Bank Iowa®

Member FDIC | EQUAL HOUSING LENDER

BANK IOWA'S

CRA PUBLIC FILE

Deposit Products

- Checking Accounts
- Savings Accounts
- Money Market Accounts
- Certificate of Deposits
- Individual Retirement Accounts
- Health Savings Accounts
- Balance Banking – BankOn Certified Account

Loan Products

- Ag
- Commercial
- Consumer
- Home Equity (including HELOC)
- Home Mortgage

Other Services

- Debit Cards
- Treasury Management
- Safe Deposit Boxes
- Night Depository
- Official Checks
- Wire Transfers
- Identity Theft Services
- Online/Mobile Banking
- Bill Pay
- Mobile Deposit
- Online Account Opening
- Telephone Banking
- eStatements
- Notary
- SavvyMoney

For more information on our products and services, visit our website at www.bankiowa.bank or ask a bank employee for available brochures.

Bank Iowa

www.bankiowa.bank | Member FDIC

Common Fee Schedule

DEBIT CARD

- Foreign ATM Withdrawal Fee: $2.00 per withdrawal
- Debit Card Replacement: $10.00 per card*
- Debit Card Rush Replacement: $60.00 per card*

NON-CUSTOMER

- Notary Fee - Non-Customer: $10.00 each
- Non-Customer Check Cashing Fee: $5.00 per check

NIGHT DEPOSIT

- Night Deposit Locked Bag: $20.00 per bag*
- Night Deposit Zipper Bag: $5.00 per bag*

SAFE DEPOSIT BOX

- SafeDeposit Box Rent: Style Dependent
- Safe Deposit Box Drilling Fee: Market Rate
- Safe Deposit Key Replacement: Market Rate
- SDB Lock Charge Fee: Market Rate
- Safe Deposit Late Payment Fee: $15.00

STATEMENTS

- Statement Reprint: $5.00 per statement*
- Statement Reconcile: $35.00 per hour*

WIRE TRANSFERS

- Inc Wire Tfr Fee - Domestic: $20.00 per wire*
- Out Wire Tfr Fee - Domestic: $40.00 per wire*
- Inc Wire Tfr Fee - Int'l: $75.00 per wire*
- Out Wire Tfr Fee - Int'l: $75.00 per wire*

IRAS/HSAS

- IRA Termination Fee: $50.00 per plan
- Transfer/Direct Rollover Fee (out): $50.00 per transfer
- HSA Annual Fee: $20.00 per plan*

ACCOUNTS

- Garnishments , Subpoenas and Levies: $100.00 each
- Early Account Closure (90 days of opening): $30.00 per account*
- Overdraft Fee: $35.00 per item**
- Returned Item (Deposited Item): $12.00 per item*
- Returned Item Fee (NSF): $35.00 per item**
- Stop Payment Request: $35.00 per request*
- Foreign Ck Handling Fee: $55.00 per item
- Dormant Account Fee: $10.00 per month*

MISCELLANEOUS

- Official Checks: $5.00 per check
- Counter Checks: $2.00 per check*
- Notary Fee - Clients: No charge
- Check Collection: $30.00 per check
- Research Fee: $50.00 per hour*
- Check Photocopy: $3.00 per check*
- Photocopy Fee: $.25 per page
- Fax Fee: $2.00 per fax request
- Foreign Currency Exchange Fee: $30.00

*Fees subject to state and local tax.

**May be imposed on check, ACH, ATM Withdrawal, debit card transaction, in-person withdrawal, or by other electronic means.

OFFICE LOCATIONS

Location	Address	City	State	Zip	County	Census Tract	Tract Income Level	Underserved or Distressed Tract	Located in a majority minority census tract? (Y/N) Include %	Phone	Type	Products Offered	Loan Applications Taken? (Y/N)
Clarinda	101 E Main St	Clarinda	IA	51632	Page	4905.00	Middle	Yes	N - 10.22%	712.542.2121	Branch	Full loan and deposit	Y
Villisca	300 S Third Ave	Villisca	IA	50864	Montgomery	9604.00	Middle	Yes	N - 4.51%	712.826.2562	Branch	Full loan and deposit	Y
Denison	1108 Broadway	Denison	IA	51442	Crawford	0704.02	Moderate	No	Y - 65.20%	712.263.9361	Branch	Full loan and deposit	Y
Schleswig	121 Second St	Schleswig	IA	51461	Crawford	0702.00	Middle	Yes	N - 12.55%	712.676.3321	Branch	Full loan and deposit	Y
Manilla	341 Fourth St	Manilla	IA	51454	Crawford	0705.00	Middle	Yes	N - 7.31%	712.654.2962	Branch	Full loan and deposit	Y
Humboldt Main	506 Sumner Ave	Humboldt	IA	50548	Humboldt	9703.00	Middle	Yes	N - 8.38%	515.332.1451	Branch	Full loan and deposit	Y
Humboldt Drive up	1302 Fifth Ave N	Humboldt	IA	50548	Humboldt	9704.00	Middle	Yes	N - 9.40%	515.332.1808	Drive Up	Limited	N
Oskaloosa	1710 Third Ave E	Oskaloosa	IA	52577	Mahaska	9505.00	Middle	No	N - 10.48%	641.673.7400	Branch	Full loan and deposit	Y
Fremont	210 E Main St	Fremont	IA	52561	Mahaska	9501.00	Middle	No	N - 4.33%	641.933.4248	Branch	Full loan and deposit	Y
Newton	215 W Second St N	Newton	IA	50208	Jasper	0405.00	Moderate	No	N - 12.10%	641.792.4500	Branch	Full loan and deposit	Y
Pella	640 Washington Street	Pella	IA	50219	Marion	0302.02	Upper	No	N - 10.74%	641.628.1056	Branch	Full loan and deposit	Y
Colfax	100 N Walnut St	Colfax	IA	50054	Jasper	0407.00	Middle	No	N - 6.94%	515.674.3533	Branch	Full loan and deposit	Y
Altoona	420 Eighth St SE	Altoona	IA	50009	Polk	0107.09	Middle	No	N - 11.19%	515.967.7283	Branch	Full loan and deposit	Y
Johnston	5580 Merle Hay Rd	Johnston	IA	50131	Polk	0117.02	Middle	No	N - 17.67%	515.727.4484	Branch	Full loan and deposit	Y
West Des Moines	1150 Jordan Creek Pkwy	West Des Moines	IA	50266	Dallas	0508.14	Upper	No	N - 24.90%	515.225.0710	Branch	Full loan and deposit	Y
Prairie Vista Convenience	2785 First Ave. South	Altoona	IA	50009	Polk	0107.08	Middle	No	N - 13.22%	515.967.7283	Branch	Limited	N
Shenandoah	701 W Sheridan Ave	Shenandoah	IA	51601	Page	4902.00	Moderate	No	N - 11.56%	712.246.1311	Branch	Full loan and deposit	Y
Shenandoah Drive Up	1300 W Nishna Rd	Shenandoah	IA	51601	Page	4903.00	Middle	Yes	N - 7.61%	712.246.3473	Drive Up	Limited	N
Essex	528 Iowa Ave	Essex	IA	51638	Page	4901.00	Middle	Yes	N - 4.30%	712.379.3111	Branch	Full loan and deposit	Y
Red Oak	1805 N Broadway St	Red Oak	IA	51566	Montgomery	9603.00	Moderate	No	N - 11.83%	712.623.6960	Branch	Full loan and deposit	Y
Lawler	500 E Highway 24	Lawler	IA	52154	Chickasaw	0703.00	Middle	Yes	N - 5.88%	563.238.2054	Branch	Full loan and deposit	Y
New Hampton	606 W Milwaukee St	New Hampton	IA	50659	Chickasaw	0704.00	Middle	Yes	N - 11.23%	641.394.6800	Branch	Full loan and deposit	Y
Fredericksburg	165 N Woodward Ave	Fredericksburg	IA	50630	Chickasaw	0703.00	Middle	Yes	N - 5.88%	563.237.5200	Branch	Full loan and deposit	Y
Waucoma	102 First Ave SW	Waucoma	IA	52171	Fayette	0807.00	Middle	Yes	N - 5.00%	563.776.6414	Branch	Full loan and deposit	Y
Clear Lake	1919 US Hwy 18 East	Clear Lake	IA	50428	Cerro Gordo	9507.00	Middle	No	N - 9.03%	641.357.1700	Branch	Full loan and deposit	Y

ATMS

Location	Address	City	State	Zip	County	Census Tract	Tract Income Level	Underserved or Distressed Tract	Located in a majority minority census tract? (Y/N) Include %	Phone	Type	Products Offered
Clarinda	101 E Main St	Clarinda	IA	51632	Page	4905.00	Middle	Yes	N - 10.22%	NA	ATM	Dispensing only
Villisca	300 S Third Ave	Villisca	IA	50864	Montgomery	9604.00	Middle	Yes	N - 4.51%	NA	ATM	Dispensing only
Denison	1108 Broadway	Dension	IA	51442	Crawford	0704.02	Moderate	No	Y - 65.20%	NA	ATM	Dispensing only
Schleswig	2 Ash Rd	Schleswig	IA	51461	Crawford	0702.00	Middle	Yes	N - 12.55%	NA	ATM	Dispensing only
Manilla	341 Fourth St	Manilla	IA	51454	Crawford	0705.00	Middle	Yes	N - 7.31%	NA	ATM	Dispensing only
Humboldt Main	506 Sumner Ave	Humboldt	IA	50548	Humboldt	9703.00	Middle	Yes	N - 8.38%	NA	ATM	Dispensing only
Humboldt Drive up	1302 Fifth Ave N	Humboldt	IA	50548	Humboldt	9704.00	Middle	Yes	N - 9.40%	NA	ATM	Dispensing only
Oskaloosa	1710 Third Ave E	Oskaloosa	IA	52577	Mahaska	9505.00	Middle	No	N - 10.48%	NA	ATM	Dispensing only
Fremont	210 E Main St	Fremont	IA	52561	Mahaska	9501.00	Middle	No	N - 4.33%	NA	ATM	Dispensing only
Newton	215 W Second St N	Newton	IA	50208	Jasper	0405.00	Moderate	No	N - 12.10%	NA	ATM	Dispensing only
Pella	640 Washington Street	Pella	IA	50219	Marion	0302.02	Upper	No	N - 10.74%	NA	ATM	Dispensing only
Colfax	100 N Walnut Street	Colfax	IA	50054	Jasper	0407.00	Middle	No	N - 6.94%	NA	ATM	Dispensing only
Altoona	420 Eighth St SE	Altoona	IA	50009	Polk	0107.09	Middle	No	N - 11.19%	NA	ATM	Dispensing only
Johnston	5580 Merle Hay Rd	Johnston	IA	50131	Polk	0117.02	Middle	No	N - 17.67%	NA	ATM	Dispensing only
West Des Moines	1150 Jordan Creek Pkwy	West Des Moines	IA	50266	Dallas	0508.14	Upper	No	N - 24.90%	NA	ATM	Dispensing only
Shenandoah	701 W Sheridan Ave	Shenandoah	IA	51601	Page	4902.00	Moderate	No	N - 11.56%	NA	ATM	Dispensing only
Shenandoah Drive Up	1300 W Nishna Rd	Shenandoah	IA	51601	Page	4903.00	Middle	Yes	N - 7.61%	NA	ATM	Dispensing only
Essex	528 Iowa Ave	Essex	IA	51638	Page	4901.00	Middle	Yes	N - 4.30%	NA	ATM	Dispensing only
Red Oak	1805 N Broadway St	Red Oak	IA	51566	Montgomery	9603.00	Moderate	No	N - 11.83%	NA	ATM	Dispensing only
Lawler	500 E Highway 24	Lawler	IA	52154	Chickasaw	0703.00	Middle	Yes	N - 5.88%	NA	ATM	Dispensing only
New Hampton	606 W Milwaukee St	New Hampton	IA	50659	Chickasaw	0704.00	Middle	Yes	N - 11.23%	NA	ATM	Dispensing only
Fredericksburg	165 N Woodward Ave	Fredericksburg	IA	50630	Chickasaw	0703.00	Middle	Yes	N - 5.88%	NA	ATM	Dispensing only
Clear Lake	1919 US Hwy 18 East	Clear Lake	IA	50428	Cerro Gordo	9507.00	Middle	No	N - 9.03%	NA	ATM	Dispensing only

OFFICE HOURS OF OPERATION

Location	Lobby						Drive-Up In Office					
	Mon-Thurs		Friday		Saturday		Mon-Thurs		Friday		Saturday	
	Open	Close	Open	Close	Open	Close	Open	Close	Open	Close	Open	Close
Clarinda	9:00AM	4:00PM	9:00AM	4:00PM	Closed	Closed	8:00AM	5:00PM	8:00AM	5:30PM	9:00AM	12:00PM
Villisca	9:00AM	3:00PM	9:00AM	3:00PM	Closed	Closed	9:00AM	4:00PM	9:00AM	4:00PM	9:00AM	12:00PM
Denison	8:30AM	4:00PM	8:30AM	4:00PM	Closed	Closed	8:30AM	5:00PM	8:30PM	5:00PM	9:00AM	12:00PM
Schleswig	9:00AM	4:00PM	9:00AM	4:00PM	Closed	Closed	NA	NA	NA	NA	NA	NA
Manilla	8:30AM	4:00PM	8:30AM	4:00PM	Closed	Closed	8:30AM	4:00PM	8:30AM	4:00PM	Closed	Closed
Humboldt Main	8:00AM	4:00PM	8:00AM	5:00PM	Closed	Closed	NA	NA	NA	NA	NA	NA
Humboldt Drive up*	Closed	Closed	Closed	Closed	Closed	Closed	8:30AM	5:00PM	8:30AM	5:30PM	9:00AM	12:00PM
Oskaloosa	8:30AM	4:30PM	8:30AM	4:30PM	Closed	Closed	8:00AM	5:00PM	8:00AM	5:00PM	9:00AM	11:00AM
Fremont*	Closed	Closed	Closed	Closed	Closed	Closed	9:00AM	4:00PM	9:00AM	4:00PM	Closed	Closed
Newton	8:30AM	4:30PM	8:30AM	4:30PM	Closed	Closed	8:00AM	5:00PM	8:00AM	5:00PM	9:00AM	11:00AM
Pella	8:30AM	4:30PM	8:30AM	4:30PM	Closed	Closed	8:00AM	5:00PM	8:00AM	5:00PM	9:00AM	11:00AM
Colfax	8:30AM	4:30PM	8:30AM	4:30PM	Closed	Closed	8:30AM	5:00PM	8:30AM	5:00PM	9:00AM	11:00AM
Altoona	8:30AM	5:00PM	8:30AM	5:00 PM	9:00AM	12:00PM	8:00AM	5:30PM	8:00AM	5:30PM	9:00AM	12:00PM
Johnston	8:30AM	5:00PM	8:30AM	5:00PM	9:00AM	12:00PM	8:00AM	5:30PM	8:00AM	5:30PM	9:00AM	12:00PM
West Des Moines*	8:30AM	5:00PM	8:30AM	5:00 PM	Closed	Closed	8:00AM	5:30PM	8:00AM	5:30PM	9:00AM	12:00PM
Prairie Vista Convenience*	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed	Closed
Shenandoah	9:00AM	4:00PM	9:00AM	4:00PM	Closed	Closed	NA	NA	NA	NA	NA	NA
Shenandoah Drive Up	Closed	Closed	Closed	Closed	Closed	Closed	8:00AM	5:00PM	8:00AM	5:00PM	9:00AM	12:00PM
Essex*	9:00AM	4:00PM	9:00AM	4:00PM	Closed	Closed	NA	NA	NA	NA	NA	NA
Red Oak	9:00AM	4:00PM	9:00AM	4:00PM	Closed	Closed	8:00AM	5:00PM	8:00AM	5:00PM	9:00AM	12:00PM
Lawler	8:00AM	4:00PM	8:00AM	5:00PM	Closed	Closed	8:00AM	4:00PM	8:00AM	5:00PM	Closed	Closed
New Hampton	8:00AM	4:00PM	8:00AM	5:00PM	Closed	Closed	8:00AM	4:00PM	8:00AM	5:00PM	Closed	Closed
Fredericksburg	8:00AM	4:00PM	8:00AM	5:00PM	Closed	Closed	8:00AM	4:00PM	8:00AM	5:00PM	Closed	Closed
Waucoma	8:00AM	12:00PM	8:00AM	5:00PM	Closed	Closed	NA	NA	NA	NA	NA	NA
Clear Lake	9:00AM	4:00PM	9:00AM	4:00PM	Closed	Closed	8:30AM	4:30PM	8:30AM	4:30PM	9:00AM	11:00AM

**Essex Branch is closed daily from 12:00PM-1:00PM.*
**Fremont lobby is by appointment only, and drive-up closed daily from 12:00PM-1:00PM.*
**West Des Moines lobby closed Saturday except by appointment only from 9:00AM - 12:00PM.*
**Prairie Vista has staff on site every Wednesday for 1 hour.*
**Humboldt drive-up lobby is permanently closed effective Sept. 5, 2023.*

BANK IOWA

OFFICES OPENED, CLOSED, OR CHANGED

(Current year and two prior calendar years)

- **Charter Oak office closed as of March 15, 2024**
    - **Charter Oak office address: 17 Main Street, Charter Oak, IA 51439**
    - **MSA: NA**
    - **State: 19 Iowa**
    - **County: 047 Crawford**
    - **Census Tract: 0703.00**

- **Gilmore City office closed as of January 31, 2025**
    - **Gilmore City office address: 106 SE C Avenue, Gilmore City, IA 50541**
    - **MSA: NA**
    - **State: 19 Iowa**
    - **County: 091 Humboldt**
    - **Census Tract: 9702.00**

- **Clear Lake office opened as of June 2, 2025**
    - **Clear Lake office address: 1919 US Hwy 18 East, Clear Lake, IA 50428**
    - **MSA: NA**
    - **State: 19 Iowa**
    - **County: 033 Cerro Gordo**
    - **Census Tract: 9507.00**

BANK IOWA

LOAN TO DEPOSIT RATIOS

(Include at least prior calendar year)

DECEMBER 2025	**87%**
SEPTEMBER 2025	**85%**
JUNE 2025	**91%**
MARCH 2025	**90%**

HOME MORTGAGE DISCLOSURE ACT NOTICE

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers' and information about loan approvals and denials.

These data are available online at the Consumer Finance Protection Bureau's website (www.consumerfinance.gov/hmda). HMDA data for many other financial institutions are also available at this website.

CRA DISCLOSURE STATEMENT

The Bank Iowa CRA Disclosure Statements are available for review at the Federal Financial Institution Examination Council (FFIEC) website.

To view the Disclosure Statement(s), visit www.ffiec.gov and enter the year you wish to review and the Respondent ID (0000187947) or Institution Name.

BANK IOWA

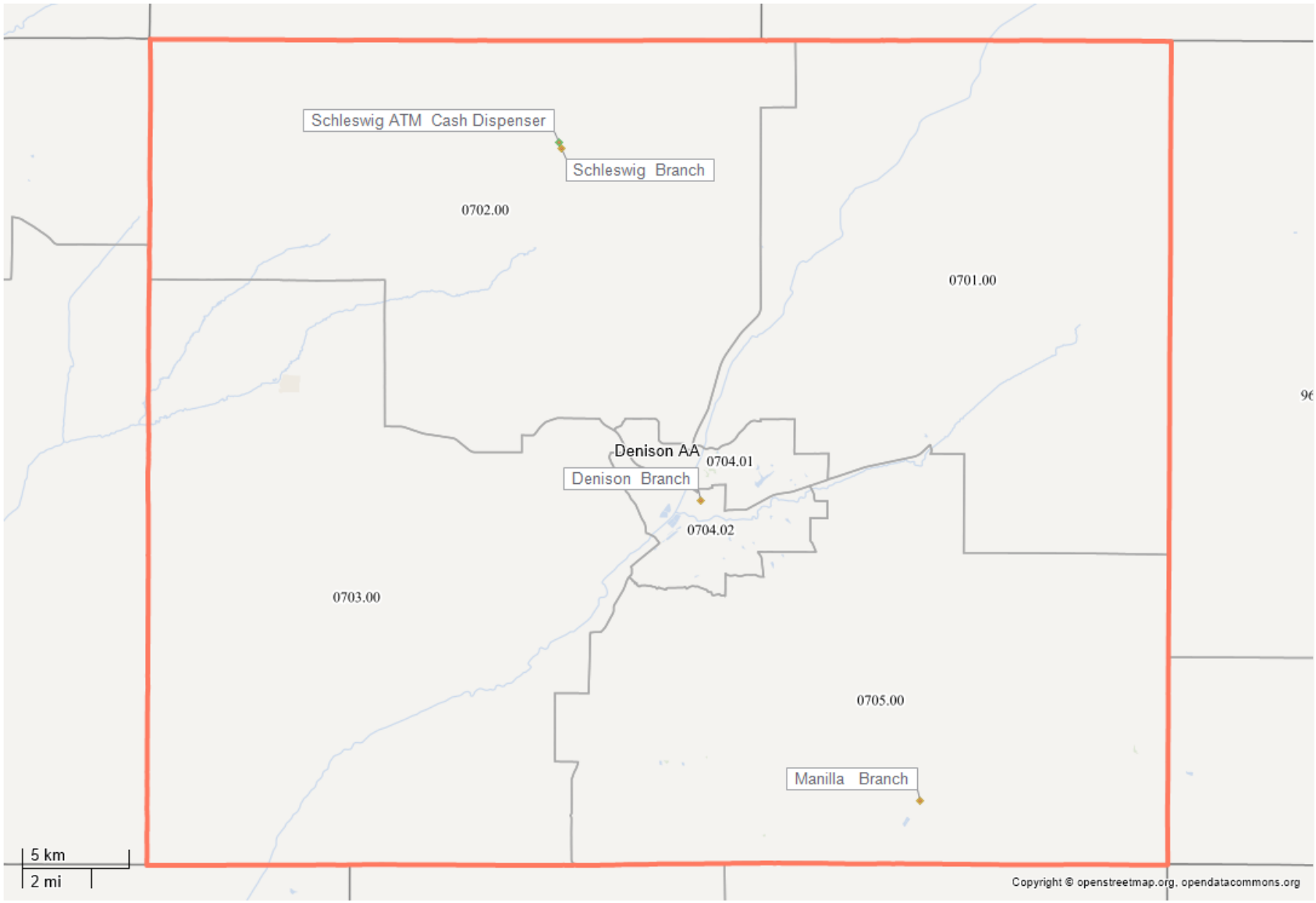
WRITTEN CRA COMMENTS

(Current year and two prior calendar years)

- **The bank did not receive any comments from the public regarding CRA Performance during this time period.**

Bank Iowa

Denison Assessment Area



Applied Filters

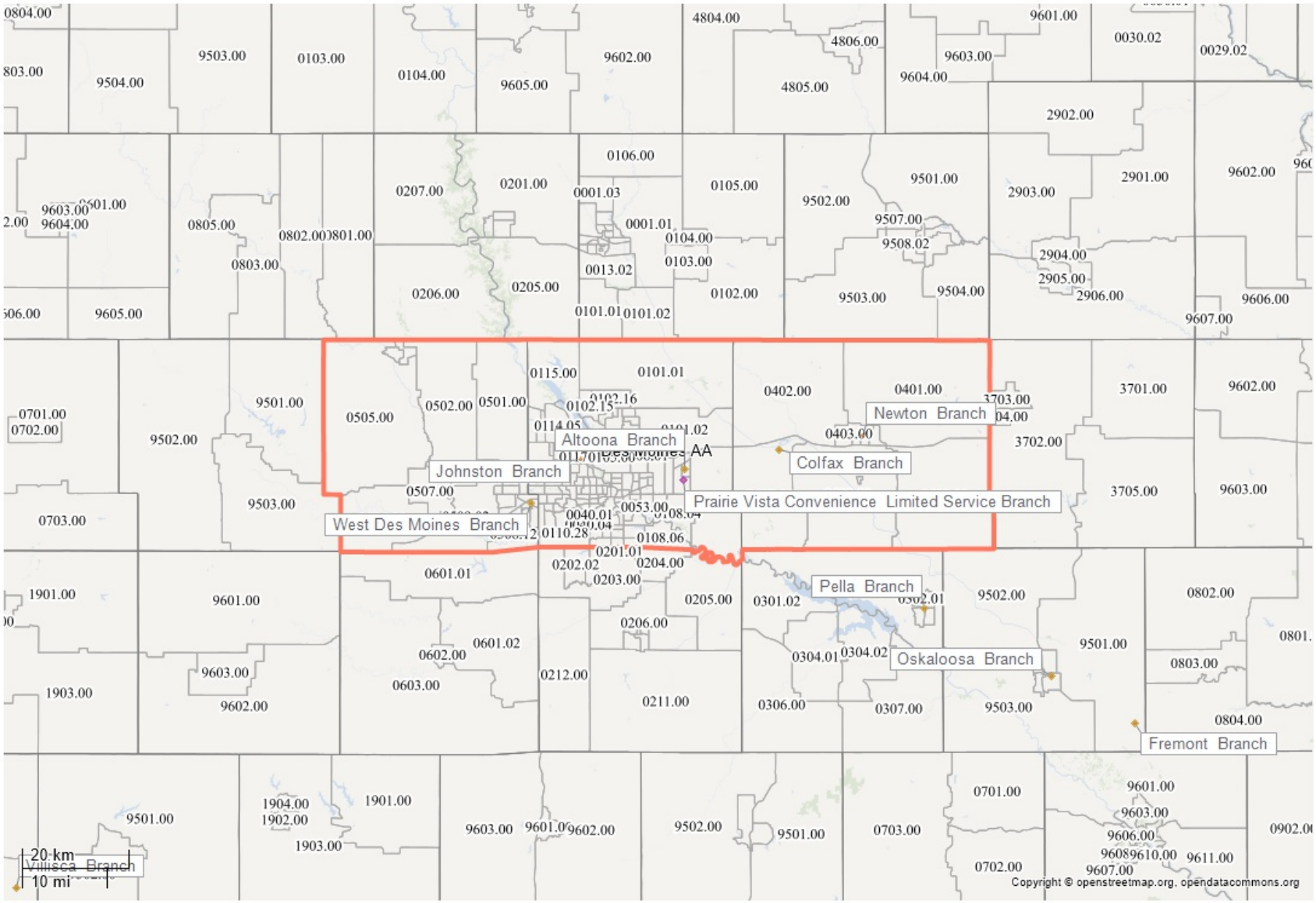
- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (1/1/2025 - 12/31/2025)
- Real Estate Loans: Loan File
- You are included in the HMDA benchmark.
- Area: (Denison AA)

2026 FFIEC Census Report - Summary Census Overview Information
State: IOWA
County: 047 - CRAWFORD COUNTY
All Tracts: 6

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	CRAWFORD COUNTY	0701.00	3 - Middle	96.67	Yes	$94,100	$69,375	1690	216	12.78	715	929
IA	CRAWFORD COUNTY	0702.00	3 - Middle	93.75	Yes	$94,100	$67,284	2032	255	12.55	692	1039
IA	CRAWFORD COUNTY	0703.00	3 - Middle	83.95	Yes	$94,100	$60,250	2033	166	8.17	632	1058
IA	CRAWFORD COUNTY	0704.01	4 - Upper	125.00	No	$94,100	$89,709	3666	1684	45.94	583	836
IA	CRAWFORD COUNTY	0704.02	2 - Moderate	75.49	No	$94,100	$54,179	5285	3446	65.20	1242	2060
IA	CRAWFORD COUNTY	0705.00	3 - Middle	114.52	Yes	$94,100	$82,188	1819	133	7.31	569	804
IA	CRAWFORD COUNTY	9999.99	3 - Middle	93.08	No	$94,100	$66,804	16525	5900	35.70	4433	6726

Bank Iowa

Des Moines Assessment Area



- State
- County
- Census Tract
- Zip Code
- Assessment Area
- Branch
- Limited Service Branch
- Main Office
- Cash Dispenser
- Deposit ATMor ITM
- Other

Applied Filters

- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (1/1/2025 - 12/31/2025)
- Real Estate Loans: Loan File
- You are included in the HMDA benchmark.
- Area: (Des Moines AA)

2026 FFIEC Census Report - Summary Census Overview Information
State: IOWA
County: 049 - DALLAS COUNTY
All Tracts: 19

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	DALLAS COUNTY	0501.00	4 - Upper	152.21	No	$114,800	$136,289	7480	699	9.34	2143	2381
IA	DALLAS COUNTY	0502.00	3 - Middle	89.26	No	$114,800	$79,929	3953	244	6.17	1185	1462
IA	DALLAS COUNTY	0503.00	2 - Moderate	67.94	No	$114,800	$60,833	4630	1786	38.57	981	1828
IA	DALLAS COUNTY	0504.00	1 - Low	49.94	No	$114,800	$44,721	3284	1709	52.04	881	1356
IA	DALLAS COUNTY	0505.00	3 - Middle	81.07	No	$114,800	$72,596	2080	152	7.31	703	891
IA	DALLAS COUNTY	0506.00	3 - Middle	108.56	No	$114,800	$97,209	3132	212	6.77	979	1233
IA	DALLAS COUNTY	0507.00	3 - Middle	110.91	No	$114,800	$99,313	6575	450	6.84	1532	1977
IA	DALLAS COUNTY	0508.03	4 - Upper	156.09	No	$114,800	$139,766	13572	2055	15.14	3038	3434
IA	DALLAS COUNTY	0508.05	4 - Upper	179.79	No	$114,800	$160,986	6715	920	13.70	1642	1763
IA	DALLAS COUNTY	0508.07	4 - Upper	124.80	No	$114,800	$111,750	8483	1843	21.73	2432	2526
IA	DALLAS COUNTY	0508.12	4 - Upper	156.53	No	$114,800	$140,156	4149	592	14.27	862	1035
IA	DALLAS COUNTY	0508.13	3 - Middle	117.13	No	$114,800	$104,877	1776	498	28.04	555	685
IA	DALLAS COUNTY	0508.14	4 - Upper	154.62	No	$114,800	$138,452	5453	1358	24.90	1279	1400
IA	DALLAS COUNTY	0508.15	4 - Upper	140.88	No	$114,800	$126,146	4257	1091	25.63	1050	1220
IA	DALLAS	0508.16	3 - Middle	108.78	No	$114,800	$97,404	5097	1318	25.86	729	949

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
	COUNTY											
IA	DALLAS COUNTY	0508.17	4 - Upper	148.32	No	$114,800	$132,809	6471	1157	17.88	1989	2140
IA	DALLAS COUNTY	0508.18	4 - Upper	136.55	No	$114,800	$122,266	4073	1053	25.85	967	1090
IA	DALLAS COUNTY	0509.01	3 - Middle	100.86	No	$114,800	$90,313	3403	409	12.02	990	1384
IA	DALLAS COUNTY	0509.02	4 - Upper	144.25	No	$114,800	$129,167	5095	424	8.32	1613	1897

