
Unknown	1	1	0
Total	113	113	0
<i>Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2006-2010 U.S. Census Bureau: Decennial Census: America Community Survey Data: 2011-2015</i>			

Within the assessment area, the bank operates four branch offices in Altoona, Johnston, and West Des Moines. Three of the branches are accompanied by ATMs; Altoona operates a full-service ATM, while Johnston and West Des Moines operate cash-only ATMs. Two branches (Altoona and Prairie Vista Convenience) are located in middle-income census tracts, while the other two

(Johnston and West Des Moines) are located in upper-income census tracts. There were no branches opened or closed since the previous evaluation.

According to the June 30, 2019, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, Bank Iowa ranked 14th among 43 FDIC-insured financial institutions operating in the assessment area with 1.2 percent of market share. Leaders in market share include Principal Bank (16.2 percent), Wells Fargo Bank (15.8 percent), and Bankers Trust Company (15.5 percent). The 42 banks competing for deposits and loans with Bank Iowa have 174 offices in the assessment area. Additional assessment area demographic information is provided in the following table. Please refer to Appendix B for 2017 demographic information.

Assessment Area: 2018 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	10	8.8	7,240	5.4	2,091	28.9	27,821	20.7
Moderate-income	29	25.7	26,880	20.0	4,217	15.7	22,993	17.1
Middle-income	46	40.7	54,519	40.6	3,723	6.8	28,944	21.6
Upper-income	27	23.9	45,555	33.9	1,337	2.9	54,436	40.6
Unknown-income	1	0.9	0	0.0	0	0.0	0	0.0
Total Assessment Area	113	100.0	134,194	100.0	11,368	8.5	134,194	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	13,035	5,060	3.6	38.8	6,449	49.5	1,526	11.7
Moderate-income	46,779	26,168	18.6	55.9	16,736	35.8	3,875	8.3
Middle-income	92,990	59,715	42.4	64.2	27,081	29.1	6,194	6.7
Upper-income	65,773	49,837	35.4	75.8	13,596	20.7	2,340	3.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	218,577	140,780	100.0	64.4	63,862	29.2	13,935	6.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	%
Low-income	1,133	4.3	972	4.1	153	6.2	8	2.6
Moderate-income	3,610	13.7	3,253	13.8	333	13.4	24	7.7
Middle-income	13,001	49.2	11,470	48.6	1,355	54.6	176	56.4
Upper-income	8,653	32.8	7,913	33.5	636	25.6	104	33.3
Unknown-income	9	0.0	6	0.0	3	0.1	0	0.0
Total Assessment Area	26,406	100.0	23,614	100.0	2,480	100.0	312	100.0
	Percentage of Total Businesses:			89.4		9.4		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	%
Low-income	3	0.4	3	0.5	0	0.0	0	0.0
Moderate-income	37	5.4	35	5.3	2	10.5	0	0.0
Middle-income	397	58.0	387	58.3	10	52.6	0	0.0
Upper-income	247	36.1	239	36.0	7	36.8	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	684	100.0	664	100.0	19	100.0	1	100.0
	Percentage of Total Farms:			97.1		2.8		0.1

2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS

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

The following presentation of key demographics used to help inform the evaluation of bank activity in its assessment area is based on a comparison of two sets of ACS data, 2006-2010 and 2011-2015.

Population Characteristics

The table below presents the population trends for the assessment area, the Des Moines-West Des Moines, IA MSA, Dallas 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 527,261, an increase of 6.1 percent from 2010. The assessment area’s population change of 6.1 percent was comparable to the Des Moines-West Des Moines, MSA of 5.5 percent. Within Dallas and Polk Counties, the population increased by 13.2 and 5.0 percent, respectively, while the State of Iowa experienced a minimal increase of 1.6 percent. According to community representatives, the population increase within Dallas and Polk Counties are widely attributed to the millennial population moving into the area. Further, the counties continue to be attractive to live in due to the cost of living and wages earned.

Population Change 2010 and 2011-2015			
Area	2010 Population	2011-2015 Population	Percentage Change (%)
Assessment Area	496,775	527,261	6.1
Dallas County	66,135	74,892	13.2
Polk County	430,640	452,369	5.0
Des Moines-West Des Moines, IA MSA	569,633	601,187	5.5
State of Iowa	3,046,355	3,093,526	1.6
<i>Source: 2006-2010—U.S. Census Bureau: Decennial Census 2011-2015—U.S. Census Bureau: Annual Population Estimates OR 2010—U.S. Census Bureau: Decennial Census</i>			

Income Characteristics

The following table compares the median family income for the assessment area, the Des Moines-West Des Moines, IA MSA, Dallas and Polk Counties, and the state of Iowa from 2010 to 2015. According to the 2018 FFIEC Census Data, the assessment area is comprised of 134,194 families, of which 20.7 percent are designated as low-, 17.1 percent are moderate-, 21.6 percent are middle-, and 40.6 percent are upper-income. Only 8.5 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.

According to the 2011-2015 Census Bureau data, the median family income (MFI) in the assessment area is \$76,608, an increase of 7.1 percent from 2006-2010 Census Bureau data. Overall, assessment area MFI figures were consistent with the Des Moines-West Des Moines, IA MSA at \$76,385 and above the state of Iowa at \$67,466. Amongst the counties within the assessment area, Dallas County maintains the highest MFI of \$92,428 and experienced the greatest increase at 10.0 percent between 2006-2010 and 2011-2015 Census Bureau Data.

According to community representatives, the wage potential within the assessment area is high and is attributed to the area being heavily concentrated in the financial and insurance industries, which continue to see growth and contribute to the increase in median family income.

Median Family Income 2006-2010 and 2011-2015			
Area	2006-2010 Median Family Income 2010 Dollars (\$)	2011-2015 Median Family Income 2015 Dollars (\$)	Percentage Change (%)
Assessment Area	71,519	76,608	7.1
Dallas County	84,018	92,428	10.0
Polk County	70,445	74,335	5.5
Des Moines-West Des Moines, IA MSA	71,705	76,385	6.5
State of Iowa	61,804	67,466	9.2
<i>Source: 2006-2010 – U.S. Census Bureau: American Community Survey 2011-2015 – U.S. Census Bureau: American Community Survey</i>			

Bankruptcy Characteristics

According to the Administrative Office of the U.S. Courts, the bankruptcy filing rates in the assessment area have been historically comparable to the State of Iowa. Overall, all areas experienced a year-to-year decrease from 2013 to 2015 and experienced the lowest bankruptcy rates in 2016. The table below highlights personal filling rates for all assessment area regions and the state of Iowa from 2013 – 2016.

Personal Bankruptcy Filing Rate (per 1,000 population)				
Area	2013	2014	2015	2016
Dallas County	1.7	1.6	1.1	1.1
Polk County	2.6	2.3	1.8	1.8
Des Moines-West Des Moines, IA MSA	2.4	2.1	1.7	1.7
State of Iowa	1.8	1.6	1.4	1.3
<i>Source: 2015 – Administrative Office of the U.S. Courts</i>				

Housing Characteristics

The following table presents recent trends in housing costs within the assessment area, the Des Moines-West Des Moines, IA MSA, Dallas and Polk Counties, and the state of Iowa. Overall, there are a total of 218,577 housing units in the assessment area. The majority of housing units are owner-occupied at 64.4 percent, while 29.2 percent are rental units and 6.4 percent are vacant housing units.

According to the 2011-2015 American Community Survey, the assessment area had a median housing value of \$160,897 and median gross rent of \$808. Median housing values in the assessment area increased 5.7 percent, while median gross rents increased 13.3 percent from 2010. The assessment area figures were comparable to the Des Moines-West Des Moines, IA MSA, with a median housing value of \$160,068 and median gross rent at \$802; but higher than the state of Iowa’s median housing value of \$129,200 and median gross rent of \$697. Of the counties comprising the assessment area, Dallas County maintained the highest median housing value at \$190,700 and the highest median gross rent at \$910. Dallas County also experienced a significant increase in median gross rent at 32.3 percent.

According to community representatives, there is a large demand to rent within Dallas and Polk Counties given median housing values continue to rise. One representative stated that new construction homes in Dallas County may start at \$300,000 to \$350,000, increasing median housing values and contributing to the increase in rent demand due to affordability. Contacts also stated that rental demand is primarily driven by a young population moving into Dallas and Polk Counties who are currently unable to purchase a home. As such, rental inventory and rates continue to grow at a faster pace than single-family home purchasing.

A common method to compare relative affordability of housing across geographic areas is the affordability ratio, which is defined in Appendix D. A higher ratio supports more affordable housing opportunities. Based on the 2011-2015 U.S. Census Bureau American Community Survey data, the bank’s assessment area was the least affordable as the affordability ratio for the assessment area was 0.38, compared to the Des Moines-West Des Moines MSA at 0.39 percent, and the State of Iowa’s ratio of 0.41. Of the geographies within the bank’s assessment area, Dallas County is more affordable at 0.40 compared to Polk County at 0.38 percent.

Trends in Housing Costs 2006-2010 and 2011-2015							
Area	Median Housing Value (\$)			Median Gross Rent (\$)			Affordability Ratio
	2006-2010	2011-2015	% Change	2006-2010	2011-2015	% Change	2011-2015
Assessment Area	152,240	160,897	5.7	713	808	13.3	0.38
Dallas County	176,600	190,700	8.0	688	910	32.3	0.40
Polk County	149,700	157,200	5.0	714	799	11.9	0.38
Des Moines-West Des Moines MSA	151,057	160,068	6.0	706	802	13.6	0.39
State of Iowa	119,200	129,200	8.4	617	697	13.0	0.41
<i>Source: 2006-2010— U.S. Census Bureau: American Community Survey 2011-2015— U.S. Census Bureau: American Community Survey</i>							

Foreclosure Inventory Rates

The Federal Reserve Bank of Chicago conducted a study on the changes in the foreclosure inventory rate at the county level. The foreclosure inventory rate measures the number of residential properties in some phase of foreclosure. It excludes properties that have completed the foreclosure cycle. Overall, foreclosure inventory rates in the state and assessment area counties have declined since the previous evaluation. This indicates the housing crisis that affected much of the nation, including assessment area counties, has diminished. As of July 2018, the state of Iowa's foreclosure inventory rate was 0.7 percent which is comparable to the foreclosure inventory rates of Dallas and Polk counties at 0.3 and 0.6 percent, respectively. Ultimately, the lower percentage of properties in the process of foreclosure indicates housing sector improvements within the assessment area and state of Iowa.

Employment Characteristics

The following table presents the unemployment trends for the assessment area counties, the Des Moines-West Des Moines MSA, and the state of Iowa from 2013 to 2016. Overall, both counties within the assessment area experienced declining unemployment rates from 2013 to 2016, which aligns with unemployment trends in Des Moines-West Des Moines MSA and the state of Iowa.

A community representative noted the assessment area counties continue to attract retail and service jobs that contribute to the declining unemployment rates. More recently, the counties have become a technology hub as Microsoft and Facebook have established data centers within these areas given the land space and access to tax incentives. However, in order for these companies to receive tax incentives, they must guarantee a certain number of jobs that will pay between \$18 and \$25 an hour. Ultimately, these new positions have contributed to the regions declining unemployment rates. Further, Amazon is opening a fulfillment center in late 2020, which will hire at least 1,000 workers at minimum wage of \$15 or more.

Unemployment Rates (%)				
Area	2013	2014	2015	2016
Dallas County	3.7	3.4	2.9	2.7
Polk County	4.8	4.4	3.7	3.5
Des Moines-West Des Moines, IA MSA	4.6	4.2	3.6	3.4
State of Iowa	4.6	4.4	3.8	3.7

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

Industry Characteristics

The following table presents the largest employers operating in Dallas and Polk counties. The information presented below illustrates that a majority of the largest employers in the assessment area are located in Polk County. The employment base covers multiple industries with the largest being in financial services and healthcare. As previously noted, the Amazon distribution center opening in late 2020 will bring 1,000 new jobs to the area. In addition, Amazon is opening a last-mile delivery station, which will add 200 to 400 new jobs to the area.

Largest Employers in the Assessment Area			
Company	County	Industry	# of Employees
Principal Financial Group	Polk	Financial Advisory Services	8,000
Blank Children’s Hospital	Polk	Hospitals	6,000
State Public Policy Group Inc.	Polk	State Government General Offices	5,000
Mercy Medical Group	Polk	Medical Centers	3,734
Iowa Methodist Medical Center	Polk	Hospitals	3,412
Mercy One Des Moines Medical Center	Polk	Hospitals	3,000
John Deere Des Moines Work	Polk	Farm Equipment	2,000
Wells Fargo Home Mortgage	Dallas	Real Estate Loans	2,000
TMC Transportation	Polk	Transportation Services	1,800
Wellmark Inc.	Polk	Insurance	1,600
<i>Source: Business information provided by Infogroup®, Omaha, NE</i>			

Community Representatives

Three 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 there is a need for financial literacy, including housing programs and small business assistance. In addition, one representative noted a need for affordable housing within the community. The contacts believe financial institutions within the counties are very involved, but could further support their community by placing liaisons in the area to work with small businesses and support economic development.

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

LENDING TEST

Geographic Distribution of Loans

The bank's geographic distribution reflects excellent dispersion throughout the bank's assessment area. The geographic distribution of HMDA-reportable loans reflects excellent dispersion, while small business and small farm loans reflects reasonable dispersion throughout the assessment area.

In 2018, Bank Iowa originated loans in 58.4 percent of the 113 census tracts in the assessment area, while in 2017, the bank originated loans in 53.1 percent of the total census tracts. In 2018, the bank originated loans in five of the ten (50.0 percent) low-income census tracts and 17 of the 29 (58.6 percent) moderate-income census tracts and in 2017 originated loans in three of the ten (30.0 percent) low-income census tracts and 21 of the 29 (72.4 percent) moderate-income census tracts. Based upon this analysis, it appears there are no conspicuous geographic lending gaps.

Due to loan volume in 2017 and 2018, home purchase and refinance loans will be the primary focus in the evaluation.

HMDA-Reportable Loans

The geographic distribution of HMDA-reportable loans reflects excellent dispersion throughout the assessment area. In 2018, Bank Iowa originated six loans, or 6.3 percent of total HMDA-reportable loans in low-income census tracts, which is above the aggregate of lenders at 2.7 percent and the percentage of owner-occupied units at 3.6 percent. Further, the bank originated 21 loans, or 21.9 percent in moderate-income census tracts which is above the aggregate of lenders at 15.1 percent and the percentage of owner-occupied units at 18.6 percent. The greatest number of total HMDA-reportable loans (42.7 percent) were originated in middle-income census tracts, consistent with the aggregate of lenders (40.5 percent) and makeup of the bank's assessment area (42.4 percent). In 2018, 28 loans (29.2 percent) were originated in upper-income census tracts, below both the aggregate of lenders (41.7 percent) and the percentage of owner-occupied units in those geographies (35.4 percent).

In 2017, Bank Iowa's geographic distribution of HMDA-reportable loans was generally comparable to its lending in 2018. Most notable was the bank's excellent performance within moderate-income census tracts at 31.7 percent compared to the aggregate of lenders at 15.1 percent and the percentage of owner-occupied units at 18.6 percent.

Home Purchase

In 2018, home purchase loans represented 83.3 percent of the bank's total HMDA-reportable loans in the assessment area. Bank Iowa originated 7.5 percent of its home purchase loans in low-income census tracts. The bank's performance is above the aggregate at 2.6 percent and the 3.6 percent of owner-occupied units. The bank originated 20.0 percent of its home purchase loans in moderate-income census tracts. The bank's performance is above the aggregate of lenders at 15.4 percent and the percentage of owner-occupied units at 18.6 percent. The majority of the bank's home purchase loans were originated in middle-income census tracts at 45.0 percent, above the aggregate of lenders at 39.9 percent and the percentage of owner-occupied units 42.4 percent. Lastly, the bank originated 27.5 percent of its home purchase loans in upper-income census tracts, which was below the aggregate of lenders at 42.0 percent and below the 35.4 percent of owner-occupied units located in upper-income census tracts.

Refinance

In 2018, refinance loans represented 12.5 percent of the bank's total HMDA-reportable loans in the assessment area. The bank did not originate any refinance loans in low-income census tracts. The bank's performance is comparable to the aggregate at 2.6 percent and the 3.6 percent of owner-occupied units. The bank originated 16.7 percent of its refinance loans in moderate-income census tracts. The bank's performance is comparable to both the aggregate at 15.1 percent and the 18.6 percent of owner-occupied units. The bank originated 41.7 percent of its refinance loans in middle-income census tracts. The bank's performance is comparable to both the aggregate at 42.3 percent and the 42.4 percent of owner-occupied units. Lastly, the bank originated 41.7 percent of its refinance loans in upper-income census tracts, which was comparable to the aggregate at 39.9 percent and above the 35.4 percent of owner-occupied units located in upper-income census tracts.

The following table summarizes the bank's 2018 HMDA-reportable lending in the assessment area. Please refer to Appendix B for the 2017 geographic distribution lending tables.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2018 Des Moines-West Des Moines, IA MSA 19780								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	6	7.5	2.6	498	3.6	1.4	3.6
	Moderate	16	20.0	15.4	1,921	13.9	9.6	18.6
	Middle	36	45.0	39.9	6,055	43.7	38.0	42.4
	Upper	22	27.5	42.0	5,385	38.9	51.0	35.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	80	100.0	100.0	13,859	100.0	100.0	100.0
Refinance	Low	0	0.0	2.6	0	0.0	1.2	3.6
	Moderate	2	16.7	15.1	161	6.0	8.7	18.6
	Middle	5	41.7	42.3	1,132	42.3	39.7	42.4
	Upper	5	41.7	39.9	1,385	51.7	50.4	35.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	12	100.0	100.0	2,678	100.0	100.0	100.0
Home Improvement	Low	0	0.0	2.4	0	0.0	1.7	3.6
	Moderate	1	100.0	13.3	55	100.0	9.2	18.6
	Middle	0	0.0	42.1	0	0.0	39.8	42.4
	Upper	0	0.0	42.3	0	0.0	49.3	35.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	1	100.0	100.0	55	100.0	100.0	100.0
Multi-Family	Low	0	0.0	11.6	0	0.0	2.7	Multi-Family 7.4
	Moderate	2	66.7	20.6	922	89.2	7.5	20.2
	Middle	0	0.0	39.2	0	0.0	41.3	46.4
	Upper	1	33.3	28.6	112	10.8	48.5	25.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	3	100.0	100.0	1,034	100.0	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.9	0	0.0	0.7	3.6
	Moderate	0	0.0	8.4	0	0.0	5.2	18.6
	Middle	0	0.0	38.8	0	0.0	33.9	42.4
	Upper	0	0.0	51.9	0	0.0	60.2	35.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	1.9	0	0.0	0.9	3.6
	Moderate	0	0.0	13.2	0	0.0	7.8	18.6
	Middle	0	0.0	40.4	0	0.0	31.3	42.4
	Upper	0	0.0	44.5	0	0.0	60.1	35.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	5.6	0	0.0	3.1	3.6
	Moderate	0	0.0	22.3	0	0.0	13.3	18.6
	Middle	0	0.0	38.8	0	0.0	38.6	42.4
	Upper	0	0.0	33.4	0	0.0	45.0	35.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	6	6.3	2.7	498	2.8	1.5	3.6
	Moderate	21	21.9	15.1	3,059	17.4	9.2	18.6
	Middle	41	42.7	40.5	7,187	40.8	38.6	42.4
	Upper	28	29.2	41.7	6,882	39.0	50.7	35.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	96	100.0	100.0	17,626	100.0	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. The 2018 sample includes 17 small business loans within the assessment area. Of the sample, no small business loans were originated in low-income census tracts, primarily due to strong competition in the area. Overall, the bank’s performance was below the 4.3 percent of total businesses operating in the bank’s assessment area. However, the bank’s lending volume in moderate-income census tracts of 17.6 percent is above the percentage of total businesses located in moderate-income census tracts at 13.7 percent. The bank originated the largest number (47.1 percent) of its small business loans in middle-income tracts, which is comparable to the percentage of total businesses located in those geographies at 49.2 percent. Finally, the bank originated 35.3 percent of its small business loans in upper-income census tracts, above the percentage of total businesses located in those geographies at 32.8 percent.