2026 FFIEC Census Report - Summary Census Overview Information
State: IOWA
County: 153 - POLK COUNTY
All Tracts: 112

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	POLK COUNTY	0001.01	1 - Low	45.04	No	$114,800	$40,333	3569	1429	40.04	655	709
IA	POLK COUNTY	0001.02	2 - Moderate	66.97	No	$114,800	$59,968	3971	1045	26.32	1113	1464
IA	POLK COUNTY	0001.03	2 - Moderate	75.45	No	$114,800	$67,561	2087	580	27.79	592	967
IA	POLK COUNTY	0002.01	3 - Middle	81.15	No	$114,800	$72,667	2676	892	33.33	760	975
IA	POLK COUNTY	0002.02	2 - Moderate	73.77	No	$114,800	$66,059	3743	1209	32.30	905	1327
IA	POLK COUNTY	0003.00	1 - Low	49.60	No	$114,800	$44,415	4440	1741	39.21	757	1085
IA	POLK COUNTY	0004.00	2 - Moderate	62.19	No	$114,800	$55,685	4754	2079	43.73	1328	1826
IA	POLK COUNTY	0005.00	2 - Moderate	60.01	No	$114,800	$53,735	4641	2226	47.96	1215	1874
IA	POLK COUNTY	0006.00	2 - Moderate	73.19	No	$114,800	$65,540	4023	1612	40.07	1056	1636
IA	POLK COUNTY	0007.01	2 - Moderate	77.38	No	$114,800	$69,286	3537	2317	65.51	698	913
IA	POLK COUNTY	0007.02	3 - Middle	81.94	No	$114,800	$73,370	3397	1322	38.92	1117	1293
IA	POLK COUNTY	0007.03	3 - Middle	91.90	No	$114,800	$82,292	3134	603	19.24	1157	1368
IA	POLK COUNTY	0007.04	3 - Middle	84.36	No	$114,800	$75,536	3197	1086	33.97	890	1134
IA	POLK COUNTY	0008.01	3 - Middle	81.61	No	$114,800	$73,074	6094	2229	36.58	1632	1948
IA	POLK COUNTY	0008.02	3 - Middle	115.42	No	$114,800	$103,350	3453	475	13.76	1156	1497
IA	POLK COUNTY	0008.03	2 - Moderate	61.38	No	$114,800	$54,965	3998	1172	29.31	1035	1586
IA	POLK COUNTY	0009.01	3 - Middle	82.05	No	$114,800	$73,472	3417	831	24.32	1120	1449
IA	POLK COUNTY	0009.02	4 - Upper	121.10	No	$114,800	$108,438	3303	489	14.80	1139	1533
IA	POLK COUNTY	0010.00	2 - Moderate	77.46	No	$114,800	$69,363	4688	1308	27.90	1296	1869
IA	POLK COUNTY	0011.00	1 - Low	31.16	No	$114,800	$27,903	4744	2465	51.96	460	874
IA	POLK COUNTY	0012.00	2 - Moderate	59.10	No	$114,800	$52,924	3494	2707	77.48	580	1032
IA	POLK COUNTY	0015.00	2 - Moderate	74.63	No	$114,800	$66,823	2865	1263	44.08	673	968
IA	POLK COUNTY	0017.00	2 - Moderate	53.98	No	$114,800	$48,333	2824	2298	81.37	480	737
IA	POLK COUNTY	0018.00	2 - Moderate	67.33	No	$114,800	$60,288	1985	727	36.62	631	883
IA	POLK COUNTY	0019.00	2 - Moderate	72.94	No	$114,800	$65,316	4371	1393	31.87	1202	1704

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	POLK COUNTY	0021.00	1 - Low	47.53	No	$114,800	$42,563	4718	1961	41.56	1133	1894
IA	POLK COUNTY	0026.00	2 - Moderate	57.13	No	$114,800	$51,161	2208	1335	60.46	191	591
IA	POLK COUNTY	0027.00	3 - Middle	90.94	No	$114,800	$81,429	3857	1723	44.67	586	993
IA	POLK COUNTY	0028.00	3 - Middle	91.32	No	$114,800	$81,771	3210	831	25.89	928	1312
IA	POLK COUNTY	0029.00	2 - Moderate	52.78	No	$114,800	$47,260	4045	840	20.77	919	1203
IA	POLK COUNTY	0030.01	3 - Middle	107.20	No	$114,800	$95,987	2105	281	13.35	630	845
IA	POLK COUNTY	0030.02	4 - Upper	194.51	No	$114,800	$174,167	3354	329	9.81	1339	1528
IA	POLK COUNTY	0031.00	4 - Upper	207.77	No	$114,800	$186,042	1826	210	11.50	561	634
IA	POLK COUNTY	0032.00	4 - Upper	168.20	No	$114,800	$150,607	2902	354	12.20	946	690
IA	POLK COUNTY	0039.01	1 - Low	45.66	No	$114,800	$40,884	3784	2439	64.46	603	1002
IA	POLK COUNTY	0039.02	3 - Middle	86.46	No	$114,800	$77,422	5481	3117	56.87	1218	1265
IA	POLK COUNTY	0040.01	2 - Moderate	75.94	No	$114,800	$68,000	3809	1729	45.39	668	787
IA	POLK COUNTY	0040.04	3 - Middle	109.23	No	$114,800	$97,805	3245	552	17.01	1051	1194
IA	POLK COUNTY	0041.00	3 - Middle	90.22	No	$114,800	$80,789	3135	649	20.70	1260	1450
IA	POLK COUNTY	0042.00	2 - Moderate	71.19	No	$114,800	$63,750	3147	1223	38.86	631	819
IA	POLK COUNTY	0043.00	3 - Middle	82.54	No	$114,800	$73,911	4723	1482	31.38	1337	1800
IA	POLK COUNTY	0044.00	2 - Moderate	53.49	No	$114,800	$47,896	4170	2107	50.53	850	1330
IA	POLK COUNTY	0045.01	2 - Moderate	68.68	No	$114,800	$61,500	4092	1772	43.30	928	1315
IA	POLK COUNTY	0045.02	3 - Middle	85.24	No	$114,800	$76,328	2577	659	25.57	647	898
IA	POLK COUNTY	0046.02	2 - Moderate	67.34	No	$114,800	$60,300	6661	3043	45.68	1192	2038
IA	POLK COUNTY	0046.03	3 - Middle	85.27	No	$114,800	$76,352	3667	1028	28.03	1154	1483
IA	POLK COUNTY	0047.01	2 - Moderate	67.07	No	$114,800	$60,061	4272	1543	36.12	1266	1713
IA	POLK COUNTY	0047.02	2 - Moderate	51.09	No	$114,800	$45,745	2990	1299	43.44	248	446
IA	POLK COUNTY	0048.00	2 - Moderate	53.48	No	$114,800	$47,892	3055	2176	71.23	469	793
IA	POLK COUNTY	0049.00	2 - Moderate	52.41	No	$114,800	$46,932	1687	1185	70.24	261	502
IA	POLK COUNTY	0050.00	1 - Low	26.82	No	$114,800	$24,015	3717	2852	76.73	468	1008
IA	POLK COUNTY	0051.01	4 - Upper	126.54	No	$114,800	$113,306	7040	1846	26.22	496	332
IA	POLK COUNTY	0051.02	4 - Upper	136.99	No	$114,800	$122,664	1331	452	33.96	69	42
IA	POLK COUNTY	0052.00	1 - Low	44.23	No	$114,800	$39,609	3207	1932	60.24	262	833

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	POLK COUNTY	0053.00	2 - Moderate	74.68	No	$114,800	$66,875	2633	1170	44.44	571	806
IA	POLK COUNTY	0101.01	4 - Upper	138.04	No	$114,800	$123,606	5925	528	8.91	1730	2075
IA	POLK COUNTY	0101.02	4 - Upper	123.19	No	$114,800	$110,310	11046	1162	10.52	2993	3325
IA	POLK COUNTY	0102.05	4 - Upper	128.37	No	$114,800	$114,940	7864	1037	13.19	1656	2215
IA	POLK COUNTY	0102.07	4 - Upper	122.65	No	$114,800	$109,821	4531	560	12.36	1111	1294
IA	POLK COUNTY	0102.08	3 - Middle	93.18	No	$114,800	$83,438	4379	558	12.74	1076	1231
IA	POLK COUNTY	0102.09	3 - Middle	109.52	No	$114,800	$98,065	6225	947	15.21	1534	1750
IA	POLK COUNTY	0102.11	3 - Middle	114.18	No	$114,800	$102,237	3871	530	13.69	1408	1526
IA	POLK COUNTY	0102.12	3 - Middle	106.88	No	$114,800	$95,702	4190	617	14.73	1550	1820
IA	POLK COUNTY	0102.13	3 - Middle	119.74	No	$114,800	$107,216	4744	404	8.52	1301	1450
IA	POLK COUNTY	0102.14	3 - Middle	113.98	No	$114,800	$102,059	9299	1463	15.73	2796	3209
IA	POLK COUNTY	0102.15	4 - Upper	168.34	No	$114,800	$150,735	7047	671	9.52	1746	1824
IA	POLK COUNTY	0102.16	3 - Middle	110.08	No	$114,800	$98,570	16172	2119	13.10	4307	5009
IA	POLK COUNTY	0104.04	3 - Middle	114.44	No	$114,800	$102,476	4682	928	19.82	1328	1392
IA	POLK COUNTY	0104.06	3 - Middle	90.97	No	$114,800	$81,458	3870	777	20.08	1132	1190
IA	POLK COUNTY	0104.07	4 - Upper	154.38	No	$114,800	$138,229	4418	636	14.40	1380	1458
IA	POLK COUNTY	0104.08	3 - Middle	103.07	No	$114,800	$92,292	3943	1054	26.73	1005	1537
IA	POLK COUNTY	0104.09	3 - Middle	106.39	No	$114,800	$95,262	4248	895	21.07	1364	1420
IA	POLK COUNTY	0104.10	3 - Middle	85.26	No	$114,800	$76,346	2535	513	20.24	811	905
IA	POLK COUNTY	0104.11	3 - Middle	88.50	No	$114,800	$79,250	4501	1206	26.79	809	825
IA	POLK COUNTY	0105.00	2 - Moderate	73.49	No	$114,800	$65,809	6297	1154	18.33	2168	2632
IA	POLK COUNTY	0106.01	3 - Middle	87.32	No	$114,800	$78,191	2622	363	13.84	1133	1287
IA	POLK COUNTY	0106.02	3 - Middle	103.91	No	$114,800	$93,042	7142	1524	21.34	2145	2467
IA	POLK COUNTY	0107.02	3 - Middle	112.39	No	$114,800	$100,636	6600	648	9.82	1872	2170
IA	POLK COUNTY	0107.03	3 - Middle	91.82	No	$114,800	$82,218	5264	929	17.65	1134	1267
IA	POLK COUNTY	0107.07	3 - Middle	86.86	No	$114,800	$77,780	3892	696	17.88	1057	1482
IA	POLK COUNTY	0107.08	3 - Middle	117.60	No	$114,800	$105,298	5990	792	13.22	1250	1401
IA	POLK COUNTY	0107.09	3 - Middle	95.58	No	$114,800	$85,583	4423	495	11.19	1252	1511
IA	POLK COUNTY	0108.03	3 - Middle	82.36	No	$114,800	$73,750	5021	973	19.38	1224	1409

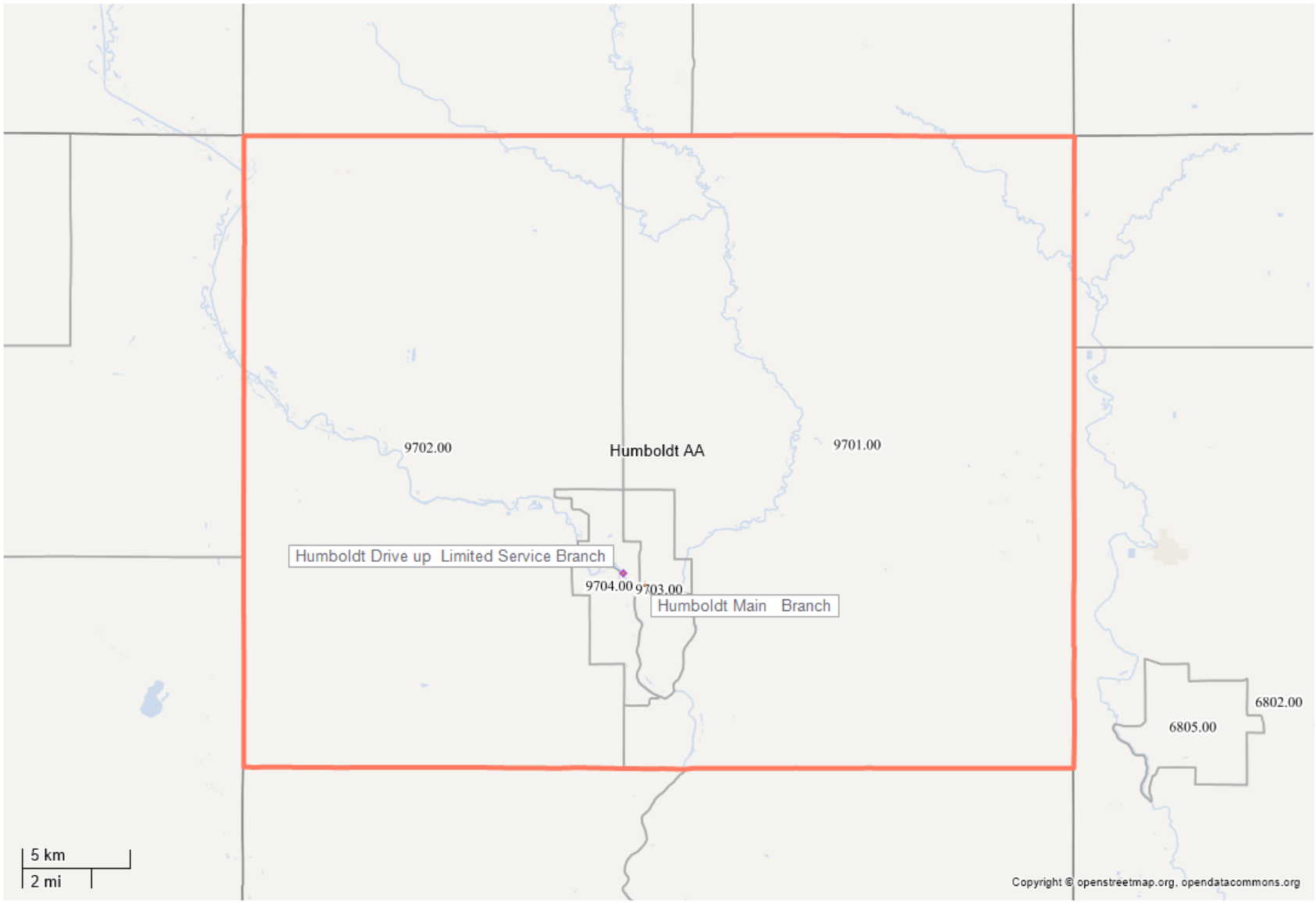
State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	POLK COUNTY	0108.04	3 - Middle	118.95	No	$114,800	$106,506	5390	707	13.12	1689	1935
IA	POLK COUNTY	0108.05	3 - Middle	108.21	No	$114,800	$96,895	7148	2948	41.24	1930	2102
IA	POLK COUNTY	0108.06	2 - Moderate	72.52	No	$114,800	$64,940	4389	1884	42.93	1396	1717
IA	POLK COUNTY	0110.01	2 - Moderate	69.86	No	$114,800	$62,560	3527	1106	31.36	881	1356
IA	POLK COUNTY	0110.21	3 - Middle	113.32	No	$114,800	$101,471	4705	742	15.77	1765	1973
IA	POLK COUNTY	0110.25	4 - Upper	131.56	No	$114,800	$117,801	3791	636	16.78	1195	1349
IA	POLK COUNTY	0110.26	4 - Upper	165.09	No	$114,800	$147,821	5644	841	14.90	1632	1846
IA	POLK COUNTY	0110.27	3 - Middle	114.90	No	$114,800	$102,886	6809	1503	22.07	2302	2404
IA	POLK COUNTY	0110.28	4 - Upper	135.92	No	$114,800	$121,702	5322	1103	20.73	1441	1574
IA	POLK COUNTY	0111.11	2 - Moderate	62.87	No	$114,800	$56,301	5205	1563	30.03	1104	1285
IA	POLK COUNTY	0111.12	3 - Middle	114.47	No	$114,800	$102,500	4217	899	21.32	1380	1401
IA	POLK COUNTY	0111.13	3 - Middle	117.40	No	$114,800	$105,125	2397	790	32.96	439	586
IA	POLK COUNTY	0111.14	0 - Unknown	0.00	No	$114,800	$0	4048	1266	31.27	592	621
IA	POLK COUNTY	0112.01	3 - Middle	104.80	No	$114,800	$93,837	5332	1188	22.28	1519	2104
IA	POLK COUNTY	0112.03	4 - Upper	168.36	No	$114,800	$150,750	3628	524	14.44	1492	1517
IA	POLK COUNTY	0112.05	3 - Middle	92.24	No	$114,800	$82,598	3669	2055	56.01	582	793
IA	POLK COUNTY	0112.06	4 - Upper	126.34	No	$114,800	$113,125	3657	542	14.82	1256	1247
IA	POLK COUNTY	0113.01	4 - Upper	142.32	No	$114,800	$127,434	4278	410	9.58	1233	1035
IA	POLK COUNTY	0113.02	3 - Middle	113.09	No	$114,800	$101,266	3128	368	11.76	599	857
IA	POLK COUNTY	0113.03	3 - Middle	92.73	No	$114,800	$83,031	7426	1166	15.70	1747	2386
IA	POLK COUNTY	0113.04	4 - Upper	181.48	No	$114,800	$162,500	4972	662	13.31	1825	1797
IA	POLK COUNTY	0113.05	3 - Middle	93.92	No	$114,800	$84,099	3193	1050	32.88	508	538
IA	POLK COUNTY	0114.05	4 - Upper	214.12	No	$114,800	$191,719	2970	426	14.34	807	834
IA	POLK COUNTY	0114.06	3 - Middle	88.78	No	$114,800	$79,500	6751	1346	19.94	1605	2159
IA	POLK COUNTY	0115.00	4 - Upper	147.13	No	$114,800	$131,741	7785	482	6.19	2269	2474
IA	POLK COUNTY	0116.00	0 - Unknown	0.00	No	$114,800	$0	0	0	0.00	0	0
IA	POLK COUNTY	0117.02	3 - Middle	106.35	No	$114,800	$95,227	3906	690	17.67	1133	1380
IA	POLK COUNTY	0117.03	4 - Upper	164.98	No	$114,800	$147,722	6601	1105	16.74	2079	2179
IA	POLK COUNTY	0117.04	4 - Upper	162.10	No	$114,800	$145,150	2719	343	12.61	951	951

2026 FFIEC Census Report - Summary Census Overview Information
State: IOWA
County: 099 - JASPER COUNTY
All Tracts: 10

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	JASPER COUNTY	0401.00	3 - Middle	88.07	No	$114,800	$78,864	3692	275	7.45	1290	1570
IA	JASPER COUNTY	0402.00	3 - Middle	106.46	No	$114,800	$95,326	3989	202	5.06	1291	1683
IA	JASPER COUNTY	0403.00	2 - Moderate	65.24	No	$114,800	$58,423	2676	283	10.58	703	1211
IA	JASPER COUNTY	0404.00	2 - Moderate	61.58	No	$114,800	$55,142	5392	602	11.16	1525	2203
IA	JASPER COUNTY	0405.00	2 - Moderate	54.35	No	$114,800	$48,669	5122	620	12.10	1192	1864
IA	JASPER COUNTY	0406.00	2 - Moderate	69.80	No	$114,800	$62,500	3059	346	11.31	1040	1323
IA	JASPER COUNTY	0407.00	3 - Middle	84.93	No	$114,800	$76,050	5390	374	6.94	1616	2147
IA	JASPER COUNTY	0408.00	3 - Middle	93.53	No	$114,800	$83,750	4186	215	5.14	1367	1651
IA	JASPER COUNTY	0409.00	3 - Middle	93.06	No	$114,800	$83,333	2967	131	4.42	926	1251
IA	JASPER COUNTY	9800.00	0 - Unknown	0.00	No	$114,800	$0	1340	320	23.88	0	0

Bank Iowa

Humboldt Assessment Area



Applied Filters

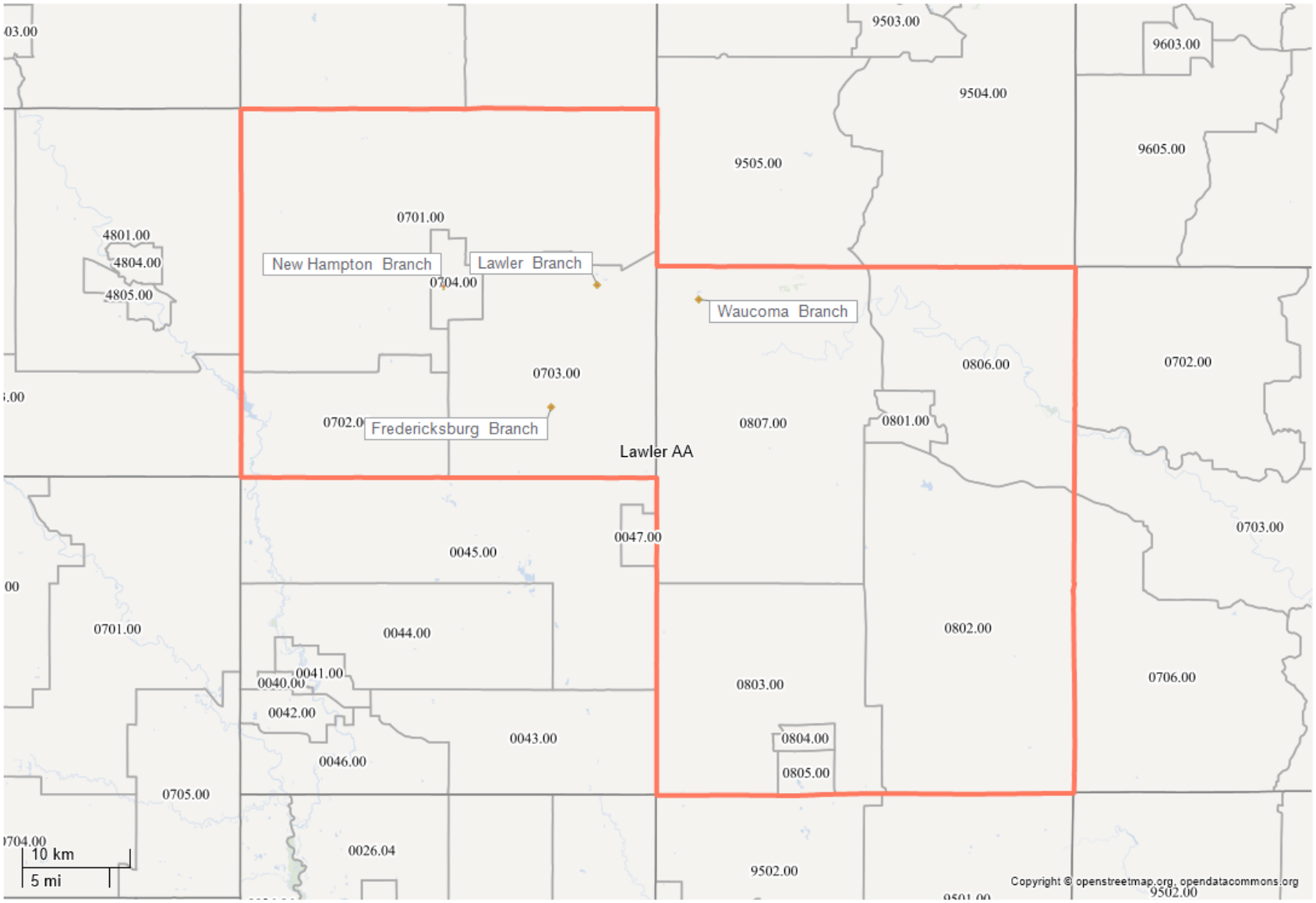
- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (1/1/2025 - 12/31/2025)
- Real Estate Loans: Loan File
- You are included in the HMDA benchmark.
- Area: (Humboldt AA)

2026 FFIEC Census Report - Summary Census Overview Information
State: IOWA
County: 091 - HUMBOLDT COUNTY
All Tracts: 4

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	HUMBOLDT COUNTY	9701.00	3 - Middle	95.80	Yes	$94,100	$68,750	2063	154	7.46	740	1033
IA	HUMBOLDT COUNTY	9702.00	3 - Middle	98.07	Yes	$94,100	$70,385	1736	104	5.99	650	902
IA	HUMBOLDT COUNTY	9703.00	3 - Middle	87.58	Yes	$94,100	$62,857	2829	237	8.38	940	1302
IA	HUMBOLDT COUNTY	9704.00	3 - Middle	99.94	Yes	$94,100	$71,724	2969	279	9.40	810	1281
IA	HUMBOLDT COUNTY	9999.99	3 - Middle	98.10	No	$94,100	$70,404	9597	774	8.07	3140	4518

Bank Iowa

Lawler Assessment Area



Applied Filters

- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (1/1/2025 - 12/31/2025)
- Real Estate Loans: Loan File
- You are included in the HMDA benchmark.
- Area: (Lawler AA)

2026 FFIEC Census Report - Summary Census Overview Information
State: IOWA
County: 037 - CHICKASAW COUNTY
All Tracts: 4

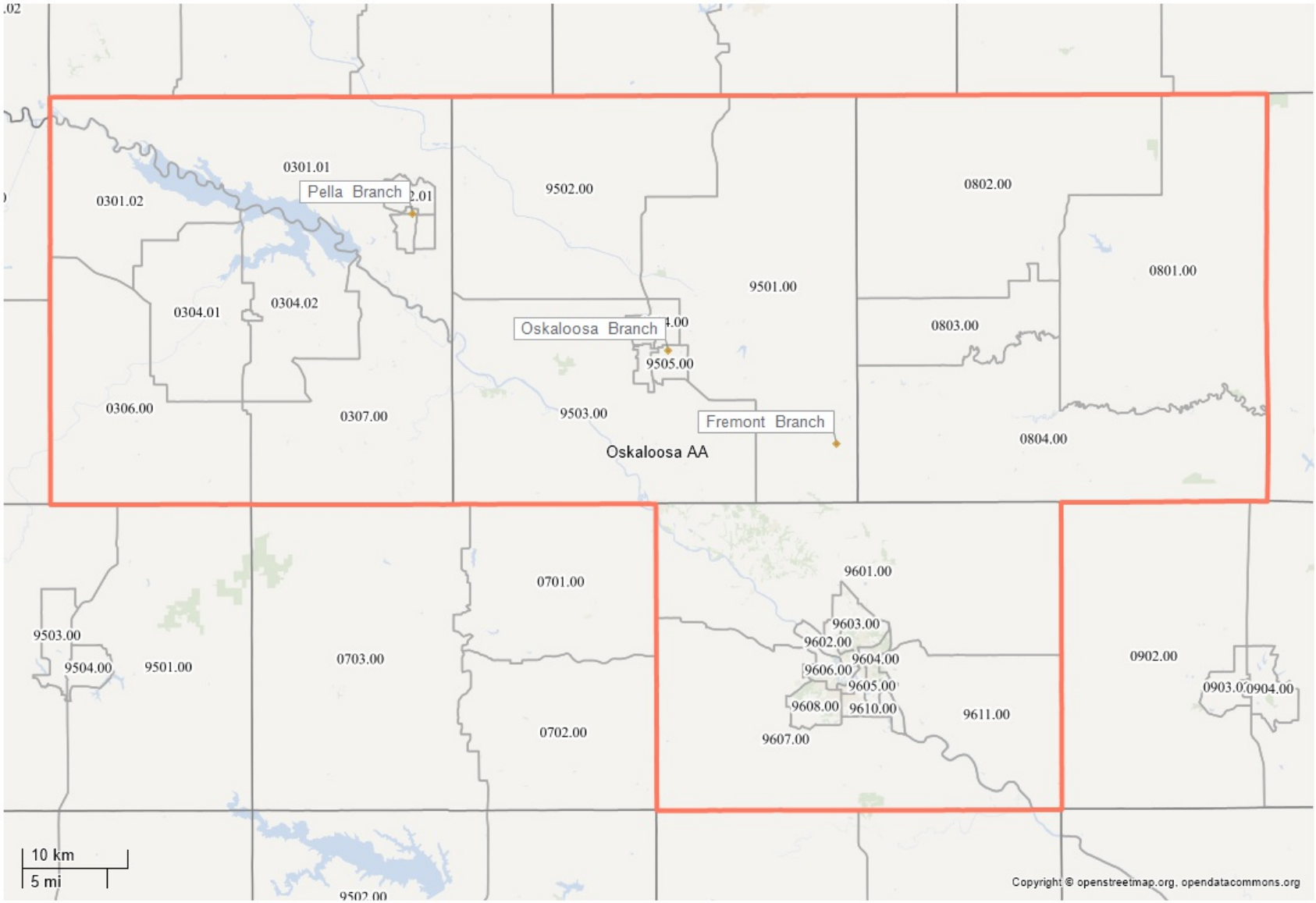
State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	CHICKASAW COUNTY	0701.00	3 - Middle	116.12	Yes	$94,100	$83,333	3194	159	4.98	1065	1393
IA	CHICKASAW COUNTY	0702.00	3 - Middle	104.51	Yes	$94,100	$75,000	2362	99	4.19	826	1106
IA	CHICKASAW COUNTY	0703.00	3 - Middle	109.17	Yes	$94,100	$78,348	2689	158	5.88	945	1145
IA	CHICKASAW COUNTY	0704.00	3 - Middle	95.90	Yes	$94,100	$68,824	3767	423	11.23	1355	1782
IA	CHICKASAW COUNTY	9999.99	3 - Middle	105.62	No	$94,100	$75,797	12012	839	6.98	4191	5426

2026 FFIEC Census Report - Summary Census Overview Information
State: IOWA
County: 065 - FAYETTE COUNTY
All Tracts: 7

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	FAYETTE COUNTY	0801.00	3 - Middle	116.02	Yes	$94,100	$83,264	2655	222	8.36	788	1244
IA	FAYETTE COUNTY	0802.00	2 - Moderate	77.42	No	$94,100	$55,560	3280	250	7.62	869	1391
IA	FAYETTE COUNTY	0803.00	3 - Middle	113.85	Yes	$94,100	$81,705	2333	89	3.81	837	1044
IA	FAYETTE COUNTY	0804.00	2 - Moderate	74.58	No	$94,100	$53,523	2811	335	11.92	848	1331
IA	FAYETTE COUNTY	0805.00	2 - Moderate	76.21	No	$94,100	$54,695	3371	338	10.03	954	1630
IA	FAYETTE COUNTY	0806.00	3 - Middle	90.02	Yes	$94,100	$64,608	2360	87	3.69	791	1156
IA	FAYETTE COUNTY	0807.00	3 - Middle	87.29	Yes	$94,100	$62,647	2699	135	5.00	1007	1354
IA	FAYETTE COUNTY	9999.99	3 - Middle	89.18	No	$94,100	$64,004	19509	1456	7.46	6094	9150

Bank Iowa

Oskaloosa Assessment Area



State
County
Census Tract
Zip Code
Assessment Area

Branch

Limited Service Branch
Main Office
Cash Dispenser
Deposit ATM or ITM
Other

Applied Filters

- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (1/1/2025 - 12/31/2025)
- Real Estate Loans: Loan File
- You are included in the HMDA benchmark.
- Area: (Oskaloosa AA)