The following table presents the bank’s geographic distribution of small business loans in 2018.

Geographic Distribution of Small Business Loans						
Assessment Area: 2018 Des Moines-West Des Moines, IA MSA 19780						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2018 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	
Small Business	Low	0	0.0	0	0.0	4.3
	Moderate	3	17.6	491	10.9	13.7
	Middle	8	47.1	1,137	25.3	49.2
	Upper	6	35.3	2,872	63.8	32.8
	Unknown	0	0.0	0	0.0	0.0
	Total	17	100.0	4,500	100.0	100.0

2018 FFIEC Census Data & 2018 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 reasonable dispersion throughout the assessment area. Within the sample of loans, only one small farm loan was reflected in this assessment area in an upper-income census tract. Given the minimal lending opportunities available within the metropolitan area, a limited analysis was conducted and the bank’s performance is deemed adequate.

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

The bank's borrower distribution reflects excellent penetration throughout the bank's assessment area. The bank's HMDA-reportable lending reflects excellent penetration among individuals of different income levels, and small business and small farm lending reflects reasonable penetration among businesses and farms of different sizes. Due to loan volume in 2017 and 2018, home purchase and refinance loans will be the primary focus in the evaluation.

HMDA-Reportable Loans

The borrower distribution of HMDA-reportable loans reflects excellent penetration among individuals of different income levels. In 2018, Bank Iowa originated 11.5 percent of its total HMDA-reportable loans to low-income borrowers, above the aggregate of lenders rate of 8.4 percent, but below the percentage of low-income families in the assessment area at 20.7 percent. The bank originated 28.1 percent of its HMDA-reportable loans to moderate-income borrowers, above both the aggregate at 19.8 percent and the percentage of families designated as moderate-income in the assessment area at 17.1 percent. Bank Iowa originated 22.9 percent of HMDA-reportable loans to middle-income borrowers, comparable to both the aggregate and the demographic at 22.2 percent and 21.6 percent, respectively. The bank originated 22.9 percent of its HMDA loans to upper-income borrowers which was below the aggregate of lenders (33.8 percent) and the assessment area demographic (40.6 percent). In addition, 14.6 percent of the bank's HMDA-reportable loans were originated to borrowers of unknown income, comparable to the aggregate of lenders at 15.8 percent.

In 2017, Bank Iowa's borrower distribution of HMDA-reportable loans was generally comparable to its lending in 2018. Most notable was the bank's excellent performance lending to low-income borrowers (21.7 percent) compared to the aggregate (10.5 percent) and the percentage of owner-occupied units (20.7 percent).

Home Purchase

In 2018, Bank Iowa originated 12.5 percent of its home purchase loans to low-income borrowers. The bank's performance is above the aggregate of lenders at 9.0 percent, but below the percentage of low-income families located in the assessment area of 20.7 percent. Further, the bank originated 33.8 percent of its home purchase loans to moderate-income borrowers. The bank's performance was above the aggregate of lenders and the percentage of moderate-income families in the assessment area at 21.9 percent and 17.1 percent, respectively. Bank Iowa originated 25.0 percent of home purchase loans to middle-income borrowers, above the aggregate of lenders and the demographic at 22.6 percent and 21.6 percent, respectively. The bank originated 16.3 percent of its home purchase loans to upper-income borrowers. The bank's performance was below both the aggregate of lenders at 31.1 percent and the percentage of upper-income families in the assessment area at 40.6 percent. Lastly, the bank originated 12.5 percent of home purchase loans to borrowers

with unknown-income, below the aggregate of lenders at 15.5 percent.

Refinance

In 2018, Bank Iowa did not originate any refinance loans to low- or moderate-income borrowers. The bank's performance is significantly below the aggregate of lenders and the percentage of low- and moderate-income families located in the assessment area. The bank originated 16.7 percent of its refinance loans to middle-income borrowers. The bank's performance was below both the aggregate and the percent of middle-income families in the assessment area at 22.6 percent and 21.6 percent, respectively. Bank Iowa originated a majority of its refinance loans to upper-income borrowers (75.0 percent), significantly above the aggregate and the demographic at 37.6 percent and 40.6 percent, respectively. The bank originated 8.3 percent of refinance loans to borrowers with unknown-income, slightly below the aggregate at 13.2 percent.

The following table summarizes the bank's 2018 HMDA-reportable lending in the assessment area. Please refer to Appendix B for the 2017 borrower distribution lending tables.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2018 Des Moines-West Des Moines, IA MSA 19780								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2018			Dollar			
		Count Bank		Agg	Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	10	12.5	9.0	1,105	8.0	4.9	20.7
	Moderate	27	33.8	21.9	4,050	29.2	16.4	17.1
	Middle	20	25.0	22.6	3,570	25.8	21.7	21.6
	Upper	13	16.3	31.1	3,568	25.7	40.7	40.6
	Unknown	10	12.5	15.5	1,566	11.3	16.3	0.0
	Total		80	100.0	100.0	13,859	100.0	100.0
Refinance	Low	0	0.0	9.1	0	0.0	5.0	20.7
	Moderate	0	0.0	17.5	0	0.0	12.5	17.1
	Middle	2	16.7	22.6	215	8.0	19.4	21.6
	Upper	9	75.0	37.6	2,293	85.6	48.9	40.6
	Unknown	1	8.3	13.2	170	6.3	14.2	0.0
	Total		12	100.0	100.0	2,678	100.0	100.0
Home Improvement	Low	1	100.0	5.6	55	100.0	3.9	20.7
	Moderate	0	0.0	17.1	0	0.0	12.2	17.1
	Middle	0	0.0	24.5	0	0.0	21.1	21.6
	Upper	0	0.0	49.2	0	0.0	56.5	40.6
	Unknown	0	0.0	3.6	0	0.0	6.3	0.0
	Total		1	100.0	100.0	55	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	20.7
	Moderate	0	0.0	0.5	0	0.0	0.1	17.1
	Middle	0	0.0	2.1	0	0.0	0.2	21.6
	Upper	0	0.0	1.6	0	0.0	0.1	40.6
	Unknown	3	100.0	95.8	1,034	100.0	99.7	0.0
	Total		3	100.0	100.0	1,034	100.0	100.0
Other Purpose LOC	Low	0	0.0	5.5	0	0.0	3.8	20.7
	Moderate	0	0.0	16.1	0	0.0	12.3	17.1
	Middle	0	0.0	24.2	0	0.0	20.0	21.6
	Upper	0	0.0	51.9	0	0.0	61.7	40.6
	Unknown	0	0.0	2.3	0	0.0	2.1	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	6.4	0	0.0	3.4	20.7
	Moderate	0	0.0	19.5	0	0.0	14.2	17.1
	Middle	0	0.0	25.2	0	0.0	20.3	21.6
	Upper	0	0.0	46.9	0	0.0	57.9	40.6
	Unknown	0	0.0	2.1	0	0.0	4.2	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.6	0	0.0	0.7	20.7
	Moderate	0	0.0	0.4	0	0.0	0.1	17.1
	Middle	0	0.0	0.9	0	0.0	0.0	21.6
	Upper	0	0.0	1.1	0	0.0	0.2	40.6
	Unknown	0	0.0	97.0	0	0.0	99.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	11	11.5	8.4	1,160	6.6	4.3	20.7
	Moderate	27	28.1	19.8	4,050	23.0	13.5	17.1
	Middle	22	22.9	22.2	3,785	21.5	18.5	21.6
	Upper	22	22.9	33.8	5,861	33.3	37.8	40.6
	Unknown	14	14.6	15.8	2,770	15.7	25.9	0.0
	Total		96	100.0	100.0	17,626	100.0	100.0

Originations & Purchases
2016 FFIEC Census Data

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

Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different revenue sizes. The sample of loans reflects 17 small business loans, of which 11 or 64.7 percent (by number) were to businesses with gross revenues equal to or less than \$1 million. The bank’s performance was below the percentage of small businesses in the assessment area, at 89.4 percent. However, of the 11 small business loans originated, 18.2 percent of those were in amounts of \$100,000 or less, and 45.5 percent were originated in amounts of \$250,000 or less, indicating the bank’s willingness to meet the credit needs of small businesses. Ultimately, these loans are considered the most beneficial to small businesses. While the bank’s performance is below the total businesses located within the assessment area, high competition along with larger businesses dominating the metropolitan area makes it challenging for the bank to increase its small business lending. The following table presents the bank’s borrower distribution of small business loans in 2018.

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2018 Des Moines-West Des Moines, IA MSA 19780							
Product Type		Bank & Demographic Comparison					
		2018		2018		Total Businesses %	
Revenue	Loan Size	Count Bank	Dollar Bank				
		#	%	\$ 000s	\$ %		
Small Business	\$1 Million or Less	11	64.7	3,102	68.9	89.4	
		Over \$1 Million or Unknown	6	35.3	1,398	31.1	10.6
		Total	17	100.0	4,500	100.0	100.0
	\$100,000 or Less	\$100,001 - \$250,000	4	23.5	203	4.5	
		\$250,001 - \$1 Million	7	41.2	1,225	27.2	
		Total	6	35.3	3,072	68.3	
		Total	17	100.0	4,500	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	2	18.2	130	4.2	
		\$100,001 - \$250,000	5	45.5	871	28.1	
		\$250,001 - \$1 Million	4	36.4	2,101	67.7	
		Total	11	100.0	3,102	100.0	
	Originations & Purchases						
2018 FFIEC Census Data & 2018 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 reasonable penetration among farms of different revenue sizes. Due to minimal lending in this assessment area, a limited analysis was conducted.

COMMUNITY DEVELOPMENT TEST

The bank's community development performance demonstrates adequate responsiveness to community development needs of its assessment area through community development loans, donations, and community development services, as appropriate, considering the bank's capacity and the need and the availability of such opportunities for community development in the bank's assessment area.

Lending

During the evaluation period, the bank originated 14 qualified loans totaling approximately \$14.2 million toward community services and affordable housing within the assessment area. Most noteworthy are loans to provide affordable housing which was identified as a critical need by a community representative. The bank increased community development lending since the previous evaluation period, in which nine community development loans totaling \$11.3 million were originated in the assessment area.

Investments

The bank did not make any new qualified investments during this evaluation period, however the bank had one outstanding investment benefiting a school district within the assessment area from the prior period evaluation totaling \$375,000. During this evaluation period, the bank made 20 qualified donations totaling approximately \$12,515 to community organizations in the assessment area. Recipient organizations focused primarily on community services and affordable housing. These donations primarily benefited organizations that support low- and moderate-income individuals and families. During the prior evaluation the bank held four qualified community development investments for \$2.6 million and qualified community development donations totaling \$53,365.

Services

During the evaluation period bank staff provided 648 hours of community development services. Of the total number of service hours, 460 were dedicated to organizations with a community service focus, 102 service hours were dedicated to organizations with an economic development focus, 67 service hours were dedicated to organizations to revitalize or stabilize low- or moderate-income areas, and 19 service hours were dedicated to organizations with an affordable housing focus. The majority of service hours involved bank staff serving as board members providing

financial expertise for non-profit organizations, in addition to serving on boards that aim to provide individuals with affordable housing. During the prior evaluation the bank’s qualified community development service hours totaled 392.

The table below presents the bank’s community development activities during the evaluation period.

Summary of CD Activities, Review Period August 1, 2017 – March 2, 2020										
Type of Activity	Affordable Housing		Economic Development		Activities that Revitalize/Stabilize		Community Services		Totals	
	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours
Lending	11	8,929,754	0	0	0	0	3	5,270,536	14	14,200,290
Investment	0	0	0	0	0	0	1	375,000	0	0
Donations	2	1,000	0	0	0	0	18	11,515	20	12,515
Services	8	19	39	102	17	67	99	460	163	648

OSKALOOSA, IOWA NON-MSA – FULL REVIEW

SCOPE OF EXAMINATION

Full scope examination procedures were used to evaluate the bank’s performance in the Oskaloosa, 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 OSKALOOSA NON-MSA

The bank’s Oskaloosa, Iowa Non-MSA assessment area consists of Jasper, Keokuk, Mahaska, Marion, and Wapello Counties in their entireties. The assessment area has changed since the previous evaluation to include Marion County. Based on 2018 FFIEC Census data, the census tract composition includes seven moderate-income, 27 middle-income, and five 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.

As shown in the Census Tract Designation Changes table below, there were changes in the distribution of census tracts by income since the previous evaluation.

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). The income data used to calculate geographic income designations changed between 2016 and 2017. Lending activity performed in 2017 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015.

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	2016 Designations (#)	2018 Designations (#)	Net Change (#)
Low	0	0	0
Moderate	5	7	2
Middle	25	27	2
Upper	1	5	4
Unknown	0	0	0
Total	31	39	8
<i>Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2006-2010 U.S. Census Bureau: Decennial Census: America Community Survey Data: 2011-2015</i>			

Within the assessment area, the bank operates five branches in Colfax, Fremont, Newton, Oskaloosa, and Pella. Four branches are accompanied by ATMs; Fremont, Oskaloosa, and Pella operate cash-only ATMs, while Newton operates a full-service ATM. Since the previous evaluation, the bank converted a loan production office into a branch office on December 18, 2017.

Subsequently, it relocated that branch and its cash-only ATM to another location (on April 8, 2019) within the same middle-income census tract in Pella, Iowa. In addition, the bank acquired its Colfax branch and standalone cash-only ATM on December 2, 2019.

Note, the Colfax and Newton offices and ATMs will be included in the bank's Des Moines-West Des Moines, MSA in the next evaluation, due to the addition of Jasper County to the MSA in 2019.

According to the June 30, 2019, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, Bank Iowa ranked 7th among 23 FDIC-insured financial institutions operating in the assessment area with 5.9 percent of market share. Leaders in market share include MidWestOne Bank (12.3 percent), U.S. Bank National Association (10.6 percent), and Marion County State Bank (10.1 percent). The 22 banks competing for deposits and loans with Bank Iowa have 54 offices in the assessment area.

Additional assessment area demographic information is provided in the following table. Please refer to Appendix B for 2017 demographic information.

Assessment Area: 2018 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	7,090	19.3
Moderate-income	7	17.9	4,532	12.3	890	19.6	6,752	18.4
Middle-income	27	69.2	25,516	69.5	2,032	8.0	8,543	23.3
Upper-income	5	12.8	6,654	18.1	348	5.2	14,317	39.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	39	100.0	36,702	100.0	3,270	8.9	36,702	100.0
	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	8,717	4,680	11.6	53.7	3,127	35.9	910	10.4
Middle-income	42,054	28,396	70.2	67.5	9,814	23.3	3,844	9.1
Upper-income	10,048	7,395	18.3	73.6	1,866	18.6	787	7.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	60,819	40,471	100.0	66.5	14,807	24.3	5,541	9.1
	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
Moderate-income	863	780	14.3	14.2	71	16.4	12	11.8
Middle-income	4,084	3,710	67.8	67.6	300	69.1	74	72.5
Upper-income	1,080	1,001	17.9	18.2	63	14.5	16	15.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	6,027	5,491	100.0	100.0	434	100.0	102	100.0
	Percentage of Total Businesses:			91.1		7.2		1.7
	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
Moderate-income	9	9	0.9	0.9	0	0.0	0	0.0
Middle-income	851	842	81.9	81.9	6	75.0	3	100.0
Upper-income	179	177	17.2	17.2	2	25.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	1,039	1,028	100.0	100.0	8	100.0	3	100.0
	Percentage of Total Farms:			98.9		0.8		0.3
2018 FFIEC Census Data & 2018 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 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 137,976, a slight decrease of 0.5 percent from 2010. All counties within the assessment area saw a decline in population besides Mahaska County, however the increase was minimal (0.1 percent). The greatest decrease in population was seen within Keokuk County, which experienced a decrease of 2.1 percent. Meanwhile the population increased in the State of Iowa by only 1.6 percent. According to a community representative, the areas have not experienced much fluctuation in population and find the population to be relatively stable.

Population Change 2010 and 2011-2015			
Area	2010 Population	2011-2015 Population	Percentage Change (%)
Assessment Area	138,668	137,976	-0.5
Jasper County	36,842	36,726	-0.3
Keokuk County	10,511	10,291	-2.1
Mahaska County	22,381	22,396	0.1
Marion County	33,309	33,248	-0.2
Wapello County	35,625	35,315	-0.9
State of Iowa	3,046,355	3,093,526	1.6
<i>Source: 2006-2010 – U.S. Census Bureau: Decennial Census 2011-2015 – U.S. Census Bureau: Annual Population Estimates OR 2010 – U.S. Census Bureau: Decennial Census</i>			

Income Characteristics

The following table compares the median family income for the assessment area, its counties, and the State of Iowa. According to the 2018 FFIEC Census Data, the assessment area is comprised of 36,702 families, of which 19.3 percent are designated as low-income, 18.4 percent are moderate-income, 23.3 percent are middle-income, and 39.0 percent are upper-income. Only 8.9 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.

According to the 2011-2015 Census Bureau data, median family income (MFI) in the assessment area increased 9.0 percent from 2010, which is comparable to the State of Iowa increase of 9.2 percent. Further, median family income increased among four of the five assessment area counties. Jasper County experienced the greatest increase in MFI of 21.6 percent while Mahaska County experienced a decrease of 0.7 percent. According to a community representative, due to a shortage in workers, the competition is high amongst manufacturers and subsequently wages are increased to secure qualified employees.

Median Family Income Change 2006-2010 and 2011-2015			
Area	2006-2010 Median Family Income 2010 Dollars (\$)	2011-2015 Median Family Income 2015 Dollars (\$)	Percentage Change (%)
Assessment Area	56,547	61,642	9.0
Jasper County	56,484	68,685	21.6
Keokuk County	53,456	55,571	4.0
Mahaska County	57,877	57,459	-0.7
Marion County	65,817	69,510	5.6
Wapello County	49,309	53,242	8.0
State of Iowa	61,804	67,466	9.2
<i>Source: 2006-2010 – U.S. Census Bureau: American Community Survey 2011-2015 – U.S. Census Bureau: American Community Survey</i>			

Bankruptcy Characteristics

According to the Administrative Office of the U.S. Courts, the bankruptcy filing rates in the assessment area have been historically comparable to the State of Iowa. Keokuk County saw the lowest filing rate for 2016 with 0.6 per 1,000 population. Jasper County saw the highest bankruptcy filing rate of 2.1 per 1,000 population. The State of Iowa saw its lowest rate of 1.3 per 1,000 population in 2016.

Personal Bankruptcy Filing Rate (per 1,000 population)				
Area	2013	2014	2015	2016
Jasper County	2.2	2.1	1.9	2.1
Keokuk County	1.1	0.8	1.0	0.6
Mahaska County	2.0	1.3	1.5	1.6
Marion County	1.7	1.7	1.3	1.2
Wapello County	2.0	2.3	1.8	1.7
State of Iowa	1.8	1.6	1.4	1.3
<i>Source: 2015 – Administrative Office of the U.S. Courts</i>				

Housing Characteristics

The following table presents recent trends in housing costs within the assessment area, its counties, and the State of Iowa. Overall, there are a total of 60,819 housing units in the assessment area. The majority of housing units are owner-occupied at 66.5 percent, while 24.3 percent are rental units and 9.1 percent of housing units are vacant.

According to the 2011-2015 American Community Survey, the assessment area had a median housing value of \$104,573 and median gross rent of \$630. Median housing values in the assessment area increased 5.0 percent, while median gross rents increased 9.8 percent from 2010. During the same period, the State of Iowa had a median housing value of \$129,200 and median gross rent of \$697. The State of Iowa experienced an increase in median housing value of 8.4 percent, and an increase in median gross rent of 13.0 percent from 2010.