2026 FFIEC Census Report - Summary Census Overview Information
State: IOWA
County: 107 - KEOKUK COUNTY
All Tracts: 4

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	KEOKUK COUNTY	0801.00	3 - Middle	110.70	Yes	$94,100	$79,444	2253	131	5.81	734	1057
IA	KEOKUK COUNTY	0802.00	2 - Moderate	77.13	No	$94,100	$55,357	2403	128	5.33	906	1275
IA	KEOKUK COUNTY	0803.00	3 - Middle	93.43	Yes	$94,100	$67,054	2612	160	6.13	852	1225
IA	KEOKUK COUNTY	0804.00	3 - Middle	108.11	Yes	$94,100	$77,589	2765	138	4.99	897	1200
IA	KEOKUK COUNTY	9999.99	3 - Middle	97.50	No	$94,100	$69,970	10033	557	5.55	3389	4757

2026 FFIEC Census Report - Summary Census Overview Information
State: IOWA
County: 123 - MAHASKA COUNTY
All Tracts: 7

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	MAHASKA COUNTY	9501.00	3 - Middle	93.54	No	$94,100	$67,132	3141	136	4.33	929	1386
IA	MAHASKA COUNTY	9502.00	4 - Upper	128.06	No	$94,100	$91,906	3353	132	3.94	1016	1380
IA	MAHASKA COUNTY	9503.00	3 - Middle	99.12	No	$94,100	$71,138	3614	166	4.59	1179	1485
IA	MAHASKA COUNTY	9504.00	3 - Middle	104.27	No	$94,100	$74,833	2960	292	9.86	789	1225
IA	MAHASKA COUNTY	9505.00	3 - Middle	105.65	No	$94,100	$75,821	3226	338	10.48	883	1277
IA	MAHASKA COUNTY	9506.00	3 - Middle	105.79	No	$94,100	$75,921	3323	501	15.08	676	1448
IA	MAHASKA COUNTY	9507.00	2 - Moderate	70.28	No	$94,100	$50,441	2573	366	14.22	615	1139
IA	MAHASKA COUNTY	9999.99	3 - Middle	102.08	No	$94,100	$73,259	22190	1931	8.70	6087	9340

2026 FFIEC Census Report - Summary Census Overview Information
State: IOWA
County: 125 - MARION COUNTY
All Tracts: 10

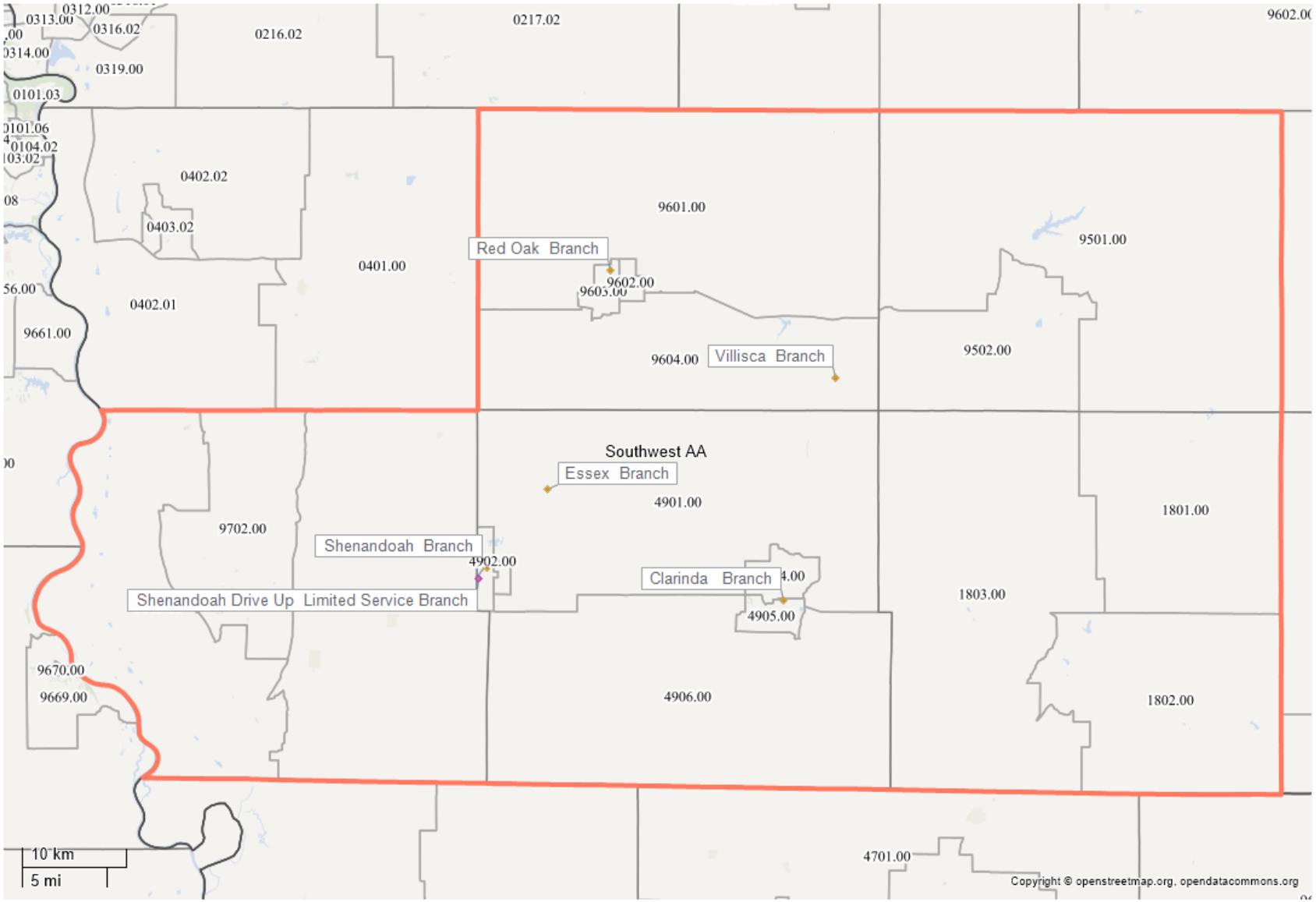
State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	MARION COUNTY	0301.01	4 - Upper	138.75	No	$94,100	$99,572	5025	306	6.09	1537	1585
IA	MARION COUNTY	0301.02	3 - Middle	96.99	No	$94,100	$69,605	2815	180	6.39	982	1281
IA	MARION COUNTY	0302.01	4 - Upper	147.30	No	$94,100	$105,708	3811	306	8.03	1082	1278
IA	MARION COUNTY	0302.02	4 - Upper	120.42	No	$94,100	$86,422	3166	340	10.74	824	1118
IA	MARION COUNTY	0303.00	3 - Middle	91.78	No	$94,100	$65,870	2930	280	9.56	495	724
IA	MARION COUNTY	0304.01	3 - Middle	86.58	No	$94,100	$62,138	4855	364	7.50	1289	1782
IA	MARION COUNTY	0304.02	3 - Middle	116.32	No	$94,100	$83,478	3758	253	6.73	1241	1574
IA	MARION COUNTY	0305.00	2 - Moderate	79.86	No	$94,100	$57,314	2000	203	10.15	571	1048
IA	MARION COUNTY	0306.00	3 - Middle	91.19	No	$94,100	$65,446	2527	129	5.10	964	1203
IA	MARION COUNTY	0307.00	3 - Middle	99.28	No	$94,100	$71,250	2527	135	5.34	991	1182

2026 FFIEC Census Report - Summary Census Overview Information
State: IOWA
County: 179 - WAPELLO COUNTY
All Tracts: 11

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	WAPELLO COUNTY	9601.00	3 - Middle	89.41	No	$94,100	$64,167	2879	294	10.21	856	1184
IA	WAPELLO COUNTY	9602.00	2 - Moderate	63.70	No	$94,100	$45,714	2614	999	38.22	464	966
IA	WAPELLO COUNTY	9603.00	3 - Middle	92.78	No	$94,100	$66,588	4420	773	17.49	1447	1812
IA	WAPELLO COUNTY	9604.00	2 - Moderate	71.08	No	$94,100	$51,012	3910	1220	31.20	856	1477
IA	WAPELLO COUNTY	9605.00	2 - Moderate	55.51	No	$94,100	$39,839	2404	1022	42.51	480	997
IA	WAPELLO COUNTY	9606.00	1 - Low	48.34	No	$94,100	$34,695	3138	892	28.43	676	1270
IA	WAPELLO COUNTY	9607.00	3 - Middle	102.15	No	$94,100	$73,313	3229	170	5.26	1170	1491
IA	WAPELLO COUNTY	9608.00	3 - Middle	95.68	No	$94,100	$68,670	3517	596	16.95	1244	1435
IA	WAPELLO COUNTY	9609.00	2 - Moderate	69.31	No	$94,100	$49,745	3225	1092	33.86	680	1231
IA	WAPELLO COUNTY	9610.00	2 - Moderate	54.28	No	$94,100	$38,958	3341	907	27.15	829	1249
IA	WAPELLO COUNTY	9611.00	3 - Middle	100.86	No	$94,100	$72,386	2760	177	6.41	1050	1374

Bank Iowa

Southwest Assessment Area



- State
- County
- Census Tract
- Zip Code
- Assessment Area

- Branch
- Limited Service Branch
- Main Office
- Cash Dispenser
- Deposit ATMor ITM
- Other

Applied Filters

- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (1/1/2025 - 12/31/2025)
- Real Estate Loans: Loan File
- You are included in the HMDA benchmark.
- Area: (Southwest AA)

2026 FFIEC Census Report - Summary Census Overview Information
State: IOWA
County: 003 - ADAMS COUNTY
All Tracts: 2

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	ADAMS COUNTY	9501.00	3 - Middle	94.17	Yes	$94,100	$67,583	1587	67	4.22	607	835
IA	ADAMS COUNTY	9502.00	3 - Middle	99.55	Yes	$94,100	$71,442	2117	119	5.62	708	1134
IA	ADAMS COUNTY	9999.99	3 - Middle	97.57	No	$94,100	$70,022	3704	186	5.02	1315	1969

2026 FFIEC Census Report - Summary Census Overview Information
State: IOWA
County: 071 - FREMONT COUNTY
All Tracts: 3

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	FREMONT COUNTY	9701.00	3 - Middle	99.43	Yes	$94,100	$71,354	2015	97	4.81	687	1031
IA	FREMONT COUNTY	9702.00	3 - Middle	104.72	Yes	$94,100	$75,156	2695	227	8.42	827	1179
IA	FREMONT COUNTY	9703.00	3 - Middle	97.20	Yes	$94,100	$69,757	1895	136	7.18	750	1151
IA	FREMONT COUNTY	9999.99	3 - Middle	100.89	No	$94,100	$72,404	6605	460	6.96	2264	3361

2026 FFIEC Census Report - Summary Census Overview Information
State: IOWA
County: 137 - MONTGOMERY COUNTY
All Tracts: 4

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	MONTGOMERY COUNTY	9601.00	3 - Middle	113.74	Yes	$94,100	$81,630	1953	62	3.17	637	984
IA	MONTGOMERY COUNTY	9602.00	3 - Middle	81.33	Yes	$94,100	$58,371	2412	157	6.51	673	1021
IA	MONTGOMERY COUNTY	9603.00	2 - Moderate	74.31	No	$94,100	$53,333	3262	386	11.83	989	1654
IA	MONTGOMERY COUNTY	9604.00	3 - Middle	107.09	Yes	$94,100	$76,855	2703	122	4.51	938	1332
IA	MONTGOMERY COUNTY	9999.99	3 - Middle	93.11	No	$94,100	$66,820	10330	727	7.04	3237	4991

2026 FFIEC Census Report - Summary Census Overview Information
State: IOWA
County: 145 - PAGE COUNTY
All Tracts: 6

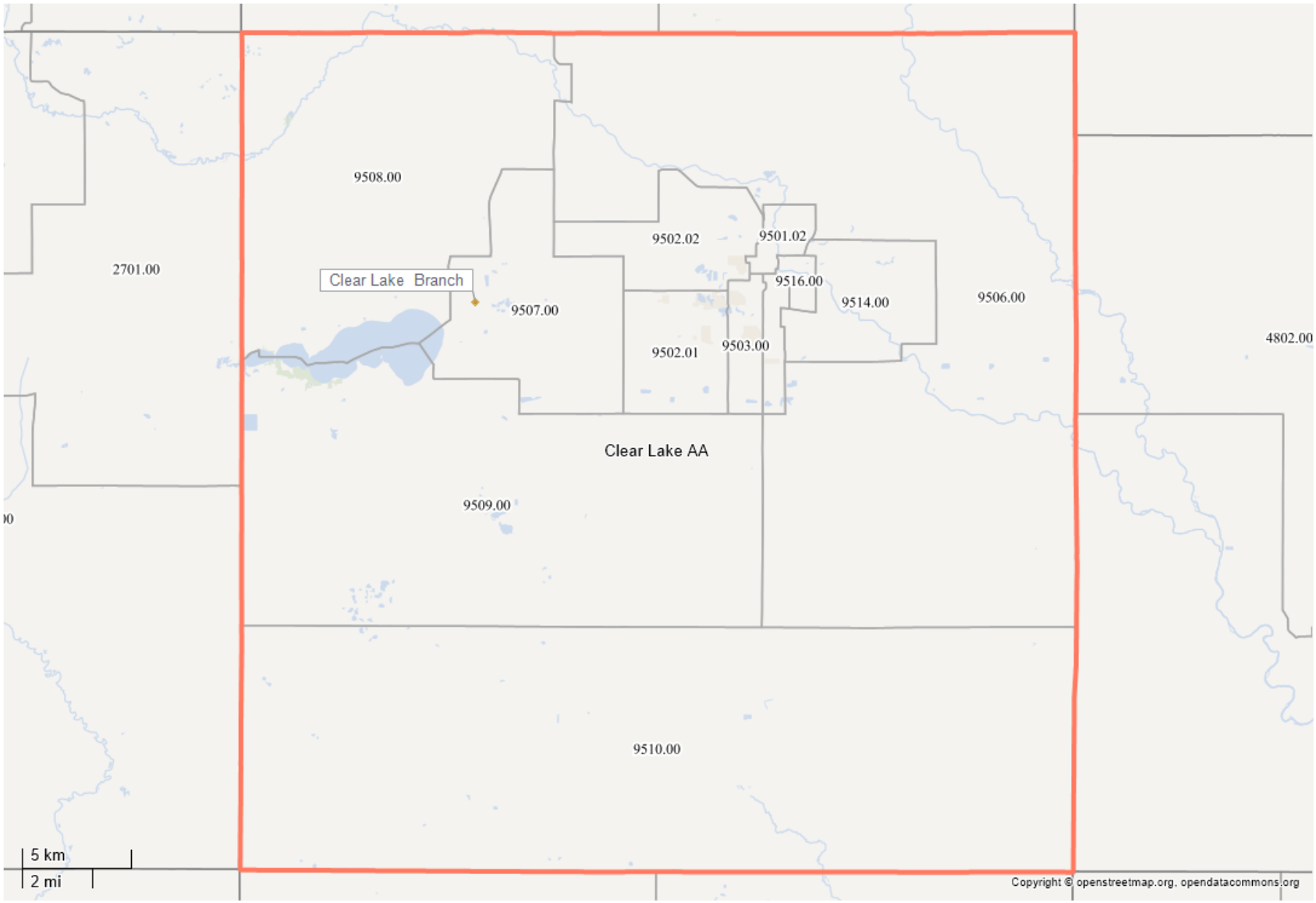
State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	PAGE COUNTY	4901.00	3 - Middle	104.51	Yes	$94,100	$75,000	2463	106	4.30	941	1217
IA	PAGE COUNTY	4902.00	2 - Moderate	70.44	No	$94,100	$50,556	2266	262	11.56	510	837
IA	PAGE COUNTY	4903.00	3 - Middle	92.27	Yes	$94,100	$66,216	2812	214	7.61	886	1346
IA	PAGE COUNTY	4904.00	3 - Middle	89.95	Yes	$94,100	$64,556	3189	592	18.56	674	1044
IA	PAGE COUNTY	4905.00	3 - Middle	85.93	Yes	$94,100	$61,667	2319	237	10.22	641	924
IA	PAGE COUNTY	4906.00	3 - Middle	81.86	Yes	$94,100	$58,750	2162	114	5.27	855	1144
IA	PAGE COUNTY	9999.99	3 - Middle	89.13	No	$94,100	$63,965	15211	1525	10.03	4507	6512

2026 FFIEC Census Report - Summary Census Overview Information
State: IOWA
County: 173 - TAYLOR COUNTY
All Tracts: 3

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	TAYLOR COUNTY	1801.00	3 - Middle	86.18	Yes	$94,100	$61,850	2168	411	18.96	834	1228
IA	TAYLOR COUNTY	1802.00	3 - Middle	95.95	Yes	$94,100	$68,859	2062	110	5.33	678	1037
IA	TAYLOR COUNTY	1803.00	3 - Middle	112.66	Yes	$94,100	$80,850	1666	71	4.26	580	772
IA	TAYLOR COUNTY	9999.99	3 - Middle	95.14	No	$94,100	$68,281	5896	592	10.04	2092	3037

Bank Iowa

Clear Lake Assessment Area



State
County
Census Tract
Zip Code
Assessment Area

Branch
Limited Service Branch
Main Office
Cash Dispenser
Deposit ATM or ITM
Other

Applied Filters

- CRA Loans Action Taken Date: (1/1/2025 - 12/31/2025)
- Facility Status: (Open)
- CRA Loans: CRA LAR
- Real Estate Loans Action Taken Date: (1/1/2025 - 12/31/2025)
- Real Estate Loans: Loan File
- You are included in the HMDA benchmark.
- Area: (Clear Lake AA)

2026 FFIEC Census Report - Summary Census Overview Information
State: IOWA
County: 033 - CERRO GORDO COUNTY
All Tracts: 12

State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2026 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
IA	CERRO GORDO COUNTY	9501.02	3 - Middle	93.53	No	$94,100	$67,125	4374	821	18.77	1335	2182
IA	CERRO GORDO COUNTY	9502.01	3 - Middle	115.01	No	$94,100	$82,539	2737	442	16.15	979	1229
IA	CERRO GORDO COUNTY	9502.02	3 - Middle	113.19	No	$94,100	$81,235	3664	562	15.34	1432	1810
IA	CERRO GORDO COUNTY	9503.00	2 - Moderate	74.60	No	$94,100	$53,540	4422	808	18.27	1208	2107
IA	CERRO GORDO COUNTY	9504.02	2 - Moderate	63.85	No	$94,100	$45,824	4146	568	13.70	985	1703
IA	CERRO GORDO COUNTY	9506.00	4 - Upper	128.75	No	$94,100	$92,400	2145	116	5.41	756	968
IA	CERRO GORDO COUNTY	9507.00	3 - Middle	110.99	No	$94,100	$79,653	4030	364	9.03	1393	1934
IA	CERRO GORDO COUNTY	9508.00	4 - Upper	120.11	No	$94,100	$86,199	4785	342	7.15	1531	2157
IA	CERRO GORDO COUNTY	9509.00	4 - Upper	134.75	No	$94,100	$96,705	1659	97	5.85	641	1251
IA	CERRO GORDO COUNTY	9510.00	3 - Middle	107.99	No	$94,100	$77,500	2763	164	5.94	914	1221
IA	CERRO GORDO COUNTY	9514.00	4 - Upper	126.50	No	$94,100	$90,785	3900	443	11.36	1048	1268
IA	CERRO GORDO COUNTY	9516.00	3 - Middle	99.94	No	$94,100	$71,721	4502	581	12.91	1312	1768

PUBLIC DISCLOSURE

September 9, 2024

COMMUNITY REINVESTMENT ACT

PERFORMANCE EVALUATION

Bank Iowa
RSSD# 187947

1150 Jordan Creek Parkway
West Des Moines, Iowa 50266

Federal Reserve Bank of Chicago

230 South LaSalle Street
Chicago, Illinois 60604-1413

NOTE: This document is an evaluation of this bank's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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INSTITUTION'S CRA RATING

Bank Iowa Overall CRA Rating: Satisfactory

Performance Test Rating Table

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

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

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

Summary of Major Factors that Support the Rating

Lending Test:

- The bank's lending levels reflect excellent responsiveness to credit needs in its combined assessment area.
- A high percentage of loans were made in the bank's combined assessment area.
- The geographic distribution of loans reflects excellent penetration throughout the bank's assessment areas.
- The distribution of loans reflects, given the product lines offered, excellent penetration among borrowers of different income levels and to businesses and farms of different sizes.
- Lending exhibits an excellent record of serving credit needs of low-income individuals and

areas, and very small businesses and farms.
- The bank makes an adequate level of community development loans.
- The bank makes use of innovative and flexible lending practices.

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

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

BANK IOWA

DESCRIPTION OF INSTITUTION

Bank Iowa is a wholly owned subsidiary of Bank Iowa Corporation, both headquartered in West Des Moines, Iowa, with total assets of $2.1 billion as of March 31, 2024. The bank has two subsidiaries which do not engage in lending or deposit related activities, including Bank Iowa Capital Investments LLC and Panhandle 1 LLC.

The bank maintains its main office in West Des Moines and a network of 25 branches and 22 cash-only automated teller machines (ATMs) located throughout the state of Iowa. The bank operates primarily in rural communities throughout the state, with the exception of the Des Moines-West Des Moines, Iowa metropolitan statistical area (MSA) assessment area. There have been no mergers, acquisitions, or branch openings during the evaluation period. The bank did close one branch in the Denison, Iowa Non-MSA assessment area during the evaluation period, which included a cash-only ATM, as well as a cash-only ATM in the Humboldt, Iowa Non-MSA assessment area.

Bank Iowa
Branch Locations
by Census Tract Income Level

Assessment Area	Low Income		Moderate Income		Middle Income		Upper Income		Total	
	#	%	#	%	#	%	#	%	#	% of Total
Des Moines-West Des Moines IA MSA 19780 MSA	0	0.0	1	16.7	4	66.7	1	16.7	6	24.0
Southwest IA Non-MSA	0	0.0	2	33.3	4	66.7	0	0.0	6	24.0
Denison, IA Non-MSA	0	0.0	1	33.3	2	66.7	0	0.0	3	12.0
Humboldt, IA Non-MSA	0	0.0	0	0.0	3	100.0	0	0.0	3	12.0
Lawler, IA Non-MSA	0	0.0	0	0.0	4	100.0	0	0.0	4	16.0
Oskaloosa, IA Non-MSA	0	0.0	0	0.0	2	66.7	1	33.3	3	12.0
Total	**0**	**0.0**	**4**	**16.0**	**19**	**76.0**	**2**	**8.0**	**25**	**100.0**

Note: Percentages may not total to 100.0 percent due to rounding.

The bank offers a variety of lending products including agricultural loans, consumer loans, residential real estate loans (in-house and secondary market), and consumer closed- and open-end loans. Bank Iowa is primarily a commercial and agricultural lender, as these categories represent

50.8 percent and 33.1 percent of the loan portfolio, respectively. Furthermore, the bank offers standard non-complex consumer deposit and savings products including checking, savings, money market, retirement, health savings, prepaid cards, and certificates of deposit as well as business/commercial checking and savings. Additionally, at no cost to its customers it offers online banking, mobile/text banking, bill pay, e-statements, debit cards, identity theft services, night depository, and notary services. Bank Iowa's marketing strategy is mostly focused on building brand awareness and promoting the bank's mortgage, commercial, agricultural and consumer products, using both traditional print and newsletters, digital streaming and audio, a digital banking platform, social media, radio, television, event sponsorships, direct mail, and in-branch marketing collateral.

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

Composition of Loan Portfolio as of March 31, 2024 (000's)		
Loan Type	**$**	**%**
Commercial	773,487	50.8
Agricultural	503,965	33.1
Residential Real Estate	157,305	10.3
Consumer	53,504	3.5
Other	34,729	2.3
Total	1,522,990	100.0
Note: *Percentages may not total 100.0 percent due to rounding*		

Total loans as of March 31, 2024, reflects an increase of 28.8 percent compared to total loans as of March 31, 2022, reflected in the previous evaluation. The biggest increase by percentage was in commercial loans which increased by 37.5 percent. Although agricultural loans increased by 15.3 percent, this percentage increase was the lowest of all categories.

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

At its previous evaluation conducted on July 11, 2022, the bank was rated **Satisfactory** under the Community Reinvestment Act (CRA).

SCOPE OF THE EXAMINATION

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

The retail analysis was based on the 2022 and 2023 Home Mortgage Disclosure Act (HMDA)-reportable loans. Home purchase and home refinance comprised the majority of HMDA-reportable loans and were the primary products analyzed. Home improvement loans were also analyzed in one of the assessment areas due to lending volume. The following products reported under HMDA were not evaluated due to limited or no volume in each of the assessment areas: multifamily; other purpose lines of credit; other purpose closed/exempt; and loan purpose not applicable. Refer to the individual assessment areas for additional details.

This review also included an analysis of 2022 and 2023 CRA-reportable small business and small farm loans. For purposes of evaluating the bank's lending performance, more weight was given to CRA-reportable loan activity, due to higher volumes in small business and small farms both by number and dollar amount compared to HMDA-reportable lending. Further, more weight was given to the bank's CRA-reportable performance in 2022, as this was the most recent year in which aggregate lender's data was available for comparison purposes.

The bank's six assessment areas and the scope of review for each assessment area are shown in the following table. Full scope analysis was selected in four assessment areas based on the number of branch offices, concentration of loans and deposits, demographic factors such as the number of low-and moderate-income families, and length of time since assessment areas were last subject to a full-scope review. There were no changes made to the bank's assessment areas from the previous evaluation. The following table provides a description of the scope of each assessment area:

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

The bank's Des Moines-West Des Moines, Iowa MSA assessment area and the Southwest, Iowa Non-MSA were weighed more heavily than other full scope assessment areas because of the number of branches, the number of loan originations, and total deposits in each assessment area compared to the totals for all other full scope assessment areas.

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

- *Level of Lending Activity*: The bank's HMDA-reportable residential real estate loan originations and CRA-reportable loans originated from January 1, 2022 through December 31, 2023, were reviewed to determine the responsiveness to credit needs in the combined assessment area.

- *Lending in the Assessment Area*: The bank's HMDA-reportable residential real estate loans and CRA-reportable loans, originated from January 1, 2022 through December 31, 2023, were analyzed to determine the percentage of loans in the bank's combined assessment area.

- *Geographic Distribution of Lending in the Assessment Area:* The bank's HMDA-reportable residential real estate loans and CRA-reportable loans originated from January 1, 2022 through December 31, 2023, were analyzed to determine the extent to which the bank is lending in census tracts of different income levels, particularly those designated as low-or moderate-income.

- *Lending to Borrowers of Different Incomes and to Businesses and Farms of Different Sizes:* The bank's HMDA-reportable residential real estate loans and CRA-reportable loans originated from January 1, 2022 through December 31, 2023, were analyzed to determine the distribution among borrowers of different income levels, particularly low-or moderate-income borrowers, and to businesses and farms of different revenue sizes.

- *Community Development Lending:* The number, dollar volume, and complexity of community development loans from July 11, 2022 through September 9, 2024, were evaluated for their responsiveness to community credit needs.

- *Innovative or Flexible Lending Practices:* The degree to which the bank uses innovative and flexible lending practices to address the credit needs of low- and moderate-income individuals or geographies and small businesses and small farms was assessed.

- *Investments:* Qualified investments, grants, and donations made from July 11, 2022 through September 9, 2024, were reviewed to determine the bank's responsiveness to community development needs. In addition, outstanding qualified investments made prior to July 11, 2022, were also considered. Qualified investments were also evaluated to determine the bank's use of innovative or complex investments.

- *Services:* The distribution of the bank's branch offices, banking services, hours of operation, availability of loan and deposit products, and the extent and innovativeness of community development services undertaken from July 11, 2022 through September 9, 2024, were reviewed.

In addition, information, observations, and insights from 11 community representatives familiar with the various assessment areas was utilized to provide information regarding local economic and socio-economic conditions in the assessment areas. These community representatives' areas of emphasis involved affordable housing, economic development, and agriculture. Refer to individual assessment area summaries for community representative information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

Bank Iowa's performance relative to the lending test is rated outstanding based on the performance across the combined assessment area. Factors contributing to the rating include: lending activity reflects excellent responsiveness to credit needs in its assessment areas; a high percentage of loans were made in the bank's combined assessment area; geographic distribution of loans reflects excellent penetration throughout the assessment areas; distribution of borrowers reflects excellent penetration among individuals of different income levels and to businesses and farms of different sizes; an excellent record of serving the credit needs of low-income individuals and areas, and very small businesses and farms; the bank made an adequate level of community development loans and makes use of innovative and flexible lending practices in serving individual assessment area credit needs.

Level of Lending Activity

The bank's lending levels reflect excellent responsiveness to the credit needs in its combined assessment area, taking into account the number and amount of home mortgage, small business, and small farm loans, and given its ranking among all HMDA and CRA reporters in the full-scope assessment areas. Bank Iowa's small business and small farm lending, in particular, is a significant percentage of overall small businesses and small farm lending in several assessment areas.

During the review period, the bank's HMDA-reportable (home mortgage) and CRA-reportable (small business and small farm) lending activity comprised 5,743 loans for a total of $732.8 million. This level of lending activity was a decline from the bank's level during the previous evaluation period, from January 1, 2020 to December 31, 2021, in which the bank originated 10,373 loans for a total of $1.1 billion. Significant declines occurred in home mortgage refinances (79.7 percent), as well as small business loans (51.1 percent).

The table below presents the bank's lending activity period from January 1, 2022 through December 31, 2023.

Summary of Lending Activity January 1, 2022 – December 31, 2023				
Loan Type	**#**	**%**	**$(000s)**	**%**
Home Improvement	182	3.2	9,973	1.4
Home Purchase	768	13.4	152,610	20.8
Multi-Family Housing	53	0.9	12,498	1.7
Refinancing	289	5.0	37,699	5.1
Total HMDA-reportable loans	1,292	22.5	212,779	29.0
Small Business	1,523	26.5	165,000	22.5
Small Farm	2,928	50.1	355,093	48.5
Total Small Business and Small Farm loans	4,451	76.6	520,093	71.0
TOTAL LOANS	**5,743**	**100.0**	**732,872**	**100.0**
Note: Percentages may not add to 100.0 percent due to rounding.				

Assessment Area Concentration

Bank Iowa made a high percentage of its loans in its combined assessment area. Overall, the bank originated 79.7 percent of its loans by number and 76.7 percent by dollar volume within the combined assessment area. Home mortgage loans originated in the assessment area represented 23.0 percent of all such loans by number and 28.5 percent by dollar. Small business loans originated in the assessment area represented 26.6 percent by number and 20.4 percent by dollar. Finally, small farm loans in the assessment area represented the largest portion of its lending by both number and dollar with 50.4 percent and 51.1 percent respectively. Overall, the level of lending within the combined assessment area of 79.7 percent, by number, was consistent with the bank's prior evaluation performance at 82.6 percent.

The following table summarizes the bank's lending inside and outside its combined assessment area for home mortgage, small business, and small farm loans from January 1, 2022 through December 31, 2023.

Loan Types	Inside				Outside			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Improvement	159	87.4	$8,516	85.4	23	12.6	$1,456	14.6
Home Purchase - Conventional	560	79.1	$105,649	72.6	148	20.9	$39,784	27.4
Home Purchase - FHA	50	83.3	$5,906	82.3	10	16.7	$1,271	17.7
Multi-Family Housing	47	88.7	$11,311	90.5	6	11.3	$1,187	9.5
Refinancing	238	82.4	$29,044	77.0	51	17.6	$8,655	23.0
Total HMDA related	**1,054**	**81.6**	**$160,426**	**75.4**	**238**	**18.4**	**$52,352**	**24.6**
Small Business	1,219	80.0	$114,642	69.5	304	20.0	$50,358	30.5
Total Small Bus. related	**1,219**	**80.0**	**$114,642**	**69.5**	**304**	**20.0**	**$50,358**	**30.5**
Small Farm	2,306	78.8	$287,294	80.9	622	21.2	$67,799	19.1
Total Small Farm related	**2,306**	**78.8**	**$287,294**	**80.9**	**622**	**21.2**	**$67,799**	**19.1**
TOTAL LOANS	**4,579**	**79.7**	**$562,362**	**76.7**	**1,164**	**20.3**	**$170,509**	**23.3**

Geographic and Borrower Distribution

Bank Iowa's lending activities reflect excellent distribution throughout the assessment areas. Further, Bank Iowa's lending activities reflect excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank. Bank Iowa exhibits an excellent record of serving the credit needs of highly economically disadvantaged areas in its assessment areas, low-income individuals, and businesses and farms with gross annual revenues of $1 million or less, consistent with safe and sound operations. Additionally, the bank makes use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- or moderate-income individuals and geographies. The conclusions are based upon the bank's record of lending in the four full scope review assessment areas.

The bank offers flexible loan programs for both homebuyers and small farms. The following are the programs that the bank makes available:

- *Home Possible*, which is a Federal Home Loan Mortgage (Freddie Mac) program that offers flexible underwriting standards and downpayments as low as three percent to low-and moderate-income buyers.

- *Home Ready*, which is a Federal National Mortgage Association (Fannie Mae) program that offers flexible underwriting standards and downpayments as low as three percent to low- and moderate-income buyers with $2,500 credit to low-income borrowers.

- Grants to low- and moderate-income first-time homebuyers to assist with down payment and closing costs through the Federal Home Loan Bank.

- Loans offering low-downpayment features and closing cost assistance through the Iowa Finance Authority, the Fannie Mae Preferred Program, and the Freddie Mac Advantage Program.

- Loan programs through the United States Department of Agriculture (USDA) Rural Development, which are available to low- and moderate-income borrowers purchasing in certain rural areas of Iowa and provide underwriting flexibility by not requiring a credit score.

- *Beginning Farmer*, which is a USDA Service Agency program that offers a reduced interest rate on a portion of the dollars borrowed and a downpayment as low as five percent.

Community Development Lending

Bank Iowa makes an adequate level of community development loans. The bank originated 26 community development loans, totaling $33.1 million during this evaluation period. Of this amount, $23.3 million were within the combined assessment area, and the remaining dollars were originated in the broader statewide regional area. By dollar, this reflected a decrease of 65.4 percent from the previous evaluation, where the bank had a total of $95.6 million with $65.6 million in its assessment areas. Approximately half of the dollars in the full review assessment areas were for revitalization/stabilization purposes, which was a need indicated by community representatives.

The following table provides a summary of the bank's qualified community development lending.

BANK IOWA Community Development Loans (Dollars in 000s) July 11, 2022 to September 9, 2024										
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalization\ Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
FULL REVIEW										
Des Moines-West Des Moines, IA MSA	3	8,550	0	0	1	100	1	2,280	5	10,930
Southwest, IA Non-MSA	1	118	3	650	0	0	9	11,113	13	11,881
Denison, IA Non-MSA	1	360	1	120	0	0	0	0	2	480
Humboldt, IA Non-MSA	0	0	0	0	0	0	0	0	0	0
TOTAL	5	9,028	4	770	1	100	10	13,393	20	23,291
LIMITED SCOPE										
Lawler, IA Non-MSA	0	0	0	0	0	0	0	0	0	0
Oskaloosa, IA Non-MSA	0	0	0	0	0	0	1	27	1	27
TOTAL	0	0	0	0	0	0	1	27	1	27
OTHER										
Broader Statewide Regional Area	1	383	1	1,260	1	7,800	2	348	5	9,792
GRAND TOTAL	6	9,412	5	2,030	2	7,900	13	13,768	26	33,110

INVESTMENT TEST

Bank Iowa's performance relative to the Investment Test is low satisfactory based on an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. In addition, the bank makes rare use of innovative or complex investments to support community development initiatives and exhibits adequate responsiveness to credit and community development needs. The bank made three investments for $3.9 million, all in the Des Moines-West Des Moines MSA, which was an improvement from the previous evaluation where the bank did not have any investments within its combined assessment area. Two of the investments were for affordable housing which was a need expressed by community representatives in the assessment area and the other was for capital improvements in the city of Newton, which contains three of Jasper County's four moderate-income census tracts. Opportunity for community development investments in all five of the bank's Non-MSA assessment areas is limited, largely due to a limited number of low- and moderate-income census tracts.

The following table is a summary of qualified community development investments by assessment area and community development activity.

BANK IOWA Qualified Investments (Dollars in 000s) July 11, 2022 to September 9, 2024						
Assessment Area	Current Period Funded				Current Period Funded	Prior Period Outstanding Balances
	Affordable Housing	Community Service	Economic Development	Revitalization \ Stabilization		
FULL REVIEW						
Des Moines-West Des Moines, IA MSA	2,654	0	0	1,256	3,910	0
Southwest, IA Non-MSA	0	0	0	0	0	0
Denison, IA Non-MSA	0	0	0	0	0	0
Humboldt, IA Non-MSA	0	0	0	0	0	0
TOTAL	2,654	0	0	1,256	3,910	0
LIMITED REVIEW						
Lawler, IA Non-MSA	0	0	0	0	0	0
Oskaloosa, IA Non-MSA	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0
OTHER						
Broader Statewide Regional Area	0	0	0	0	0	0
GRAND TOTAL	2,654	0	0	1,256	3,910	0

In addition, the bank made a total of $203,443 in qualified community development grants and donations in the current 26-month evaluation period, which is a 26.2 percent increase from the $161,227 in donations from the previous evaluation, a 28-month review period. Further analysis indicates that $98,768 in donations, or 48.5 percent, went towards organizations with a community service focus, followed by $66,425 or 32.7 percent, in donations going towards revitalization/stabilization. Overall, 60 different organizations with a community development purpose received donations from the bank.

The following table is a summary of qualified community development donations by assessment area and community development activity.

BANK IOWA Community Development Donations July 11, 2022 to September 9, 2024										
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalization and Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
FULL SCOPE REVIEW										
Des Moines-West Des Moines, IA MSA	3	2,750	24	27,200	1	150	2	30,000	30	60,100
Southwest, IA Non-MSA	0	0	10	22,400	5	8,450	2	10,100	17	40,950
Denison, IA Non-MSA	1	500	8	38,300	0	0	6	26,325	15	65,125
Humboldt, IA Non-MSA	0	0	5	1,160	1	3,500	0	0	6	4,660
TOTAL	4	3,250	47	89,060	7	12,100	10	66,425	68	170,835
LIMITED SCOPE REVIEW										
Lawler, IA Non-MSA	1	1,000	2	625	1	500	0	0	4	2,125
Oskaloosa, IA Non-MSA	1	250	7	8,433	6	21,150	0	0	14	29,833
TOTAL	2	1,250	8	9,058	7	21,650	0	0	18	31,958
OTHER										
Broader Statewide Regional Area	0	0	3	650	0	0	0	0	3	650
GRAND TOTAL	6	4,500	59	98,768	14	33,750	10	66,425	89	203,443

SERVICE TEST

Bank Iowa's performance with respect to the Service Test is low satisfactory based on the following major factors in the individual assessment areas: the bank's service delivery systems are accessible to geographies and individuals of different income levels in its assessment areas. The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. Services and business hours do not vary in a way that inconveniences the needs of its assessment areas, particularly low- and moderate-income geographies and low- and moderate-income individuals. The bank provides an adequate level of community development services.

Retail Services

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

The bank's retail services are provided through its network, including the bank's main office, 25 branches, 23 cash-only ATMs, telephone, on-line services, and mobile banking activities. The bank's on-line offerings include the ability to apply for consumer loans or residential real estate mortgages, and to open consumer deposit accounts. All branches offer consumer, mortgage, and commercial products and services. Branches are typically open Monday through Friday from 8:30 or 9:00 a.m. to 4:00 or 5:00 p.m., with some branches open on Saturday from 8:00 a.m. to 12:00 p.m. In addition to branch hours, appointments with lenders for loan applications at the applicant's convenience and internet, phone, and mobile banking services make the bank's products and services accessible to low- and moderate-income individuals and in low- and moderate-income census tracts.

The bank does not operate any branches in low-income census tracts. The bank operates four branches in moderate-income census tracts throughout the combined assessment area, as well as two branch offices within underserved non-metropolitan middle-income census tracts. The bank's remaining branches and the main office are located in either middle- or upper-income census tracts. The bank did close one branch and one ATM during the evaluation period, both located in middle-income census tracts.

Community Development Services

Bank Iowa provides an adequate level of community development services. During the review period, the bank provided 1,602 hours of community development service in its combined assessment area (including broader statewide and/or regional areas), representing an increase of 66.9 percent from its performance at the previous evaluation during which time it provided 960 hours. With the exception of the Southwest, IA Non-MSA assessment area which had a slight decline, all of the bank's assessment areas displayed an increase in both the number of events and the total activity hours. The Des Moines MSA assessment area had the most significant increase in number of hours as it displayed a 161.7 percent increase over the previous performance. The bank had a significant increase in the number of economic development purpose activities which accounted for 46.3 percent of the total hours.

The following table is a summary of qualified community development services throughout its combined assessment area during the review period.

BANK IOWA Community Development Services July 11, 2022 to September 9, 2024										
Assessment Area	**Affordable Housing**		**Community Service**		**Economic Development**		**Revitalize/ Stabilize**		**Total**	
	Events	**Hours**	**Events**	**Hours**	**Events**	**Hours**	**Events**	**Hours**	**Events**	**Hours**
FULL SCOPE REVIEW										
Des Moines-West Des Moines, IA MSA	33	89	31	167	75	135	0	0	139	390
Southwest, IA Non-MSA	11	46	40	59	153	235	0	0	204	340
Denison, IA Non-MSA	0	0	30	56	24	28	29	58	83	142
Humboldt, IA Non-MSA	15	25	12	21	43	75	2	8	72	129
TOTAL	59	160	113	302	295	473	31	66	498	1,000
LIMITED SCOPE REVIEW										
Lawler, IA Non-MSA	1	2	0	0	79	121	0	0	80	123
Oskaloosa, IA Non-MSA	1	2	24	203	13	103	9	25	47	332
TOTAL	2	4	24	203	92	224	9	25	127	455
OTHER										
Broader Stateside Regional Area	3	22	21	25	27	46	19	55	70	147
Grand Total	64	185	158	530	414	742	59	146	695	1602

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 delineates part of the Des Moines-West Des Moines, Iowa MSA to consist of Polk, Jasper, and Dallas Counties as its assessment area. The assessment area is unchanged from the previous evaluation of July 11, 2022. Based on 2020 FFIEC Census data, the assessment area is comprised of 141 census tracts with the following income designations: eight low-income, 35 moderate-income, 62 middle-income, 33 upper-income, and three unknown-income. Of the three unknown-income census tracts, two are in Polk County, including one which is comprised entirely by the Des Moines International Airport and the other containing a high school, retail mall, other businesses (as well as an interstate running through it). The other unknown-income census tract is the location of a prison in Jasper County.

The bank operates its main office and five branch offices within this assessment area. The bank's main office is located in Dallas County in an upper -income census tract. One branch in Jasper County is located in a moderate-income census tract while there are four branches in middle-income census tracts: one located in Jasper County and three in Polk County. Five of the six locations also contain cash-only ATMs. There were no branch openings or closings in this assessment area since the previous evaluation of July 11, 2022.

According to the June 30, 2023, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, Bank Iowa ranked 10th among 50 FDIC-insured financial institutions operating in the assessment area with 1.5 percent of market share. Bank deposits increased from $413.3 million to $446.0 million, or 7.9 percent, for the period of June 30, 2021 to June 30, 2023. However, the bank's market share decreased from 1.7 percent to 1.5 percent (though its rank remained unchanged). The top three leaders in market share in the assessment area account for approximately half of all deposits with Principal Bank (25.4 percent), Bankers Trust Company (12.4 percent), and Wells Fargo Bank (12.0 percent). Overall, the 49 banks competing for deposits and loans with Bank Iowa as of June 30, 2023, have 179 offices in the assessment area which represents, since June 30, 2021, a net increase of two banks.

Bank Iowa ranked ninth in both 2022 and 2023 in the number of combined home purchase and refinance HMDA-reportable transactions among all FDIC-insured institutions that had a main

office or branch presence in the assessment area, indicating the bank's ability to offer competitive products and services in a highly competitive financial market. Credit Unions were the top three HMDA-reportable lenders in the assessment area in 2023. In 2022, Bank Iowa was 13th in small business originations, however the bank ranked first in both lending to small farms and small farm loans to small farms.

Tract Designation Change Data

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 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	**2021 Designations (#)**	**2022 Designations (#)**	**Net Change (#)**
Low	9	8	(1)
Moderate	32	35	3
Middle	51	62	11
Upper	29	33	4
Unknown	1	3	2
Total	122	141	19
Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015 *U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020*			

The following presentation of key demographics used to help inform the evaluation of bank activity in its assessment area for the year 2023. The table for 2022 can be found in Appendix B.

2023 Des Moines-West Des Moines, IA MSA 19780 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	8	5.7	6,644	4.4	1,584	23.8	30,460	20.2
Moderate	35	24.8	30,519	20.3	3,767	12.3	27,638	18.3
Middle	62	44.0	70,088	46.5	3,321	4.7	32,546	21.6
Upper	33	23.4	42,842	28.4	1,209	2.8	59,993	39.8
Unknown	3	2.1	544	0.4	0	0.0	0	0.0
Total AA	**141**	**100.0**	**150,637**	**100.0**	**9,881**	**6.6**	**150,637**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	11,974	5,219	3.2	43.6	5,542	46.3	1,213	10.1
Moderate	58,655	31,988	19.4	54.5	20,952	35.7	5,715	9.7
Middle	116,942	78,492	47.7	67.1	31,531	27.0	6,919	5.9
Upper	68,209	48,361	29.4	70.9	16,884	24.8	2,964	4.3
Unknown	2,436	592	0.4	24.3	1,591	65.3	253	10.4
Total AA	**258,216**	**164,652**	**100.0**	**63.8**	**76,500**	**29.6**	**17,064**	**6.6**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,141	4.1	980	3.9	150	6.3	11	3.6
Moderate	4,871	17.5	4,380	17.4	450	19.0	41	13.5
Middle	12,263	44.1	11,263	44.8	877	37.1	123	40.6
Upper	8,746	31.4	7,845	31.2	775	32.7	126	41.6
Unknown	795	2.9	678	2.7	115	4.9	2	0.7
Total AA	**27,816**	**100.0**	**25,146**	**100.0**	**2,367**	**100.0**	**303**	**100.0**
Percentage of Total Businesses:				**90.4**		**8.5**		**1.1**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	11	1.2	10	1.1	1	6.7	0	0.0
Moderate	54	6.0	53	6.0	1	6.7	0	0.0
Middle	540	60.3	532	60.5	7	46.7	1	100.0
Upper	285	31.8	281	32.0	4	26.7	0	0.0
Unknown	5	0.6	3	0.3	2	13.3	0	0.0
Total AA	**895**	**100.0**	**879**	**100.0**	**15**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.2**		**1.7**		**0.1**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Population Characteristics

Per the U.S Census Bureau, the counties in the Des Moines-West Des Moines, Iowa MSA have experienced the most significant growth of all counties within the state of Iowa, with Dallas County ranked as the fastest growing by percentage and Polk County by number. A study by the U.S. Department of Housing and Urban Development (HUD) has attributed the growth partly to lower housing prices compared to the national average, as well as job growth. Referenced in its report was a study conducted by the Greater Des Moines Partnership that noted the cost of living is 14.0 percent less than the national average. The study also credited the influx of workers who primarily work from home as another contributing factor. The lower cost of living in Dallas County was also cited by a community representative as making the area attractive to newcomers.

Polk County has the largest population of any of Iowa's 99 counties and is the home of the city of Des Moines, which is the state capital. The 2020 U.S. Decennial Census indicated that the city had population of 214,133. The growth in the city itself, by percentage, has not matched that of surrounding communities within the county given that it is a very mature area effectively limiting new development opportunities. One community representative noted the growth in the city of Ankeny, which per the city's official statistics grew from 54,598 in 2015 to 67,892 in 2020, represented a 24.3 percent increase.

Community representatives cited that greater availability of land in Dallas County was providing an opportunity for housing development contributing to its population growth. One representative cited the city of Waukee in Dallas County as an example of significant population increase. Per the city's official website, the municipality has grown by 28.8 percent from 2015 to 2020, to a population of 22,810.

Jasper County, which is adjacent to Polk County's eastern border, has shown only a minimal increase in population growth at 3.0 percent and is in line with the overall state of Iowa. Housing developments and business expansion or relocation have been concentrated more in Dallas and Polk Counties. A farm study completed by the U.S. Department of Agriculture in 2022 found that Jasper County not only had more farms (defined as any agricultural operation that sold or could have sold $1,000 in production in the past year) than the other two counties, but the median acreage per farm was nearly twice that of Dallas County and triple that of Polk County, despite these counties being approximately 80.0 percent in land size compared to Jasper County's land size. One community representative indicated that the expectation was that at some point in the next five to ten years Jasper County would begin to experience stronger growth in terms of residential development.

The following table presents the population growth for the period between 2015 and 2020. The 2023 Des Moines-West Des Moines, Iowa MSA assessment area (AA) listed in the table represents the aggregate population of the three counties in the assessment area whereas the Des Moines-West Des Moines, Iowa MSA 19780 is the total population of the entire MSA that includes the

additional counties of Guthrie, Madison, and Warren that are not part of the bank's assessment area. Per data from the Federal Reserve Bank of St. Louis Economic Data Report (FRED), both Dallas and Polk Counties continue to gain in population while Jasper County has been relatively steady.

Des Moines-West Des Moines, IA MSA 19780
Population Change
2015 and 2020

Area	2015 Population	2020 Population	Percent Change
2023 Des Moines-West Des Moines, IA MSA AA	563,987	629,892	11.7%
Dallas County, IA	74,892	99,678	33.1%
Jasper County, IA	36,726	37,813	3.0%
Polk County, IA	452,369	492,401	8.8%
Des Moines-West Des Moines, IA MSA 19780	637,913	709,466	11.2%
Iowa	3,093,526	3,190,369	3.1%

Source: 2011-2015 U.S. Census Bureau American Community Survey
2020 U.S. Census Bureau Decennial Census

Income Characteristics

The following table compares the median family income (MFI) for the assessment area, Dallas, Jasper, and Polk Counties individually, the Des-Moines-West Des Moines, Iowa MSA in its entirety, and the state of Iowa between 2015 and 2020. According to the FFIEC Census Data, the assessment area is composed of 150,637 families, of which 20.2 percent are low-, 18.3 percent are moderate-, 21.6 percent are middle- and 39.8 percent are upper-income. Only 6.6 percent of families residing within the assessment area live below the poverty line.

The assessment area experienced an overall increase in MFI between the time periods noted, with the individual counties comprising the assessment area experiencing a high degree of variance between them. Jasper County saw a decrease in MFI at 6.4 percent, while Polk County saw a 6.5 percent increase in MFI. Dallas County had the largest increase at 13.7 percent during the time period.

Only Dallas County's increase exceeded the national inflation rate for the five-year period, as calculated by the Bureau of Labor Statistics (BLS) Consumer Price Index (CPI), which was 9.9 percent. Jasper County in particular was described by one community representative as "mostly a blue-collar county." An economist affiliated with a major Iowa university noted income in the county has not kept pace with inflation as it is still residually affected by the Maytag plant closing in 2007, and that in 2015 the county had fallen to 20.0 percent below that of the state of Iowa with respect to the going rate for manufacturing work.

Des Moines-West Des Moines, IA MSA 19780 Median Family Income 2011-2015 and 2016-2020			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
2023 Des Moines-West Des Moines, IA MSA	$82,962	$87,894	5.9%
Dallas County, IA	$100,985	$114,777	13.7%
Jasper County	$75,044	$70,266	-6.4%
Polk County, IA	$81,217	$86,525	6.5%
Des Moines-West Des Moines, IA MSA 19780	$82,657	$89,538	8.3%
Iowa	$73,712	$79,186	7.4%
Source: 2011 - 2015 U.S. Census Bureau American Community Survey *2016 - 2020 U.S. Census Bureau American Community Survey* *Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.*			

Housing Characteristics

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

Renters across all income levels in the assessment area experience this burden at 38.6 percent. The three counties in the assessment area are fairly comparable in the cost burden to low-income renters but vary more across moderate-income renters. The previously referenced HUD study of the Des Moines MSA that included Dallas and Polk Counties noted the rising net in-migration into the metropolitan area throughout the past decade increasing the demand for housing. This was somewhat offset by an increase in multifamily construction of structures with five or more family units during the mid-to-late 2010s. Despite the increase in the number of multi-family units, a 2019 fair housing study completed to meet HUD funding requirements found that within the Des Moines-West Des Moines Community Based Statistical Area (Dallas, Guthrie, Madison, Polk, and Warren counties), which included Dallas and Polk Counties, there was still a lack of affordable housing creating competition, and often those with the lowest incomes becoming cost-burdened by settling for housing units they may not be able to afford. One community representative commented that service workers employed in Dallas County cannot afford to live within the county and therefore commute from surrounding areas.

The housing cost burden is comparable for moderate-income homeowners, however, there is a variance among low-income homeowners, especially between Dallas County and Polk County. This is congruent with the data that shows Dallas County has significantly higher MFI compared

to Polk County, given income is part of the housing cost burden equation. Overall, the housing cost burden for homeowners within the assessment area at 15.9 percent is comparable to the state of Iowa, with 14.8 percent of all homeowners being burdened by their payments towards housing.

According to FFIEC HMDA loan and application records, home mortgage trends reflect increases in home mortgage activity in recent years across the assessment area's counties and the broader region peaking in the low-interest rate environment of 2020 and declining in 2021 and 2022 due to higher interest rates. FRED, using data from the U.S. Housing Finance Agency from the years 2021-2023, states that all three counties displayed consistent increases in the Home Price Index ranging from 21.3 percent in Polk County to 22.4 percent in Jasper County indicating a strong demand for housing in the area.

Des Moines-West Des Moines, IA MSA 19780 Housing Cost Burden						
	Cost Burden - Renters			Cost Burden – Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
2023 Des Moines-West Des Moines, IA MSA	78.2%	25.0%	38.6%	63.3%	29.6%	15.9%
Dallas County, IA	78.5%	32.3%	33.9%	52.9%	29.5%	12.9%
Jasper County, IA	75.9%	20.3%	37.5%	58.1%	27.8%	16.1%
Polk County, IA	78.3%	24.3%	39.4%	65.2%	29.8%	16.5%
Des Moines-West Des Moines, IA MSA 19780	76.8%	23.8%	38.3%	62.6%	29.1%	16.0%
Iowa	71.1%	18.6%	37.6%	56.9%	22.0%	14.8%
Cost Burden is housing cost that equals 30 percent or more of household income						
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy						

Employment Characteristics

The following table presents the unemployment trends for the assessment area, Dallas, Jasper and Polk Counties, the Des Moines-West Des Moines, IA MSA in its entirety, and the state of Iowa from 2018 to 2022. Overall, the assessment area displayed a recovery from the 2020 COVID-19 pandemic highs to return to the levels of 2018 and 2019. The rates of unemployment among the three counties were comparable to the entire MSA as well as the state of Iowa.

Gross Domestic Product (GDP) growth data collected by the Bureau of Economic Analysis for the period of 2020-2022 all-industry total, reflect this was strongest by percentage in Dallas County which grew from $6.4 billion to $7.9 billion (or 23.0 percent). The most significant component of the increase was in the category of finance, insurance, real estate rental and leasing, which when combined, accounted for approximately half of the GDP in the county. The $835.6 million rise in

this category accounted for 56.1 percent of the increase in the county for the two-year period. During the same period Polk County grew from $49.2 billion to $55.1 billion (or 12.0 percent). Although finance, insurance, real estate rental, and leasing accounted for the most significant portion of overall GDP at 39.4 percent, it displayed only nominal growth. Professional and business services accounted for the second largest contributor of overall GDP at $6.1 billion (or 11.0 percent) but reflected a higher growth rate of 18.2 percent. Jasper County had the smallest overall GDP at $1.4 billion, which grew at a rate of 13.0 percent. Unlike the other two counties, the primary growth factor was in the category of agriculture, forestry, fishing, and hunting which increased by 277.5 percent and contributed 84.9 percent of the amount of the growth. In 2022 manufacturing continued to be the overall largest contributor to GDP at $237.7 million (or 16.4 percent), which was a decline of 23.2 percent from 2020 with a significant portion of the drop-off due to the closing of a manufacturer at the end of 2021, resulting in the layoff of 710 employees.

The largest employers in Dallas and Polk Counties are Wells Fargo & Co., Hy-Vee Inc., Principal Financial Group, MercyOne Healthcare, and UnityPoint Health Partners. The 2022 HUD study made reference to the area as being the "Hartford of the Midwest" as it is home to over 80 insurance companies. Major employers in Jasper County include the Newton Community School District, Hy-Vee, and Walmart.

Des Moines-West Des Moines, MSA 19780
Unemployment Rates

Area	2018	2019	2020	2021	2022
2023 Des Moines-West Des Moines, IA MSA	2.5%	2.6%	5.5%	3.8%	2.6%
Dallas County, IA	1.7%	1.9%	3.5%	2.6%	2.0%
Jasper County, IA	2.7%	2.9%	5.2%	3.9%	3.0%
Polk County, IA	2.6%	2.8%	5.9%	4.0%	2.7%
Des Moines-west Des Moines, IA MSA 19780	2.5%	2.6%	5.4%	3.8%	2.6%
Iowa	2.6%	2.7%	5.2%	3.8%	2.7%

Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics

Community Representatives

Information was gathered from four community representatives familiar with the economic and demographic conditions within the three-county assessment area, and two community representatives familiar with the agricultural economy in the state of Iowa. In aggregate their observations are somewhat uniform in terms of population, housing, and business climate.

Community representatives noted population growth, especially in Dallas County, as residents moved to the county leading to new home developments. The average higher incomes of residents in Dallas County allows them to afford the costs associated with the increasing expense of materials, labor, and land acquisition, as well as related transportation costs to commute to their jobs. Dallas County in general has a lower cost of living, attracting new residents to homes that are

newer and larger.

Affordable housing was a concern expressed by four of the community representatives, outpacing the building of new apartments in downtown Des Moines, located in Polk County. Polk County has limited land availability for greenfield type development and, thus, construction is focused more on repairs and renovation of existing homes, creating a need for more home improvement assistance programs. The higher housing costs in Dallas County has caused service workers to commute from Polk County and other surrounding counties to their jobs. Polk County has a high demand for affordable rental units with long waiting lists for housing assistance. One representative commented on the need not only for more affordable units, but single-family housing as well.

While Jasper County's population has grown modestly according to one community representative, higher growth in the next 10 years is expected. Housing prices have gone up due to the scarcity of materials and construction workers. The community representative noted rents have increased by almost 300.0 percent as well.

Overall, job opportunities are abundant, and unemployment is low. Observations were mixed with respect to the economic climate; however, with the acknowledgement that, while some businesses are thriving, there was concern that small businesses were struggling, indicating additional need for small business lending. Community representatives also indicated that expansion projects and employee growth has stalled with businesses waiting for interest rates and operation costs to decrease. One community representative did note that there was a need for more service workers as patronization of local establishments had increased post-pandemic while another commented on the shortage of skilled construction laborers. A community representative in Jasper County noted that the moderate-income census tracts in the county primarily reflect rural populations whose incomes are likely lower than areas with incomes similar to the larger metropolitan area.

The community representative most familiar with agricultural trends described the rising cost of acreage in both Dallas and Polk County as land is increasingly being acquired by residential home developers. Also noted was the increase in the number of hobby farms in the Des Moines-West Des Moines, IA MSA where individuals grow vegetables, raise chickens, or a few head of cattle for sale. Current challenges facing farmers include dramatically rising insurance premiums and drops in crop prices.

In general, there was a favorable view of bank responsiveness to community needs with regard to their participation in the community and funding of housing assistance programs. However, one representative expressed their concern over regulatory constraints making it much more difficult for applicants to qualify for loans and the need for more small business lending.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DES MOINES-WEST DES MOINES, IOWA MSA #19780

LENDING TEST

Geographic Distribution of Loans

The bank's geographic dispersion of loans reflects good distribution throughout the assessment area. In addition, the dispersion of loans reflects good penetration throughout the assessment area. Bank Iowa originated HMDA-reportable loans in 51.1 percent of the 141 census tracts in 2023. This figure includes loans in 37.5 percent of the low-income census tracts and 51.4 percent of the moderate-income census tracts in the assessment area. In 2022 the bank originated CRA-reportable loans in 29.1 percent of the census tracts in the assessment area; with such loans being made in 12.5 percent of low-income census tracts and 20.0 percent of moderate-income census tracts. Taking into account the bank's total lending for 2022 and 2023 for HMDA-reportable and CRA-reportable loans, it displayed at least one origination in 118 of the 141 census tracts or 83.7 percent, including 75.0 percent of the low-income census tracts and 88.5 percent of moderate-income census tracts. There were no conspicuous gaps in HMDA- and CRA-reportable lending across the bank's assessment area for the two-year period.

HMDA-Reportable Lending

The geographic distribution of home mortgage loans reflects excellent penetration throughout the assessment area.

In 2023, 2.1 percent of Bank Iowa's HMDA-reportable loans were made in low-income census tracts. This performance is below the aggregate and the percentage of owner-occupied units in low-income census tracts, both of which were at 3.2 percent. Bank Iowa originated 35.6 percent of total HMDA-reportable loans in moderate-income census tracts, performing significantly above the aggregate at 18.0 percent and the percentage of owner-occupied units in moderate-income census tracts at 19.4 percent. The bank originated 39.0 percent of its HMDA-reportable loans in middle-income census tracts, which was below the aggregate at 44.2 percent and percentage of owner-occupied units in middle-income tracts at 47.7 percent. Finally, the bank originated 23.3 percent of HMDA-reportable loans in upper-income census tracts, which was significantly below the aggregate at 34.1 percent and below the percentage of owner-occupied units in those tracts at 29.4 percent. The bank's distribution of lending in 2023, compared to 2022, was by percentage higher in moderate-income census tracts but lower by percentage in middle-income census tracts.

Home improvement and multifamily originations were not subject to analysis due to the low volume of originations in each of these products, which does not allow for an effective analysis.

Home Purchase Loans

In 2023, 2.5 percent of Bank Iowa's home purchase loans were originated in low-income census tracts. The bank's performance was below the aggregate at 3.4 percent and the percentage of owner-occupied units in low-income census tracts at 3.2 percent. Finding opportunities to lend in low-income census tracts continues to be challenging with 46.3 percent of the housing serving as rental property and 10.1 percent of the properties listed as vacant, a combined total of 56.4 percent. The bank originated 33.9 percent of its home purchase loans in moderate-income census tracts, which was significantly above the aggregate at 18.5 percent and the percentage of owner-occupied units at 19.4 percent. The bank originated 37.2 percent of its home purchase loans in middle-income census tracts, which was below the aggregate at 43.0 percent and the percentage of owner-occupied units in middle-income census tracts at 47.7 percent. Finally, the bank originated 26.4 percent of its home purchase loans in upper-income census tracts, which was below the aggregate performance of 34.8 percent and the 29.4 percent of owner-occupied units in upper-income census tracts.