Amongst the counties comprising the assessment area, median housing values have also increased across all counties, with the exception of Marion County. Of those counties, Mahaska County experienced the greatest increase in median housing value at 11.6 percent; while Jasper County experienced the greatest increase in median gross rent at 16.9 percent. A community representative stated that despite increases in both housing values and gross rents, a recent housing study reflected adequate affordable housing exists in the area, but indicated a greater need for middle-income single family housing.

A common method to compare relative affordability of housing across geographic areas is the affordability ratio, which is defined in Appendix D. A higher ratio supports more affordable housing opportunities. Based on the 2011-2015 U.S. Census Bureau American Community Survey data, of the geographies within the bank’s assessment area, Keokuk County is the most affordable (0.57) followed by Wapello County (0.52), while Marion County is the least affordable. Overall, the assessment area was more affordable at 0.48 compared to the state of Iowa at 0.41.

Trends in Housing Costs 2006-2010 and 2011-2015							
Area	Median Housing Value			Median Gross Rent			Affordability Ratio
	2006-2010	2011-2015	% Change	2006-2010	2011-2015	% Change	2011-2015
Assessment Area	99,548	104,573	5.0	574	630	9.8	0.48
Jasper County	114,600	117,700	2.7	586	685	16.9	0.47
Keokuk County	74,700	77,100	3.2	508	576	13.4	0.57
Mahaska County	95,200	106,200	11.6	521	593	13.8	0.46
Marion County	137,300	137,300	0.0	625	647	3.5	0.40
Wapello County	74,800	80,400	7.5	565	612	8.3	0.52
State of Iowa	119,200	129,200	8.4	617	697	13.0	0.41

*Source: 2006-2010 – U.S. Census Bureau: American Community Survey
2011-2015 – U.S. Census Bureau: American Community Survey*

Foreclosure Inventory Rates

The Federal Reserve Bank of Chicago conducted a study on the changes in the foreclosure inventory rate at the county level. The foreclosure inventory rate measures the number of residential properties in some phase of foreclosure. It excludes properties that have completed the foreclosure cycle. Foreclosure inventory rates in the state and a majority of assessment area counties have declined since the previous evaluation. Wapello County was the only county that saw a minor increase in foreclosure inventory rates, however still remains low (1.2 percent). Ultimately, this indicates the housing crisis that affected much of the nation, including assessment area counties, has diminished.

Employment Characteristics

The following table presents the unemployment trends for the assessment area counties and the state of Iowa from 2013 to 2016. A majority of the assessment area counties and the state of Iowa saw declining unemployment rates year-over-year from 2013 through 2016. Of those counties, Jasper County has experienced the largest drop at 2.0 and maintains the lowest unemployment rate in the bank’s assessment area at 3.6 percent.

Community representatives noted that unemployment rates continue to decline. Further, they stated job opportunities are abundant throughout the counties and companies are having difficulties filling positions. In particular, a contact noted that Jasper County’s unemployment rate continues to fall given the proximity to the Des Moines metropolitan area.

Unemployment Rates				
Area	2013	2014	2015	2016
Jasper County	5.6	4.6	4.0	3.6
Keokuk County	4.9	4.6	4.3	4.4
Mahaska County	4.8	4.6	4.0	3.8
Marion County	4.5	4.0	3.3	3.1
Wapello County	6.2	5.7	5.2	5.9
State of Iowa	4.6	4.4	3.8	3.7

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

Industry Characteristics

The following table presents the largest employers operating within the assessment area counties. The information presented below indicates a majority of the largest employers in the assessment area are located in Marion and Wapello Counties. The employment base covers multiple industries with the largest being in window and meat product manufacturers. A community representative noted that the counties thrive due to the manufacturers and the agricultural base in the community. The contact noted the businesses within the area have seen moderate growth and continue to create jobs due to expansion.

Largest Employers in the Assessment Area			
Company	County	Industry	# of Employees
Pella Corporation	Marion	Window and Door Manufacturers	4,000
JBS USA LLC	Wapello	Meat Product Manufacturers	2,100
Vernon Company	Jasper	Advertising-Promotional	1,000
John Deere Ottumwa Works	Wapello	Farm Equipment Manufacturers	800
Pella Regional Health Center	Marion	Hospitals	550
3M Company	Marion	Packaging Materials Wholesale	542
Ottumwa Regional Health Center	Wapello	Hospitals	509
Physician's Clinic	Mahaska	Clinics	500
Weiler Incorporated	Marion	Metal Fabricators	400
Skiff Medical Center	Jasper	Hospitals	375
<i>Source: Business information provided by Infogroup®, Omaha, NE</i>			

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 there is a need for participation amongst banks to convert existing buildings from the Maytag campus into small businesses and housing opportunities. In addition, one representative noted a need for middle-income single family housing within the community. The contacts believe financial institutions within the counties are very involved, but could further support their community by increasing support for economic development.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OSKALOOSA NON-MSA

LENDING TEST

Geographic Distribution of Loans

The bank's geographic distribution of HMDA-reportable, small business, and small farm loans reflects reasonable dispersion throughout the bank's assessment area.

In 2018, Bank Iowa originated loans in 82.1 percent of the 39 census tracts in the assessment area and in 2017, originated loans in 67.7 percent of the total census tracts. In 2018, the bank originated loans in three of the seven (42.9 percent) moderate-income census tracts and in 2017 originated loans in one of the six (16.7 percent) moderate-income census tracts. The bank's assessment area does not consist of any low-income census tracts. Based upon this analysis, it appears there are no conspicuous geographic lending gaps.

Due to loan volume in 2017 and 2018, home purchase and refinance loans will be the primary focus in the evaluation. Given there are no low-income census tracts in the assessment area, lending in these tracts will not be discussed in the geographic distribution.

HMDA-Reportable Loans

The geographic distribution of HMDA-reportable loans reflects reasonable dispersion throughout the assessment area. In 2018, Bank Iowa originated ten loans, or 9.3 percent of total HMDA-reportable loans in moderate-income census tracts, which is comparable to the aggregate of lenders at 10.3 percent and the percentage of owner-occupied units at 11.6 percent. The majority of HMDA-reportable loans (78.7 percent) were originated in middle-income census tracts, above both the aggregate of lenders (66.6 percent) and the percentage of owner-occupied units (70.2 percent). Further, 13 loans (12.0 percent) were originated in upper-income census tracts, below both the aggregate of lenders (23.2 percent) and the percentage of owner-occupied units in those geographies (18.3 percent).

In 2017, Bank Iowa's geographic distribution of HMDA-reportable loans was comparable to its lending in 2018.

Home Purchase

In 2018, home purchase loans represented 69.4 percent of the bank's total HMDA-reportable loans in the assessment area. The bank originated 9.3 percent of its home purchase loans in moderate-income census tracts. The bank's performance is comparable to both the aggregate of lenders at 10.8 percent and the 11.6 percent of owner-occupied units. A substantial majority of the bank's home purchase loans were originated in middle-income census tracts at 81.3 percent, significantly

above the aggregate of lenders at 66.5 percent and the 70.2 percent of owner-occupied units. Lastly, the bank originated 9.3 percent of its home purchase loans in upper-income census tracts, which was below the aggregate of lenders at 22.8 percent and the 18.3 percent of owner-occupied units located in upper-income census tracts.

Refinance

In 2018, refinance loans represented 26.9 percent of the bank's total HMDA-reportable loans in the assessment area. The bank originated 10.3 percent of its refinance loans in moderate-income census tracts. The bank's performance is comparable to both the aggregate of lenders at 8.3 percent and the 11.6 percent of owner-occupied units. The bank originated a majority of its refinance loans (72.4 percent) in middle-income census tracts. The bank's performance is above both the aggregate at 68.7 percent and the 70.2 percent of owner-occupied units. Lastly, the bank originated 17.2 percent of its refinance loans in upper-income census tracts, which is below the aggregate of lenders at 23.0 percent and comparable to the 18.3 percent of owner-occupied units located in upper-income census tracts.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2018 Oskaloosa IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		2018			Dollar			
		Count Bank	Agg	Dollar Bank	Agg			
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	7	9.3	10.8	840	9.6	8.1	11.6
	Middle	61	81.3	66.5	7,055	80.9	64.5	70.2
	Upper	7	9.3	22.8	830	9.5	27.4	18.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		75	100.0	100.0	8,725	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	3	10.3	8.3	662	16.5	6.1	11.6
	Middle	21	72.4	68.7	2,551	63.6	66.2	70.2
	Upper	5	17.2	23.0	799	19.9	27.7	18.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		29	100.0	100.0	4,012	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	6.8	0	0.0	7.5	11.6
	Middle	1	50.0	65.1	14	43.8	70.4	70.2
	Upper	1	50.0	28.1	18	56.3	22.0	18.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		2	100.0	100.0	32	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	5.6	0	0.0	9.6	21.3
	Middle	1	100.0	72.2	107	100.0	77.6	66.6
	Upper	0	0.0	22.2	0	0.0	12.8	12.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		1	100.0	100.0	107	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	8.1	0	0.0	8.4	11.6
	Middle	0	0.0	64.9	0	0.0	63.4	70.2
	Upper	0	0.0	27.0	0	0.0	28.2	18.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	12.7	0	0.0	14.0	11.6
	Middle	1	100.0	61.8	107	100.0	55.6	70.2
	Upper	0	0.0	25.5	0	0.0	30.4	18.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		1	100.0	100.0	107	100.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	26.5	0	0.0	19.5	11.6
	Middle	0	0.0	54.9	0	0.0	55.3	70.2
	Upper	0	0.0	18.6	0	0.0	25.2	18.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	10	9.3	10.3	1,502	11.6	7.9	11.6
	Middle	85	78.7	66.6	9,834	75.7	65.3	70.2
	Upper	13	12.0	23.2	1,647	12.7	26.8	18.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		108	100.0	100.0	12,983	100.0	100.0

Originations & Purchases

2016 FFIEC Census Data

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

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. The 2018 sample include 27 small business loans within the assessment area. The bank’s lending volume in moderate-income census tracts of 7.4 percent is below the percentage of total businesses located in moderate-income census tracts at 14.3 percent. A majority (66.7 percent) of the bank’s small business loans were originated in middle-income tracts, which was comparable to the total businesses located in those geographies at 67.8 percent. The bank also originated 25.9 percent of its small business loans in upper-income census tracts, above the percentage of total businesses located in those geographies at 17.9 percent. The following table presents the bank’s geographic distribution of small business loans in 2018.

Geographic Distribution of Small Business Loans						
Assessment Area: 2018 Oskaloosa IA Non MSA						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	0	0.0	0	0.0	0.0
	Moderate	2	7.4	352	11.4	14.3
	Middle	18	66.7	1,397	45.4	67.8
	Upper	7	25.9	1,327	43.1	17.9
	Unknown	0	0.0	0	0.0	0.0
	Total	27	100.0	3,076	100.0	100.0

2018 FFIEC Census Data & 2018 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 reasonable dispersion throughout the assessment area. Given the lack of opportunity to lend to farms located in moderate-income census tracts (0.9 percent), a limited analysis was conducted. The following table presents the bank’s geographic distribution of small farm loans in 2018.

Geographic Distribution of Small Farm Loans						
Assessment Area: 2018 Oskaloosa IA Non MSA						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2018 Dollar Bank		Total Farms
		#	%	\$ 000s	\$ %	
Small Farm	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.9
	Middle	35	92.1	3,917	91.5	81.9
	Upper	3	7.9	366	8.5	17.2
	Unknown	0	0.0	0	0.0	0.0
	Total	38	100.0	4,282	100.0	100.0

2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

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

The bank’s borrower distribution reflects reasonable penetration among individuals of different income levels, businesses of different sizes and farms of different sizes. Due to loan volume in 2017 and 2018, home purchase and refinance loans will be the primary focus in the evaluation.

HMDA-Reportable Loans

The borrower distribution of HMDA-reportable loans reflects reasonable penetration among individuals of different income levels. In 2018, Bank Iowa originated 10.2 percent of its total HMDA-reportable loans to low-income borrowers, consistent with aggregate of lenders at 8.9 percent, but below the percentage of low-income families in the assessment area at 19.3 percent. The bank originated 27.8 percent of its HMDA-reportable loans to moderate-income borrowers, above the aggregate of lenders at 25.1 percent and the percentage of families designated as moderate-income in the assessment area at 18.4 percent. Bank Iowa originated 18.5 percent of HMDA-reportable loans to middle-income borrowers, below the aggregate of lenders and the percentage of families designated as middle-income at 22.1 percent and 23.3 percent, respectively. The bank originated 29.6 percent of its HMDA loans to upper-income borrowers which was comparable to the aggregate (29.3 percent) but below the demographic (39.0 percent). In addition, 13.9 percent of the bank’s HMDA-reportable loans were originated to borrowers of unknown income, comparable to the aggregate at 14.6 percent.

In 2017, Bank Iowa’s borrower distribution of HMDA-reportable loans was generally comparable to its lending in 2018.

Home Purchase

In 2018, Bank Iowa originated 13.3 percent of its home purchase loans to low-income borrowers. The bank's performance is above the aggregate of lenders at 9.5 percent, but below the percentage of low-income families located in the assessment area of 19.3 percent. The bank originated a majority of its home purchase loans to moderate-income borrowers (37.3 percent). The bank's performance was above the aggregate at 29.1 percent and significantly above the percent of moderate-income families in the assessment area at 18.4 percent. Bank Iowa originated 21.3 percent of home purchase loans to middle-income borrowers, comparable to both the aggregate and the demographic at 21.0 percent and 23.3 percent, respectively. The bank originated 14.7 percent of its home purchase loans to upper-income borrowers. The bank's lending was substantially below both the aggregate at 26.4 percent and the percent of upper-income families in the assessment area at 39.0 percent. Lastly, the bank originated 13.3 percent of home purchase loans to borrowers with unknown-income, comparable to the aggregate at 14.0 percent.

Refinance

In 2018, Bank Iowa originated 3.4 percent of its refinance loans to low-income borrowers. The bank's performance was below the aggregate of lenders at 9.4 percent and below the 19.3 percent of low-income families located in the assessment area. The bank originated 6.9 percent of its refinance loans to moderate-income borrowers, which is substantially below the aggregate at 21.7 percent and the 18.4 percent of moderate-income families in the assessment area. Bank Iowa originated 10.3 percent of its refinance loans to middle-income borrowers. The bank's performance was substantially below both the aggregate at 26.2 percent and the 23.3 percent of middle-income families in the assessment area. The bank originated the greatest percentage (65.5 percent) of its refinance loans to upper-income borrowers. The bank's performance was substantially above both the aggregate of lenders at 33.5 percent and the portion of upper-income families in the assessment area of 39.0 percent. Lastly, the bank originated 13.8 percent of refinance loans to borrowers with unknown-income, slightly above the aggregate 9.1 percent.

The following table summarizes the bank's 2018 HMDA-reportable lending in the assessment area. Please refer to Appendix B for the 2017 borrower distribution lending tables.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2018 Oskaloosa IA Non MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2018						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	10	13.3	9.5	798	9.1	5.3	19.3
	Moderate	28	37.3	29.1	2,693	30.9	22.1	18.4
	Middle	16	21.3	21.0	2,058	23.6	20.7	23.3
	Upper	11	14.7	26.4	2,285	26.2	37.6	39.0
	Unknown	10	13.3	14.0	891	10.2	14.3	0.0
	Total		75	100.0	100.0	8,725	100.0	100.0
Refinance	Low	1	3.4	9.4	62	1.5	5.3	19.3
	Moderate	2	6.9	21.7	165	4.1	16.0	18.4
	Middle	3	10.3	26.2	457	11.4	24.3	23.3
	Upper	19	65.5	33.5	2,960	73.8	42.4	39.0
	Unknown	4	13.8	9.1	368	9.2	11.9	0.0
	Total		29	100.0	100.0	4,012	100.0	100.0
Home Improvement	Low	0	0.0	6.3	0	0.0	3.4	19.3
	Moderate	0	0.0	21.4	0	0.0	23.0	18.4
	Middle	1	50.0	23.4	18	56.3	19.8	23.3
	Upper	1	50.0	44.3	14	43.8	47.7	39.0
	Unknown	0	0.0	4.7	0	0.0	6.1	0.0
	Total		2	100.0	100.0	32	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	19.3
	Moderate	0	0.0	0.0	0	0.0	0.0	18.4
	Middle	0	0.0	0.0	0	0.0	0.0	23.3
	Upper	0	0.0	11.1	0	0.0	4.8	39.0
	Unknown	1	100.0	88.9	107	100.0	95.2	0.0
	Total		1	100.0	100.0	107	100.0	100.0
Other Purpose LOC	Low	0	0.0	6.8	0	0.0	3.1	19.3
	Moderate	0	0.0	18.9	0	0.0	16.1	18.4
	Middle	0	0.0	25.7	0	0.0	28.8	23.3
	Upper	0	0.0	44.6	0	0.0	47.7	39.0
	Unknown	0	0.0	4.1	0	0.0	4.3	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	5.5	0	0.0	4.9	19.3
	Moderate	0	0.0	18.2	0	0.0	18.4	18.4
	Middle	0	0.0	32.7	0	0.0	36.1	23.3
	Upper	1	100.0	41.8	107	100.0	33.0	39.0
	Unknown	0	0.0	1.8	0	0.0	7.5	0.0
	Total		1	100.0	100.0	107	100.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	1.0	0	0.0	0.6	19.3
	Moderate	0	0.0	2.0	0	0.0	1.5	18.4
	Middle	0	0.0	1.0	0	0.0	0.3	23.3
	Upper	0	0.0	2.0	0	0.0	1.0	39.0
	Unknown	0	0.0	94.1	0	0.0	96.6	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	11	10.2	8.9	860	6.6	4.9	19.3
	Moderate	30	27.8	25.1	2,858	22.0	19.2	18.4
	Middle	20	18.5	22.1	2,533	19.5	20.6	23.3
	Upper	32	29.6	29.3	5,366	41.3	37.1	39.0
	Unknown	15	13.9	14.6	1,366	10.5	18.2	0.0
	Total		108	100.0	100.0	12,983	100.0	100.0

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

Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different revenue sizes. The 2018 sample included 27 small business loans, of which 81.5 percent by number were to businesses with gross revenues equal to or less than \$1 million. This is below the gross revenue composition of small businesses in the assessment area, at 91.1 percent. However, a high percentage, 63.6 percent, of those were in amounts of \$100,000 or less, which are considered the most beneficial to small businesses, indicating the bank’s willingness to meet the credit needs of small businesses. The following table presents the bank’s borrower distribution of small business loans in 2018.

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2018 Oskaloosa IA Non MSA							
Product Type		Bank & Demographic Comparison					
		2018		2018		Total Businesses %	
Revenue	Loan Size	Count Bank	Dollar Bank				
		#	%	\$ 000s	\$ %		
Small Business	\$1 Million or Less Over \$1 Million or Unknown Total	22	81.5	2,261	73.5	91.1	
		5	18.5	815	26.5	8.9	
		27	100.0	3,076	100.0	100.0	
	\$100,000 or Less \$100,001 - \$250,000 \$250,001 - \$1 Million Total	15	55.6	650	21.1		
		10	37.0	1,583	51.5		
		2	7.4	843	27.4		
		27	100.0	3,076	100.0		
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	14	63.6	620		27.4
		\$100,001 - \$250,000	7	31.8	1,198		53.0
\$250,001 - \$1 Million		1	4.5	443	19.6		
22		100.0	2,261	100.0			
Originations & Purchases							
2018 FFIEC Census Data & 2018 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 reasonable penetration among farms of different revenue sizes. The 2018 sample included 38 small farm loans, of which 94.7 percent by number were to farms with gross revenues equal to or less than \$1 million. This is comparable to the gross revenue composition of small farms in the assessment area, at 98.9 percent. A high percentage, 61.1 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 following table presents the bank’s borrower distribution of small farm loans in 2018.