Refinance Loans

In 2023, Bank Iowa did not originate any refinance loans in any of the low-income census tracts. The bank's performance was below the aggregate at 3.8 percent and below the percentage of owner-occupied units in low-income census tracts at 3.2 percent. The bank originated 47.1 percent of its refinance loans in moderate-income census tracts which was significantly above the aggregate at 21.3 percent as well as the percentage of owner-occupied units in moderate-income census tracts at 19.4 percent. The bank originated 47.1 percent of refinance loans in middle-income census tracts, which was comparable to the 46.2 percent by the aggregate and the 47.7 percent of owner-occupied units in middle-income tracts. Finally, the bank originated 5.9 percent of refinance loans in upper-income census tracts which was significantly below the aggregate at 28.3 percent and the percentage of owner-occupied units in such tracts at 29.4 percent.

The following table presents the geographic distribution of HMDA-reportable loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography
Assessment Area: Des Moines-West Des Moines, IA MSA 19780

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	4	3.3	3.2	503	1.3	1.8	3	2.5	3.4	512	1.7	1.8	3.2
Moderate	38	30.9	19.1	5,637	15.0	12.1	41	33.9	18.5	6,597	22.0	11.9	19.4
Middle	47	38.2	42.8	19,061	50.7	40.9	45	37.2	43.0	11,394	38.0	41.0	47.7
Upper	34	27.6	34.5	12,374	32.9	44.9	32	26.4	34.8	11,520	38.4	45.1	29.4
Unknown	0	0.0	0.4	0	0.0	0.3	0	0.0	0.4	0	0.0	0.3	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	123	100.0	100.0	37,574	100.0	100.0	121	100.0	100.0	30,022	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.5	0	0.0	2.0	0	0.0	3.8	0	0.0	2.5	3.2
Moderate	5	13.5	18.8	607	6.7	12.2	8	47.1	21.3	907	33.2	13.2	19.4
Middle	22	59.5	46.8	5,476	60.5	42.9	8	47.1	46.2	1,746	63.9	44.1	47.7
Upper	10	27.0	30.7	2,975	32.9	42.8	1	5.9	28.3	80	2.9	39.9	29.4
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.4	0	0.0	0.3	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	37	100.0	100.0	9,057	100.0	100.0	17	100.0	100.0	2,733	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.8	0	0.0	1.3	0	0.0	2.5	0	0.0	2.0	3.2
Moderate	1	9.1	13.1	37	4.5	9.8	3	60.0	14.5	375	46.9	11.1	19.4
Middle	6	54.5	46.7	388	47.2	41.9	1	20.0	47.7	275	34.4	44.3	47.7
Upper	4	36.4	38.2	398	48.4	46.8	1	20.0	35.0	150	18.8	42.3	29.4
Unknown	0	0.0	0.3	0	0.0	0.2	0	0.0	0.3	0	0.0	0.3	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	822	100.0	100.0	5	100.0	100.0	800	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	4.4	0	0.0	0.7	0	0.0	8.5	0	0.0	9.4	5.8
Moderate	7	77.8	36.0	1,947	35.6	8.1	0	0.0	38.0	0	0.0	22.8	22.0
Middle	2	22.2	30.2	3,523	64.4	23.1	3	100.0	31.7	314	100.2	53.6	40.5
Upper	0	0.0	28.0	0	0.0	66.0	0	0.0	21.8	0	0.0	14.2	28.3
Unknown	0	0.0	1.3	0	0.0	2.0	0	0.0	0.0	0	0.0	0.0	3.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	5,470	100.0	100.0	3	100.0	100.0	313	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	4	2.2	3.0	503	1.0	1.6	3	2.1	3.2	512	1.5	2.6	3.2
Moderate	51	28.3	18.2	8,228	15.5	11.3	52	35.6	18.0	7,879	23.3	13.0	19.4
Middle	77	42.8	44.2	28,447	53.7	38.2	57	39.0	44.2	13,728	40.5	42.6	47.7
Upper	48	26.7	34.2	15,747	29.8	48.3	34	23.3	34.1	11,750	34.7	41.6	29.4
Unknown	0	0.0	0.4	0	0.0	0.6	0	0.0	0.4	0	0.0	0.3	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	180	100.0	100.0	52,925	100.0	100.0	146	100.0	100.0	33,869	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

CRA-Reportable Lending

Small Business Loans

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

In 2022, Bank Iowa originated 1.4 percent of its small business loans in low-income census tracts, below the aggregate at 3.3 percent and below the percentage of total businesses located in low-income census tracts at 4.1 percent. The bank originated 19.7 percent of its small business loans in moderate-income census tracts, which was above the aggregate at 15.0 percent and above the percentage of total businesses located in moderate- income census tracts at 17.5 percent. Bank Iowa originated 50.7 percent of small business loans in middle-income census tracts, which was above both the aggregate at 43.1 percent and the percentage of businesses in middle-income census tracts at 44.1 percent. Finally, the bank originated 25.4 percent of small business loans in upper-income census tracts which was significantly below the aggregate of 35.9 percent and the 31.4 percent of total businesses in upper-income census tracts.

In 2023 the bank's distribution of loans was comparable to the percentage of total businesses in each of the census tract designations. In comparison to its 2022 performance the bank displayed improvement both by number and percentage in lending in low-income census tracts while declining slightly in moderate-income census tracts. The bank also declined slightly by percentage in middle-income census tracts while increasing in upper-income census tracts.

The following table presents the geographic distribution of small business loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography Assessment Area: Des Moines-West Des Moines, IA MSA 19780											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
Low	1	1.4	3.3	723	6.1	5.3	4	5.0	2,316	19.1	4.1
Moderate	14	19.7	15.0	2,243	18.8	14.7	13	16.3	1,389	11.4	17.5
Middle	36	50.7	43.1	5,335	44.8	38.4	38	47.5	4,757	39.1	44.1
Upper	18	25.4	35.9	3,401	28.6	38.2	24	30.0	3,283	27.0	31.4
Unknown	2	2.8	2.1	200	1.7	3.2	1	1.3	412	3.4	2.9
Tract-Unk	0	0.0	0.5	0	0.0	0.2	0	0.0	0	0.0	0.0
Total	71	100.0	100.0	11,902	100.0	100.0	80	100.0	12,157	100.0	100.0
Source: 2023 FFIEC Census Data *2023 Dun & Bradstreet Data* *2016-2020 U.S. Census Bureau: American Community Survey* *Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*											

Small Farm Loans

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

In 2022, Bank Iowa originated no small farm loans in low-income census tracts, which was below the aggregate at 1.1 percent and the percentage of total farms in low-income census tracts at 1.2 percent. The bank originated 6.3 percent of its small farm loans in moderate-income census tracts, which was above the aggregate at 4.7 percent and comparable to the percentage of total farms located in moderate-income census tracts at 6.0 percent. Originations in middle-income census tracts at 87.5 percent was significantly above aggregate's 68.5 percent and the 60.3 percent of total farms in such census tracts. Finally, the bank originated 6.3 percent of small farm loans in upper-income census tracts which was significantly below the aggregate at 25.1 percent and the 31.8 percent of total farms in upper-income census tracts.

The bank's distribution of small farm lending across geographies of different income levels in 2023 was consistent with the distribution of loans in 2022. The following table presents the geographic distribution of small farm loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Small Farm Lending By Income Level of Geography Assessment Area: Des Moines-West Des Moines, IA MSA 19780											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
Low	0	0.0	1.1	0	0.0	0.1	0	0.0	0	0.0	1.2
Moderate	8	6.3	4.7	646	3.8	4.6	5	4.2	506	3.2	6.0
Middle	112	87.5	68.5	15,304	89.5	73.7	108	90.8	13,828	87.0	60.3
Upper	8	6.3	25.1	1,147	6.7	20.8	6	5.0	1,566	9.8	31.8
Unknown	0	0.0	0.2	0	0.0	0.8	0	0.0	0	0.0	0.6
Tract-Unk	0	0.0	0.4	0	0.0	0.0	0	0.0	0	0.0	0.0
Total	128	100.0	100.0	17,097	100.0	100.0	119	100.0	15,900	100.0	100.0

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

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

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

HMDA-Reportable Lending

The distribution of home mortgage lending reflects good penetration among individuals of different income levels.

In 2023, Bank Iowa originated 14.0 percent of total HMDA-reportable loans to low-income borrowers. This is above the aggregate at 10.5 percent but below the 20.2 percent of families that are low-income in the assessment area. The bank originated 29.4 percent of HMDA-reportable loans to moderate-income borrowers, above the aggregate at 21.5 percent and significantly above the demographic at 18.3 percent. The bank originated 17.5 percent of HMDA-reportable loans to middle-income borrowers, which was below aggregate and the percentage of middle-income families within the assessment area at 22.2 percent and 21.6 percent, respectively. Originations to upper-income borrowers were at 31.5 percent for HMDA-reportable loans, which was slightly above aggregate at 29.2 percent, but below the demographic measure at 39.8 percent. The bank also originated 7.7 percent of its HMDA-reportable loans to borrowers with unknown income, which consist of either commercial entity borrowers with incomes that are not required to be reported on the HMDA Loan Application Register (LAR) or for the purpose of non-owner-occupied rental housing. Given these facts, this product will not be discussed below. The bank's distribution of

lending to borrowers of different income levels in 2023 reflected an increased level by percentage of lending to low-and moderate-income borrowers compared to 2022, and a decreased level for all other income level borrowers.

Home improvement and multifamily originations were not subject to analysis due to the low volume of originations in each of these products, which does not allow for an effective analysis.

Home Purchase Loans

In 2023, Bank Iowa originated 14.0 percent of its home purchase loans to low-income borrowers, which was above the aggregate at 10.8 percent but below the percentage of low-income families within the assessment area at 20.2 percent. The bank originated 31.4 percent of its home purchase loans to moderate-income borrowers, which was above the aggregate at 22.4 percent and significantly above the percentage of moderate-income families at 18.3 percent. The bank originated 15.7 percent of its home purchase loans to middle-income borrowers, which was below both the aggregate at 21.4 percent and below the percentage of middle-income families within the assessment area at 21.6 percent. Home purchase originations to upper-income borrowers at 32.2 percent were above aggregate's 25.1 percent, but below the 39.8 percent of upper-income families.

Refinance Loans

In 2023, Bank Iowa originated 11.8 percent of its refinance loans to low-income borrowers. The bank's performance is slightly below the aggregate at 12.7 percent and below the 20.2 percent of low-income families in the assessment area. The bank originated 23.5 percent of its refinance loans to moderate-income borrowers, which is above the aggregate at 20.5 percent and the demographic of moderate-income families at 18.3 percent. The bank originated 35.3 percent of refinance loans to middle-income borrowers which was significantly above both the aggregate and demographic of 21.0 and 21.6 percent, respectively. Refinance originations to upper-income borrowers at 23.5 percent was below the 29.2 percent by aggregate; however, was significantly below the upper-income family percentage of 39.8 percent.

The following table presents the borrower distribution of HMDA-reportable loans by borrower income level in both 2022 and 2023.

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level
Assessment Area: Des Moines-West Des Moines, IA MSA 19780

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	13	10.6	12.4	1,377	3.7	6.7	17	14.0	10.8	2,380	7.9	5.4	20.2
Moderate	33	26.8	24.3	6,072	16.2	18.5	38	31.4	22.4	7,483	24.9	17.1	18.3
Middle	28	22.8	21.1	6,710	17.9	21.7	19	15.7	21.4	4,422	14.7	21.3	21.6
Upper	33	26.8	25.0	11,956	31.8	35.5	39	32.2	25.1	14,494	48.3	35.6	39.8
Unknown	16	13.0	17.3	11,460	30.5	17.7	8	6.6	20.4	1,244	4.1	20.6	0.0
Total	123	100.0	100.0	37,574	100.0	100.0	121	100.0	100.0	30,022	100.0	100.0	100.0
Refinance Loans													
Low	2	5.4	12.6	102	1.1	6.8	2	11.8	12.7	154	5.7	6.5	20.2
Moderate	9	24.3	21.4	1,269	14.0	15.8	4	23.5	20.5	277	10.1	14.4	18.3
Middle	5	13.5	19.6	896	9.9	18.0	6	35.3	21.0	996	36.4	17.9	21.6
Upper	15	40.5	28.3	5,141	56.8	41.6	4	23.5	29.2	1,176	43.0	41.5	39.8
Unknown	6	16.2	18.1	1,651	18.2	17.9	1	5.9	16.6	130	4.8	19.7	0.0
Total	37	100.0	100.0	9,057	100.0	100.0	17	100.0	100.0	2,733	100.0	100.0	100.0
Home Improvement Loans													
Low	2	18.2	7.2	52	6.3	4.7	1	20.0	8.0	150	18.8	4.7	20.2
Moderate	0	0.0	17.2	0	0.0	10.7	0	0.0	19.6	0	0.0	13.4	18.3
Middle	1	9.1	24.9	134	16.3	20.7	0	0.0	25.3	0	0.0	22.0	21.6
Upper	7	63.6	48.0	576	70.0	59.3	2	40.0	44.6	425	53.1	56.5	39.8
Unknown	1	9.1	2.7	61	7.4	4.6	2	40.0	2.5	225	28.1	3.5	0.0
Total	11	100.0	100.0	822	100.0	100.0	5	100.0	100.0	800	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	17	9.9	11.5	1,530	3.2	6.6	20	14.0	10.5	2,684	8.0	5.5	20.2
Moderate	42	24.6	22.4	7,341	15.5	17.4	42	29.4	21.5	7,760	23.1	16.5	18.3
Middle	34	19.9	21.3	7,740	16.3	20.7	25	17.5	22.2	5,418	16.1	20.9	21.6
Upper	55	32.2	29.1	17,672	37.2	38.3	45	31.5	29.2	16,095	48.0	37.7	39.8
Unknown	23	13.5	15.6	13,172	27.8	17.0	11	7.7	16.5	1,599	4.8	19.4	0.0
Total	171	100.0	100.0	47,455	100.0	100.0	143	100.0	100.0	33,556	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

CRA-Reportable Lending

Small Business Loans

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

In 2022, Bank Iowa originated 66.2 percent of its small business loans to businesses reporting annual revenues of $1 million or less, which was significantly above the aggregate at 49.7 percent but significantly below the percentage of small businesses in the assessment area at 90.4 percent. Of the 47 loans originated to small businesses with revenues less $1 million, 78.7 percent were in amounts of $100,000 or less, which are typically considered most beneficial to small businesses.

The bank's distribution of lending to business of different revenue sizes in 2023 was consistent with the distribution of loans in 2022 with regard to loan sizes of $100,000 or less. The bank also displayed significant increases by both number and percentage in loans that ranged in size from $100,000 to $250,000, but significant decrease by percentage in the category of $250,001 to $1 million.

The following table presents the borrower distribution of small business loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses
Assessment Area: Des Moines-West Des Moines, IA MSA 19780

	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
By Revenue											
$1 Million or Less	47	66.2	49.7	5,418	45.5	34.4	60	75.0	5,444	44.8	90.4
Over $1 Million	24	33.8		6,484	54.5		20	25.0	6,713	55.2	8.5
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	1.1
Total	71	100.0		11,902	100.0		80	100.0	12,157	100.0	100.0
By Loan Size											
$100,000 or Less	48	67.6	91.4	2,102	17.7	30.3	54	67.5	2,441	20.1	
$100,001 - $250,000	5	7.0	3.9	877	7.4	14.2	15	18.8	2,655	21.8	
$250,001 - $1 Million	18	25.4	4.6	8,923	75.0	55.5	11	13.8	7,061	58.1	
Total	71	100.0	100.0	11,902	100.0	100.0	80	100.0	12,157	100.0	
By Loan Size and Revenues $1 Million or Less											
$100,000 or Less	37	78.7		1,437	26.5		45	75.0	1,909	35.1	
$100,001 - $250,000	3	6.4		487	9.0		11	18.3	1,850	34.0	
$250,001 - $1 Million	7	14.9		3,494	64.5		4	6.7	1,685	31.0	
Total	47	100.0		5,418	100.0		60	100.0	5,444	100.0	

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

Small Farm Loans

The distribution of small farm lending reflects excellent penetration among farms of different sizes.

In 2022, the bank originated 90.6 percent of its small farm loans to farms with $1 million in revenue or less. This performance is significantly above the aggregate performance of 59.7 percent but below the percentage of total small farms in the assessment area, at 98.2 percent. Further, 57.8 percent of these loans were in amounts of $100,000 or less, which are considered the most beneficial to small farms, further indicating the bank's willingness to meet the credit needs of small farms.

The bank's distribution of lending to farms of different revenue sizes in 2023 was consistent with the distribution of loans in 2022, as well as in loan amounts of $100,000 or less. The following table presents the borrower distribution of small farms loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Small Farm Lending By Revenue Size of Farms
Assessment Area: Des Moines-West Des Moines, IA MSA 19780

	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
By Revenue											
$1 Million or Less	116	90.6	59.7	13,342	78.0	71.6	108	90.8	12,521	78.7	98.2
Over $1 Million	12	9.4		3,755	22.0		11	9.2	3,379	21.3	1.7
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	0.1
Total	128	100.0		17,097	100.0		119	100.0	15,900	100.0	100.0
By Loan Size											
$100,000 or Less	70	54.7	77.2	2,688	15.7	23.4	68	57.1	2,392	15.0	
$100,001 - $250,000	38	29.7	12.7	7,009	41.0	29.0	32	26.9	6,068	38.2	
$250,001 - $500,000	20	15.6	10.1	7,400	43.3	47.6	19	16.0	7,440	46.8	
Total	128	100.0	100.0	17,097	100.0	100.0	119	100.0	15,900	100.0	
By Loan Size and Revenues $1 Million or Less											
$100,000 or Less	67	57.8		2,449	18.4		67	62.0	2,292	18.3	
$100,001 - $250,000	36	31.0		6,609	49.5		27	25.0	5,039	40.2	
$250,001 - $500,000	13	11.2		4,284	32.1		14	13.0	5,190	41.5	
Total	116	100.0		13,342	100.0		108	100.0	12,521	100.0	

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

Community Development Lending

Bank Iowa makes an adequate level of community development loans. During the review period the bank made five qualified community development loans totaling $10.9 million. When compared to the previous evaluation this reflected a decrease of 78.9 percent by number and 80.8 percent by dollar. The preponderance of the current community development loans both by number and dollar were for affordable housing purposes, including the acquisition and rehabilitation of a 100-plus unit property in a moderate-income geography. The bank's emphasis on community development lending for affordable housing purposes indicates its responsiveness to expressions of concern by community representatives over the availability of such housing in the assessment area.

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

Des Moines-West Des Moines, IA MSA Community Development Loans (Dollars in 000s) July 11, 2022 to September 9, 2024										
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalization\ Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
Des Moines-West Des Moines, IA MSA	3	8,550	0	0	1	100	1	2,280	5	10,930

INVESTMENT TEST

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

During the evaluation period, the bank made three qualified investments for $3.9 million, which exceeded its performance during the previous evaluation period where it did not have any such qualified investments. Investments included mortgage-backed securities, and a municipal bond used for capital improvements in the city of Newton, whose majority of the population resides in moderate-income census tracts. The investments in affordable housing display responsiveness by the bank to affordable housing needs in the assessment area indicated by various community representatives.

The following table presents the bank's community development loans during the evaluation period.

Des Moines-West Des Moines, IA MSA Qualified Investments (Dollars in 000s) July 11, 2022 to September 9, 2024						
Current Period Funded				Total Current Period Funded	Prior Period Outstanding Balances	Total Unfunded
Affordable Housing	Community Service	Economic Development	Revitalization \ Stabilization			
2,654	0	0	1,256	3,910	0	0

The bank made a total of 30 qualified donations worth $60,100 in the current evaluation period. The donations by number were made primarily to organizations that focus on community services. The bank's aggregate by dollar donations were primarily for revitalization/stabilization purposes in a specific area comprised primarily of low- or moderate-income geographies. When compared to the previous evaluation of 30 qualified donations totaling $21,105, the bank's grants and donations increased 184.8 percent by dollar.

The following table presents the bank's community development donations during the review period.

Des Moines-West Des Moines, IA MSA Community Development Donations July 11, 2022 to September 9, 2024										
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalization and Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
Des Moines-West Des Moines, IA MSA	3	2,750	24	27,200	1	150	2	30,000	30	60,100

SERVICE TEST

Retail Services

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

The bank operates its main office and five branch offices and five cash-only ATMs in the assessment area. There is one office located in a moderate-income census tract, four are located in middle-income census tracts and the main office is in an upper-income census tract. Alternative

delivery systems include phone, internet, and mobile banking. During the review period, the bank did not open or close any branch offices. Offices in the assessment area generally have standard hours of Monday through Friday, but with the Newton and Colfax branch offices operating between the hours of 8:30 a.m. to 4:30 p.m. and the remaining branches operating between the hours of 8:30 a.m. to 5:00 p.m. Each of the branch offices have extended drive-up hours, while a few of the branches offer limited hours on Saturday mornings through their drive-up facility. Saturday lobby hours are available in the Altoona branch. Applications for loan and deposit products are accepted at each location. Additionally, mortgage applications are accepted online through the bank's website.

Community Development Services

Bank Iowa provides an adequate level of community development services. The bank provided 390 hours of volunteer community development services during the current review period; a significant increase compared to the previous evaluation's 149 hours. Community services and economic development displayed the most significant increase, at 139 hours and 83 hours respectively. Organizations that were the recipient of bank staff financial expertise included governmental agencies involved in affordable housing, local economic development corporations and non-profits whose primary mission is serving low-and moderate-income individuals and/or low-and moderate-income geographies.

Des Moines-West Des Moines, MSA Community Development Services July 11, 2022 to September 9, 2024					
Assessment Area	**Affordable Housing**	**Community Service**	**Economic Development**	**Revitalization and Stabilization**	**Total Hours**
	Hours	**Hours**	**Hours**	**Hours**	
Des Moines-West Des Moines, IA MSA	89	167	135	0	390

SOUTHWEST, IOWA Non-MSA - Full Review

SCOPE OF THE EXAMINATION

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN SOUTHWEST, IOWA Non-MSA

The Southwest, Iowa Non-MSA assessment area consists of Adams, Fremont, Montgomery, Page, and Taylor Counties in their entireties. The assessment area is unchanged from the previous evaluation of July 11, 2022. Based on 2020 FFIEC Census data, the assessment area consists of 18 census tracts, with two moderate-income and 16 middle-income census tracts. All three of the middle-income census tracts in Taylor County are designated as underserved. Underserved census tracts are defined as being remote and rural as the county's population is considered to be sufficiently small, thin, and distant from a population center and likely to have difficulty financing the fixed costs of meeting essential community needs. Both of Adams County's census tracts are also designated as underserved, as well as distressed, due to population loss as the county lost more than 10.0 percent of its population during the time period from the previous to the most recent decennial census.

The bank has six branches in the assessment area. Two branches are located in Montgomery County with one in a moderate-income census tract and the other in a middle-income census tract. There are four branch locations in Page County with one in a moderate-income census tract and three in middle-income census tracts. Each of these facilities contain a cash-only ATM. There were no branch openings or closings since the previous evaluation.

According to the June 30, 2023, FDIC Deposit Market Share Report, Bank Iowa ranked first among 15 FDIC-insured financial institutions operating in the assessment area with 27.5 percent of market share. Bank deposits increased from $365.2 million to $446.8 million (or 22.4 percent) for the period of June 30, 2021, to June 30, 2023; though a significant portion of this increase was attributed to a deposit of funds from a single entity sale of business. The bank's market share increased from 23.0 percent to 27.5 percent maintaining its number one position in deposits. The other three top leaders in market share in the assessment area account for slightly over one-third of all deposits: First Interstate Bank (13.7 percent), PCSB Bank (13.4 percent), and Houghton State Bank (8.7 percent). Overall, the other 14 banks competing for deposits and loans with Bank Iowa as of June 30, 2023, have 29 branches in the assessment area which is unchanged from the number of banks since June of 2021.

In both 2022 and 2023 the bank ranked first among all HMDA-reportable lenders in the assessment area in the number of home purchase and refinance originations. The bank ranked first by number with regard to 2022 CRA-reportable originations among CRA reporters in the assessment area. Bank Iowa was ranked first in small business originations and first in small business loans to small businesses. The bank was first in both lending to small farms and small farm loans to small farms. The bank's lending to small farms accounted for 64.6 percent of such loans originated in the assessment area by CRA reporters and 81.0 percent of small farm loans to small farms.

Bank Iowa's ranking in these categories reflects its ability to meet the credit needs of a rural market assessment area that contains a significant number of competitors.

Tract Designation Change Data

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 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.

Adams, Fremont, Montgomery and Page Counties were unaffected, with respect to the number of census tracts, by the most recent ACS and Office of Management and Budget (OMB) revisions that covered the period of 2016-2020. Taylor County, however, had two of its moderate-income census tracts adjusted to middle-income designations.

Census Tract Designation Changes
American Community Survey Data (ACS)

Tract Income Designation	2021 Designations (#)	2022 Designations (#)	Net Change (#)
Low	0	0	0
Moderate	4	2	(2)
Middle	14	16	2
Upper	0	0	0
Unknown	0	0	0
Total	18	18	0

Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015
U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020

Additional assessment area demographic information is provided in the following table for 2023. Refer to Appendix B for 2022 demographic information.

2023 Southwest IA Non MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,182	19.4
Moderate	2	11.1	1,326	11.8	172	13.0	2,306	20.5
Middle	16	88.9	9,900	88.2	711	7.2	2,677	23.8
Upper	0	0.0	0	0.0	0	0.0	4,061	36.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**18**	**100.0**	**11,226**	**100.0**	**883**	**7.9**	**11,226**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	2,877	1,499	11.2	52.1	879	30.6	499	17.3
Middle	18,093	11,916	88.8	65.9	3,745	20.7	2,432	13.4
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 AA	**20,970**	**13,415**	**100.0**	**64.0**	**4,624**	**22.1**	**2,931**	**14.0**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	303	14.7	271	14.5	28	20.4	4	6.7
Middle	1,762	85.3	1,597	85.5	109	79.6	56	93.3
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 AA	**2,065**	**100.0**	**1,868**	**100.0**	**137**	**100.0**	**60**	**100.0**
Percentage of Total Businesses:				**90.5**		**6.6**		**2.9**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	6	1.0	5	0.8	1	14.3	0	0.0
Middle	624	99.0	617	99.2	6	85.7	1	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 AA	**630**	**100.0**	**622**	**100.0**	**7**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.7**		**1.1**		**0.2**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Population Characteristics

Each of the five counties experienced population loss, which is similar to many of the Non-MSA counties throughout the state of Iowa. In general, according to a community representative, population loss is due to individuals moving to areas that contain larger metropolitan areas for more job opportunities. . Another aspect noted by a community representative with respect to the population decrease is retirees leaving the area for warmer climates. The same community representative also noted the smaller average family size compared to previous years. The following table displays the population loss between 2015 to 2020 for the assessment area, Adams, Fremont, Montgomery, Page, and Taylor Counties, all Non-MSA counties in the state of Iowa (Non-MSA Iowa), and the state of Iowa. American Community Survey estimates analyzed by the Federal Reserve Bank of St. Louis indicates that the trend is continuing into the 2020s. Freemont County had the highest population loss by both number and percentage, and according to one of the community representatives this was attributed to the effects of the 2019 flooding by the Missouri River causing migration to Montgomery and Page Counties, each of which had the lowest loss by percentage.

Southwest, IA Non-MSA Population Change
2015 and 2020

Area	2015 Population	2020 Population	Percent Change
2023 Southwest, IA Non-MSA	43,336	41,746	-3.7%
Adams County, IA	3,892	3,704	-4.8%
Fremont County, IA	7,106	6,605	-7.1%
Montgomery County, IA	10,465	10,330	-1.3%
Page County, IA	15,660	15,211	-2.9%
Taylor County, IA	6,213	5,896	-5.1%
Non-MSA Iowa	1,250,756	1,232,642	-1.4%
Iowa	3,093,526	3,190,369	3.1%

Source: 2011-2015 U.S. Census Bureau American Community Survey
2020 U.S. Census Bureau Decennial Census

Income Characteristics

The following table compares the MFI for the assessment area, Adams, Fremont, Montgomery, Page, and Taylor Counties, Non-MSA Iowa, and the state of Iowa from 2015 to 2020. According to the 2020 FFIEC Census Data, the assessment area is comprised of 11,226 families, of which 19.4 percent are designated as low-, 20.5 percent are moderate-, 23.8 percent are middle-, and 36.2 percent are upper-income, and7.9 percent of families live below the poverty line.

The 2019 flood not only affected Fremont County's population numbers, but also businesses

located in the area and their employees. Outside the impact of the flood, both Fremont and Page Counties also had the departure of a major employer who had been in the area for nearly 50 years, which may have played a role in impairing overall income. One community representative indicated that the company's departure led to a cumulative loss of 500-600 positions. This was reflected in Gross Domestic Product (GDP) numbers, as reported by the Bureau of Economic Analysis, of the pre-COVID period of 2019 compared to 2018 where the manufacturing component declined in each county. Both Montgomery and Taylor Counties were the only ones with increases by percentage in MFI that exceeded the 9.9 percent Consumer Price Index inflation rate for the same period. One community representative commented that there are strong manufacturers remaining and that manufacturing jobs earn an average wage of $28.00 per hour.

Southwest, IA Non-MSA Median Family Income 2011-2015 and 2016-2020			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
2023 Southwest, IA Non-MSA	$62,672	$67,191	7.2%
Adams County, IA	$64,089	$70,022	9.3%
Fremont County, IA	$71,137	$72,404	1.8%
Montgomery County, IA	$59,095	$66,820	13.1%
Page County, IA	$66,122	$63,965	(3.3%)
Taylor County, iA	$59,139	$68,281	15.5%
Non-MSA Iowa	$67,391	$71,763	6.5%
Iowa	$73,712	$79,186	7.4%
Source: 2011 - 2015 U.S. Census Bureau American Community Survey *2016 - 2020 U.S. Census Bureau American Community Survey* *Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.*			

Housing Characteristics

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

Renters across all income levels in the assessment area experience this burden at 27.3 percent, which is below the level of Non-MSA Iowa at 32.5 percent and the state of Iowa at 37.6 percent. Adams County has significantly lower rates of housing cost burden for low- and moderate-income renters when compared to the other counties within the assessment area, as well as the state of Iowa. Page County at 34.6 percent has the highest percentage within the assessment area and is slightly above the level of Non-MSA Iowa but below that of the state of Iowa. A community representative familiar with housing needs of the area indicated that the area does have a large

number of disabled and elderly individuals living on limited income. They also noted that Montgomery County in particular had a large number of rental units.

Adams County has the highest percentage of both low- and moderate-income homeowners experiencing housing cost burden. It was the only county in the assessment area above that of Non-MSA Iowa and the state of Iowa. One of the community representatives commented that one of the contributing factors to rising home prices was a rise of new construction, which are typically higher-priced due to the cost of labor and materials.

Southwest, IA Non-MSA Housing Cost Burden						
	Cost Burden - Renters			Cost Burden - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
2023 Southwest, IA Non-MSA	60.0%	7.3%	27.3%	43.5%	14.1%	12.2%
Adams County, IA	27.6%	0.0%	9.2%	60.0%	20.9%	17.7%
Fremont County, IA	53.6%	13.0%	24.1%	49.4%	11.5%	14.0%
Montgomery County, IA	61.0%	6.0%	26.9%	41.3%	12.2%	10.7%
Page County, IA	68,6%	6.0%	34.6%	37.7%	12.4%	11.3%
Taylor County, IA	37.2%	14.1%	15.4%	42.7%	16.4%	11.2%
Non-MSA Iowa	64.5%	13.8%	32.5%	53.4%	18.1%	14.1%
Iowa	71.1%	18.6%	37.6%	56.9%	22.0%	14.8%
Cost Burden is housing cost that equals 30 percent or more of household income						
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy						

An observation was made by a community representative that it was difficult to have subdivision developments in the area due to the limited resources of local municipalities to support extensive infrastructure projects. Another community representative also noted that there had been efforts to minimize the cost of constructing single-family homes by eliminating basements, but given tornadoes and straight-wind events, this was becoming somewhat problematic. Efforts were directed to rehabilitating existing properties, but that also posed challenges with regard to costs involved in meeting code requirements. Some areas also had flood plain issues where the cost of flood insurance as well as structural considerations increased the overall cost of rehabilitation.

The minimal amount of new construction in the assessment area is reflected by the following table of authorized housing construction permits in each of the counties as compiled by the Iowa State University Extension and Outreach for the seven-year period of 2015-2021.

New Construction Housing Permits 2015-2021				
County	Property Type			
	Single Family	Duplex	Multifamily	Total
Adams	27	0	0	27
Fremont	65	0	0	65
Montgomery	54	2	1	57
Page	63	5	0	68
Taylor	35	0	0	35

Employment Characteristics

The following table presents the unemployment trends for the assessment area, the individual counties that comprise the assessment area, Non-MSA Iowa, and the state of Iowa. Over the five-year period, the assessment area displayed a lower unemployment rate than in Non-MSA Iowa and the state of Iowa. One community representative indicated that there had been only one major employer of note who had left the area in recent years, and the other major employers in the area have successfully retained employees. Major employers in the area include Pella Windows, NFK Bearing, and Lloyd Industries. Local school districts and medical facilities also employ a significant number of the workforce. Local meat processing companies are having employees come from as far away as Omaha, Nebraska to work in their facilities, currently paying wages up to $26.00 per hour, while the manufacturing hourly wage is around $28.00 per hour.

Per one of the community representatives, local established small businesses are successful, especially if they carry little or no debt. Alternatively, newer small businesses struggle, especially those with 20-25 employees as they encounter strong competition from the local and national retailers and with proximity of Omaha, Nebraska businesses to the area.

Southwest, IA Non-MSA Unemployment Rates					
Area	2018	2019	2020	2021	2022
2023 Southwest, IA Non-MSA	2.3%	2.3%	4.1%	3.3%	2.3%
Adams County IA	2.0%	1.7%	3.7%	2.7%	2.0%
Fremont County, IA	1.9%	2.7%	3.0%	2.6%	2.4%
Montgomery County, IA	2.5%	2.6%	4.6%	3.7%	2.5%
Page County IA	2.5%	2.5%	4.9%	3.7%	2.4%
Taylor County IA	2.0%	1.9%	3.6%	2.8%	2.0%
Non-MSA Iowa	2.7%	2.7%	4.8%	3.7%	2.8%
Iowa	2.6%	2.7%	5.2%	3.8%	2.7%
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics					

The counties in the assessment area, similar to many other agricultural oriented counties, had strong GDP growth from 2020 to 2022. The following table displays GDP data collected by the Bureau of Economic Analysis for each of the counties in millions and specifically for the category of agriculture, forestry, fishing, and hunting (AFFH) which had the major impact in GDP growth.

COUNTY	2020 GDP All Industry (AI)	2020 GDP AFFH (SM)	2020 Percentage AFFH of AI GDP	2022 GDP All industry (AI)	2022 GDP AFFH (SM)	2022 Percentage AFFH of AI GDP	Growth (%) AI 2020-2022	Growth (%) AFFH 2020-2022
Adams	204.7	37.6	18.4	289.6	77.9	26.9	41.5	107.1
Fremont	315.5	28.6	9.1	441.1	122.1	27.7	39.8	327.1
Montgomery	441.1	1.9	0.4	556.2	75.1	13.5	26.1	3,852.6
Page	624.7	41.1	6.6	793.6	140.0	17.6	27.0	240.6
Taylor	262.4	34.6	13.2	384.6	100.0	26.0	46.6	189.0

The strong increases in agricultural GDP in each of the counties was significantly driven by the rise in commodity prices. As reported in the 2022 United States Department of Agricultural study, the average county acreage per farm in the assessment area is approximately 500 acres, which is well above the state of Iowa average of 365 acres. Taylor County has the largest number of cattle farms due to having more grassland terrain.

The following table presents data collected by the Iowa State University Extension and Outreach monthly average agriculturally related prices covering the period of January 2020 to December 2022.

Commodity Prices 2020-2022					
Product	Price 1/2020	Price 12/2022	Percentage Increase	High	Date of High
Corn (per bushel)	$3.78	$6.69	77.0	$7.48	June-2022
Soybeans (per bushel)	$8.73	$14.50	66.1	$16.20	June-2022
Cattle (100 lbs. live weight)	$124.45	$157.04	26.2	157.04	December-2022
Hogs (cwt 100 lbs.)	$62.31	$81.92	31.5	$112.41	August- 2022

One community representative did indicate that 2024 was becoming a more challenging year for farmers as prices for corn and soybeans were declining; one of the major factors that was cited was the increased competition in the export market from Argentina and Brazil.

Community Representatives

Two community representatives familiar with the socioeconomic trends of the assessment area were contacted to provide information regarding local economic and demographic conditions, as well as two community representatives familiar with the agricultural economy in the state of Iowa. The representatives provided information on housing, employment, agriculture, and economic

development needs within the assessment area. Bank Iowa was identified by one of the representatives as being one of the banks responsive to the needs of economic development in the area especially with regard to agriculture. One representative noted a workforce skill gap where there is a need for more educators and medical professionals. An additional community representative familiar with the Iowa agricultural economy expressed that there was a growing concern with regard to the increasing escalation in insurance premiums on farm structures ranging from 40.0 to 50.0 percent.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTHWEST, IOWA Non-MSA

LENDING TEST

Geographic Distribution of Loans

The bank's geographic dispersion of loans reflects excellent distribution throughout the assessment area. Bank Iowa originated HMDA-reportable loans in 88.9 percent of the 18 census tracts in the assessment area in 2023. This includes loans in both of the moderate-income census tracts in the assessment area. In 2022 the bank originated CRA-reportable loans in 94.4 percent of the census tracts in the assessment area; including both of the moderate-income census tracts. An analysis of the combined HMDA-reportable and CRA-reportable lending for 2022 and 2023 indicated the bank originated loans in all the assessment area's census tracts. A detailed discussion of HMDA-reportable and CRA-reportable small business and small farm lending in relation to aggregate and census demographics is provided below.

HMDA-Reportable Lending

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area.

In 2023, 18.9 percent of Bank Iowa's HMDA-reportable loans were made in moderate-income census tracts. This performance is above the aggregate at 13.2 percent and above the percentage of owner-occupied units in moderate-income census tracts at 11.2 percent. The bank originated 81.1 percent of total HMDA-reportable loans in middle-income census tracts, performing below both the aggregate and the percentage of owner-occupied units at 86.8 percent and 88.8 percent, respectively. The bank's distribution of lending across geographies of different income levels in 2022 within HMDA-reportable loans was consistent with the distribution of loans in 2023.

Home improvement and multifamily originations were not subject to analysis due to the low volume of originations in each of these products, which does not allow for an effective analysis.

Home Purchase Loans

In 2023, Bank Iowa originated 25.0 percent of its home purchase loans in moderate-income census tracts, which was significantly above the aggregate at 14.3 percent and the percentage of owner-occupied units at 11.2 percent. The bank originated 75.0 percent of its home purchase loans in middle-income census tracts, which was below the aggregate at 85.7 percent and the percentage of owner-occupied units in middle-income census tracts at 88.8 percent.

Refinance Loans

In 2023, Bank Iowa originated 20.7 percent of its refinance loans in moderate-income census tracts which was above the aggregate at 13.2 percent and above the percentage of owner-occupied units in moderate-income census tracts at 11.2 percent. The bank originated 79.3 percent of refinance loans in middle-income census tracts, which was below the 86.8 percent by the aggregate and the 88.8 percent of owner-occupied units in middle-income tracts.

The following table presents the geographic distribution of HMDA-reportable loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography
Assessment Area: Southwest IA Non MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	10	11.4	15.0	1,128	10.5	12.1	17	25.0	14.3	1,384	16.1	10.9	11.2
Middle	78	88.6	85.0	9,601	89.5	87.9	51	75.0	85.7	7,206	83.9	89.1	88.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	88	100.0	100.0	10,728	100.0	100.0	68	100.0	100.0	8,590	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	7	13.7	12.8	662	12.4	8.7	6	20.7	13.2	154	7.2	7.0	11.2
Middle	44	86.3	87.2	4,695	87.6	91.3	23	79.3	86.8	1,986	92.8	93.0	88.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	51	100.0	100.0	5,357	100.0	100.0	29	100.0	100.0	2,140	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	9	20.9	14.3	191	12.1	7.9	3	7.0	7.1	110	4.6	4.4	11.2
Middle	34	79.1	85.7	1,383	87.9	92.1	40	93.0	92.9	2,274	95.4	95.6	88.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	43	100.0	100.0	1,574	100.0	100.0	43	100.0	100.0	2,383	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	50.0	44.4	495	56.5	45.3	1	33.3	18.2	5	5.9	0.7	35.1
Middle	3	50.0	55.6	381	43.5	54.7	2	66.7	81.8	81	94.7	99.3	64.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	876	100.0	100.0	3	100.0	100.0	85	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	29	15.4	14.1	2,476	13.4	11.3	27	18.9	13.2	1,653	12.5	9.7	11.2
Middle	159	84.6	85.9	16,061	86.6	88.7	116	81.1	86.8	11,546	87.5	90.3	88.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	188	100.0	100.0	18,536	100.0	100.0	143	100.0	100.0	13,199	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

CRA-Reportable Lending

Small Business Loans

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

In 2022, Bank Iowa originated 16.3 percent of its small business loans in moderate-income census tracts, which was above the aggregate at 10.5 percent and above the percentage of total businesses located in moderate- income census tracts at 14.7 percent. Of note, 28.0 percent of small business loans by dollar amount were originated in moderate-income census tracts, which was significantly above the aggregate at 12.3 percent. Bank Iowa originated 83.7 percent of small business loans in middle-income census tracts, which was slightly below the aggregate at 87.1 percent and the 85.3 percent of the total number of businesses in such census tracts.

The bank's distribution of small business lending across geographies of different income levels in 2023 was lower than in 2022 in moderate-income census tracts, but higher than in 2022 in middle-income census tracts, by percentage.

The following table presents the geographic distribution of small business loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography
Assessment Area: Southwest IA Non MSA

Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	27	16.3	10.5	2,914	28.0	12.3	23	11.8	2,608	14.6	14.7
Middle	139	83.7	87.7	7,508	72.0	87.1	172	88.2	15,303	85.4	85.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	1.9	0	0.0	0.6	0	0.0	0	0.0	0.0
Total	166	100.0	100.0	10,422	100.0	100.0	195	100.0	17,911	100.0	100.0

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

Small Farm Loans

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

In 2022, Bank Iowa originated 2.5 percent of its small farm loans in moderate-income census tracts which was slightly above aggregate at 2.0 percent and total farms in such tracts at 1.0 percent. The bank originated 97.5 percent of its small farm loans in middle-income census tracts which was comparable to the aggregate at 97.6 percent and the percentage of total farms located in such tracts at 99.0 percent.

The bank's distribution of small farm lending across geographies of different income levels in 2023 was consistent with the distribution of loans in 2022. The bank had the identical number of originations in both 2022 and 2023.

The following table presents the geographic distribution of small farm loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Small Farm Lending By Income Level of Geography
Assessment Area: Southwest IA Non MSA

Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	10	2.5	2.0	1,623	3.0	2.9	6	1.5	735	1.5	1.0
Middle	383	97.5	97.6	51,632	97.0	97.0	387	98.5	49,937	98.5	99.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.5	0	0.0	0.1	0	0.0	0	0.0	0.0
Total	393	100.0	100.0	53,255	100.0	100.0	393	100.0	50,672	100.0	100.0

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

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

The bank's lending activities reflect excellent distribution, particularly in its assessment area, of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

HMDA-Reportable Lending

The distribution of home mortgage lending reflects good penetration among individuals of different income levels.

In 2023, Bank Iowa originated 14.3 percent of total HMDA-reportable loans to low-income borrowers. This is nearly identical to the aggregate at 14.4 percent but below the 19.4 percent of low-income families in the assessment area. The bank originated 22.1 percent of HMDA-reportable loans to moderate-income borrowers, which is comparable to the aggregate at 24.9 percent and the demographic at 20.5 percent. The bank originated 20.0 percent of HMDA-reportable loans to middle-income borrowers, which was comparable to the aggregate and the percentage of middle-income families within the assessment area at 21.6 percent and 23.8 percent, respectively. Originations to upper-income borrowers at 32.9 percent was above the aggregate at 22.5 percent and comparable to the demographic measure at 36.2 percent. The bank also originated 10.7 percent of its HMDA-reportable loans to borrowers with unknown income, which consist of either commercial entity borrowers with incomes that are not required to be reported on the HMDA LAR or for the purpose of non-owner-occupied rental housing. Given these facts, this product will not be discussed below. The bank's distribution of lending to borrowers of different income levels in 2022 was consistent with the distribution of loans in 2023 for HMDA-reportable loans.

Home improvement and multifamily originations were not subject to analysis due to the low volume of originations in each of these products, which does not allow for an effective analysis.

Home Purchase Loans

In 2023, Bank Iowa originated 13.2 percent of its home purchase loans to low-income borrowers, which was comparable to the aggregate at 12.8 percent but below the percentage of low-income families within the assessment area at 19.4 percent. The bank originated 30.9 percent of its home purchase loans to moderate-income borrowers, which was above the aggregate at 26.9 percent and above the percentage of moderate-income families at 20.5 percent. The bank originated 17.6 percent of its home purchase loans to middle- income borrowers, which was below the aggregate at 20.5 percent and the percentage of middle-income families within the assessment area at 23.8 percent. Home purchase originations to upper-income borrowers at 26.5 percent was above the aggregate at 18.5 percent but below the demographic measure at 36.2 percent.

Refinance Loans

In 2023, Bank Iowa originated 20.7 percent of its refinance loans to low-income borrowers. The bank's performance is above the aggregate at 17.4 percent and slightly above the 19.4 percent of low-income families in the assessment area. The bank originated 20.7 percent of its refinance loans to moderate-income borrowers which is below the aggregate at 25.0 percent and comparable to the demographic of moderate-income families at 20.5 percent. The bank originated 20.7 percent of

refinance loans to middle-income borrowers, which is slightly above the aggregate but below demographic performance at 19.4 percent and 23.8 percent, respectively. The bank originated its largest percentage of refinance loans to upper-income borrowers at 31.0 percent which was above the aggregate at 27.8 percent but below the 36.2 percent of upper-income families.

The following table presents the borrower distribution of HMDA-reportable loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level
Assessment Area: Southwest IA Non MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	12	13.6	15.5	787	7.3	9.0	9	13.2	12.8	860	10.0	7.3	19.4
Moderate	26	29.5	26.9	2,769	25.8	22.7	21	30.9	26.9	2,377	27.7	21.7	20.5
Middle	24	27.3	19.4	3,098	28.9	21.7	12	17.6	20.5	1,342	15.6	20.4	23.8
Upper	19	21.6	15.2	3,286	30.6	24.3	18	26.5	18.5	3,150	36.7	28.0	36.2
Unknown	7	8.0	23.0	788	7.3	22.4	8	11.8	21.2	862	10.0	22.6	0.0
Total	88	100.0	100.0	10,728	100.0	100.0	68	100.0	100.0	8,590	100.0	100.0	100.0
Refinance Loans													
Low	6	11.8	14.8	293	5.5	8.3	6	20.7	17.4	268	12.5	7.1	19.4
Moderate	10	19.6	18.7	773	14.4	15.8	6	20.7	25.0	343	16.0	17.2	20.5
Middle	11	21.6	24.5	1,337	25.0	27.2	6	20.7	19.4	284	13.3	16.3	23.8
Upper	20	39.2	26.5	2,396	44.7	30.1	9	31.0	27.8	1,155	54.0	40.6	36.2
Unknown	4	7.8	15.6	559	10.4	18.7	2	6.9	10.4	90	4.2	18.8	0.0
Total	51	100.0	100.0	5,357	100.0	100.0	29	100.0	100.0	2,140	100.0	100.0	100.0
Home Improvement Loans													
Low	3	7.0	12.1	43	2.7	6.0	5	11.6	15.3	66	2.8	8.3	19.4
Moderate	8	18.6	23.1	329	20.9	22.2	4	9.3	14.1	191	8.0	12.2	20.5
Middle	10	23.3	25.3	324	20.6	21.8	10	23.3	28.2	381	16.0	24.0	23.8
Upper	18	41.9	31.9	724	46.0	40.6	19	44.2	31.8	1,462	61.4	38.5	36.2
Unknown	4	9.3	7.7	155	9.9	9.3	5	11.6	10.6	284	11.9	17.0	0.0
Total	43	100.0	100.0	1,574	100.0	100.0	43	100.0	100.0	2,383	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	21	11.5	15.2	1,123	6.4	8.7	20	14.3	14.4	1,194	9.1	7.5	19.4
Moderate	44	24.2	23.6	3,871	21.9	20.4	31	22.1	24.9	2,911	22.2	20.4	20.5
Middle	45	24.7	21.9	4,759	26.9	23.4	28	20.0	21.6	2,006	15.3	19.9	23.8
Upper	57	31.3	20.6	6,405	36.3	27.2	46	32.9	22.5	5,767	44.0	31.0	36.2
Unknown	15	8.2	18.6	1,502	8.5	20.3	15	10.7	16.6	1,236	9.4	21.1	0.0
Total	182	100.0	100.0	17,660	100.0	100.0	140	100.0	100.0	13,114	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

CRA-Reportable Lending

Small Business Loans

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

In 2022, Bank Iowa originated 80.1 percent of its small business loans to businesses reporting annual revenues of $1 million or less, which was significantly above the aggregate at 53.6 percent but below the percentage of small businesses in the assessment area at 90.5 percent. Of the 133 loans originated to businesses with revenues less $1 million, 91.7 percent were in amounts of $100,000 or less, which are typically considered most beneficial to small businesses. Further, the 133 loans represented 36.2 percent of all such loans originated by the 45 CRA-reporters in the assessment area.

The bank's distribution of lending to business of different revenue sizes in 2023 was significantly below its performance in 2022 among small businesses of $1 million or less at 66.2 percent. This was the result of a large increase in loans to businesses with revenues over $1 million while remaining relatively constant in the number of loans to businesses with revenues less than $1 million. However, the bank remained consistent with regard to loan amounts of $100,000 or less at 89.9 percent to businesses with revenues less than $1 million. Overall, the increase of 17.5 percent by number and 71.9 percent by dollar in business lending from 2022 to 2023 indicated the bank's commitment to such lending in the assessment area.

The following table presents the borrower distribution of small business loans in the assessment for the years 2022 and 2023.

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses Assessment Area: Southwest IA Non MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
By Revenue											
$1 Million or Less	133	80.1	53.6	7,278	69.8	33.2	129	66.2	7,448	41.6	90.5
Over $1 Million	31	18.7		3,096	29.7		54	27.7	8,330	46.5	6.6
Revenue Unknown	2	1.2		48	0.5		12	6.2	2,133	11.9	2.9
Total	166	100.0		10,422	100.0		195	100.0	17,911	100.0	100.0
By Loan Size											
$100,000 or Less	145	87.3	89.7	5,181	49.7	35.6	150	76.9	5,305	29.6	
$100,001 - $250,000	16	9.6	6.3	2,731	26.2	21.8	28	14.4	4,618	25.8	
$250,001 - $1 Million	5	3.0	4.0	2,510	24.1	42.7	17	8.7	7,988	44.6	
Total	166	100.0	100.0	10,422	100.0	100.0	195	100.0	17,911	100.0	
By Loan Size and Revenues $1 Million or Less											
$100,000 or Less	122	91.7		3,934	54.1		116	89.9	3,776	50.7	
$100,001 - $250,000	7	5.3		1,108	15.2		7	5.4	1,002	13.5	
$250,001 - $1 Million	4	3.0		2,236	30.7		6	4.7	2,670	35.8	
Total	133	100.0		7,278	100.0		129	100.0	7,448	100.0	

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

Small Farm Loans

The distribution of small farm lending reflects excellent penetration among farms of different sizes.

In 2022, the bank originated 83.5 percent of its small farm loans to farms with $1 million in revenue or less. This performance is significantly above the aggregate performance of 66.0 percent but significantly below the 98.7 percent of total farms in the assessment area. In addition, of the 328 loans originated to farms with revenues less $1 million, 62.5 percent 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. Further, the 328 loans represented 81.0 percent of all such loans originated by the 45 CRA-reporters in the assessment area.

The bank's distribution of lending to farms of different revenue sizes in 2023 was consistent with the distribution of loans in 2022.

The following table presents the borrower distribution of small farms loans in the assessment area for the years 2022 and 2023.

Distribution of 2022 and 2023 Small Farm Lending By Revenue Size of Farms Assessment Area: Southwest IA Non MSA											
	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
By Revenue											
$1 Million or Less	328	83.5	66.0	38,318	72.0	68.8	311	79.1	31,792	62.7	98.7
Over $1 Million	62	15.8		14,393	27.0		77	19.6	18,443	36.4	1.1
Revenue Unknown	3	0.8		544	1.0		5	1.3	437	0.9	0.2
Total	393	100.0		53,255	100.0		393	100.0	50,672	100.0	100.0
By Loan Size											
$100,000 or Less	227	57.8	69.1	9,398	17.6	20.9	241	61.3	10,496	20.7	
$100,001 - $250,000	95	24.2	18.4	16,645	31.3	32.0	86	21.9	15,110	29.8	
$250,001 - $500,000	71	18.1	12.5	27,212	51.1	47.1	66	16.8	25,066	49.5	
Total	393	100.0	100.0	53,255	100.0	100.0	393	100.0	50,672	100.0	
By Loan Size and Revenues $1 Million or Less											
$100,000 or Less	205	62.5		8,093	21.1		214	68.8	8,969	28.2	
$100,001 - $250,000	79	24.1		13,733	35.8		64	20.6	11,178	35.2	
$250,001 - $500,000	44	13.4		16,492	43.0		33	10.6	11,645	36.6	
Total	328	100.0		38,318	100.0		311	100.0	31,792	100.0	

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

Community Development Lending

Bank Iowa is a leader in making community development loans. During the review period the bank made 13 loans totaling $11.9 million. When compared to the previous evaluation this reflected an increase of 225.0 percent by number and 18.1 percent by dollar from the previous evaluation. The majority of loans both by number and dollar were for revitalization/stabilization purposes, primarily related to medical facilities located in counties that contained moderate-income census tracts, indicating the bank's responsiveness in helping meet essential community needs among low- and moderate-income populations.

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

Southwest, IA Non-MSA Community Development Loans (Dollars in 000s) July 11, 2022 to September 9, 2024										
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalization\ Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
Southwest, IA Non-MSA	1	118	3	650	0	0	9	11,113	13	11,881

INVESTMENT TEST

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

During the evaluation period, Bank Iowa did not make any qualified investments, similar to its performance in the assessment area at the previous evaluation where it also did not make any qualified investments.

The bank made 17 qualified donations totaling $40,950 in the current evaluation period. The bank displayed responsiveness to the needs of the assessment area as a majority of the donations were made primarily to organizations that focus on community services to low- and moderate-income individuals. When compared to the previous evaluation, the bank's qualified donations decreased by 10.5 percent by number and 34.8 percent by dollar.

The following table presents the bank's community development donations during the review period.

Southwest, IA Non-MSA Community Development Donations July 11, 2022 to September 9, 2024										
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalization and Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
Southwest, IA Non-MSA	0	0	10	22,400	5	8,450	2	10,100	17	40,950

SERVICE TEST

Retail Services

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

The bank operates six offices and six cash-only ATMs. There are two offices located in moderate-income census tracts, with the remaining four located in middle-income census tracts. Alternative delivery systems include phone, internet banking, and mobile banking. During the review period, the bank did not close or open any branches in the assessment area. Offices in the assessment area generally have standard hours of 9:00 a.m. to 4:00 p.m., Monday through Friday with the exception of the Villisca office which closes at 3:00 p.m. The Red Oak, Shenandoah, and Villisca drive-ups have Saturday morning hours of 9:00 a.m. to 12:00 p.m. The Clarinda drive-up has Saturday hours of 8:30 a.m. to 12:00 p.m. Applications for loan and deposit products are accepted at each location, with the exception of the Shenandoah drive-up. Additionally, mortgage applications are accepted online through the bank's website.

Community Development Services

Bank Iowa provides a relatively high level of community development services. The bank provided 340 hours of volunteer financial services during the current review period. While this represents a decrease compared to the previous evaluation (379 hours), the bank is viewed by community representatives as being highly responsive to assessment area needs. Organizations that were recipients of the bank's staff financial expertise included local foundations, municipal governments, economic development corporations, and organizations involved in affordable housing initiatives.

Southwest, IA Non-MSA Community Development Services July 11, 2022 to September 9, 2024					
Assessment Area	Affordable Housing	Community Service	Economic Development	Revitalization and Stabilization	Total
	Hours	Hours	Hours	Hours	Hours
Southwest, IA Non-MSA	46	59	235	0	340

DENISON, IOWA Non-MSA - Full Review

SCOPE OF THE EXAMINATION

Full scope examination procedures were used to evaluate the bank's performance in the Denison 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 DENNISON, IOWA Non-MSA

The Denison, Iowa Non-MSA assessment area consists of Crawford County in its entirety. The assessment area remains unchanged since the previous performance evaluation of July 11, 2022. Based on the most current American Community Survey the assessment area consists of six census tracts. Of the six census tracts, one is designated as moderate-income, four as middle-income, and one as upper-income. The four middle-income census tracts are all designated as underserved due to being remote and rural as the county's population is considered to be sufficiently small, thin, and distant from a population center and likely to have difficulty financing the fixed costs of meeting essential community needs.

Within the assessment area, the bank operates three branches. One branch is in a moderate-income census tract with a cash-only ATM; and two branches are located in middle-income census tracts, one with a cash-only ATM and the other without an ATM. Additionally, there is one stand-alone cash-only ATM located in a middle-income census tract. The bank did close one branch in a middle-income census tract during the evaluation period in March of 2024, as there was a declining number of banking transactions conducted onsite and increasing use of the bank's digital services by its customers.

According to the June 30, 2023 FDIC Deposit Market Share Report, Bank Iowa ranked second among six FDIC-insured financial institutions operating in the assessment area with 26.3 percent of the market share. The bank's market share decreased from 27.5 percent in 2021, when the bank had been first in deposits by market share. Bank deposits decreased slightly from $177.0 million to $175.6 million, or a decrease of 0.8 percent between June 30, 2021, to June 30, 2023. The other three top leaders in market share in the assessment area account for approximately two-thirds of all deposits: United Bank of Iowa (27.8 percent), Crawford County Trust and Savings Bank (26.0 percent), and Wells Fargo Bank N.A. (10.5 percent). Overall, the five other banks competing for deposits and loans with Bank Iowa as of June 30, 2023, have nine branches in the assessment area which represents a decrease of one bank and one branch serving the assessment area in June of 2021.

In 2023, the bank ranked first among all HMDA-reportable lenders in the assessment area in the number of home purchase and refinance HMDA-reportable originations. In 2022, the bank ranked

second overall, though it was first in refinances. The bank ranked second by number of 2022 CRA-reportable originations among CRA reporters in the assessment area. Bank Iowa was ranked first in small business originations and first in small business loans to small businesses. The bank was ranked second in both lending to small farms and small farm loans to small farms. The bank's lending to small farms accounted for 36.9 percent of such loans originated in the assessment area by CRA reporters and 47.3 percent of small farm loans to small farms.

Although the bank exhibited no growth in deposits, it was still able to maintain its position as a primary lender in the assessment area.

Tract Designation Change Data

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 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.

Based on the most recent ACS and OMB revisions, the current assessment area represents an expansion of the number of census tracts from five to six, and an adjustment of census tract designations from all middle-income underserved in the previous evaluation to the current designations reflected in the following table.

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	**2021 Designations (#)**	**2022 Designations (#)**	**Net Change (#)**
Low	0	0	0
Moderate	0	1	1
Middle	5	4	-1
Upper	0	1	1
Unknown	0	0	0
Total	5	6	1
Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015 *U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020*			

Additional assessment area demographic information is provided in the following table. Refer to Appendix B for 2022 demographic information.

2023 Denison, IA Non MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,081	23.9
Moderate	1	16.7	1,630	36.1	455	27.9	860	19.0
Middle	4	66.7	2,251	49.9	186	8.3	910	20.2
Upper	1	16.7	634	14.0	49	7.7	1,664	36.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**6**	**100.0**	**4,515**	**100.0**	**690**	**15.3**	**4,515**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	2,106	1,242	28.0	59.0	762	36.2	102	4.8
Middle	3,864	2,608	58.8	67.5	752	19.5	504	13.0
Upper	1,098	583	13.2	53.1	441	40.2	74	6.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**7,068**	**4,433**	**100.0**	**62.7**	**1,955**	**27.7**	**680**	**9.6**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	293	37.7	264	37.7	27	49.1	2	9.5
Middle	388	49.9	350	49.9	19	34.5	19	90.5
Upper	96	12.4	87	12.4	9	16.4	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**777**	**100.0**	**701**	**100.0**	**55**	**100.0**	**21**	**100.0**
Percentage of Total Businesses:				**90.2**		**7.1**		**2.7**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	11	6.0	11	6.0	0	0.0	0	0.0
Middle	164	89.1	164	89.1	0	0.0	0	0.0
Upper	9	4.9	9	4.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**184**	**100.0**	**184**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Population Characteristics

The following table presents the population trends for the assessment area, Non-MSA Iowa, and the state of Iowa. The assessment area, which consists solely of Crawford County, like many of Iowa's rural counties is experiencing a decline in its population. The city of Denison by itself accounts for approximately 50.0 percent of the county's population. One community representative estimated that the population loss is averaging approximately one percent per year and indicated employee migration to other counties and to metropolitan areas as a primary reasons for the loss. One of the community representatives indicated that there had been some offset to the population outflow by immigrants coming into the area, especially locating in Denison.