Small Farm Lending By Revenue & Loan Size							
Assessment Area: 2018 Oskaloosa IA Non MSA							
Product Type		Bank & Demographic Comparison					
		2018		2018		Total Farms	
Revenue	Loan Size	Count Bank	Dollar Bank				
		#	%	\$ 000s	\$ %	%	
Small Farm	\$1 Million or Less		36	94.7	3,884	90.7	98.9
		Over \$1 Million or Unknown	2	5.3	398	9.3	1.1
		Total	38	100.0	4,282	100.0	100.0
	\$100,000 or Less		23	60.5	707	16.5	
		\$100,001 - \$250,000	10	26.3	1,775	41.4	
		\$250,001 - \$500,000	5	13.2	1,801	42.0	
		Total	38	100.0	4,283	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	22	61.1	623	16.0	
		\$100,001 - \$250,000	10	27.8	1,775	45.7	
		\$250,001 - \$500,000	4	11.1	1,486	38.3	
		Total	36	100.0	3,884	100.0	
	Originations & Purchases						
2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

COMMUNITY DEVELOPMENT TEST

The bank’s community development performance demonstrates adequate responsiveness to community development needs of its assessment area through community development loans, donations, and community development services, as appropriate, considering the bank’s capacity and the need and the availability of such opportunities for community development in the bank’s assessment area.

Lending

During the evaluation period, the bank originated two qualified loans totaling approximately \$498,756 towards affordable housing and revitalization and stabilization activities within the assessment area. The bank increased community development lending since the previous evaluation period, in which no community development loans were originated in the assessment area.

Investments

The bank did not make any new investments, or have any outstanding investments from the prior period evaluation. Although there is a lack of investments for this evaluation period, a significant increase in qualified donations compared to the prior evaluation is noted. During this evaluation period, the bank made 14 qualified donations totaling approximately \$9,678 to community organizations in the assessment area. Recipient organizations focus primarily on community

services and economic development. These donations primarily benefitted organizations that provide community services, affordable housing, food assistance, financial services, education and support to low- and moderate-income individuals and families. During the prior evaluation the bank did not make any qualified investments and made four qualified community development donations totaling \$6,750.

Services

During the evaluation period bank staff provided 839 hours of community development services. Of the total number of service hours, 396 service hours were dedicated to organizations with an economic development focus, 341 were dedicated to organizations with a community service focus, 99 service hours were dedicated to organizations with an affordable housing focus, and three service hours were dedicated to organizations with a revitalization and stabilization focus. Most notable was the bank’s focus on providing economic development services, which was considered a need by a community representative to support economic growth and business development within the assessment area. During the prior evaluation the bank’s qualified community development service hours totaled 234. The table below presents the bank’s community development activities during the evaluation period.

Summary of CD Activities, Review Period August 1, 2017 – March 2, 2020										
Type of Activity	Affordable Housing		Economic Development		Activities that Revitalize/Stabilize		Community Services		Totals	
	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours
Lending	1	32,100	0	0	1	466,656	0	0	2	498,756
Investment	0	0	0	0	0	0	0	0	0	0
Donations	0	0	3	1,250	0	0	11	8,428	14	9,678
Services	25	99	108	396	2	3	116	341	251	839

SOUTHWEST IOWA NON-MSA – FULL REVIEW

SCOPE OF 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 bank’s Southwest Iowa Non-MSA assessment area consists of Adams, Fremont, Montgomery, Page, and Taylor Counties. The assessment area remains unchanged since the previous examination. Based on 2018 FFIEC Census data, the census tract composition includes four moderate-income and 14 middle-income census tracts. No low- or upper-income census tracts are located 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) middle-income geographies.

As shown in the Census Tract Designation Changes table below, there were changes in the distribution of census tracts by income since the previous evaluation.

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). The income data used to calculate geographic income designations changed between 2016 and 2017. Lending activity performed in 2017 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015.

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	2016 Designations (#)	2018 Designations (#)	Net Change (#)
Low	0	0	0
Moderate	3	4	1
Middle	15	14	-1
Upper	0	0	0
Unknown	0	0	0
Total	18	18	0
<small>Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2006-2010 U.S. Census Bureau: Decennial Census: America Community Survey Data: 2011-2015</small>			

Within the assessment area, the bank operates seven branches all accompanied by ATMs located in Red Oak, Shenandoah, Clarinda, Essex, and Villisca. Red Oak is the only branch operating a full-service ATM. There were no branches opened or closed since the previous evaluation.

According to the June 30, 2019, 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 22.2 percent of market share. Following Bank Iowa in market share are Great Western Bank (17.1 percent) and PCSB Bank (13.8 percent). The 14 banks competing for deposits and loans with Bank Iowa have 29 offices in the assessment area.

Assessment Area: 2018 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	2,698	22.2	
Moderate-income	4	22.2	2,706	22.3	604	22.3	2,249	18.5	
Middle-income	14	77.8	9,450	77.7	736	7.8	3,095	25.5	
Upper-income	0	0.0	0	0.0	0	0.0	4,114	33.8	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	18	100.0	12,156	100.0	1,340	11.0	12,156	100.0	
	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	
Total Assessment Area	20,902	13,309	100.0	63.7	5,011	24.0	2,582	12.4	
	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	0.0
Moderate-income	501	24.2	443	24.0	44	29.7	14	19.4	
Middle-income	1,567	75.8	1,405	76.0	104	70.3	58	80.6	
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	
Total Assessment Area	2,068	100.0	1,848	100.0	148	100.0	72	100.0	
	Percentage of Total Businesses:			89.4		7.2		3.5	
	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	0.0
Moderate-income	83	12.3	81	12.1	2	28.6	0	0.0	
Middle-income	592	87.7	586	87.9	5	71.4	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	
Total Assessment Area	675	100.0	667	100.0	7	100.0	1	100.0	
	Percentage of Total Farms:			98.8		1.0		0.1	

2018 FFIEC Census Data & 2018 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 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 slight decrease of 2.5 percent from 2010. Similarly, all counties within the assessment area saw decreases in population. The greatest decline in population was seen within Fremont County, which experienced a decrease of 4.5 percent. According to a community representative, many individuals are moving to the Des Moines-West Des Moines, Iowa MSA to access higher paying jobs, contributing to the decreases in population.

Population Change 2010 and 2011-2015			
Area	2010 Population	2011-2015 Population	Percentage Change (%)
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	-1.7
State of Iowa	3,046,355	3,093,526	1.6
<i>Source: 2006-2010—U.S. Census Bureau: Decennial Census 2011-2015—U.S. Census Bureau: Annual Population Estimates OR 2010—U.S. Census Bureau: Decennial Census</i>			

Income Characteristics

The following table compares the median family income for the assessment area and the state of Iowa. According to the 2018 FFIEC Census Data, the assessment area is comprised of 12,156 families, of which 22.2 percent are designated as low-, 18.5 percent are moderate-, 25.5 percent are middle-, and 33.8 percent are upper-income. Within the assessment area, 11.0 percent of families live below the poverty line, higher than the State of Iowa poverty rate of 8.1 percent.

According to the 2011-2015 Census Bureau data, median family income (MFI) in the assessment area is \$57,361. The assessment area experienced an increase in MFI of 5.7 percent since 2010. However, the MFI for the assessment area remains below that of the state of Iowa at \$67,466 with an increase of 9.2 percent since 2010. Among the counties within the assessment area, median family income increased among all assessment area counties. Page County experienced the greatest increase in MFI of 14.6 percent followed by Taylor County experiencing a 12.4 percent increase. According to a community representative, while median family income has increased, the assessment area lacks affluent jobs as those opportunities exist outside of the rural communities.

Median Family Income Change 2006-2010 and 2011-2015			
Area	2006-2010 Median Family Income 2010 Dollars (\$)	2011-2015 Median Family Income (2015 Dollars (\$))	Percentage Change (%)
Assessment Area	54,292	57,361	5.7
Adams County	52,782	58,659	11.1
Fremont County	59,622	65,109	9.2
Montgomery County	50,595	54,088	6.9
Page County	52,791	60,519	14.6
Taylor County	48,156	54,128	12.4
State of Iowa	61,804	67,466	9.2
<i>Source: 2006-2010— U.S. Census Bureau: American Community Survey 2011-2015— U.S. Census Bureau: American Community Survey</i>			

Bankruptcy Characteristics

According to the Administrative Office of the U.S. Courts, the bankruptcy filing rates in the assessment area have been historically comparable to the State of Iowa. Taylor County saw the lowest filing rate for 2016 with 0.3 per 1,000 population. Adams, Fremont, Montgomery, and Page County all saw filing rates comparable to the State of Iowa which experienced its lowest rate of 1.3 per 1,000 population in 2016.

Personal Bankruptcy Filing Rate (per 1,000 population)				
Area	2013	2014	2015	2016
Adams County	1.0	0.5	0.5	1.3
Fremont County	2.0	0.9	1.1	1.0
Montgomery County	1.4	0.8	0.6	1.3
Page County	1.3	1.0	1.0	1.1
Taylor County	1.1	0.8	2.1	0.3
State of Iowa	1.8	1.6	1.4	1.3
<i>Source: 2015— Administrative Office of the U.S. Courts</i>				

Housing Characteristics

The following table presents recent trends in housing costs within the assessment area and the State of Iowa. There are a total of 20,902 housing units in the assessment area. The majority of housing units are owner-occupied at 63.7 percent, while 24.0 percent are rental units and 12.4 percent of housing units are vacant.

According to the 2011-2015 American Community Survey, the assessment area had a median housing value of \$82,693 and median gross rent of \$588. Median housing values in the assessment area increased 1.5 percent, while median gross rents increased 20.0 percent from 2010. During the same period, the State of Iowa had a median housing value of \$129,200 and median gross rent of \$697. The State of Iowa experienced an increase in median housing value of 8.4 percent, and an increase in median gross rent of 13.0 percent from 2010.

The median housing values and median gross rents within the majority of the assessment area counties have increased since 2010 figures, with the exception of Montgomery County which experienced a 2.6 percent decline in median housing values. Of those counties, Adams County experienced the greatest increase in median family income at 8.1 percent, while Taylor County experienced the greatest increase in median gross rent at 35.5 percent. A community representative stated that the area has experienced higher demand for rental properties as families in the area prefer to rent versus purchasing a home.

A common method to compare relative affordability of housing across geographic areas is the affordability ratio, which is defined in Appendix D. A higher ratio supports more affordable housing opportunities. Based on the 2011-2015 U.S. Census Bureau American Community Survey data, the assessment area counties were far more affordable when compared to the state of Iowa. Of the geographies within the bank’s assessment area, Taylor County is the most affordable (0.63) followed by Adams County (0.55).

Trends in Housing Costs 2006-2010 and 2011-2015							
Area	Median Housing Value			Median Gross Rent			Affordability Ratio
	2006-2010	2011-2015	% Change	2006-2010	2011-2015	% Change	2011-2015
Assessment Area	81,482	82,693	1.5	490	588	20.0	0.56
Adams County	81,200	87,800	8.1	401	538	34.2	0.55
Fremont County	92,800	100,100	7.9	497	608	22.3	0.53
Montgomery County	80,800	78,700	-2.6	534	609	14.0	0.54
Page County	81,900	82,500	0.7	486	564	16.0	0.53
Taylor County	67,000	70,400	5.1	437	592	35.5	0.63
State of Iowa	119,200	129,200	8.4	617	697	13.0	0.41

*Source: 2006-2010 – U.S. Census Bureau: American Community Survey
2011-2015 – U.S. Census Bureau: American Community Survey*

Foreclosure Inventory Rates

The Federal Reserve Bank of Chicago conducted a study on the changes in the foreclosure inventory rate at the county level. The foreclosure inventory rate measures the number of residential properties in some phase of foreclosure. It excludes properties that have completed the foreclosure cycle.

Foreclosure inventory rates in the state and a majority of assessment area counties have declined since the previous evaluation. Adams County was the only county that saw an increase in foreclosure inventory rates and remains higher than the assessment area counties and the State of Iowa at 4.0 percent. The remainder of the assessment area counties saw declines in foreclosure rates, indicating the housing crisis that affected much of the nation has diminished. Ultimately, the lower percentage of properties in the process of foreclosure indicates housing sector improvements within the assessment area and state of Iowa.

Employment Characteristics

The following table presents the unemployment trends for the assessment area counties and the state of Iowa from 2013 to 2016. A majority of the assessment area counties, with the exception of Page County, experienced year-over-year declines in unemployment rates from 2013 through 2016. In 2016 (most recent data), Page County maintained the highest unemployment rate at 5.1 percent and has maintained the highest unemployment rate over the three year period.

A community representative noted that mass layoffs with the Eaton Corporation (about 300 employees) has contributed to higher unemployment rates. The representative stated that Page County will continue to see higher unemployment figures due to the closure of Eaton Corporation, which was announced in February 2020.

Unemployment Rates				
Area	2013	2014	2015	2016
Adams County, IA	3.8	3.5	2.8	2.7
Fremont County, IA	4.2	4.1	3.4	3.3
Montgomery County, IA	4.9	4.3	3.6	3.6
Page County, IA	5.0	4.6	4.2	5.1
Taylor County, IA	3.6	3.8	3.2	3.0
State of Iowa	4.6	4.4	3.8	3.7

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

Industry Characteristics

The following table presents the largest employers operating within the assessment area counties. The information presented below indicates a majority of the largest employers in the assessment area are located in Page and Fremont Counties. The employment base covers multiple industries with the largest being in hospitals, clinics, and manufacturers. A community representative stated the counties are influenced by hospitals, including pharmaceutical companies, as well as many small businesses.

Largest Employers in the Assessment Area			
Company	County	Industry	# of Employees
Shenandoah Medical Center	Page	Hospitals	310
Shenandoah Medical Center	Fremont	Clinics	300
NSK Corporation	Page	Ball and Roller Bearing Manufacturers	300
Lisle Corporation	Page	Manufacturers	300
Montgomery County Memorial Hospital	Montgomery	Hospitals	260
Michael Foods Incorporated	Taylor	Food Products and Manufacturers	250
Hy-Vee	Adams	Grocers – Retail	200
H&H Trailers	Page	Trailers – Equipment and Parts	200
Parker Hose Products	Montgomery	Rubber and Plastics Manufacturers	190
M G Waldbaum Company	Taylor	Food Products and Manufacturers	180
<i>Source: Business information provided by Infogroup®, Omaha, NE</i>			

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 there is a need for affordable housing; particularly one facility in the area is in need of assistance. Further, there is a need for utility assistance among low- and moderate-income individuals. The contacts believe financial institutions within the counties are involved, but could further support their community by increasing economic development and affordable housing efforts.

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

LENDING TEST

Geographic Distribution of Loans

The bank’s geographic distribution of HMDA-reportable, small business, and small farm loans reflects reasonable dispersion throughout the assessment area.

In 2018, Bank Iowa originated loans in 88.9 percent of the 18 census tracts in the assessment area and in 2017, originated loans in 83.3 percent of the total census tracts. In 2018, the bank originated loans in two of the four (50.0 percent) moderate-income census tracts and in 2017 originated loans in three of the four (75.0 percent) moderate-income census tracts. The bank’s assessment area does not consist of any low-income census tracts. Based upon this analysis, it appears there are no conspicuous geographic lending gaps.

Due to loan volume in 2017 and 2018, home purchase and refinance loans will be the primary focus in the evaluation. Given there are no low-income census tracts in the assessment area, lending in these tracts will not be discussed in the geographic distribution.

HMDA-Reportable Loans

The geographic distribution of HMDA-reportable loans reflects reasonable dispersion throughout the assessment area. In 2018, Bank Iowa originated 26 loans, or 24.3 percent of total HMDA-reportable loans in moderate-income census tracts, which is above the aggregate of lenders at 23.1 percent and the percentage of owner-occupied units at 20.4 percent. The majority of HMDA-reportable loans (75.7 percent) were originated in middle-income census tracts, which is comparable to the aggregate of lenders (76.9 percent) but below the percentage of owner occupied housing units (79.6 percent).

In 2017, Bank Iowa's geographic distribution of HMDA-reportable loans was comparable to its lending performance in 2018.

Home Purchase

In 2018, home purchase loans represented 70.1 percent of the bank's total HMDA-reportable loans in the assessment area. The bank originated 22.7 percent of its home purchase loans in moderate-income census tracts. The bank's performance is comparable to both the aggregate at 23.5 percent and the 20.4 percent of owner-occupied units. A substantial majority of the bank's home purchase loans were originated in middle-income census tracts at 77.3 percent, comparable to the aggregate of lenders at 76.5 percent and below the 79.6 percent of owner-occupied housing units.

Refinance

In 2018, refinance loans represented 27.1 percent of the bank's total HMDA-reportable loans in the assessment area. The bank originated 27.6 percent of its refinance loans in moderate-income census tracts. The bank's performance is above the aggregate of lenders at 23.2 percent and above the 20.4 percent of owner-occupied housing units. The bank originated a substantial majority of its refinance loans (72.4 percent) in middle-income census tracts, which is below the aggregate of lenders at 76.8 percent and below the 79.6 percent of owner-occupied housing units.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2018 Southwest IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		Count		Dollar		Agg	Agg	
		#	%	%	\$ (000s)			
		2018						
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	17	22.7	23.5	767	10.6	18.5	20.4
	Middle	58	77.3	76.5	6,438	89.4	81.5	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
	Total		75	100.0	100.0	7,205	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	8	27.6	23.2	343	15.6	15.7	20.4
	Middle	21	72.4	76.8	1,855	84.4	84.3	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
	Total		29	100.0	100.0	2,198	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	20.0	0	0.0	26.5	20.4
	Middle	1	100.0	80.0	25	100.0	73.5	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
	Total		1	100.0	100.0	25	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family
	Moderate	1	50.0	36.4	204	44.7	72.2	31.9
	Middle	1	50.0	63.6	252	55.3	27.8	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
	Total		2	100.0	100.0	456	100.0	100.0
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	20.4
	Middle	0	0.0	100.0	0	0.0	100.0	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
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	28.6	0	0.0	21.1	20.4
	Middle	0	0.0	71.4	0	0.0	78.9	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
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	8.3	0	0.0	5.7	20.4
	Middle	0	0.0	91.7	0	0.0	94.3	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
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	26	24.3	23.1	1,314	13.3	21.5	20.4
	Middle	81	75.7	76.9	8,570	86.7	78.5	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
	Total		107	100.0	100.0	9,884	100.0	100.0

Originations & Purchases

2016 FFIEC Census Data

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

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. The 2018 sample includes 32 small business loans within the assessment area. The bank’s lending volume in moderate-income census tracts of 25.0 percent is comparable to the percentage of total businesses located in moderate-income census tracts at 24.2 percent. A substantial majority (75.0 percent) of the bank’s small business loans were originated in middle-income tracts, which was comparable to the total businesses located in those geographies at 75.8 percent. The following table presents the bank’s geographic distribution of small business loans in 2018.

Geographic Distribution of Small Business Loans						
Assessment Area: 2018 Southwest IA Non MSA						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2018 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	
Small Business	Low	0	0.0	0	0.0	0.0
	Moderate	8	25.0	651	40.3	24.2
	Middle	24	75.0	964	59.7	75.8
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Total	32	100.0	1,615	100.0	100.0

2018 FFIEC Census Data & 2018 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 reasonable dispersion throughout the assessment area. The 2018 sample includes 35 small farm loans within the assessment area. The sample consists of one small farm loan within a moderate-income census tract (2.9 percent), which was below the total farms located in moderate-income census tracts of 12.3 percent. A substantial majority (97.1 percent) of the bank’s small farm loans were originated in middle-income tracts, which was above the total farms located in those geographies at 87.7 percent. Although the bank’s performance was below the demographic in moderate-income census tracts during the evaluation period, with only 12.3 percent of farms located in moderate-income census tracts, opportunities for originating loans in those census tracts are limited. The following table presents the bank’s geographic distribution of small farm loans in 2018.

Geographic Distribution of Small Farm Loans						
Assessment Area: 2018 Southwest IA Non MSA						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2018 Dollar Bank		Total Farms
		#	%	\$ 000s	\$ %	
Small Farm	Low	0	0.0	0	0.0	0.0
	Moderate	1	2.9	100	2.0	12.3
	Middle	34	97.1	4,797	98.0	87.7
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Total	35	100.0	4,897	100.0	100.0

2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

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

The bank’s borrower distribution reflects reasonable penetration throughout the bank’s assessment area. The bank’s lending reflects reasonable penetration among individuals of different income levels and farms of different sizes, and excellent penetration among businesses of different sizes. Due to loan volume in 2017 and 2018, home purchase and refinance loans will be the primary focus in the evaluation.