Denison, IA Non-MSA
Population Change
2015 and 2020

Area	2015 Population	2020 Population	Percent Change
Denison, IA Non-MSA	17,252	16,525	(4.2%)
Non-MSA Iowa	1,250,756	1,232,642	(1.4%)
Iowa	3,093,526	3,190,369	3.1%

Source: 2011-2015 U.S. Census Bureau American Community Survey
2020 U.S. Census Bureau Decennial Census

Income Characteristics

The following table compares the MFI for the Denison, IA Non-MSA, Non-MSA Iowa, and the state of Iowa from 2015 to 2020. According to the 2020 FFIEC Census Data, the assessment area is comprised of 4,515 families, of which 23.9 percent are designated as low-, 19.0 percent are moderate-, 20.2 percent are middle-, and 36.9 percent are upper-income. Families residing within the assessment area that are below the poverty level comprise 15.3 percent of the total number of families.

The assessment area experienced an increase in MFI between the referenced time periods and displayed a modestly stronger performance than both Non-MSA Iowa and the state of Iowa. However, the 2020 MFI for the assessment area, at $66,804, was still below the 2020 MFI for both Non-MSA Iowa and the state of Iowa. Additionally, the 8.0 percent gain was under the 9.9 percent inflation rate for the same period as calculated by the Bureau of Labor Statistics Consumer Price Index during the same period.

According to a community representative, wages over the recent period have not kept up with inflation. The city of Denison, in particular, is struggling as wages tend to be lower than average with a large number of people working in the meat industry.

Denison, IA Non-MSA 2022 IA Non MSA Median Family Income Change			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Denison, IA Non-MSA	$61,884	$66,804	8.0%
Non-MSA Iowa	$67,391	$71,763	6.5%
Iowa	$73,712	$79,186	7.4%
Source: 2011 - 2015 U.S. Census Bureau American Community Survey *2016 - 2020 U.S. Census Bureau American Community Survey* *Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.*			

Housing Characteristics

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

Renters across all income levels in the assessment area experience this burden; however, the overall percentage at 30.4 percent is below that of Non-MSA Iowa and the state of Iowa that were at 32.5 percent and 37.6 percent, respectively. The housing cost burden for homeowners in the assessment area is similarly below that of both Non-MSA Iowa and state of Iowa.

Both community representatives noted the need for affordable housing, citing several factors contributing to rising cost of housing in general. Supply and demand are the primary issue where there are not enough rentals available causing upward pressure on rents. The lack of new construction for both rentals and owner-occupied properties was confirmed by an Iowa State University Extension and Outreach Study that indicated there were only five single-family housing permits in 2020 and six in 2021, with no permits issued for any two-unit or more properties. One of the community representatives commented that a major impediment to new construction is the "value gap" where the cost of building a new home is greater than its actual value when completed. Other contributing factors noted by the representatives were that a large number of rentals are single-family homes, and the rising costs associated with these properties such as maintenance, insurance, and inflation were driving up rents. Additionally, homeowners are reluctant to move and place their homes up for sale due to their low-interest rate mortgages contributing to a shortage of homes on the for-sale market.

Denison, IA Non-MSA Housing Cost Burden						
	Cost Burden – Renters			Cost Burden - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Denison, IA Non-MSA	58.5%	22.7%	30.4%	39.2%	18.4%	10.5%
Non-MSA Iowa	64.5%	13.8%	32.5%	53.4%	18.1%	14.1%
Iowa	71.1%	18.6%	37.6%	56.9%	22.0%	14.8%
Cost Burden is housing cost that equals 30 percent or more of household income						
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy						

Employment Characteristics

The following table presents the unemployment trends for the assessment area, the Non-MSA Iowa, and the state of Iowa. Over the five-year period, the Denison, IA Non-MSA assessment area displayed a higher unemployment rate than Non-MSA Iowa and, with the exception of 2020 where many areas were impacted by the COVID pandemic, exceeded the state of Iowa rate. One community representative indicated that the local economy was still experiencing the residual effects of the closing of a portion of a meat plant in Denison in 2015, accounting for the unemployment disparity. Another community representative noted that recently there have been a number of successful small businesses opened by immigrants. Major employers in the area are Monogram (pork company), a local hospital, a high school, and Walmart.

2023 Denison, IA Non-MSA Unemployment Rates					
Area	2018	2019	2020	2021	2022
Denison, IA Non-MSA	3.5%	3.4%	5.1%	4.7%	4.0%
Non-MSA Iowa	2.7%	2.7%	4.8%	3.7%	2.8%
Iowa	2.6%	2.7%	5.2%	3.8%	2.7%
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics					

Crawford County, similar to many other agricultural oriented counties, had strong GDP growth from 2020 to 2022. Data collected by the Bureau of Economic Analysis showed the county increased its GDP to a total of $996.3 million, which represented a 28.7 percent increase from $773.9 million in 2020, a 9.5 percent increase from $909.6 million in 2021. Manufacturing contributed $227.1 million in 2022, which was stable compared to the $238.8 million in 2020. Agriculture, forestry, fishing, and hunting GDP increased from $45.0 million in 2020 to $235.8 million in 2022. The approximate $190.1 million rise in agricultural GDP accounted for 85.5 percent of the overall assessment area improvement.

Escalating prices in corn, soybeans, and livestock were instrumental to increasing GDP. The

following table presents data collected by the Iowa State University Extension and Outreach monthly average agriculturally related prices covering the period of January 2020 to December 2022.

Commodity Prices 2020-2022					
Product	**Price 1/2020**	**Price 12/2022**	**Percentage Increase**	**High**	**Date of High**
Corn (per bushel)	$3.78	$6.69	77.0	$7.48	June-2022
Soybeans (per bushel)	$8.73	$14.50	66.1	$16.20	June-2022
Cattle (100 lbs. live weight)	$124.45	$157.04	26.2	157.04	December-2022
Hogs (cwt.100 lbs.)	$62.31	$81.92	31.5	$112.41	August- 2022

The majority of the farms are in the southern portion of the county. Per the United States Department of Agriculture definition of a farm (defined as any agricultural operation that sold or could have sold $1,000 in production in the past year), the county contains a significant number of cattle farms, which one community representative attributed to the large amount of pastureland. The average acreage per the 2022 USDA study is 462 acres, which is 30.1 percent larger than the average 365-acre size farm in Iowa. The production of both bushels per acre of corn and soybeans are below that of the state average as estimated by the USDA which one community representative indicated may be due to the hillier terrain. The county's Corn Suitability Rating or CSR2 (soil's measure of productivity) was 68.6 in 2020, falling in the mid-tier range of all of Iowa's Counties whose average is 68.4.

Community Representatives

Two community representatives familiar with the socioeconomic trends of the assessment area were contacted to provide information regarding local economic and demographic conditions. The representatives provided information on housing, employment, agriculture, and economic development needs within the assessment area. Bank Iowa was identified by one of the representatives as being one of the banks responsive to the needs of economic development in the area. Major areas of concern included affordable housing, workforce skill gaps to fill a need for construction contractors and building inspectors, and the need for a credit repair program, especially for younger individuals. Additional community representatives familiar with the Iowa agricultural economy expressed that there was a growing concern with regard to the increasing rise in insurance premiums on farm structures which was ranging from 40.0 to 50.0 percent, if coverage could even be obtained, causing some farmers to reconfigure plans for any new structures to minimize the premium.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DENISON, IA Non-MSA

LENDING TEST

Geographic Distribution of Loans

The bank's geographic dispersion of loans reflects excellent distribution throughout the assessment area. Bank Iowa originated HMDA-reportable loans in all six census tracts in the assessment area in 2023, including the sole moderate-income census tract. The bank also originated CRA-reportable loans all of the census tracts in the assessment area. A detailed discussion of HMDA-reportable and CRA-reportable small business and small farm lending in relation to aggregate and census demographics is provided below.

HMDA-Reportable Lending

The geographic distribution of home mortgage loans reflects excellent penetration throughout the assessment area.

In 2023, 46.2 percent of Bank Iowa's HMDA-reportable loans were made in moderate-income census tracts. This performance is significantly above the aggregate at 35.1 percent and significantly above the percentage of owner-occupied units in moderate-income census tracts at 28.0 percent. The bank originated 41.0 percent of its HMDA-reportable loans in middle-income census tracts, which was below the aggregate at 46.0 percent, and significantly below the percentage of owner-occupied units in middle-income tracts at 58.8 percent. Finally, the bank originated 12.8 percent of HMDA-reportable loans in upper-income census tracts, which was below aggregate performance of 18.8 percent and comparable to the percentage of owner-occupied units in those tracts at 13.2 percent. In 2023, the bank displayed a stronger lending performance in moderate-income census tracts than in 2022. Distribution of lending across the other geographies was consistent in 2022 and 2023.

Multifamily originations were not subject to analysis due to the low volume of originations in this product, which does not allow for an effective analysis.

Home Purchase Loans

In 2023, Bank Iowa originated 61.5 percent of its home purchase loans in moderate-income census tracts, which was significantly above the aggregate at 36.9 percent and the percentage of owner-occupied units at 28.0 percent. The bank originated 30.8 percent of its loans in middle-income census tracts, which was significantly below the aggregate at 42.6 percent and significantly below the percentage of owner-occupied units in middle-income census tracts at 58.8 percent. Home purchase originations in upper-income census tracts at 7.7 percent were significantly below aggregate at 20.6 percent and below the demographic at 13.2 percent.

Refinance Loans

In 2023, Bank Iowa originated 31.3 percent of its refinance loans in moderate-income census tracts which was below the aggregate at 37.8 percent, but above the percentage of owner-occupied units in moderate-income census tracts at 28.0 percent. The bank originated 56.3 percent of refinance loans in middle-income census tracts, which was above the 46.7 percent by the aggregate and slightly below the 58.8 percent of owner-occupied units in middle-income tracts. Refinance originations in upper-income census tracts by the bank was 12.5 percent which was below aggregate at 15.6 percent and slightly below demographic at 13.2 percent.

Home Improvement Loans

In 2023, Bank Iowa originated 23.8 percent of its home improvement loans in moderate-income census tracts which was comparable to the aggregate at 23.3 percent, but below the percentage of owner-occupied units in moderate-income census tracts at 28.0 percent. The bank originated 52.4 percent of home improvement loans in middle-income census tracts, which was below the 60.0 percent by the aggregate and below the 58.8 percent of owner-occupied units in middle-income tracts. Home Improvement originations in upper-income census tracts by the bank was 23.8 percent which was above the aggregate at 16.7 percent and above the demographic at 13.2 percent.

The following table presents the geographic distribution of HMDA-reportable loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography
Assessment Area: Denison, IA Non MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	17	43.6	29.7	1,168	40.0	28.4	24	61.5	36.9	2,122	69.4	36.6	28.0
Middle	16	41.0	48.9	1,228	42.1	45.9	12	30.8	42.6	633	20.7	33.6	58.8
Upper	6	15.4	21.4	523	17.9	25.8	3	7.7	20.6	303	9.9	29.8	13.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	39	100.0	100.0	2,918	100.0	100.0	39	100.0	100.0	3,058	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	8	29.6	28.2	265	15.9	29.5	5	31.3	37.8	214	24.5	27.9	28.0
Middle	15	55.6	55.3	1,183	71.2	49.7	9	56.3	46.7	605	69.4	52.9	58.8
Upper	4	14.8	16.5	215	12.9	20.8	2	12.5	15.6	54	6.2	19.2	13.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	27	100.0	100.0	1,662	100.0	100.0	16	100.0	100.0	872	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	35.3	41.2	476	64.5	47.7	5	23.8	23.3	330	32.6	31.0	28.0
Middle	7	41.2	38.2	112	15.1	31.4	11	52.4	60.0	477	47.1	53.7	58.8
Upper	4	23.5	20.6	151	20.5	20.9	5	23.8	16.7	206	20.3	15.2	13.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	17	100.0	100.0	738	100.0	100.0	21	100.0	100.0	1,012	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	100.0	36.4	152	100.6	18.5	2	100.0	70.0	450	100.0	72.9	13.5
Middle	0	0.0	54.5	0	0.0	24.5	0	0.0	30.0	0	0.0	27.1	9.9
Upper	0	0.0	9.1	0	0.0	57.1	0	0.0	0.0	0	0.0	0.0	76.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	151	100.0	100.0	2	100.0	100.0	450	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	33	38.8	30.5	2,060	37.7	28.5	36	46.2	35.1	3,116	57.8	39.1	28.0
Middle	38	44.7	51.1	2,522	46.1	44.5	32	41.0	46.0	1,715	31.8	37.4	58.8
Upper	14	16.5	18.4	889	16.2	27.0	10	12.8	18.8	563	10.4	23.4	13.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	85	100.0	100.0	5,471	100.0	100.0	78	100.0	100.0	5,393	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

CRA-Reportable Lending

Small Business Loans

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

In 2022, Bank Iowa originated 27.3 percent of its small business loans in moderate-income census tracts, which was slightly below the aggregate at 28.3 percent, and below the percentage of total businesses located in moderate-income census tracts at 37.7 percent. The bank's performance in the moderate-income census tract is noteworthy as its 44 originations represent 34.6 percent of small business loans among all CRA-reporters originated in the tract. Bank Iowa originated 53.4 percent of small business loans in middle-income census tracts, which was slightly below the aggregate at 57.6 percent but above the percentage of total businesses in middle-income census tracts at 49.9 percent. Lastly, the bank originated 19.3 percent of small business loans in upper-income census tracts, which was above the aggregate at 12.1 percent and the 12.4 percent of total businesses in upper-income census tracts.

In 2023 the bank improved its distribution of small business lending in moderate-income census to 36.9 percent which was comparable to the demographic but above its performance in 2022. Its 2023 performance in middle- and upper- income census tracts was below its performance in 2022.

The following table presents the geographic distribution of small business loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography
Assessment Area: Denison, IA Non MSA

Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	44	27.3	28.3	2,323	21.5	28.1	52	36.9	4,666	46.1	37.7
Middle	86	53.4	57.6	5,853	54.3	61.0	66	46.8	3,640	36.0	49.9
Upper	31	19.3	12.1	2,606	24.2	10.5	23	16.3	1,806	17.9	12.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	2.0	0	0.0	0.4	0	0.0	0	0.0	0.0
Total	161	100.0	100.0	10,782	100.0	100.0	141	100.0	10,112	100.0	100.0

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

Small Farm Loans

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

In 2022, Bank Iowa originated 2.4 percent of its small farm loans in moderate-income census tracts, which was slightly above the aggregate at 1.8 percent but below the percentage of total farms located in moderate- income census tracts at 6.0 percent. The bank's performance in the moderate-income census tract is noteworthy as its originations represent 50.0 percent of small farm loans among all CRA-reporters originated in such tracts. The bank originated 92.8 percent of small farm loans in middle-income census tracts, which was slightly below the aggregate at 95.4 percent but slightly above the percentage of total farms in middle-income census tracts at 89.1 percent. Finally, the bank originated 4.8 percent of small farm loans in upper-income census tracts, which was above the aggregate of 2.8 percent and comparable to the 4.9 percent of total farms in upper-income census tracts.

In 2023, the bank's distribution of small farm lending in moderate-income census tracts was less than its 2022 performance. It was also less by percentage in upper-income census tracts, and slightly below with respect to middle-income census tracts.

The following table presents the geographic distribution of small farm loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Small Farm Lending By Income Level of Geography
Assessment Area: Denison, IA Non MSA

Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	5	2.4	1.8	852	3.9	3.7	2	0.9	356	1.5	6.0
Middle	194	92.8	95.4	20,236	92.8	93.4	207	96.7	22,796	95.9	89.1
Upper	10	4.8	2.8	712	3.3	3.0	5	2.3	622	2.6	4.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Total	209	100.0	100.0	21,800	100.0	100.0	214	100.0	23,774	100.0	100.0

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

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

The bank's lending activities reflect excellent distribution, particularly in its assessment area, of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

HMDA-Reportable Lending

The geographic distribution of home mortgage loans reflects excellent penetration throughout the assessment area.

In 2023, Bank Iowa originated 34.2 percent of total HMDA-reportable loans to low-income borrowers. This is significantly above the aggregate at 20.1 percent and above the 23.9 percent of low-income families in the assessment area. The bank originated 30.3 percent of HMDA-reportable loans to moderate-income borrowers, comparable to aggregate at 30.6 percent but significantly above the demographic at 19.0 percent. The bank originated 17.1 percent of HMDA-reportable loans to middle-income borrowers, which was comparable to aggregate but below the percentage of middle-income families within the assessment area at 16.6 percent and 20.2 percent, respectively. Bank Iowa originated 13.2 percent of HMDA-reportable loans to upper-income borrowers, which was significantly below the aggregate at 23.6 percent and the demographic measure at 36.9 percent. The bank also originated 5.3 percent of its HMDA-reportable loans to borrowers with unknown income, which consist of either commercial entity borrowers with incomes that are not required to be reported on the HMDA LAR or for the purpose of non-owner-occupied rental housing. Given these facts, this product will not be discussed below. The bank's distribution of lending to low-income borrowers in 2023 was significantly above its performance in 2022, but distribution to moderate-income borrowers was lower. In loans to middle-income borrowers the bank's performance was consistent for both years, while for upper-income borrowers, 2022 performance was higher than in 2023.

Multifamily originations were not subject to analysis due to the low volume of originations in this product, which does not allow for an effective analysis.

Home Purchase Loans

In 2023, Bank Iowa originated 41.0 percent of its home purchase loans to low-income borrowers, which was significantly above the aggregate at 19.1 percent as well as significantly above the percentage of low-income families within the assessment area at 23.9 percent. The bank originated 30.8 percent of its home purchase loans to moderate-income borrowers, which was slightly below the aggregate at 31.9 percent but significantly above the percentage of moderate-income families at 19.0 percent. The bank originated 7.7 percent of its home purchase loans to middle-income borrowers, which was below the aggregate at 12.8 percent and significantly below the percentage

of middle-income families within the assessment area at 20.2 percent. Home purchase loans to upper-income borrowers in 2023, at 17.9 percent, was below the aggregate at 24.1 percent and significantly below the demographic at 36.9 percent.

Refinance Loans

In 2023, Bank Iowa originated 50.0 percent of its refinance loans to low-income borrowers. The bank's performance was significantly above the aggregate at 33.3 percent and the 23.9 percent of low-income families in the assessment area. The bank originated 31.3 percent of its refinance loans to moderate-income borrowers which was significantly above the aggregate at 20.0 percent and the 19.0 percent demographic of moderate-income families. The bank originated 6.3 percent of refinance loans to middle-income borrowers, which was significantly below both the aggregate and demographic performance of 17.8 and 20.2 percent, respectively. Finally, the bank originated 6.3 percent of its refinance loans to upper-income borrowers, which was significantly below the aggregate at 24.4 percent and the 36.9 percent demographic of upper-income families.

Home Improvement Loans

In 2023, Bank Iowa originated 9.5 percent of its home improvement loans to low-income borrowers. The bank's performance was below the aggregate at 13.3 percent and significantly below the 23.9 percent of low-income families in the assessment area. The bank originated 28.6 percent of its home improvement loans to moderate-income borrowers which was below the aggregate at 33.3 percent and above the 19.0 percent demographic of moderate-income families. The bank originated 42.9 percent of home improvement loans to middle-income borrowers, which was above the aggregate at 33.3 percent and significantly above the 20.2 percent of middle-income families. Finally, at 9.5 percent of home improvement loans to upper-income borrowers, the bank's lending was below the aggregate at 13.3 percent and significantly below the 36.9 percent demographic of upper-income families.

The following table presents the borrower distribution of HMDA-reportable loans in the assessment area for the years 2022 and 2023.

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level Assessment Area: Denison, IA Non MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	3	7.7	14.8	169	5.8	9.0	16	41.0	19.1	1,043	34.1	11.1	23.9
Moderate	20	51.3	37.9	1,328	45.5	32.5	12	30.8	31.9	967	31.6	24.6	19.0
Middle	7	17.9	22.0	686	23.5	25.3	3	7.7	12.8	222	7.2	12.3	20.2
Upper	5	12.8	18.7	494	16.9	28.0	7	17.9	24.1	813	26.6	38.3	36.9
Unknown	4	10.3	6.6	241	8.3	5.2	1	2.6	12.1	14	0.5	13.6	0.0
Total	39	100.0	100.0	2,918	100.0	100.0	39	100.0	100.0	3,058	100.0	100.0	100.0
Refinance Loans													
Low	8	29.6	22.3	297	17.8	10.6	8	50.0	33.3	292	33.5	19.5	23.9
Moderate	8	29.6	32.0	398	23.9	23.9	5	31.3	20.0	477	54.7	21.0	19.0
Middle	6	22.2	13.6	448	27.0	11.9	1	6.3	17.8	14	1.6	19.8	20.2
Upper	5	18.5	26.2	520	31.3	40.9	1	6.3	24.4	60	6.9	36.9	36.9
Unknown	0	0.0	5.8	0	0.0	12.6	1	6.3	4.4	30	3.4	2.8	0.0
Total	27	100.0	100.0	1,662	100.0	100.0	16	100.0	100.0	872	100.0	100.0	100.0
Home Improvement Loans													
Low	5	29.4	20.6	152	20.5	13.2	2	9.5	13.3	55	5.4	10.4	23.9
Moderate	3	17.6	23.5	128	17.3	19.4	6	28.6	33.3	251	24.8	29.2	19.0
Middle	1	5.9	17.6	15	2.0	20.6	9	42.9	33.3	428	42.3	34.2	20.2
Upper	6	35.3	29.4	395	53.5	40.8	2	9.5	13.3	240	23.7	23.3	36.9
Unknown	2	11.8	8.8	50	6.8	6.0	2	9.5	6.7	39	3.9	2.9	0.0
Total	17	100.0	100.0	738	100.0	100.0	21	100.0	100.0	1,012	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	16	19.3	17.8	617	11.6	9.9	26	34.2	20.1	1,389	28.1	12.1	23.9
Moderate	31	37.3	34.7	1,854	34.8	29.3	23	30.3	30.6	1,695	34.3	25.1	19.0
Middle	14	16.9	18.7	1,149	21.6	20.8	13	17.1	16.6	663	13.4	14.6	20.2
Upper	16	19.3	22.6	1,408	26.5	32.5	10	13.2	23.6	1,113	22.5	37.4	36.9
Unknown	6	7.2	6.2	291	5.5	7.4	4	5.3	9.2	84	1.7	10.8	0.0
Total	83	100.0	100.0	5,320	100.0	100.0	76	100.0	100.0	4,943	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

CRA-Reportable Lending

Small Business Loans

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

In 2022, Bank Iowa originated 81.4 percent of its small business loans to businesses reporting annual revenues of $1 million or less, which was significantly above the aggregate at 60.7 percent but below the percentage of total businesses in the assessment area at 90.2 percent. Of the 131 loans originated to small businesses with revenues less $1 million, 90.1 percent were in amounts of $100,000 or less, which are typically considered most beneficial to small businesses, and also represented 49.1 percent of all small business loans made to small businesses in the assessment area. Further indicating the bank's willingness to meet the credit needs of small businesses. The bank's distribution of lending to business of different revenue sizes in 2023 was consistent with the distribution of loans in 2022.

The following table presents the borrower distribution of small business loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses
Assessment Area: Denison, IA Non MSA

	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
By Revenue											
$1 Million or Less	131	81.4	60.7	6,462	59.9	58.5	112	79.4	5,925	58.6	90.2
Over $1 Million	30	18.6		4,320	40.1		26	18.4	4,119	40.7	7.1
Revenue Unknown	0	0.0		0	0.0		3	2.1	68	0.7	2.7
Total	161	100.0		10,782	100.0		141	100.0	10,112	100.0	100.0
By Loan Size											
$100,000 or Less	129	80.1	85.7	4,743	44.0	38.9	118	83.7	4,296	42.5	
$100,001 - $250,000	26	16.1	9.6	3,473	32.2	22.4	16	11.3	2,489	24.6	
$250,001 - $1 Million	6	3.7	4.7	2,566	23.8	38.6	7	5.0	3,327	32.9	
Total	161	100.0	100.0	10,782	100.0	100.0	141	100.0	10,112	100.0	
By Loan Size and Revenues $1 Million or Less											
$100,000 or Less	118	90.1		4,132	63.9		98	87.5	3,362	56.7	
$100,001 - $250,000	10	7.6		1,436	22.2		12	10.7	1,803	30.4	
$250,001 - $1 Million	3	2.3		894	13.8		2	1.8	760	12.8	
Total	131	100.0		6,462	100.0		112	100.0	5,925	100.0	

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

Small Farm Loans

The distribution of small farm lending reflects excellent penetration among farms of different sizes.

In 2022, the bank originated 91.4 percent of its small farm loans to farms with $1 million in revenue

or less. This performance is significantly above the aggregate performance of 71.4 percent but below the percentage of total farms in the assessment area, at 100.0 percent. Further, 69.1 percent of those were in amounts of $100,000 or less, which are considered the most beneficial to small farms, and also represented 47.3 percent of all small farm loans made to small farms in the assessment area. Further indicating the bank's willingness to meet the credit needs of small farms. The bank's distribution of lending to farms of different revenue sizes in 2023 was below the distribution of loans in 2022; however, of these loans, the bank's distribution in amounts of $100,000 or less was slightly above that in 2022.

The following table presents the borrower distribution of small farms loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Small Farm Lending By Revenue Size of Farms
Assessment Area: Denison, IA Non MSA

	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
By Revenue											
$1 Million or Less	191	91.4	71.4	18,351	84.2	70.4	181	84.6	16,794	70.6	100.0
Over $1 Million	18	8.6		3,449	15.8		30	14.0	6,821	28.7	0.0
Revenue Unknown	0	0.0		0	0.0		3	1.4	159	0.7	0.0
Total	209	100.0		21,800	100.0		214	100.0	23,774	100.0	100.0
By Loan Size											
$100,000 or Less	139	66.5	63.8	4,833	22.2	18.6	140	65.4	5,060	21.3	
$100,001 - $250,000	44	21.1	21.4	7,696	35.3	33.8	44	20.6	7,631	32.1	
$250,001 - $500,000	26	12.4	14.8	9,271	42.5	47.6	30	14.0	11,083	46.6	
Total	209	100.0	100.0	21,800	100.0	100.0	214	100.0	23,774	100.0	
By Loan Size and Revenues $1 Million or Less											
$100,000 or Less	132	69.1		4,441	24.2		131	72.4	4,729	28.2	
$100,001 - $250,000	38	19.9		6,639	36.2		30	16.6	5,188	30.9	
$250,001 - $500,000	21	11.0		7,271	39.6		20	11.0	6,877	40.9	
Total	191	100.0		18,351	100.0		181	100.0	16,794	100.0	

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

Community Development Lending

Bank Iowa makes an adequate level of community development loans. During the review period, the bank made two loans totaling $480,000. When compared to the previous evaluation this reflected a decrease of 33.3 percent by number and 35.3 percent by dollar. One loan was for a multi-unit apartment building offering below market rents and the other to a non-profit venture

associated with an essential community service.

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

Denison, IA Non-MSA Community Development Loans (Dollars in 000s) July 11, 2022 to September 9, 2024										
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalization\ Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
Denison, IA Non-MSA	1	360	1	120	0	0	0	0	2	480

INVESTMENT TEST

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

During the evaluation period, Bank Iowa did not make any qualified investments, which is consistent with its performance in the previous evaluation. However, the bank made a total of 15 qualified donations totaling $65,125 in the current evaluation period. The amount of the bank's donations represented its largest contribution by dollar to any individual assessment area during the review period. The donations were made primarily to organizations that focus on community service and revitalization/stabilization. When compared to the previous evaluation the bank's performance reflected a decrease of 6.3 percent by number but an increase of 94.5 percent by dollar. There was one significant contribution in a moderate-income census tract to facilitate youth activities that is indicative of the bank's responsiveness to an area where household incomes may not facilitate more private options for youth participation.

The following table presents the bank's community development donations during the review period.

Denison, IA Non-MSA Community Development Donations July 11, 2022 to September 9, 2024										
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalization and Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
Denison, IA Non-MSA	1	500	8	38,300	0	0	6	26,325	15	65,125

SERVICE TEST

Retail Services

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

The bank operates three offices and three cash-only ATMs, one of which is a stand-alone in the assessment area. One branch with an ATM is in a moderate-income census tract and the other two branches are located in underserved middle-income census tracts as is the stand-alone ATM. During the review period, the bank did close one branch and cash-only ATM in a middle-income census tract. Offices in the assessment area generally have standard hours of 9:00 a.m. to 4:00 p.m., Monday through Friday with the exception of the Schleswig office which opens at 8:30 a.m. The Denison drive-up is the only facility that is open on Saturdays with hours of 8:30 a.m. to 12:00 p.m. Applications for loan and deposit products are accepted at each location. Additionally, mortgage applications are accepted online through the bank's website.

Community Development Services

Bank Iowa provides an adequate level of community development services. The bank provided 142 hours of volunteer financial services during the current review period; an increase of 31.5 percent compared to the previous evaluation's 108 hours. Organizations involved in providing community services as well as revitalization/stabilization efforts were the primary recipients of the bank staff's financial expertise. These organizations included economic development corporations, municipal utilities, and educational institutions.

Denison IA, Non-MSA Community Development Services July 11, 2022 to September 9, 2024					
Assessment Area	Affordable Housing	Community Service	Economic Development	Revitalization and Stabilization	Total
	Hours	Hours	Hours	Hours	Hours
Denison, IA Non-MSA	0	56	28	58	142

HUMBOLDT, IOWA Non-MSA - Full Review

SCOPE OF THE EXAMINATION

Full scope examination procedures were used to evaluate the bank's performance in the Humboldt 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 HUMBOLDT, IOWA Non-MSA

The Humboldt, Iowa Non-MSA assessment area consists of Humboldt County and Pocahontas Counties in their entireties. The assessment area is unchanged from the previous performance evaluation of July 11, 2022. Based on the most current American Community Survey the assessment area consists of seven census tracts all of which are designated as middle-income. The three middle-income census tracts that comprise Pocahontas County are classified as both underserved and distressed. Underserved census tracts are defined as being remote and rural as the county's population is considered to be sufficiently small, thin, and distant from a population center and likely to have difficulty financing the fixed costs of meeting essential community needs. The county is also considered distressed due to population loss as the county lost more than 10.0 percent of its population from the previous and most recent decennial census.

Within the assessment area, the bank operates all its banking facilities in Humboldt County through three branches, including one branch with a cash-only ATM, one branch without an ATM, and one drive-up facility with a cash-only ATM. A stand-alone cash-only ATM was closed during the evaluation period. There were no other openings or closings of bank facilities during the evaluation period.

According to the June 30, 2023, FDIC Deposit Market Share Report, Bank Iowa ranked first among 10 FDIC-insured financial institutions operating in the assessment area with 25.0 percent of market share. The bank's market share decreased from 26.9 percent, as of June 30, 2021, to 25.0 percent while maintaining its number one position in deposits. The other three leaders in market share in the assessment area account for approximately 37.0 percent of all deposits: Availa Bank (14.2 percent), Northwest Bank (12.0 percent), and Pocahontas State Bank (10.8 percent). Overall, the other nine banks competing for deposits and loans with Bank Iowa as of June 30, 2023, have 14 branches in the assessment area which is unchanged from June of 2021.

In 2023, the bank ranked second among all HMDA-reportable lenders in the assessment area by number of originations in the combined categories of home purchase loans and refinance loans. In 2022, the bank had ranked third in combined home purchase and refinance transactions. The bank ranked first by number of 2022 CRA-reportable originations among CRA-reporters in the assessment area. Bank Iowa was ranked second in small business originations and third in small

business loans to small businesses. The bank was second in loans to small farms but first in small farm loans to small farms.

Tract Designation Change Data

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 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.