HMDA-Reportable Loans

The borrower distribution of HMDA-reportable loans reflects reasonable penetration among individuals of different income levels. In 2018, Bank Iowa originated 10.3 percent of its total HMDA-reportable loans to low-income borrowers, below the aggregate of lenders at 13.6 percent, and below the percentage of low-income families in the assessment area at 22.2 percent. The bank originated 30.8 percent of its HMDA-reportable loans to moderate-income borrowers, above the aggregate of lenders at 26.7 percent and above the percentage of families designated as moderate-income in the assessment area at 18.5 percent. Bank Iowa originated 23.4 percent of HMDA-reportable loans to middle-income borrowers, above the aggregate of lenders at 20.7 percent but below the percentage of families-by-family income at 25.5 percent. The bank originated 29.9 percent of its HMDA loans to upper-income borrowers which was above the aggregate of lenders (23.9 percent) but below the percentage of families-by-family income (33.8 percent). In addition, 5.6 percent of the bank’s HMDA-reportable loans were originated to borrowers of unknown income, below the aggregate of lenders at 15.1 percent.

In 2017, Bank Iowa’s borrower distribution of HMDA-reportable loans exceeded 2018 figures. Most notable was the bank’s overall HMDA-reportable lending to low- and moderate-income families in the assessment area of 51.2 percent.

Home Purchase

In 2018, Bank Iowa originated 12.0 percent of its home purchase loans to low-income borrowers. The bank's performance was comparable to the aggregate of lenders at 14.7 percent, but below the percentage of low-income families located in the assessment area of 22.2 percent. The bank originated 25.3 percent of its home purchase loans to moderate-income borrowers. The bank's performance was comparable to the aggregate of lenders at 27.6 percent and above the percent of moderate-income families in the assessment area at 18.5 percent. Bank Iowa originated 25.3 percent of home purchase loans to middle-income borrowers, above the aggregate of lenders and comparable to the percentage of families-by-family income at 18.5 percent and 25.5 percent, respectively. The bank originated 30.7 percent of its home purchase loans to upper-income borrowers. The bank's performance was above the aggregate of lenders at 22.8 percent but below the percent of upper-income families in the assessment area at 33.8 percent. Lastly, the bank originated 6.7 percent of home purchase loans to borrowers with unknown-income, below the aggregate of lenders at 16.4 percent.

Refinance

In 2018, Bank Iowa originated 6.9 percent of its refinance loans to low-income borrowers. The bank's performance was below the aggregate of lenders at 12.6 percent and substantially below the 22.2 percent of low-income families located in the assessment area. The bank originated a majority of its refinance loans to moderate-income borrowers (44.8 percent), above the aggregate of lenders at 29.5 percent and the 18.5 percent of moderate-income families in the assessment area. Bank Iowa originated 20.7 percent of its refinance loans to middle-income borrowers. The bank's performance was below the aggregate of lenders at 24.6 percent and the 25.5 percent of middle-income families in the assessment area. The bank originated 27.6 percent of its refinance loans to upper-income borrowers. The bank's performance was comparable to the aggregate of lenders at 26.6 percent and below the portion of upper-income families in the assessment area of 33.8 percent. The bank did not originate any refinance loans to borrowers with unknown income.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2018 Southwest IA Non MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2018			Dollar			
		Count Bank		Agg	Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	9	12.0	14.7	453	6.3	9.0	22.2
	Moderate	19	25.3	27.6	1,177	16.3	23.4	18.5
	Middle	19	25.3	18.5	1,615	22.4	18.5	25.5
	Upper	23	30.7	22.8	3,219	44.7	33.0	33.8
	Unknown	5	6.7	16.4	741	10.3	16.1	0.0
	Total	75	100.0	100.0	7,205	100.0	100.0	100.0
Refinance	Low	2	6.9	12.6	104	4.7	7.0	22.2
	Moderate	13	44.8	29.5	709	32.3	20.3	18.5
	Middle	6	20.7	24.6	569	25.9	26.7	25.5
	Upper	8	27.6	26.6	816	37.1	37.2	33.8
	Unknown	0	0.0	6.8	0	0.0	8.8	0.0
	Total	29	100.0	100.0	2,198	100.0	100.0	100.0
Home Improvement	Low	0	0.0	10.0	0	0.0	8.2	22.2
	Moderate	1	100.0	10.0	25	100.0	8.4	18.5
	Middle	0	0.0	33.3	0	0.0	39.2	25.5
	Upper	0	0.0	36.7	0	0.0	36.4	33.8
	Unknown	0	0.0	10.0	0	0.0	7.9	0.0
	Total	1	100.0	100.0	25	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	22.2
	Moderate	0	0.0	0.0	0	0.0	0.0	18.5
	Middle	0	0.0	0.0	0	0.0	0.0	25.5
	Upper	1	50.0	36.4	204	44.7	7.1	33.8
	Unknown	1	50.0	63.6	252	55.3	92.9	0.0
	Total	2	100.0	100.0	456	100.0	100.0	100.0
Other Purpose LOC	Low	0	0.0	25.0	0	0.0	13.6	22.2
	Moderate	0	0.0	25.0	0	0.0	16.3	18.5
	Middle	0	0.0	50.0	0	0.0	70.1	25.5
	Upper	0	0.0	0.0	0	0.0	0.0	33.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	28.6	0	0.0	29.9	22.2
	Moderate	0	0.0	28.6	0	0.0	34.5	18.5
	Middle	0	0.0	42.9	0	0.0	35.6	25.5
	Upper	0	0.0	0.0	0	0.0	0.0	33.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	22.2
	Moderate	0	0.0	8.3	0	0.0	5.1	18.5
	Middle	0	0.0	0.0	0	0.0	0.0	25.5
	Upper	0	0.0	0.0	0	0.0	0.0	33.8
	Unknown	0	0.0	91.7	0	0.0	94.9	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	11	10.3	13.6	557	5.6	7.8	22.2
	Moderate	33	30.8	26.7	1,911	19.3	20.4	18.5
	Middle	25	23.4	20.7	2,184	22.1	19.5	25.5
	Upper	32	29.9	23.9	4,239	42.9	31.6	33.8
	Unknown	6	5.6	15.1	993	10.0	20.7	0.0
	Total	107	100.0	100.0	9,884	100.0	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Loans

The distribution of small business loans reflects excellent penetration among businesses of different revenue sizes. In 2018, the sample reviewed includes 32 small business loans, of which 93.8 percent by number were to businesses with gross revenues equal to or less than \$1 million. This is above the percentage of small businesses in the assessment area, at 89.4 percent. Further, 83.3 percent of those were in amounts of \$100,000 or less, which are considered the most beneficial to small businesses, indicating the bank’s willingness to meet the credit needs of small businesses.

The following table presents the bank’s borrower distribution of small business loans in 2018.

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2018 Southwest IA Non MSA							
Product Type		Bank & Demographic Comparison					
		2018		2018		Total Businesses %	
Revenue	Loan Size	Count Bank	Dollar Bank				
		#	%	\$ 000s	\$ %		
Small Business	Revenue	\$1 Million or Less	30	93.8	1,440	89.2	89.4
		Over \$1 Million or Unknown	2	6.3	175	10.8	10.6
	Total	32	100.0	1,615	100.0	100.0	
Small Business	Loan Size	\$100,000 or Less	27	84.4	903	55.9	
		\$100,001 - \$250,000	5	15.6	712	44.1	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	32	100.0	1,615	100.0	
Small Business	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	25	83.3	728	50.6	
		\$100,001 - \$250,000	5	16.7	712	49.4	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	30	100.0	1,440	100.0	
Originations & Purchases							
2018 FFIEC Census Data & 2018 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 reasonable penetration among businesses of different revenue sizes. The 2018 sample included 35 small farm loans, of which 97.1 percent by number were to farms with gross revenues equal to or less than \$1 million. This is comparable to the percentage of small farms in the assessment area, at 98.8 percent. Further, 61.8 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 following table presents the bank’s borrower distribution of small farm loans in 2018.

Small Farm Lending By Revenue & Loan Size							
Assessment Area: 2018 Southwest IA Non MSA							
Product Type		Bank & Demographic Comparison					
		2018		2018		Total Farms	
Revenue	Loan Size	Count		Dollar			
		#	%	\$ 000s	\$ %	%	
Small Farm	Revenue	\$1 Million or Less	34	97.1	4,774	97.5	98.8
		Over \$1 Million or Unknown	1	2.9	123	2.5	1.2
		Total	35	100.0	4,897	100.0	100.0
	Loan Size	\$100,000 or Less	21	60.0	766	15.6	
		\$100,001 - \$250,000	5	14.3	753	15.4	
		\$250,001 - \$500,000	9	25.7	3,378	69.0	
		Total	35	100.0	4,897	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	21	61.8	766	16.0	
		\$100,001 - \$250,000	4	11.8	630	13.2	
		\$250,001 - \$500,000	9	26.5	3,378	70.8	
		Total	34	100.0	4,774	100.0	

Originations & Purchases
2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

COMMUNITY DEVELOPMENT TEST

The bank’s community development performance demonstrates adequate responsiveness to community development needs of its assessment area through community development loans, qualified investments and donations, and community development services, as appropriate, considering the bank’s capacity and the need and the availability of such opportunities for community development in the bank’s assessment area.

Lending

During the evaluation period, the bank originated two qualified loans totaling approximately \$70,032 toward community services within the assessment area. The bank decreased community development lending since the previous evaluation period, in which five community development loans totaling \$172,849 were originated in the assessment area.

Investments

The bank made two qualified investments totaling \$465,000. This is a slight increase in dollar volume since the previous evaluation. During this evaluation period, the bank made 31 qualified donations totaling approximately \$16,997 to community organizations in the assessment area. Recipient organizations focus primarily on community services and economic development. These donations primarily benefitted organizations that provide community services, financial services,

education and support to low- and moderate-income individuals and families. During the prior evaluation the bank held three qualified community development investments for \$422,786 and qualified community development services donations totaling \$19,490.

Services

During the evaluation period bank staff provided 1,938 hours of community development services. Of the total number of service hours, 1,361 were dedicated to organizations with a community service focus, 462 service hours were dedicated to organizations with an economic development focus, and 115 service hours were dedicated to organizations with an affordable housing focus. The majority of service hours involved bank staff serving as board members providing financial expertise for non-profit organizations, in addition to serving on boards that aim to provide individuals with affordable housing. In addition, a significant amount of service hours were spent on small business development assistance. These activities show dedication to improving the area's financial education. During the prior evaluation the bank's qualified community development service hours totaled 893. The table below presents the bank's community development activities during the evaluation period.

Summary of CD Activities, Review Period August 1, 2017 – March 2, 2020										
Type of Activity	Affordable Housing		Economic Development		Activities that Revitalize/Stabilize		Community Services		Totals	
	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours
Lending	0	0	0	0	0	0	2	70,032	2	70,032
Investment	0	0	0	0	2	465,000	0	0	2	465,000
Donations	0	0	5	6,300	0	0	26	10,697	31	16,997
Services	46	115	149	462	0	0	154	1,361	349	1,938

DENISON, IOWA NON-MSA - Limited Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN DENISON NON-MSA

The bank's Denison, Iowa Non-MSA assessment area consists of Crawford County. The assessment area remains unchanged since the previous examination. Based on 2018 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 of the branches are accompanied by cash-only ATMs. 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, 2019, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, Bank Iowa ranked second among six FDIC-insured financial institutions operating in the assessment area with 27.8 percent of market share. Leaders in market share include United Bank of Iowa (29.3 percent), Bank Iowa (27.8 percent), and Crawford County Trust and Savings Bank (21.3 percent). The five banks competing for deposits and loans with Bank Iowa have nine offices in the assessment area.

Assessment Area: 2018 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	1,096	24.6
Moderate-income	0	0.0	0	0.0	0	0.0	810	18.2
Middle-income	5	100.0	4,449	100.0	622	14.0	935	21.0
Upper-income	0	0.0	0	0.0	0	0.0	1,608	36.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5	100.0	4,449	100.0	622	14.0	4,449	100.0
	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
Total Assessment Area	6,981	4,774	100.0	68.4	1,581	22.6	626	9.0
	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	784	100.0	708	100.0	61	100.0	15	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
Total Assessment Area	784	100.0	708	100.0	61	100.0	15	100.0
	Percentage of Total Businesses:			90.3		7.8		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	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	190	100.0	190	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
Total Assessment Area	190	100.0	190	100.0	0	0.0	0	0.0
	Percentage of Total Farms:			100.0		0.0		0.0

2018 FFIEC Census Data & 2018 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 IN DENISON, IOWA NON-MSA

LENDING TEST

Bank Iowa's lending performance in the Denison, IA Non-MSA is consistent with the bank's lending performance overall.

Geographic Distribution of Loans

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2018 Denison IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2018		2018				
		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	33	100.0	100.0	2,693	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
	Total		33	100.0	100.0	2,693	100.0	100.0
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	24	100.0	100.0	1,548	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
	Total		24	100.0	100.0	1,548	100.0	100.0
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
	Total		0	0.0	100.0	0	0.0	100.0
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	88.9	161	100.0	98.2	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	11.1	0	0.0	1.8	0.0
	Total		1	100.0	100.0	161	100.0	100.0
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
	Total		0	0.0	0.0	0	0.0	0.0
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
	Total		0	0.0	100.0	0	0.0	100.0
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
	Total		0	0.0	100.0	0	0.0	100.0
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	58	100.0	99.6	4,402	100.0	99.8	100.0
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.4	0	0.0	0.2	0.0
	Total		58	100.0	100.0	4,402	100.0	100.0

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: 2018 Denison IA Non MSA						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2018 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	38	100.0	2,714	100.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Total	38	100.0	2,714	100.0	100.0
2018 FFIEC Census Data & 2018 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: 2018 Denison IA Non MSA						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2018 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	23	100.0	1,768	100.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Total	23	100.0	1,768	100.0	100.0
2018 FFIEC Census Data & 2018 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 to Businesses of Farms of Different Sizes

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2018 Denison IA Non MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2018			2018			
		Count Bank		Agg	Dollar Bank		Agg	
#	%	%	\$(000s)	\$ %	\$ %			
Home Purchase	Low	4	12.1	12.2	245	9.1	8.0	24.6
	Moderate	9	27.3	32.1	704	26.1	26.4	18.2
	Middle	9	27.3	26.0	945	35.1	29.3	21.0
	Upper	10	30.3	26.7	630	23.4	31.4	36.1
	Unknown	1	3.0	3.1	169	6.3	4.9	0.0
	Total	33	100.0	100.0	2,693	100.0	100.0	100.0
Refinance	Low	2	8.3	8.3	60	3.9	3.2	24.6
	Moderate	8	33.3	34.5	474	30.6	27.0	18.2
	Middle	7	29.2	26.2	420	27.1	24.0	21.0
	Upper	6	25.0	26.2	570	36.8	40.8	36.1
	Unknown	1	4.2	4.8	24	1.6	5.0	0.0
	Total	24	100.0	100.0	1,548	100.0	100.0	100.0
Home Improvement	Low	0	0.0	20.0	0	0.0	27.8	24.6
	Moderate	0	0.0	20.0	0	0.0	7.5	18.2
	Middle	0	0.0	40.0	0	0.0	42.8	21.0
	Upper	0	0.0	20.0	0	0.0	21.9	36.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	24.6
	Moderate	0	0.0	0.0	0	0.0	0.0	18.2
	Middle	0	0.0	11.1	0	0.0	3.9	21.0
	Upper	1	100.0	11.1	161	100.0	8.3	36.1
	Unknown	0	0.0	77.8	0	0.0	87.8	0.0
	Total	1	100.0	100.0	161	100.0	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	24.6
	Moderate	0	0.0	0.0	0	0.0	0.0	18.2
	Middle	0	0.0	0.0	0	0.0	0.0	21.0
	Upper	0	0.0	0.0	0	0.0	0.0	36.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	0.0	0	0.0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	20.0	0	0.0	10.2	24.6
	Moderate	0	0.0	40.0	0	0.0	69.5	18.2
	Middle	0	0.0	40.0	0	0.0	20.3	21.0
	Upper	0	0.0	0.0	0	0.0	0.0	36.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	24.6
	Moderate	0	0.0	0.0	0	0.0	0.0	18.2
	Middle	0	0.0	0.0	0	0.0	0.0	21.0
	Upper	0	0.0	0.0	0	0.0	0.0	36.1
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	6	10.3	10.8	305	6.9	6.0	24.6
	Moderate	17	29.3	31.3	1,178	26.8	24.4	18.2
	Middle	16	27.6	26.3	1,365	31.0	25.5	21.0
	Upper	17	29.3	25.0	1,361	30.9	32.2	36.1
	Unknown	2	3.4	6.7	193	4.4	11.9	0.0
	Total	58	100.0	100.0	4,402	100.0	100.0	100.0

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: 2018 Denison IA Non MSA							
Product Type		Bank & Demographic Comparison					
		2018		2018		Total Businesses %	
Revenue		Count Bank		Dollar Bank			%
		#	%	\$ 000s	\$ %		
Small Business	Revenue	\$1 Million or Less	34	89.5	2,128	78.4	90.3
		Over \$1 Million or Unknown	4	10.5	586	21.6	9.7
		Total	38	100.0	2,714	100.0	100.0
	Loan Size	\$100,000 or Less	30	78.9	875	32.2	
		\$100,001 - \$250,000	6	15.8	1,040	38.3	
		\$250,001 - \$1 Million	2	5.3	800	29.5	
		Total	38	100.0	2,715	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	27	79.4	688	32.3	
		\$100,001 - \$250,000	6	17.6	1,040	48.9	
		\$250,001 - \$1 Million	1	2.9	400	18.8	
		Total	34	100.0	2,128	100.0	
	Originations & Purchases						
2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Small Farm Lending By Revenue & Loan Size							
Assessment Area: 2018 Denison IA Non MSA							
Product Type		Bank & Demographic Comparison					
		2018		2018		Total Farms %	
Revenue		Count Bank		Dollar Bank			%
		#	%	\$ 000s	\$ %		
Small Farm	Revenue	\$1 Million or Less	21	91.3	1,535	86.8	100.0
		Over \$1 Million or Unknown	2	8.7	233	13.2	0.0
		Total	23	100.0	1,768	100.0	100.0
	Loan Size	\$100,000 or Less	18	78.3	544	30.8	
		\$100,001 - \$250,000	3	13.0	522	29.5	
		\$250,001 - \$500,000	2	8.7	702	39.7	
		Total	23	100.0	1,768	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	17	81.0	532	34.7	
		\$100,001 - \$250,000	2	9.5	301	19.6	
		\$250,001 - \$500,000	2	9.5	702	45.7	
		Total	21	100.0	1,535	100.0	
	Originations & Purchases						
2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

COMMUNITY DEVELOPMENT TEST

Bank Iowa’s community development performance in the Denison, IA Non-MSA is consistent with the bank’s community development performance overall.

Summary of CD Activities, Review Period August 1, 2017 – March 2, 2020										
Type of Activity	Affordable Housing		Economic Development		Activities that Revitalize/Stabilize		Community Services		Totals	
	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours
Lending	1	1,598,472	0	0	1	1,125,000	1	1,409,000	3	4,132,472
Investment	0	0	0	0	0	0	1	330,268	1	330,268
Donations	3	51,000	6	4,500	10	3,860	13	15,200	32	74,560
Services	3	7	16	42	13	29	45	362	77	440

HUMBOLDT, IOWA NON-MSA - Limited Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN HUMBOLDT NON-MSA

The bank's Humboldt, Iowa Non-MSA assessment area consists of Humboldt and Pocahontas Counties. The assessment area remains unchanged since the previous examination. Based on 2018 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 underserved (remote rural) middle-income geographies.

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

According to the June 30, 2019, 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 27.7 percent of market share. Leaders in market share following Bank Iowa include Availa Bank (12.5 percent), Pocahontas State Bank (12.0 percent), and Northwest Bank (10.7 percent). The nine banks competing for deposits and loans with Bank Iowa have 15 offices in the assessment area.

Assessment Area: 2018 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	1,014	21.6	
Moderate-income	0	0.0	0	0.0	0	0.0	894	19.0	
Middle-income	7	100.0	4,698	100.0	405	8.6	999	21.3	
Upper-income	0	0.0	0	0.0	0	0.0	1,791	38.1	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	7	100.0	4,698	100.0	405	8.6	4,698	100.0	
	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	
Total Assessment Area	8,434	5,498	100.0	65.2	1,889	22.4	1,047	12.4	
	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	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Middle-income	931	100.0	818	100.0	79	100.0	34	100.0	100.0
Upper-income	0	0.0	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	0.0
Total Assessment Area	931	100.0	818	100.0	79	100.0	34	100.0	100.0
	Percentage of Total Businesses:			87.9		8.5		3.7	
	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	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Middle-income	382	100.0	379	100.0	3	100.0	0	0.0	0.0
Upper-income	0	0.0	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	0.0
Total Assessment Area	382	100.0	379	100.0	3	100.0	0	0.0	0.0
	Percentage of Total Farms:			99.2		0.8		0.0	

2018 FFIEC Census Data & 2018 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 IN THE HUMBOLDT, IOWA NON-MSA

LENDING TEST

Bank Iowa's lending performance in the Humboldt, Iowa Non-MSA assessment area is consistent with the bank's lending performance overall.

Geographic Distribution of Loans

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2018 Humboldt IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2018						
		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	2,746	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
	Total		26	100.0	100.0	2,746	100.0	100.0
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	1	100.0	100.0	20	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
Total		1	100.0	100.0	20	100.0	100.0	100.0
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
Total		0	0.0	100.0	0	0.0	100.0	100.0
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	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
	Total		0	0.0	0.0	0	0.0	0.0
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
	Total		0	0.0	100.0	0	0.0	100.0
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
Total		0	0.0	100.0	0	0.0	100.0	100.0
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
Total		0	0.0	100.0	0	0.0	100.0	100.0
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	27	100.0	100.0	2,766	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
Total		27	100.0	100.0	2,766	100.0	100.0	100.0

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: 2018 Humboldt IA Non MSA						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2018 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	10	100.0	287	100.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Total	10	100.0	287	100.0	100.0
2018 FFIEC Census Data & 2018 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: 2018 Humboldt IA Non MSA						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2018 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	13	100.0	1,977	100.0	100.0
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Total	13	100.0	1,977	100.0	100.0
2018 FFIEC Census Data & 2018 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 to Businesses of Farms of Different Sizes

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2018 Humboldt IA Non MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2018			2018			
		Count Bank		Agg %	Dollar Bank		Agg %	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	6	23.1	14.8	357	13.0	8.9	21.6
	Moderate	8	30.8	23.3	671	24.4	16.2	19.0
	Middle	4	15.4	25.4	712	25.9	28.4	21.3
	Upper	6	23.1	31.2	814	29.6	40.7	38.1
	Unknown	2	7.7	5.3	192	7.0	5.8	0.0
	Total		26	100.0	100.0	2,746	100.0	100.0
Refinance	Low	1	100.0	10.3	20	100.0	4.6	21.6
	Moderate	0	0.0	22.7	0	0.0	24.3	19.0
	Middle	0	0.0	25.8	0	0.0	24.5	21.3
	Upper	0	0.0	33.0	0	0.0	37.6	38.1
	Unknown	0	0.0	8.2	0	0.0	9.0	0.0
	Total		1	100.0	100.0	20	100.0	100.0
Home Improvement	Low	0	0.0	7.4	0	0.0	4.4	21.6
	Moderate	0	0.0	3.7	0	0.0	3.3	19.0
	Middle	0	0.0	14.8	0	0.0	10.6	21.3
	Upper	0	0.0	74.1	0	0.0	81.7	38.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	21.6
	Moderate	0	0.0	0.0	0	0.0	0.0	19.0
	Middle	0	0.0	0.0	0	0.0	0.0	21.3
	Upper	0	0.0	0.0	0	0.0	0.0	38.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	0.0	0	0.0	0.0
Other Purpose LOC	Low	0	0.0	12.5	0	0.0	1.2	21.6
	Moderate	0	0.0	50.0	0	0.0	37.2	19.0
	Middle	0	0.0	0.0	0	0.0	0.0	21.3
	Upper	0	0.0	37.5	0	0.0	61.7	38.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	16.7	0	0.0	7.9	21.6
	Moderate	0	0.0	66.7	0	0.0	82.8	19.0
	Middle	0	0.0	16.7	0	0.0	9.4	21.3
	Upper	0	0.0	0.0	0	0.0	0.0	38.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	21.6
	Moderate	0	0.0	0.0	0	0.0	0.0	19.0
	Middle	0	0.0	25.0	0	0.0	21.0	21.3
	Upper	0	0.0	0.0	0	0.0	0.0	38.1
	Unknown	0	0.0	75.0	0	0.0	79.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	7	25.9	12.7	377	13.6	7.4	21.6
	Moderate	8	29.6	22.7	671	24.3	18.6	19.0
	Middle	4	14.8	23.9	712	25.7	26.2	21.3
	Upper	6	22.2	34.4	814	29.4	40.8	38.1
	Unknown	2	7.4	6.3	192	6.9	7.0	0.0
	Total		27	100.0	100.0	2,766	100.0	100.0

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: 2018 Humboldt IA Non MSA							
Product Type		Bank & Demographic Comparison					
		2018		2018		Total Businesses %	
Revenue		Count Bank		Dollar Bank			%
		#	%	\$ 000s	\$ %		
Small Business	Revenue	\$1 Million or Less	5	50.0	169	58.9	87.9
		Over \$1 Million or Unknown	5	50.0	118	41.1	12.1
		Total	10	100.0	287	100.0	100.0
	Loan Size	\$100,000 or Less	10	100.0	287	100.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	10	100.0	287	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	5	100.0	169	100.0	
		\$100,001 - \$250,000	0	0.0	0	0.0	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	5	100.0	169	100.0	
	Originations & Purchases						
2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Small Farm Lending By Revenue & Loan Size							
Assessment Area: 2018 Humboldt IA Non MSA							
Product Type		Bank & Demographic Comparison					
		2018		2018		Total Farms %	
Revenue		Count Bank		Dollar Bank			%
		#	%	\$ 000s	\$ %		
Small Farm	Revenue	\$1 Million or Less	11	84.6	1,727	87.4	99.2
		Over \$1 Million or Unknown	2	15.4	250	12.6	0.8
		Total	13	100.0	1,977	100.0	100.0
	Loan Size	\$100,000 or Less	7	53.8	266	13.5	
		\$100,001 - \$250,000	2	15.4	330	16.7	
		\$250,001 - \$500,000	4	30.8	1,381	69.9	
		Total	13	100.0	1,977	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	6	54.5	241	14.0	
		\$100,001 - \$250,000	1	9.1	105	6.1	
		\$250,001 - \$500,000	4	36.4	1,381	80.0	
		Total	11	100.0	1,727	100.0	
	Originations & Purchases						
2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

COMMUNITY DEVELOPMENT TEST

Bank Iowa’s community development performance in the Humboldt, Iowa Non-MSA assessment area is generally consistent with the bank’s community development performance overall; however the bank did not make any investments within this assessment area during the evaluation period.

Summary of CD Activities, Review Period August 1, 2017 – March 2, 2020										
Type of Activity	Affordable Housing		Economic Development		Activities that Revitalize/Stabilize		Community Services		Totals	
	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours
Lending	1	1,017,600	0	0	0	0	0	0	1	1,017,600
Investment	0	0	0	0	0	0	0	0	0	0
Donations	0	0	2	2,000	0	0	12	4,370	14	6,370
Services	0	0	17	167	6	16	69	488	92	671

LAWLER, IOWA NON-MSA - Limited Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN LAWLER NON-MSA

The bank's Lawler, Iowa Non-MSA assessment area consists of Chickasaw and Fayette Counties. The assessment area remains unchanged since the previous examination. Based on 2018 FFIEC Census data, the census tract composition includes one moderate-income and ten middle-income census tracts. None of the middle-income census tracts are designated as distressed or underserved. No low- or upper-income census tracts are located in the assessment area.

Within the assessment area, the bank operates four branches in Fredericksburg, Lawler, New Hampton, and Waucoma. Three of the branches are accompanied by full-service ATMs; Waucoma does not operate an ATM. There were no branches opened or closed since the previous evaluation.

According to the June 30, 2019, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, Bank Iowa ranked first among 19 FDIC-insured financial institutions operating in the assessment area with 19.9 percent of market share. Leaders in market share following Bank Iowa include Bank 1st (10.5 percent), State Bank (10.0 percent), and Community Bank of Oelwein (10.0 percent). The 18 banks competing for deposits and loans with Bank Iowa have 22 offices in the assessment area.

Assessment Area: 2018 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	1,730	19.2	
Moderate-income	1	9.1	823	9.1	60	7.3	2,016	22.4	
Middle-income	10	90.9	8,173	90.9	547	6.7	1,981	22.0	
Upper-income	0	0.0	0	0.0	0	0.0	3,269	36.3	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	11	100.0	8,996	100.0	607	6.7	8,996	100.0	
	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	
Total Assessment Area	15,212	10,590	100.0	69.6	3,278	21.5	1,344	8.8	
	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	0.0
Moderate-income	79	4.7	78	5.2	1	0.8	0	0.0	0.0
Middle-income	1,588	95.3	1,427	94.8	120	99.2	41	100.0	100.0
Upper-income	0	0.0	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	0.0
Total Assessment Area	1,667	100.0	1,505	100.0	121	100.0	41	100.0	100.0
	Percentage of Total Businesses:			90.3		7.3		2.5	
	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	0.0
Moderate-income	6	1.2	6	1.2	0	0.0	0	0.0	0.0
Middle-income	509	98.8	499	98.8	9	100.0	1	100.0	100.0
Upper-income	0	0.0	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	0.0
Total Assessment Area	515	100.0	505	100.0	9	100.0	1	100.0	100.0
	Percentage of Total Farms:			98.1		1.7		0.2	

2018 FFIEC Census Data & 2018 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 IN LAWLER, IOWA NON-MSA

LENDING TEST

Bank Iowa's lending performance in the Lawler, IA Non-MSA assessment area is consistent with the bank's lending performance overall.

Geographic Distribution of Loans

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2018 Lawler IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2018			2018			
		Count		Dollar				
		#	%	Agg %	Bank \$ (000s)	Agg %	Bank \$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	11.1	0	0.0	7.7	7.6
	Middle	16	100.0	88.9	1,931	100.0	92.3	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
	Total		16	100.0	100.0	1,931	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	13.5	0	0.0	8.7	7.6
	Middle	11	100.0	86.5	1,181	100.0	91.3	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
	Total		11	100.0	100.0	1,181	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	11.8	0	0.0	9.5	7.6
	Middle	0	0.0	88.2	0	0.0	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
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	26.7	0	0.0	76.0	13.2
	Middle	0	0.0	73.3	0	0.0	24.0	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
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	20.0	0	0.0	19.1	7.6
	Middle	0	0.0	80.0	0	0.0	80.9	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
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	7.4	0	0.0	18.9	7.6
	Middle	0	0.0	92.6	0	0.0	81.1	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
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	8.3	0	0.0	14.5	7.6
	Middle	0	0.0	91.7	0	0.0	85.5	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
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	12.4	0	0.0	12.5	7.6
	Middle	27	100.0	87.6	3,112	100.0	87.5	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
	Total		27	100.0	100.0	3,112	100.0	100.0

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: 2018 Lawler IA Non MSA						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2018 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	
Small Business	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	4.7
	Middle	9	100.0	1,197	100.0	95.3
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Total	9	100.0	1,197	100.0	100.0

2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of Small Farm Loans						
Assessment Area: 2018 Lawler IA Non MSA						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2018 Dollar Bank		Total Farms
		#	%	\$ 000s	\$ %	
Small Farm	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	1.2
	Middle	25	100.0	2,274	100.0	98.8
	Upper	0	0.0	0	0.0	0.0
	Unknown	0	0.0	0	0.0	0.0
	Total	25	100.0	2,274	100.0	100.0

2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

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

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2018 Lawler IA Non MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2018			Dollar			
		Count Bank		Agg %	Bank		Agg \$ %	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	1	6.3	15.8	17	0.9	8.6	19.2
	Moderate	7	43.8	35.7	670	34.7	27.0	22.4
	Middle	3	18.8	19.3	510	26.4	19.5	22.0
	Upper	4	25.0	20.5	669	34.6	36.0	36.3
	Unknown	1	6.3	8.8	65	3.4	8.9	0.0
	Total		16	100.0	100.0	1,931	100.0	100.0
Refinance	Low	0	0.0	11.4	0	0.0	4.9	19.2
	Moderate	5	45.5	28.1	400	33.9	24.0	22.4
	Middle	2	18.2	18.9	136	11.5	15.8	22.0
	Upper	4	36.4	35.7	645	54.6	48.8	36.3
	Unknown	0	0.0	5.9	0	0.0	6.5	0.0
	Total		11	100.0	100.0	1,181	100.0	100.0
Home Improvement	Low	0	0.0	13.2	0	0.0	7.3	19.2
	Moderate	0	0.0	25.0	0	0.0	22.3	22.4
	Middle	0	0.0	27.9	0	0.0	28.7	22.0
	Upper	0	0.0	33.8	0	0.0	41.8	36.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	19.2
	Moderate	0	0.0	0.0	0	0.0	0.0	22.4
	Middle	0	0.0	0.0	0	0.0	0.0	22.0
	Upper	0	0.0	40.0	0	0.0	8.0	36.3
	Unknown	0	0.0	60.0	0	0.0	92.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose LOC	Low	0	0.0	23.3	0	0.0	25.4	19.2
	Moderate	0	0.0	26.7	0	0.0	30.4	22.4
	Middle	0	0.0	13.3	0	0.0	10.1	22.0
	Upper	0	0.0	36.7	0	0.0	34.1	36.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	14.8	0	0.0	4.0	19.2
	Moderate	0	0.0	18.5	0	0.0	12.6	22.4
	Middle	0	0.0	29.6	0	0.0	22.5	22.0
	Upper	0	0.0	29.6	0	0.0	37.9	36.3
	Unknown	0	0.0	7.4	0	0.0	22.9	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	19.2
	Moderate	0	0.0	8.3	0	0.0	14.5	22.4
	Middle	0	0.0	0.0	0	0.0	0.0	22.0
	Upper	0	0.0	8.3	0	0.0	6.2	36.3
	Unknown	0	0.0	83.3	0	0.0	79.3	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	1	3.7	14.0	17	0.5	7.0	19.2
	Moderate	12	44.4	30.2	1,070	34.4	23.9	22.4
	Middle	5	18.5	19.4	646	20.8	17.3	22.0
	Upper	8	29.6	27.2	1,314	42.2	38.1	36.3
	Unknown	1	3.7	9.1	65	2.1	13.7	0.0
	Total		27	100.0	100.0	3,112	100.0	100.0

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: 2018 Lawler IA Non MSA							
Product Type		Bank & Demographic Comparison					
		2018		2018		Total Businesses %	
Revenue		Count Bank		Dollar Bank			%
		#	%	\$ 000s	\$ %		
Small Business	Revenue	\$1 Million or Less	8	88.9	597	49.9	90.3
		Over \$1 Million or Unknown	1	11.1	600	50.1	9.7
		Total	9	100.0	1,197	100.0	100.0
	Loan Size	\$100,000 or Less	6	66.7	190	15.9	
		\$100,001 - \$250,000	2	22.2	407	34.0	
		\$250,001 - \$1 Million	1	11.1	600	50.1	
		Total	9	100.0	1,197	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	6	75.0	190	31.8	
		\$100,001 - \$250,000	2	25.0	407	68.2	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	8	100.0	597	100.0	
	Originations & Purchases						
2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Small Farm Lending By Revenue & Loan Size							
Assessment Area: 2018 Lawler IA Non MSA							
Product Type		Bank & Demographic Comparison					
		2018		2018		Total Farms %	
Revenue		Count Bank		Dollar Bank			%
		#	%	\$ 000s	\$ %		
Small Farm	Revenue	\$1 Million or Less	25	100.0	2,274	100.0	98.1
		Over \$1 Million or Unknown	0	0.0	0	0.0	1.9
		Total	25	100.0	2,274	100.0	100.0
	Loan Size	\$100,000 or Less	19	76.0	894	39.3	
		\$100,001 - \$250,000	5	20.0	880	38.7	
		\$250,001 - \$500,000	1	4.0	500	22.0	
		Total	25	100.0	2,274	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	19	76.0	894	39.3	
		\$100,001 - \$250,000	5	20.0	880	38.7	
		\$250,001 - \$500,000	1	4.0	500	22.0	
		Total	25	100.0	2,274	100.0	
	Originations & Purchases						
2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

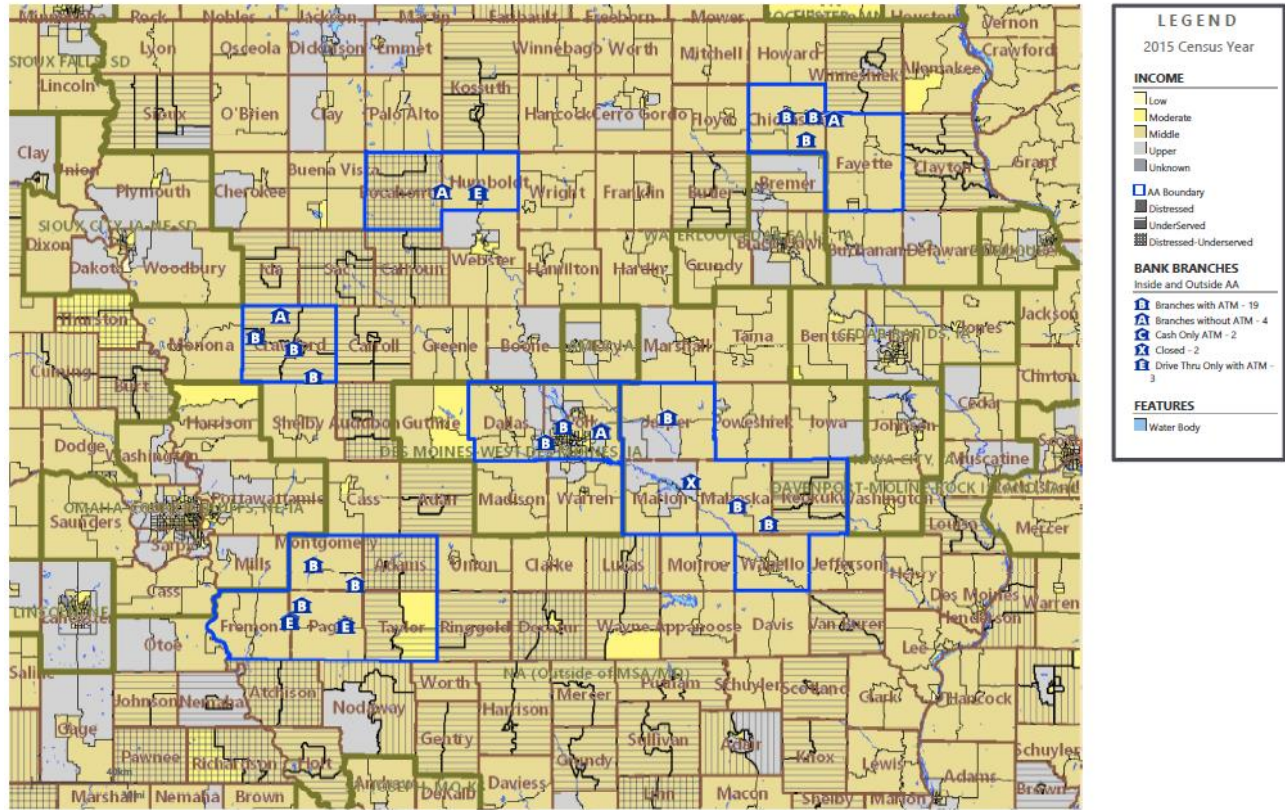
COMMUNITY DEVELOPMENT TEST

Bank Iowa’s community development performance in the Lawler, IA Non-MSA assessment area is generally consistent with the bank’s community development performance overall; however no investments were made within the assessment area during the evaluation period.

Summary of CD Activities, Review Period August 1, 2017 – March 2, 2020										
Type of Activity	Affordable Housing		Economic Development		Activities that Revitalize/Stabilize		Community Services		Totals	
	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours
Lending	0	0	0	0	0	0	1	20,000	1	20,000
Investment	0	0	0	0	0	0	0	0	0	0
Donations	0	0	1	500	0	0	25	27,080	26	27,580
Services	5	8	42	45	0	0	6	14	53	67

APPENDIX A – MAPS OF ASSESSMENT AREA

Bank Iowa 187947
Combined Assessment Area



APPENDIX B – 2017 TABLES

Assessment Area: 2017 Combined AA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	10	5.4	7,240	3.8	2,091	28.9	40,157	20.9
Moderate-income	40	21.6	34,519	17.9	5,703	16.5	34,334	17.9
Middle-income	104	56.2	101,578	52.8	7,623	7.5	42,366	22.0
Upper-income	30	16.2	48,998	25.5	1,549	3.2	75,478	39.2
Unknown-income	1	0.5	0	0.0	0	0.0	0	0.0
Total Assessment Area	185	100.0	192,335	100.0	16,966	8.8	192,335	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	13,035	5,060	2.5	38.8	6,449	49.5	1,526	11.7
Moderate-income	61,138	33,955	16.5	55.5	21,609	35.3	5,574	9.1
Middle-income	171,597	113,141	55.0	65.9	44,283	25.8	14,173	8.3
Upper-income	71,169	53,656	26.1	75.4	14,719	20.7	2,794	3.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	316,939	205,812	100.0	64.9	87,060	27.5	24,067	7.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	%
Low-income	910	3.0	762	2.8	145	4.6	3	0.7
Moderate-income	4,322	14.1	3,835	14.2	452	14.3	35	7.9
Middle-income	18,122	59.1	15,865	58.6	1,924	61.1	333	75.0
Upper-income	7,325	23.9	6,626	24.5	626	19.9	73	16.4
Unknown-income	8	0.0	5	0.0	3	0.1	0	0.0
Total Assessment Area	30,687	100.0	27,093	100.0	3,150	100.0	444	100.0
	Percentage of Total Businesses:			88.3		10.3		1.4
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	%
Low-income	2	0.1	2	0.1	0	0.0	0	0.0
Moderate-income	137	4.3	133	4.2	4	8.9	0	0.0
Middle-income	2,802	86.9	2,769	87.1	33	73.3	0	0.0
Upper-income	282	8.7	274	8.6	8	17.8	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	3,223	100.0	3,178	100.0	45	100.0	0	0.0
	Percentage of Total Farms:			98.6		1.4		0.0
2017 FFIEC Census Data & 2017 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Assessment Area: 2017 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	10	8.8	7,240	5.4	2,091	28.9	27,821	20.7
Moderate-income	29	25.7	26,880	20.0	4,217	15.7	22,993	17.1
Middle-income	46	40.7	54,519	40.6	3,723	6.8	28,944	21.6
Upper-income	27	23.9	45,555	33.9	1,337	2.9	54,436	40.6
Unknown-income	1	0.9	0	0.0	0	0.0	0	0.0
Total Assessment Area	113	100.0	134,194	100.0	11,368	8.5	134,194	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	13,035	5,060	3.6	38.8	6,449	49.5	1,526	11.7
Moderate-income	46,779	26,168	18.6	55.9	16,736	35.8	3,875	8.3
Middle-income	92,990	59,715	42.4	64.2	27,081	29.1	6,194	6.7
Upper-income	65,773	49,837	35.4	75.8	13,596	20.7	2,340	3.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	218,577	140,780	100.0	64.4	63,862	29.2	13,935	6.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	%
Low-income	910	4.2	762	4.0	145	6.0	3	1.3
Moderate-income	3,161	14.5	2,799	14.6	344	14.2	18	8.0
Middle-income	10,902	49.9	9,428	49.1	1,336	55.0	138	61.6
Upper-income	6,874	31.5	6,210	32.3	599	24.7	65	29.0
Unknown-income	8	0.0	5	0.0	3	0.1	0	0.0
Total Assessment Area	21,855	100.0	19,204	100.0	2,427	100.0	224	100.0
	Percentage of Total Businesses:			87.9		11.1		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	%
Low-income	2	0.3	2	0.3	0	0.0	0	0.0
Moderate-income	33	5.4	31	5.2	2	11.8	0	0.0
Middle-income	380	61.8	371	62.0	9	52.9	0	0.0
Upper-income	200	32.5	194	32.4	6	35.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	615	100.0	598	100.0	17	100.0	0	0.0
	Percentage of Total Farms:			97.2		2.8		0.0

2017 FFIEC Census Data & 2017 Dun & Bradstreet information according to 2015 ACS

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

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2017 Des Moines-West Des Moines, IA MSA 19780								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2017			2017			
		Count		Agg	Dollar		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	5	5.0	2.2	263	1.8	1.0	3.6
	Moderate	35	34.7	15.0	3,606	24.1	9.3	18.6
	Middle	40	39.6	41.1	6,023	40.3	38.2	42.4
	Upper	21	20.8	41.7	5,059	33.8	51.5	35.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		101	100.0	100.0	14,951	100.0	100.0
Refinance	Low	0	0.0	2.5	0	0.0	1.5	3.6
	Moderate	2	13.3	14.7	130	5.5	8.4	18.6
	Middle	8	53.3	41.7	1,117	47.1	38.5	42.4
	Upper	5	33.3	41.1	1,123	47.4	51.6	35.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		15	100.0	100.0	2,370	100.0	100.0
Home Improvement	Low	0	0.0	2.6	0	0.0	1.5	3.6
	Moderate	1	33.3	17.1	21	14.9	10.5	18.6
	Middle	1	33.3	41.7	108	76.6	40.8	42.4
	Upper	1	33.3	38.6	12	8.5	47.2	35.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		3	100.0	100.0	141	100.0	100.0
Multi-Family	Low	0	0.0	7.9	0	0.0	2.4	7.4
	Moderate	0	0.0	23.7	0	0.0	17.0	20.2
	Middle	1	100.0	50.7	1,620	100.0	53.5	46.4
	Upper	0	0.0	17.8	0	0.0	27.1	25.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		1	100.0	100.0	1,620	100.0	100.0
HMDA Totals	Low	5	4.2	2.3	263	1.4	1.3	3.6
	Moderate	38	31.7	15.1	3,757	19.7	9.8	18.6
	Middle	50	41.7	41.4	8,868	46.5	39.8	42.4
	Upper	27	22.5	41.2	6,194	32.5	49.2	35.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		120	100.0	100.0	19,082	100.0	100.0

Originations & Purchases
2017 FFIEC Census Data
Note: Percentages may not add to 100.0 percent due to rounding

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2017 Des Moines-West Des Moines, IA MSA 19780								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2017			2017			
		Count		Agg %	Dollar		Agg \$ %	
Bank #	%	Bank \$ (000s)	%					
Home Purchase	Low	24	23.8	10.9	2,403	16.1	6.2	20.7
	Moderate	23	22.8	22.2	2,890	19.3	16.8	17.1
	Middle	19	18.8	22.2	3,292	22.0	21.7	21.6
	Upper	15	14.9	28.5	4,312	28.8	38.4	40.6
	Unknown	20	19.8	16.1	2,054	13.7	16.9	0.0
	Total	101	100.0	100.0	14,951	100.0	100.0	100.0
Refinance	Low	1	6.7	9.4	52	2.2	4.9	20.7
	Moderate	1	6.7	18.6	140	5.9	13.4	17.1
	Middle	5	33.3	21.5	654	27.6	20.0	21.6
	Upper	7	46.7	32.6	1,467	61.9	43.2	40.6
	Unknown	1	6.7	18.0	57	2.4	18.4	0.0
	Total	15	100.0	100.0	2,370	100.0	100.0	100.0
Home Improvement	Low	1	33.3	11.1	21	14.9	6.2	20.7
	Moderate	1	33.3	19.4	108	76.6	13.3	17.1
	Middle	1	33.3	25.1	12	8.5	21.8	21.6
	Upper	0	0.0	39.2	0	0.0	49.7	40.6
	Unknown	0	0.0	5.1	0	0.0	8.9	0.0
	Total	3	100.0	100.0	141	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	20.7
	Moderate	0	0.0	0.0	0	0.0	0.0	17.1
	Middle	0	0.0	0.0	0	0.0	0.0	21.6
	Upper	0	0.0	0.0	0	0.0	0.0	40.6
	Unknown	1	100.0	100.0	1,620	100.0	100.0	0.0
	Total	1	100.0	100.0	1,620	100.0	100.0	100.0
HMDA Totals	Low	26	21.7	10.5	2,476	13.0	5.3	20.7
	Moderate	25	20.8	21.0	3,138	16.4	14.4	17.1
	Middle	25	20.8	22.1	3,958	20.7	19.3	21.6
	Upper	22	18.3	30.1	5,779	30.3	36.1	40.6
	Unknown	22	18.3	16.4	3,731	19.6	24.8	0.0
	Total	120	100.0	100.0	19,082	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Assessment Area: 2017 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	5,798	20.8	
Moderate-income	6	19.4	4,110	14.8	822	20.0	5,372	19.3	
Middle-income	22	71.0	20,289	72.9	1,590	7.8	6,412	23.0	
Upper-income	3	9.7	3,443	12.4	212	6.2	10,260	36.9	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	31	100.0	27,842	100.0	2,624	9.4	27,842	100.0	
	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	7,758	4,256	13.8	54.9	2,712	35.0	790	10.2	
Middle-income	33,679	22,786	73.8	67.7	7,604	22.6	3,289	9.8	
Upper-income	5,396	3,819	12.4	70.8	1,123	20.8	454	8.4	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	46,833	30,861	100.0	65.9	11,439	24.4	4,533	9.7	
	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	0.0
Moderate-income	628	16.5	557	16.2	66	20.6	5	7.6	
Middle-income	2,737	71.7	2,456	71.6	228	71.0	53	80.3	
Upper-income	451	11.8	416	12.1	27	8.4	8	12.1	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	3,816	100.0	3,429	100.0	321	100.0	66	100.0	
	Percentage of Total Businesses:			89.9		8.4		1.7	
	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	0.0
Moderate-income	5	0.6	5	0.6	0	0.0	0	0.0	0.0
Middle-income	720	89.2	713	89.3	7	77.8	0	0.0	0.0
Upper-income	82	10.2	80	10.0	2	22.2	0	0.0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Total Assessment Area	807	100.0	798	100.0	9	100.0	0	0.0	
	Percentage of Total Farms:			98.9		1.1		0.0	

2017 FFIEC Census Data & 2017 Dun & Bradstreet information according to 2015 ACS

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

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2017 Oskaloosa IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2017			Dollar			
		Count		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	2	2.9	12.1	283	4.2	8.3	13.8
	Middle	58	82.9	72.2	5,180	77.2	72.9	73.8
	Upper	10	14.3	15.8	1,245	18.6	18.8	12.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		70	100.0	100.0	6,708	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	4	7.3	10.7	1,125	12.4	8.2	13.8
	Middle	46	83.6	72.1	7,271	80.2	73.8	73.8
	Upper	5	9.1	17.1	674	7.4	17.8	12.4
	Unknown	0	0.0	0.1	0	0.0	0.3	0.0
	Total		55	100.0	100.0	9,070	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	13.7	0	0.0	6.9	13.8
	Middle	6	85.7	72.0	362	97.3	80.2	73.8
	Upper	1	14.3	14.3	10	2.7	13.0	12.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		7	100.0	100.0	372	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	20.0	0	0.0	17.2	24.6
	Middle	0	0.0	66.7	0	0.0	80.8	65.0
	Upper	0	0.0	13.3	0	0.0	2.0	10.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	6	4.5	11.8	1,408	8.7	8.7	13.8
	Middle	110	83.3	72.1	12,813	79.3	73.7	73.8
	Upper	16	12.1	16.1	1,929	11.9	17.6	12.4
	Unknown	0	0.0	0.0	0	0.0	0.1	0.0
	Total		132	100.0	100.0	16,150	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2017 Oskaloosa IA Non MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2017			Dollar			
		Count		Agg	Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	13	18.6	9.7	883	13.2	5.7	20.8
	Moderate	21	30.0	24.8	1,953	29.1	18.4	19.3
	Middle	21	30.0	24.4	2,273	33.9	24.8	23.0
	Upper	13	18.6	25.6	1,507	22.5	36.9	36.9
	Unknown	2	2.9	15.5	92	1.4	14.3	0.0
	Total	70	100.0	100.0	6,708	100.0	100.0	100.0
Refinance	Low	4	7.3	8.7	207	2.3	4.5	20.8
	Moderate	7	12.7	19.7	768	8.5	13.5	19.3
	Middle	13	23.6	22.9	1,389	15.3	20.5	23.0
	Upper	30	54.5	35.3	6,648	73.3	46.6	36.9
	Unknown	1	1.8	13.3	58	0.6	14.9	0.0
	Total	55	100.0	100.0	9,070	100.0	100.0	100.0
Home Improvement	Low	0	0.0	7.5	0	0.0	6.6	20.8
	Moderate	1	14.3	23.6	63	16.9	18.1	19.3
	Middle	3	42.9	28.0	248	66.7	21.0	23.0
	Upper	3	42.9	37.9	61	16.4	48.6	36.9
	Unknown	0	0.0	3.1	0	0.0	5.7	0.0
	Total	7	100.0	100.0	372	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	20.8
	Moderate	0	0.0	0.0	0	0.0	0.0	19.3
	Middle	0	0.0	0.0	0	0.0	0.0	23.0
	Upper	0	0.0	0.0	0	0.0	0.0	36.9
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	17	12.9	9.2	1,090	6.7	5.0	20.8
	Moderate	29	22.0	23.0	2,784	17.2	16.0	19.3
	Middle	37	28.0	24.0	3,910	24.2	22.2	23.0
	Upper	46	34.8	29.4	8,216	50.9	38.6	36.9
	Unknown	3	2.3	14.5	150	0.9	18.1	0.0
	Total	132	100.0	100.0	16,150	100.0	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Assessment Area: 2017 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	2,698	22.2	
Moderate-income	4	22.2	2,706	22.3	604	22.3	2,249	18.5	
Middle-income	14	77.8	9,450	77.7	736	7.8	3,095	25.5	
Upper-income	0	0.0	0	0.0	0	0.0	4,114	33.8	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	18	100.0	12,156	100.0	1,340	11.0	12,156	100.0	
	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	
Total Assessment Area	20,902	13,309	100.0	63.7	5,011	24.0	2,582	12.4	
	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	0.0
Moderate-income	464	24.5	411	24.5	41	27.3	12	19.0	
Middle-income	1,427	75.5	1,267	75.5	109	72.7	51	81.0	
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	
Total Assessment Area	1,891	100.0	1,678	100.0	150	100.0	63	100.0	
	Percentage of Total Businesses:			88.7		7.9		3.3	
	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	0.0
Moderate-income	91	13.1	89	12.9	2	33.3	0	0.0	
Middle-income	603	86.9	599	87.1	4	66.7	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	
Total Assessment Area	694	100.0	688	100.0	6	100.0	0	0.0	
	Percentage of Total Farms:			99.1		0.9		0.0	

2017 FFIEC Census Data & 2017 Dun & Bradstreet information according to 2015 ACS

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

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2017 Southwest IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2017			Dollar			
		Count		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	19	26.0	20.8	969	18.0	15.6	20.4
	Middle	54	74.0	79.2	4,425	82.0	84.4	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
	Total		73	100.0	100.0	5,394	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	12	31.6	19.2	312	8.5	9.2	20.4
	Middle	26	68.4	80.8	3,367	91.5	90.8	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
	Total		38	100.0	100.0	3,679	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	1	14.3	16.3	26	9.3	11.1	20.4
	Middle	6	85.7	81.6	253	90.7	87.7	79.6
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	2.0	0	0.0	1.2	0.0
	Total		7	100.0	100.0	279	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	50.0	0	0.0	78.5	31.9
	Middle	1	100.0	50.0	30	100.0	21.5	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
	Total		1	100.0	100.0	30	100.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	32	26.9	20.2	1,307	13.9	16.3	20.4
	Middle	87	73.1	79.6	8,075	86.1	83.7	79.6
	Upper	0	0.0	0.0	0	0.0	0.0	0.0
	Unknown	0	0.0	0.1	0	0.0	0.0	0.0
	Total		119	100.0	100.0	9,382	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2017 Southwest IA Non MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2017			2017			
		Count		Agg %	Dollar		Agg \$ %	
Bank #	%	Bank \$(000s)	%					
Home Purchase	Low	11	15.1	11.5	415	7.7	6.2	22.2
	Moderate	24	32.9	27.8	1,458	27.0	21.9	18.5
	Middle	20	27.4	22.2	1,670	31.0	23.6	25.5
	Upper	16	21.9	24.2	1,393	25.8	35.6	33.8
	Unknown	2	2.7	14.3	458	8.5	12.7	0.0
	Total	73	100.0	100.0	5,394	100.0	100.0	100.0
Refinance	Low	3	7.9	7.7	101	2.7	2.6	22.2
	Moderate	20	52.6	29.9	1,194	32.5	17.8	18.5
	Middle	5	13.2	20.9	561	15.2	12.2	25.5
	Upper	10	26.3	29.9	1,823	49.6	49.0	33.8
	Unknown	0	0.0	11.5	0	0.0	18.4	0.0
	Total	38	100.0	100.0	3,679	100.0	100.0	100.0
Home Improvement	Low	2	28.6	14.3	49	17.6	5.5	22.2
	Moderate	1	14.3	10.2	16	5.7	6.0	18.5
	Middle	2	28.6	28.6	88	31.5	28.9	25.5
	Upper	2	28.6	38.8	126	45.2	54.5	33.8
	Unknown	0	0.0	8.2	0	0.0	5.2	0.0
	Total	7	100.0	100.0	279	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	22.2
	Moderate	0	0.0	0.0	0	0.0	0.0	18.5
	Middle	0	0.0	0.0	0	0.0	0.0	25.5
	Upper	0	0.0	0.0	0	0.0	0.0	33.8
	Unknown	1	100.0	100.0	30	100.0	100.0	0.0
	Total	1	100.0	100.0	30	100.0	100.0	100.0
HMDA Totals	Low	16	13.4	10.4	565	6.0	4.4	22.2
	Moderate	45	37.8	27.1	2,668	28.4	18.8	18.5
	Middle	27	22.7	22.0	2,319	24.7	17.7	25.5
	Upper	28	23.5	26.8	3,342	35.6	39.6	33.8
	Unknown	3	2.5	13.7	488	5.2	19.6	0.0
	Total	119	100.0	100.0	9,382	100.0	100.0	100.0
Originations & Purchases 2017 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Assessment Area: 2017 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	1,096	24.6	
Moderate-income	0	0.0	0	0.0	0	0.0	810	18.2	
Middle-income	5	100.0	4,449	100.0	622	14.0	935	21.0	
Upper-income	0	0.0	0	0.0	0	0.0	1,608	36.1	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	5	100.0	4,449	100.0	622	14.0	4,449	100.0	
	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	
Total Assessment Area	6,981	4,774	100.0	68.4	1,581	22.6	626	9.0	
	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	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Middle-income	738	100.0	659	100.0	63	100.0	16	100.0	100.0
Upper-income	0	0.0	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	0.0
Total Assessment Area	738	100.0	659	100.0	63	100.0	16	100.0	100.0
	Percentage of Total Businesses:			89.3		8.5		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	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Middle-income	200	100.0	199	100.0	1	100.0	0	0.0	0.0
Upper-income	0	0.0	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	0.0
Total Assessment Area	200	100.0	199	100.0	1	100.0	0	0.0	0.0
	Percentage of Total Farms:			99.5		0.5		0.0	

2017 FFIEC Census Data & 2017 Dun & Bradstreet information according to 2015 ACS

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

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2017 Denison IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2017			Dollar			
		Count		Agg	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	24	100.0	100.0	1,946	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
	Total		24	100.0	100.0	1,946	100.0	100.0
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	13,958	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
	Total		54	100.0	100.0	13,958	100.0	100.0
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	9	100.0	100.0	684	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
	Total		9	100.0	100.0	684	100.0	100.0
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	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
	Total		0	0.0	100.0	0	0.0	100.0
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	87	100.0	100.0	16,588	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
	Total		87	100.0	100.0	16,588	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2017 Denison IA Non MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison					Families by Family Income %	
		2017			Dollar			
		Count		Agg	Bank			Agg
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	2	8.3	9.9	113	5.8	5.7	24.6
	Moderate	9	37.5	35.1	663	34.1	32.2	18.2
	Middle	5	20.8	26.7	406	20.9	25.5	21.0
	Upper	6	25.0	16.8	458	23.5	21.0	36.1
	Unknown	2	8.3	11.5	306	15.7	15.6	0.0
	Total		24	100.0	100.0	1,946	100.0	100.0
Refinance	Low	6	11.1	9.2	172	1.2	2.6	24.6
	Moderate	17	31.5	20.9	714	5.1	7.2	18.2
	Middle	10	18.5	21.6	409	2.9	11.0	21.0
	Upper	21	38.9	44.4	12,663	90.7	76.9	36.1
	Unknown	0	0.0	3.9	0	0.0	2.3	0.0
	Total		54	100.0	100.0	13,958	100.0	100.0
Home Improvement	Low	0	0.0	7.5	0	0.0	3.6	24.6
	Moderate	3	33.3	28.8	239	34.9	18.4	18.2
	Middle	2	22.2	32.5	160	23.4	27.5	21.0
	Upper	4	44.4	25.0	285	41.7	35.9	36.1
	Unknown	0	0.0	6.3	0	0.0	14.6	0.0
	Total		9	100.0	100.0	684	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	24.6
	Moderate	0	0.0	0.0	0	0.0	0.0	18.2
	Middle	0	0.0	0.0	0	0.0	0.0	21.0
	Upper	0	0.0	0.0	0	0.0	0.0	36.1
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	8	9.2	9.0	285	1.7	3.6	24.6
	Moderate	29	33.3	27.7	1,616	9.7	15.6	18.2
	Middle	17	19.5	25.8	975	5.9	16.6	21.0
	Upper	31	35.6	30.1	13,406	80.8	56.1	36.1
	Unknown	2	2.3	7.4	306	1.8	8.1	0.0
	Total		87	100.0	100.0	16,588	100.0	100.0
Originations & Purchases 2017 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Assessment Area: 2017 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	1,014	21.6
Moderate-income	0	0.0	0	0.0	0	0.0	894	19.0
Middle-income	7	100.0	4,698	100.0	405	8.6	999	21.3
Upper-income	0	0.0	0	0.0	0	0.0	1,791	38.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7	100.0	4,698	100.0	405	8.6	4,698	100.0
	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
Total Assessment Area	8,434	5,498	100.0	65.2	1,889	22.4	1,047	12.4
	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	866	100.0	754	100.0	78	100.0	34	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
Total Assessment Area	866	100.0	754	100.0	78	100.0	34	100.0
	Percentage of Total Businesses:			87.1		9.0		3.9
	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	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	389	100.0	386	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
Total Assessment Area	389	100.0	386	100.0	3	100.0	0	0.0
	Percentage of Total Farms:			99.2		0.8		0.0

2017 FFIEC Census Data & 2017 Dun & Bradstreet information according to 2015 ACS

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

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2017 Humboldt IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2017			Dollar			
		Count		Agg	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	34	100.0	100.0	3,921	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
	Total		34	100.0	100.0	3,921	100.0	100.0
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	9	100.0	100.0	3,859	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
	Total		9	100.0	100.0	3,859	100.0	100.0
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	119	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
	Total		1	100.0	100.0	119	100.0	100.0
Multi-Family	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	485	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
	Total		1	100.0	100.0	485	100.0	100.0
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	45	100.0	100.0	8,384	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
	Total		45	100.0	100.0	8,384	100.0	100.0

Originations & Purchases
2017 FFIEC Census Data
Note: Percentages may not add to 100.0 percent due to rounding

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2017 Humboldt IA Non MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison					Families by Family Income %	
		2017			Dollar			
		Count		Agg	Bank			Agg
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	7	20.6	10.5	562	14.3	7.0	21.6
	Moderate	8	23.5	23.6	597	15.2	19.2	19.0
	Middle	7	20.6	21.5	781	19.9	18.9	21.3
	Upper	10	29.4	33.0	1,859	47.4	45.4	38.1
	Unknown	2	5.9	11.5	122	3.1	9.5	0.0
	Total		34	100.0	100.0	3,921	100.0	100.0
Refinance	Low	0	0.0	3.9	0	0.0	2.2	21.6
	Moderate	0	0.0	24.7	0	0.0	11.7	19.0
	Middle	0	0.0	16.9	0	0.0	8.4	21.3
	Upper	9	100.0	37.7	3,859	100.0	58.2	38.1
	Unknown	0	0.0	16.9	0	0.0	19.5	0.0
	Total		9	100.0	100.0	3,859	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	21.6
	Moderate	0	0.0	38.1	0	0.0	24.1	19.0
	Middle	0	0.0	14.3	0	0.0	13.4	21.3
	Upper	1	100.0	42.9	119	100.0	61.2	38.1
	Unknown	0	0.0	4.8	0	0.0	1.3	0.0
	Total		1	100.0	100.0	119	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	21.6
	Moderate	0	0.0	0.0	0	0.0	0.0	19.0
	Middle	0	0.0	0.0	0	0.0	0.0	21.3
	Upper	0	0.0	0.0	0	0.0	0.0	38.1
	Unknown	1	100.0	100.0	485	100.0	100.0	0.0
	Total		1	100.0	100.0	485	100.0	100.0
HMDA Totals	Low	7	15.6	7.9	562	6.7	5.0	21.6
	Moderate	8	17.8	24.8	597	7.1	16.4	19.0
	Middle	7	15.6	19.7	781	9.3	14.8	21.3
	Upper	20	44.4	34.8	5,837	69.6	49.7	38.1
	Unknown	3	6.7	12.8	607	7.2	14.1	0.0
	Total		45	100.0	100.0	8,384	100.0	100.0
Originations & Purchases 2017 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Assessment Area: 2017 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	1,730	19.2	
Moderate-income	1	9.1	823	9.1	60	7.3	2,016	22.4	
Middle-income	10	90.9	8,173	90.9	547	6.7	1,981	22.0	
Upper-income	0	0.0	0	0.0	0	0.0	3,269	36.3	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	11	100.0	8,996	100.0	607	6.7	8,996	100.0	
	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	
Total Assessment Area	15,212	10,590	100.0	69.6	3,278	21.5	1,344	8.8	
	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	0.0
Moderate-income	69	4.5	68	5.0	1	0.9	0	0	0.0
Middle-income	1,452	95.5	1,301	95.0	110	99.1	41	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	
Total Assessment Area	1,521	100.0	1,369	100.0	111	100.0	41	100.0	
	Percentage of Total Businesses:			90.0		7.3		2.7	
	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	0.0
Moderate-income	8	1.5	8	1.6	0	0.0	0	0	0.0
Middle-income	510	98.5	501	98.4	9	100.0	0	0	0.0
Upper-income	0	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	0.0
Total Assessment Area	518	100.0	509	100.0	9	100.0	0	0.0	
	Percentage of Total Farms:			98.3		1.7		0.0	

2017 FFIEC Census Data & 2017 Dun & Bradstreet information according to 2015 ACS

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

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2017 Lawler IA Non MSA								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2017			Dollar			
		Count		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	15.6	0	0.0	11.1	7.6
	Middle	19	100.0	84.4	2,202	100.0	88.9	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
	Total		19	100.0	100.0	2,202	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	8.0	0	0.0	4.1	7.6
	Middle	20	100.0	92.0	7,476	100.0	95.9	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
	Total		20	100.0	100.0	7,476	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	11.1	0	0.0	8.7	7.6
	Middle	2	100.0	88.9	54	100.0	91.3	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
	Total		2	100.0	100.0	54	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	40.0	0	0.0	38.5	13.2
	Middle	0	0.0	60.0	0	0.0	61.5	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
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	12.2	0	0.0	7.3	7.6
	Middle	41	100.0	87.8	9,732	100.0	92.7	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
	Total		41	100.0	100.0	9,732	100.0	100.0

Originations & Purchases
2017 FFIEC Census Data
Note: Percentages may not add to 100.0 percent due to rounding

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2017 Lawler IA Non MSA								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison					Families by Family Income %	
		2017			Dollar			
		Count		Agg	Bank			Agg
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	3	15.8	16.3	149	6.8	10.0	19.2
	Moderate	5	26.3	27.9	423	19.2	21.2	22.4
	Middle	4	21.1	18.6	560	25.4	19.5	22.0
	Upper	5	26.3	26.6	901	40.9	39.2	36.3
	Unknown	2	10.5	10.6	169	7.7	10.1	0.0
	Total		19	100.0	100.0	2,202	100.0	100.0
Refinance	Low	0	0.0	11.5	0	0.0	2.9	19.2
	Moderate	3	15.0	16.0	291	3.9	7.6	22.4
	Middle	1	5.0	19.8	108	1.4	11.8	22.0
	Upper	12	60.0	37.8	2,440	32.6	51.2	36.3
	Unknown	4	20.0	14.9	4,637	62.0	26.6	0.0
	Total		20	100.0	100.0	7,476	100.0	100.0
Home Improvement	Low	0	0.0	11.1	0	0.0	8.0	19.2
	Moderate	0	0.0	19.8	0	0.0	16.7	22.4
	Middle	0	0.0	32.1	0	0.0	25.2	22.0
	Upper	2	100.0	32.1	54	100.0	46.9	36.3
	Unknown	0	0.0	4.9	0	0.0	3.2	0.0
	Total		2	100.0	100.0	54	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	19.2
	Moderate	0	0.0	0.0	0	0.0	0.0	22.4
	Middle	0	0.0	0.0	0	0.0	0.0	22.0
	Upper	0	0.0	0.0	0	0.0	0.0	36.3
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	3	7.3	13.6	149	1.5	5.6	19.2
	Moderate	8	19.5	21.9	714	7.3	12.7	22.4
	Middle	5	12.2	20.6	668	6.9	15.0	22.0
	Upper	19	46.3	31.6	3,395	34.9	46.0	36.3
	Unknown	6	14.6	12.3	4,806	49.4	20.6	0.0
	Total		41	100.0	100.0	9,732	100.0	100.0
Originations & Purchases								
2017 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

APPENDIX C – SCOPE OF EXAMINATION

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED	<ul style="list-style-type: none"> - Small Farm Lending: January 1, 2018 – December 31, 2018 - Small Business Lending: January 1, 2018 – December 31, 2018 - HMDA –Reportable Lending: January 1, 2017 – December 31, 2018 - Community Development Activities: August 1, 2017 – March 2, 2020 		
FINANCIAL INSTITUTION Bank Iowa			PRODUCTS REVIEWED HMDA-Reportable Loans Small Business Loans Small Farm Loans
AFFILIATE(S)	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
None	N/A		N/A
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Des Moines-West Des Moines, Iowa MSA	Full Review	N/A	N/A
Oskaloosa, Iowa Non-MSA	Full Review	N/A	N/A
Southwest, Iowa Non-MSA	Full Review	N/A	N/A

Denison, Iowa Non-MSA	Limited Review	N/A	N/A
Humboldt, Iowa Non-MSA	Limited Review	N/A	N/A
Lawler, Iowa Non-MSA	Limited Review	N/A	N/A

APPENDIX D – 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.¹

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

¹ Source: FFIEC press release dated October 19, 2011.

uninsured state branch (other than a limited branch) of a foreign bank described in section 228.11(c)(2).

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, including a home improvement loan not secured by a dwelling, and other consumer unsecured loan, including a loan for home improvement 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 householder 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: 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).

Locations

NEW HAMPTON

606 W Milwaukee St., PO Box 307
New Hampton, IA 50659

[Get Directions](#)

LAWLER

500 E Hwy. 24 P.O. Box 269
Lawler, IA 52154

[Get Directions](#)

FREDERICKSBURG

165 N Woodward Ave. P.O. Box 210
Fredericksburg, IA 50630

[Get Directions](#)

WAUCOMA

102 1st Ave. SW., P.O. Box 203
Waucoma, IA 52171

[Get Directions](#)

Bank Iowa Servicing Team

Cindy Zeien

Cindy Zeien is the Branch Manager of Bank Iowa in New Hampton, and has been with Bank Iowa since December of 2004. Cindy is a native of New Hampton and a graduate of New Hampton Community High School. Prior to her appointment as Branch Manager, Cindy served as a Teller for Bank Iowa. Cindy is active member of the New Hampton community and donates her time supporting Northeast Iowa Food Bank.

E: czeien@bankiowa.bank

O: [\(641\) 394-6800](tel:(641)394-6800)

Location: New Hampton

Katy Kuehn

Katy Kuehn is the Regional Retail Branch Manager of Bank Iowa in Lawler and has been with Bank Iowa since September of 2012. Katy is a native of New Hampton and a graduate of New Hampton High School. Prior to her appointment as Regional Retail Branch Manager, Katy served as a teller and deposit operations specialist for Bank Iowa. Currently along with Bank Iowa, Katy has been serving in the Air National Guard since 2007 as a logistics planner based out of the 132d Wing in Des Moines, IA. Katy is an active member of the New Hampton community and donates her time supporting The Chickasaw County Veterans Affairs Commission

E: kkuehn@bankiowa.bank

O: [\(563\) 482-7010](tel:(563)482-7010)

Location: Lawler

Michael Tomlonovic

Michael is Bank Iowa's Treasury Management Specialist and joined Bank Iowa in 2021 and bringing with him almost a decade of banking experience. Michael assists Treasury Management clients in day-to-day tasks to help ensure a seamless process. Michael has a passion for international travel and the importance of thinking globally, while keeping a community focus. Michael is a graduate of Loras College and is involved in his local Jasper County community, as well as volunteering with the St. Thomas Moore Center in Panora, IA.

E: mtomlonovic@bankiowa.bank

O: [\(515\) 226-2497](tel:(515)226-2497)

Location: West Des Moines

Mark K Phillips

As Vice President of Treasury Management Services for Bank Iowa, Mark is responsible for the direction, sales, and support of treasury management services for the entire bank's business clients. (Treasury Management is how organizations, businesses or corporations manage their operational cash flow by using financial services products to collect, disburse, protect, and manage their cash.) Mark has over 15 years of banking experience and has been with Bank Iowa for the last five years. A farm kid and native of Williams, Iowa, Mark is a graduate of Central College and active member of the Des Moines community serving as Board Chair for the Iowa Center for Economic Success and the Institute for Community Alliance.

E: mkphillips@bankiowa.bank

O: [\(515\) 273-2907](tel:(515)273-2907)

Location: West Des Moines

Brian Carolan

Brian Carolan is the Regional President of Bank Iowa based out of Lawler, and has been with the bank since June of 2013. Prior to that he worked in Des Moines for a large national bank in many different roles. Brian is a native of Waucoma, graduating from Turkey Valley High School in 2002, and attended UNI for Business Management. Brian and his family live south of New Hampton and enjoys being an active member of the New Hampton community serving on area boards and organizations.

E: bcarolan@bankiowa.bank

O: [\(563\) 482-7003](tel:(563)482-7003)

Location: Lawler / New Hampton / Waucoma / Fredericksburg

REGULATION CC FUNDS AVAILABILITY DISCLOSURE

Financial Institution: Bank Iowa

REGULATION CC FUNDS AVAILABILITY POLICY

The information here describes our policy of holding deposited items in a transaction account before funds are made available to you for withdrawal. This is our Funds Availability Policy. Transaction accounts, in general, are accounts which permit an unlimited number of payments to third persons and an unlimited number of telephone and preauthorized transfers to other accounts of yours with us. Checking accounts are the most common transaction accounts. Feel free to ask us whether any of your other accounts might also be under this policy.

YOUR ABILITY TO WITHDRAW FUNDS AT BANK IOWA

Our policy is to make funds from your cash and check deposits available to you on the same business day as the day we receive your deposit. Electronic direct deposits to your account will be available on the day we receive the deposit. Once the funds are available, you can withdraw them in cash and we will use the funds to pay checks that you have written.

Please remember that even after we have made funds available to you and you have withdrawn the funds, you are still responsible for checks you deposit that are returned to us unpaid and for any other problems involving your deposit.

For determining the availability of your deposits, every day is a business day, except Saturdays, Sundays, and federal holidays. If you make a deposit before 6:00 PM CT on a business day that we are open, we will consider that day to be the day of your deposit. However, if you make a deposit after 6:00 PM CT or on a day we are not open, we will consider that the deposit was made on the next business day we are open.

DEPOSITS AT NON-BANK IOWA AUTOMATED TELLER MACHINES (ATMS)

Funds from any deposits (cash or checks) made at automated teller machines (ATMs) we do not own or operate will not be available until the fifth business day after the day of your deposit. This rule does not apply at ATMs that we own or operate. All ATMs that we own or operate are identified as our machines. Our ATM locations can be found on Bank Iowa's website.

LONGER DELAYS MAY APPLY

Case by Case Delays In some cases, we will not make all of the funds that you deposit by check available to you on the same business day as the day of your deposit. Depending on the type of check that you deposit, funds may not be available until the second business day after the day of your deposit. The first \$225 of your deposits, however, may be available on the same business day of deposit.

If we are not going to make all of the funds from your deposit available on the same business day as the day of your deposit, we will notify you at the time you make your deposit. We will also tell you when the funds will be available. If your deposit is not made directly to one of our employees, or if we decide to take this action after you have left the premises, we will mail you the notice by the business day after we receive your deposit. If you will need the funds from a deposit right away, you should ask us when the funds will be available.

Safeguard Exceptions In addition, funds you deposit by check may be delayed for a longer period under the following circumstances:

We believe a check you deposit will not be paid.

You deposit checks totaling more than \$5,525 on any one day.

You redeposit a check that has been returned unpaid.

You have overdrawn your account repeatedly in the last six months.

There is an emergency, such as failure of computer or communications equipment.

We will notify you if we delay your ability to withdraw funds for any of these reasons, and we will tell you when the funds will be available.

They will generally be available no later than the seventh business day after the day of your deposit.

HOLDS ON OTHER FUNDS

If we cash a check for you that is drawn on another bank, we may withhold the availability of a corresponding amount of funds that are already in your account. Those funds will be available at the time funds from the check we cashed would have been available if you had deposited it.

If we accept for deposit a check that is drawn on another bank, we may make funds from the deposit available for withdrawal immediately but delay your availability to withdraw a corresponding amount of funds that you have on deposit in another account with us. The funds in the other account would then not be available for withdrawal until the time periods that are described elsewhere in this disclosure for the type of check that you deposited.

SPECIAL RULES FOR NEW ACCOUNTS

If you are a new customer, the following special rules will apply during the first 30 days your account is open. Funds from electronic direct deposits to your account will be available on the day we receive the deposit. Funds from deposits of cash, wire transfers, and the first \$5,525 of a day's total deposits of cashier's, certified, teller's, travelers, and federal, state and local government checks will be available on the same day as the day of your deposit if the deposit meets certain conditions. For example, the checks must be payable to you. The excess over \$5,525 will be available on the seventh business day after the day of your deposit. If your deposit of these checks (other than a U.S. Treasury check) is not made in person to one of our employees, the first \$5,525 will not be available until the second business day after the day of your deposit.

Funds from all other check deposits will be available on the seventh business day after the day of your deposit.