Both Humboldt County and Pocahontas County were unaffected by the most recent revisions by the ACS and OMB that covered the period of 2016-2020. Therefore, the previous designation of the assessment area's seven census tracts remained unchanged.

Additional assessment area demographic information is provided in the following table. Refer to Appendix B for 2022 demographic information.

2023 Humboldt, IA Non MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	924	20.8
Moderate	0	0.0	0	0.0	0	0.0	844	19.0
Middle	7	100.0	4,442	100.0	325	7.3	953	21.5
Upper	0	0.0	0	0.0	0	0.0	1,721	38.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**7**	**100.0**	**4,442**	**100.0**	**325**	**7.3**	**4,442**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
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	8,398	5,526	100.0	65.8	1,796	21.4	1,076	12.8
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 AA	**8,398**	**5,526**	**100.0**	**65.8**	**1,796**	**21.4**	**1,076**	**12.8**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
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	948	100.0	850	100.0	72	100.0	26	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 AA	**948**	**100.0**	**850**	**100.0**	**72**	**100.0**	**26**	**100.0**
Percentage of Total Businesses:				**89.7**		**7.6**		**2.7**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
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	351	100.0	348	100.0	3	100.0	0	0.0
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 AA	**351**	**100.0**	**348**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.1**		**0.9**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Population Characteristics

The following table compares the population trends for the assessment area, the individual counties that comprise the assessment area, Non-MSA Iowa, and the state of Iowa. Both Humboldt and Pocahontas Counties displayed a nominal decline in population. A community representative indicated that people were leaving the area to be closer to their jobs located outside the county. The city of Humboldt is the largest municipality within the county accounting for approximately half of the county's population. Pocahontas County has had a long history of population loss, and its three census tracts have been designated as distressed for this reason for consecutive years since 2012.

Humboldt, IA Non-MSA
Population Change
2015 and 2020

Area	2015 Population	2020 Population	Percent Change
Humboldt, IA Non-MSA	16,801	16,675	(0.7%)
Humboldt County, IA	9,674	9,597	(0.8%)
Pocahontas County, IA	7,127	7,078	(0.7%)
Non-MSA Iowa	1,250,756	1,232,642	(1.4%)
Iowa	3,093,526	3,190,639	3.1%

Source: 2011-2015 U.S. Census Bureau American Community Survey
2020 U.S. Census Bureau Decennial Census

Income Characteristics

The following table compares the MFI for the assessment area, the individual counties that comprise the assessment area, Non-MSA Iowa, and the state of Iowa from 2016 to 2020. According to the 2020 FFIEC Census Data, the assessment area is comprised of 4,442 families, of which 20.8 percent are designated as low-, 19.0 percent are moderate-, 21.5 percent are middle-, and 38.7 percent are upper-income. The assessment area has a poverty rate of 7.3 percent.

The assessment area overall experienced an increase in MFI between the 2015 and 2020, with the individual counties comprising the assessment area nearly identical in their 2020 MFI. Although each county showed increases over the five-year period, they were below the Consumer Price Index increase inflation rate of 9.9 percent during the same time frame. The MFI in each county approximates that of Non-MSA Iowa but is only 88.9 percent of the state of Iowa. According to a community representative, residents continue to fall behind financially as commodity prices decline.

Humboldt, IA Non-MSA 2022 Median Family Income Change			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Humboldt, IA Non-MSA	$64,911	$69,213	6.6%
Humboldt County, IA	$65,524	$70,404	7.4%
Pocahontas County, IA	$64,472	$70,427	9.2%
Non-MSA Iowa	$67,391	$71,763	6.5%
Iowa	$73,712	$79,186	7.4%
Source: 2011 - 2015 U.S. Census Bureau American Community Survey *2016 - 2020 U.S. Census Bureau American Community Survey* *Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.*			

Housing Characteristics

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

Renters across all income levels in the assessment area experience this burden; however, the overall percentage at 25.2 percent, is below Non-MSA Iowa and the state of Iowa levels of 32.5 percent and 37.6 percent, respectively. Humboldt County has significantly lower rates of housing cost burden for low-income renters when compared to Pocahontas County. Pocahontas County's housing cost burden for low-income renters is comparable to the Non-MSA Counties in the state and the state of Iowa. Humboldt County was similarly comparable for moderate-income renters. Both Humboldt and Pocahontas County's cost burdens for all owners with respect to home ownership were below that of Non-MSA Iowa and the state of Iowa.

A study of housing prices done by the Iowa State University Extension and Outreach for the years 2018-2022 indicated a strong disparity of median home value between the two counties. Pocahontas County at $90,400 compared to $134,300 for Humboldt County, indicating that homes in the former had one-third less value. A community representative indicated that in Humboldt County there were a few homes in the $190,000 to $210,000 range, with very little new construction occurring. The representative also indicated there had been a rise in housing prices in the county as demand was exceeding supply.

Humboldt, IA Non-MSA Housing Cost Burden						
	Cost Burden - Renters			Cost Burden - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
2023 Humboldt, IA Non-MSA	46.4%	10.3%	25.2%	47.3%	6.7%	11.4%
Humboldt County, IA	32.5%	16.7%	19.8%	50.5%	9.5%	11.6%
Pocahontas County, IA	67.1%	2.7%	32.8%	43.5%	4.3%	11.3%
Non-MSA Iowa	64.5%	13.8%	32.5%	53.4%	18.1%	14.1%
Iowa	71.1%	18.6%	37.6%	56.9%	22.0%	14.8%
Cost Burden is housing cost that equals 30 percent or more of household income						
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy						

Employment Characteristics

The following table presents the unemployment trends for the assessment area, Humboldt and Pocahontas Counties, the Non-MSA Iowa, and the state of Iowa from 2018 to 2022. Both Humboldt and Pocahontas Counties consistently had unemployment rates below those of Non-MSA Iowa and the state of Iowa. A community representative attributed the lower unemployment rate to the area having eight to ten stable manufacturing firms.

The major employers in the area are Sande Construction, Precision Pulley & Idler, Jet Company, Humboldt County Memorial Hospital, and the local school districts. Small businesses that were formed five to 10 years ago are now successful. A community representative indicated that currently Humboldt City's main street has only two vacancies. One need expressed by the community representative was that the area could benefit from the presence of a large retail store. One major drawback geographically for the city was the lack of a major highway nearby.

Humboldt, IA Non-MSA Unemployment Rates					
Area	2018	2019	2020	2021	2022
Humboldt, IA Non-MSA	2.2%	2.3%	3.8%	3.0%	2.3%
Humboldt County, IA	2.5%	2.6%	4.1%	3.1%	2.4%
Pocahontas County, IA	1.8%	1.9%	3.4%	2.8%	2.1%
Non-MSA Iowa	2.7%	2.7%	4.8%	3.7%	2.8%
Iowa	2.6%	2.7%	5.2%	3.8%	2.7%
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics					

Humboldt and Pocahontas Counties, similar to many other agricultural oriented counties had strong GDP growth from 2020 to 2022. The following table displays GDP data collected by the Bureau of Economic Analysis for each of the counties in millions and specifically for the category

of agriculture, forestry, fishing, and hunting (AFFH), which had a major impact in GDP growth.

GDP Growth by County 2020-2022								
COUNTY	2020 GDP All Industry (AI) ($ M)	2020 GDP AFFH ($ M)	2020 Percentage AFFH of AI GDP	2022 GDP AI ($ M)	2022 GDP AFFH ($ M)	Growth by Percentage AI 2020-2022	2022 Percentage AFFH of AI GDP	Growth by Percentage AFFH 2020-2022
Humboldt	449.1	52.6	11.7	590.1	157.0	31.4	26.6	198.5
Pocahontas	482.1	68.9	14.3	693.2	230.6	43.8	33.3	234.7

Increasing prices in corn, soybeans and livestock were instrumental to increasing revenue. The following table presents data collected by the Iowa State University Extension and Outreach monthly average agriculturally related prices covering the period of January 2020 to December 2022.

Commodity Prices 2020-2022					
Product	Price 1/2020	Price 12/2022	Percentage Increase	High	Date of High
Corn (per bushel)	$3.78	$6.69	77.0	$7.48	June-2022
Soybeans (per bushel)	$8.73	$14.50	66.1	$16.20	June-2022
Cattle (100 lbs. live weight)	$124.45	$157.04	26.2	157.04	December-2022
Hogs (100 lbs. cwt. 100 lbs.)	$62.31	$81.92	31.5	$112.41	August- 2022

The community representative noted that farmland purchases were mostly be done by local farmers as outside interests are deterred by concerns over not realizing adequate returns on their investment given the high price of acreages.

Community Representative

One community representative familiar with the socioeconomic trends of the assessment area was contacted to provide information regarding local economic and demographic conditions, as well as two community representatives familiar with the agricultural economy in the state of Iowa. The representatives provided information on housing, employment, agriculture, and economic development needs within the assessment area. One community representative indicated that the local banks were sufficiently meeting the needs of the assessment area. Overall, they indicated that Humboldt County was experiencing stability with respect to its economy and the only real need was for more housing in the price range of $190,000 to $210,000, as well as the presence of a larger retailer.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN HUMBOLDT, IOWA Non-MSA

LENDING TEST

Geographic Distribution of Loans

The assessment area is comprised only of middle-income census tracts and therefore a meaningful analysis could not be performed. The dispersion of the loans in the assessment area was reviewed to determine if the bank is sufficiently serving the census tracts included in the assessment area. Bank Iowa originated HMDA-reportable loans in 71.4 percent of the seven census tracts in the assessment area in 2023. In 2022 the bank originated CRA-reportable loans in 85.7 percent of the census tracts in the assessment area. There was one census tract of the seven in the assessment area that had no HMDA-reportable or CRA-reportable lending in either 2022 or 2023.

The following table presents the geographic distribution of HMDA-reportable loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography
Assessment Area: Humboldt, IA Non MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	16	100.0	100.0	1,310	100.0	100.0	19	100.0	100.0	2,368	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	16	100.0	100.0	1,310	100.0	100.0	19	100.0	100.0	2,367	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	8	100.0	100.0	696	100.1	100.0	8	100.0	100.0	549	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	695	100.0	100.0	8	100.0	100.0	549	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	6	100.0	100.0	482	100.2	100.0	1	100.0	100.0	75	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	481	100.0	100.0	1	100.0	100.0	75	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	100.0	100.0	155	100.4	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	154	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	31	100.0	100.0	2,642	100.0	100.0	28	100.0	100.0	2,992	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	31	100.0	100.0	2,642	100.0	100.0	28	100.0	100.0	2,991	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

CRA-Reportable Lending

Small Business Loans

The following table presents the geographic distribution of small business loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography Assessment Area: Humboldt, IA Non MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Middle	49	100.0	99.4	3,435	100.0	99.9	33	100.0	2,962	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.6	0	0.0	0.1	0	0.0	0	0.0	0.0
Total	49	100.0	100.0	3,435	100.0	100.0	33	100.0	2,962	100.0	100.0
Source: 2023 FFIEC Census Data *2023 Dun & Bradstreet Data* *2016-2020 U.S. Census Bureau: American Community Survey* *Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*											

Small Farm Loans

The following table presents the geographic distribution of small farm loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Small Farm Lending By Income Level of Geography Assessment Area: Humboldt, IA Non MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Middle	101	100.0	100.0	12,720	100.0	100.0	103	100.0	14,731	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Total	101	100.0	100.0	12,720	100.0	100.0	103	100.0	14,731	100.0	100.0

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

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

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

HMDA-Reportable Lending

The distribution of home mortgage lending reflects good penetration among individuals of different income levels.

In 2023, Bank Iowa originated 25.0 percent of total HMDA-reportable loans to low-income borrowers. This was significantly above the aggregate at 11.7 percent and above the 20.8 percent of families that are low-income in the assessment area. The bank originated 10.7 percent of HMDA-reportable loans to moderate-income borrowers, which was significantly below the aggregate at 22.5 percent and below the demographic at 19.0 percent. The bank originated 17.9 percent of HMDA-reportable loans to middle-income borrowers, which was below the aggregate and the percentage of middle-income families within the assessment area at 24.2 percent and 21.5 percent, respectively. Bank Iowa originated 25.0 percent of HMDA-reportable loans to upper-income borrowers, which was comparable the aggregate at 28.8 percent, but significantly below the demographic measure at 38.7 percent. The bank also originated 21.4 percent of its HMDA-reportable loans to borrowers with unknown income, which consist of either commercial entity borrowers with incomes that are not required to be reported on the HMDA LAR or for the purpose of non-owner-occupied rental housing. Given these facts, this product will not be discussed below.

The bank's distribution of lending to borrowers of different income levels in 2023 varied greatly by percentage compared to 2022. The bank displayed a much higher percentage in 2023 of HMDA-reportable loans to low-income borrowers at 25.0 percent compared to the 3.3 percent in 2022. Conversely, its performance was much lower in originations to moderate-income borrowers with 10.7 percent in 2023, compared to 33.3 percent in 2022. Loans to middle-income borrowers was consistent for both years, but loans to high-income borrowers was significantly less in 2023 at 25.0 percent compared to 40.0 percent in 2022.

Home improvement and multifamily originations were not subject to analysis due to the low volume of originations in each of these products, which does not allow for an effective analysis.

Home Purchase Loans

In 2023, Bank Iowa originated 36.8 percent of its home purchase loans to low-income borrowers, which was significantly above the aggregate at 14.9 percent and the percentage of low-income families within the assessment area at 20.8 percent. The bank originated 15.8 percent of its home purchase loans to moderate-income borrowers, which was below the aggregate at 22.1 percent and the percentage of moderate-income families at 19.0 percent. The bank originated 15.8 percent of its home purchase loans to middle- income borrowers, which was below the aggregate at 24.0 percent and below the percentage of middle-income families within the assessment area at 21.5 percent. Finally, the bank's percentage of home purchase loans to upper-income borrowers at 15.8 percent was below the aggregate at 22.7 percent and significantly below the demographic of upper-income families in the assessment area at 38.7 percent.

Refinance Loans

In 2023, Bank Iowa did not originate any refinance loans to low-income borrowers. The bank's performance was significantly below the aggregate at 7.1 percent and the 20.6 percent of low-income families in the assessment area. The bank did not originate any refinance loans to moderate-income borrowers which was significantly below the aggregate at 23.8 percent and the demographic of moderate-income families at 19.0 percent. The bank originated 12.5 percent of refinance loans to middle-income borrowers which was significantly below the aggregate and below the demographic performance of 23.8 and 21.5 percent, respectively. Bank Iowa originated its largest percentage of refinance loans to upper-income borrowers at 50.0 percent, significantly above the aggregate and percent of upper-income families in the assessment area at 31.0 percent and 38.7 percent, respectively.

The following table presents the borrower distribution of HMDA-reportable loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level
Assessment Area: Humboldt, IA Non MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	6.3	16.5	136	10.4	13.0	7	36.8	14.9	655	27.7	8.9	20.8
Moderate	6	37.5	27.3	492	37.5	19.1	3	15.8	22.1	362	15.3	16.5	19.0
Middle	3	18.8	19.1	298	22.8	21.7	3	15.8	24.0	240	10.1	24.7	21.5
Upper	5	31.3	20.1	311	23.8	30.6	3	15.8	22.7	583	24.6	31.6	38.7
Unknown	1	6.3	17.0	74	5.6	15.6	3	15.8	16.2	528	22.3	18.4	0.0
Total	16	100.0	100.0	1,310	100.0	100.0	19	100.0	100.0	2,367	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	14.1	0	0.0	5.6	0	0.0	7.1	0	0.0	3.7	20.8
Moderate	3	37.5	28.2	205	29.5	22.8	0	0.0	23.8	0	0.0	21.8	19.0
Middle	3	37.5	26.8	324	46.6	32.7	1	12.5	23.8	180	32.8	23.6	21.5
Upper	2	25.0	26.8	167	24.0	33.7	4	50.0	31.0	135	24.6	35.9	38.7
Unknown	0	0.0	4.2	0	0.0	5.2	3	37.5	14.3	234	42.6	14.9	0.0
Total	8	100.0	100.0	695	100.0	100.0	8	100.0	100.0	549	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	6.3	0	0.0	3.8	20.8
Moderate	1	16.7	13.0	130	27.0	15.3	0	0.0	12.5	0	0.0	9.4	19.0
Middle	0	0.0	8.7	0	0.0	10.4	1	100.0	25.0	75	100.0	19.9	21.5
Upper	5	83.3	73.9	352	73.1	68.9	0	0.0	56.3	0	0.0	66.8	38.7
Unknown	0	0.0	4.3	0	0.0	5.4	0	0.0	0.0	0	0.0	0.0	0.0
Total	6	100.0	100.0	481	100.0	100.0	1	100.0	100.0	75	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	3.3	13.7	136	5.5	10.5	7	25.0	11.7	655	21.9	7.6	20.8
Moderate	10	33.3	26.1	827	33.2	19.7	3	10.7	22.5	362	12.1	17.1	19.0
Middle	6	20.0	19.9	622	25.0	23.4	5	17.9	24.2	495	16.5	24.5	21.5
Upper	12	40.0	27.8	830	33.3	33.9	7	25.0	28.8	718	24.0	34.7	38.7
Unknown	1	3.3	12.4	74	3.0	12.6	6	21.4	12.9	762	25.5	16.1	0.0
Total	30	100.0	100.0	2,488	100.0	100.0	28	100.0	100.0	2,991	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

CRA-Reportable Lending

Small Business Loans

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

In 2022, Bank Iowa originated 75.5 percent of its small business loans to businesses reporting annual revenues of $1 million or less, which was significantly above the aggregate at 62.7 percent but significantly below the percentage of total businesses in the assessment area at 89.7 percent. Of the 37 loans originated to small businesses with revenues less $1 million, 91.9 percent were in amounts of $100,000 or less, which are typically considered most beneficial to small businesses.

The bank's distribution of lending to business of different revenue sizes in 2023 was below the distribution of loans in 2022. There was a decline of 32.7 percent in the number of originations to small businesses with revenues of $1 million or less, however, the bank's performance was consistent with 90.9 percent of the loans to such businesses being less than $100,000.

The following table presents the borrower distribution of small business loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses
Assessment Area: Humboldt, IA Non MSA

	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
By Revenue											
$1 Million or Less	37	75.5	62.7	1,787	52.0	49.0	22	66.7	1,059	35.8	89.7
Over $1 Million	11	22.4		1,638	47.7		11	33.3	1,903	64.2	7.6
Revenue Unknown	1	2.0		10	0.3		0	0.0	0	0.0	2.7
Total	49	100.0		3,435	100.0		33	100.0	2,962	100.0	100.0
By Loan Size											
$100,000 or Less	44	89.8	92.0	1,800	52.4	43.1	27	81.8	1,220	41.2	
$100,001 - $250,000	3	6.1	4.6	551	16.0	16.3	4	12.1	717	24.2	
$250,001 - $1 Million	2	4.1	3.4	1,084	31.6	40.6	2	6.1	1,025	34.6	
Total	49	100.0	100.0	3,435	100.0	100.0	33	100.0	2,962	100.0	
By Loan Size and Revenues $1 Million or Less											
$100,000 or Less	34	91.9		1,152	64.5		20	90.9	789	74.5	
$100,001 - $250,000	2	5.4		301	16.8		2	9.1	270	25.5	
$250,001 - $1 Million	1	2.7		334	18.7		0	0.0	0	0.0	
Total	37	100.0		1,787	100.0		22	100.0	1,059	100.0	

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

Small Farm Loans

The distribution of small farm lending reflects excellent penetration among farms of different sizes.

In 2022, the bank originated 86.1 percent of its small farm loans to farms with $1 million in revenue or less. This performance is significantly above the aggregate performance of 65.6 percent, but significantly below the percentage of total farms in the assessment area, at 99.1 percent. In addition, 66.7 percent of these loans were in amounts of $100,000 or less, which are considered the most beneficial to small farms, and also represented 34.5 percent of all small farm loans made to small farms in the assessment area. Further indicating the bank's willingness to meet the credit needs of small farms. The bank's distribution of lending to farms of different revenue sizes in 2023 was consistent with the distribution of loans in 2022.

The following table presents the borrower distribution of small farms loans in the assessment area for both 2022 and 2023.

Distribution of 2022 and 2023 Small Farm Lending By Revenue Size of Farms
Assessment Area: Humboldt, IA Non MSA

	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
By Revenue											
$1 Million or Less	87	86.1	65.6	9,657	75.9	70.4	83	80.6	9,547	64.8	99.1
Over $1 Million	12	11.9		2,568	20.2		20	19.4	5,184	35.2	0.9
Revenue Unknown	2	2.0		495	3.9		0	0.0	0	0.0	0.0
Total	101	100.0		12,720	100.0		103	100.0	14,731	100.0	100.0
By Loan Size											
$100,000 or Less	63	62.4	70.5	2,655	20.9	21.9	62	60.2	2,857	19.4	
$100,001 - $250,000	18	17.8	15.0	3,348	26.3	26.2	19	18.4	3,811	25.9	
$250,001 - $500,000	20	19.8	14.5	6,717	52.8	51.9	22	21.4	8,063	54.7	
Total	101	100.0	100.0	12,720	100.0	100.0	103	100.0	14,731	100.0	
By Loan Size and Revenues $1 Million or Less											
$100,000 or Less	58	66.7		2,277	23.6		56	67.5	2,364	24.8	
$100,001 - $250,000	14	16.1		2,763	28.6		14	16.9	2,830	29.6	
$250,001 - $500,000	15	17.2		4,617	47.8		13	15.7	4,353	45.6	
Total	87	100.0		9,657	100.0		83	100.0	9,547	100.0	

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

Community Development Lending

Bank Iowa makes few, if any community development loans. During the evaluation period the bank did not make any community development loans in the assessment area. This was consistent with its performance in the previous evaluation.

INVESTMENT TEST

Bank Iowa's record of performance in this assessment area demonstrates a poor level of qualified community development investments and donations in the assessment area, and rarely in a leadership position. These investments demonstrate the rare use of innovative or complex qualified investments and provide adequate responsiveness to the credit and community development needs of the assessment area, as the majority of dollars were allocated to economic development purposes in an area that consists primarily of small retailers and does not contain any "big box" stores.

During the evaluation period, Bank Iowa did not make any qualified investments, similar to its performance in the previous evaluation. The bank made a total of six qualified donations worth $4,660 in the current evaluation period. The donations were made primarily to organizations that focus on community service and economic development. When compared to the previous evaluation the bank's donations decreased 40.0 percent by number and 68.8 percent by dollar.

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

Humboldt, IA Non-MSA Community Development Donations July 11, 2022 to September 9, 2024										
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalization and Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
Humboldt, IA Non-MSA	0	0	5	1,160	1	3,500	0	0	6	4,660

SERVICE TEST

Retail Services

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

moderate-income individuals.

The bank operates three offices and two cash-only ATMs in the assessment area. All branches are located in middle-income census tracts in Humboldt County. During the review period, the bank did not open or close any branches, however, it did close one cash-only ATM located in a retail establishment. Availability of services varies by each branch location. The Humboldt branch is open 9:00 a.m. to 4:00 p.m. Monday through Thursday and 9:00 a.m. to 5:00 p.m. on Friday and is closed on Saturday. The Humboldt drive-up is open 8:30 a.m. to 5:00 p.m. Monday through Thursday, and 8:30 a.m. to 5:30 p.m. on Fridays. It is the only facility open on Saturday with hours of 8:00 a.m. to 12:00 p.m. The Gilmore City branch is open from 8:00 a.m. to 1:00 p.m. Monday through Thursday and 8:00 a.m. to 5:00 p.m. on Fridays. Applications for loan and deposit products are accepted at each location. Additionally, mortgage applications are accepted online through the bank's website.

Community Development Services

Bank Iowa provides an adequate level of community development services. The bank provided 129 hours of volunteer financial services during the current review period; an increase of 268.6 percent compared to the previous evaluation's 35 hours. Organizations involved provided community services and revitalization/stabilization efforts were the primary recipients of the bank's staff financial expertise. These organizations primarily included municipal councils involved in economic development.

Humboldt, IA Non-MSA Community Development Services July 11, 2022 to September 9, 2024					
Assessment Area	**Affordable Housing**	**Community Service**	**Economic Development**	**Revitalization and Stabilization**	**Total**
	Hours	**Hours**	**Hours**	**Hours**	**Hours**
Humboldt, IA Non-MSA	25	21	75	8	129

LAWLER, IOWA Non-MSA – Limited Review

SCOPE OF THE EXAMINATION

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

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

The Lawler, Iowa Non-MSA assessment area consists of Chickasaw County and Fayette County in their entireties. The assessment area is unchanged from the previous evaluation of July 11, 2022. Based on 2023 FFIEC Census data, the assessment area consists of 11 census tracts, including three moderate-income census tracts and eight middle-income census tracts. Within the assessment area, the bank operates four branches and three cash-only ATMs. Three branches are located in middle-income census tracts in Chickasaw County and one in a middle-income census tract in Fayette County. There were no branch openings or closings since the previous evaluation.

According to the June 30, 2023, FDIC Deposit Market Share Report, Bank Iowa ranked second among 16 FDIC-insured financial institutions operating in the assessment area with 16.0 percent of market share. Bank deposits decreased from $190.9 million to $186.7 million, or 2.2 percent, for the period of June 30, 2021 to June 30, 2023. The bank's market share decreased from 17.3 percent to 16.0 percent though it did maintain its rank as second in the assessment area in deposits. The other three leaders in market share in the assessment area account for approximately 38.0 percent of all deposits with Fidelity Bank & Trust (16.8 percent), Bank 1st (11.4 percent), and Luana Savings Bank (9.7 percent). Overall, the 15 banks competing for deposits and loans with Bank Iowa as of June 30, 2023, have 21 offices in the assessment area which represents a net decrease of one bank and one branch compared to June of 2021.

In 2023, the bank ranked eighth among all HMDA-reportable lenders in the assessment area by number of originations in the combined categories of home purchase loans and refinance loans. However, the bank ranked fifth among FDIC-insured institutions that had a branch presence in the assessment area. In 2022, the bank had ranked sixth in combined home purchase and refinance transactions, however, it was third among FDIC-insured institutions that had a bank presence in the assessment area. In 2022, the bank ranked third in the combined number of loans to small businesses and small farms among all CRA-reporters in the assessment area.

Tract Designation Change Data

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 2021 and 2022. Accordingly,

lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.

Fayette County was impacted by the most recent revisions by the ACS and OMB that covered the period of 2016-2020. The three moderate-income census tracts in Fayette County represent a change from the previous evaluation where there was only one moderate-income census tract in the county.

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	**2021 Designations (#)**	**2022 Designations (#)**	**Net Change (#)**
Low	0	0	0
Moderate	1	3	+2
Middle	10	8	-2
Upper	0	0	0
Unknown	0	0	0
Total	11	11	0
Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015 *U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020*			

Additional assessment area demographic information is provided in the following table. Refer to Appendix B for 2022 demographic information.

2023 Lawler, IA Non MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,534	18.4
Moderate	3	27.3	2,240	26.8	180	8.0	1,729	20.7
Middle	8	72.7	6,113	73.2	318	5.2	2,025	24.2
Upper	0	0.0	0	0.0	0	0.0	3,065	36.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**11**	**100.0**	**8,353**	**100.0**	**498**	**6.0**	**8,353**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	4,606	2,671	26.0	58.0	1,182	25.7	753	16.3
Middle	10,702	7,614	74.0	71.1	1,855	17.3	1,233	11.5
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 AA	**15,308**	**10,285**	**100.0**	**67.2**	**3,037**	**19.8**	**1,986**	**13.0**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	399	25.9	368	26.3	22	20.0	9	28.1
Middle	1,144	74.1	1,033	73.7	88	80.0	23	71.9
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 AA	**1,543**	**100.0**	**1,401**	**100.0**	**110**	**100.0**	**32**	**100.0**
Percentage of Total Businesses:				**90.8**		**7.1**		**2.1**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	66	15.4	66	15.6	0	0.0	0	0.0
Middle	363	84.6	358	84.4	4	100.0	1	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 AA	**429**	**100.0**	**424**	**100.0**	**4**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.8**		**0.9**		**0.2**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Assessment Area	Lending Test	Investment Test	Service Test
Lawler, IA Non-MSA	Consistent	Below	Consistent

LENDING TEST

The institution's lending and service performance in the assessment area is consistent with the institution's lending and service performance overall. The bank's investment performance in the assessment area is below its overall performance; however, it does not change the rating for the institution.

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography
Assessment Area: Lawler, IA Non MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	42.5	0	0.0	36.9	1	12.5	40.3	148	14.2	34.6	26.0
Middle	12	100.0	57.5	2,043	100.0	63.1	7	87.5	59.7	895	85.9	65.4	74.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	2,043	100.0	100.0	8	100.0	100.0	1,042	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	29.1	0	0.0	26.6	0	0.0	37.1	0	0.0	28.9	26.0
Middle	9	100.0	70.9	975	100.0	73.4	4	100.0	62.9	655	100.1	71.1	74.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	975	100.0	100.0	4	100.0	100.0	654	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	40.0	0	0.0	29.6	0	0.0	34.3	0	0.0	29.3	26.0
Middle	0	0.0	60.0	0	0.0	70.4	0	0.0	65.7	0	0.0	70.7	74.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	68.8	0	0.0	57.8	0	0.0	27.3	0	0.0	61.4	34.7
Middle	0	0.0	31.3	0	0.0	42.2	0	0.0	72.7	0	0.0	38.6	65.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	37.5	0	0.0	34.0	1	8.3	37.7	148	8.7	33.6	26.0
Middle	21	100.0	62.5	3,018	100.0	66.0	11	91.7	62.3	1,549	91.3	66.4	74.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	21	100.0	100.0	3,018	100.0	100.0	12	100.0	100.0	1,697	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography Assessment Area: Lawler, IA Non MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	0	0.0	14.7	0	0.0	12.0	0	0.0	0	0.0	25.9
Middle	63	100.0	84.5	6,113	100.0	87.9	60	100.0	8,190	100.0	74.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.7	0	0.0	0.1	0	0.0	0	0.0	0.0
Total	63	100.0	100.0	6,113	100.0	100.0	60	100.0	8,190	100.0	100.0

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

Distribution of 2022 and 2023 Small Farm Lending By Income Level of Geography Assessment Area: Lawler, IA Non MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Moderate	0	0.0	9.6	0	0.0	9.5	1	0.7	85	0.5	15.4
Middle	147	100.0	90.4	13,512	100.0	90.5	146	99.3	15,466	99.5	84.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Total	147	100.0	100.0	13,512	100.0	100.0	147	100.0	15,551	100.0	100.0

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level
Assessment Area: Lawler, IA Non MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	8.3	18.4	81	4.0	11.1	0	0.0	14.0	0	0.0	7.2	18.4
Moderate	4	33.3	31.4	530	26.0	24.8	3	37.5	32.5	397	38.1	26.0	20.7
Middle	3	25.0	17.3	713	34.9	21.0	1	12.5	20.3	195	18.7	21.0	24.2
Upper	2	16.7	21.7	570	27.9	31.7	4	50.0	17.0	451	43.2	28.6	36.7
Unknown	2	16.7	11.1	149	7.3	11.4	0	0.0	16.1	0	0.0	17.2	0.0
Total	12	100.0	100.0	2,043	100.0	100.0	8	100.0	100.0	1,042	100.0	100.0	100.0
Refinance Loans													
Low	1	11.1	14.1	42	4.3	6.5	0	0.0	8.1	0	0.0	5.3	18.4
Moderate	5	55.6	28.1	374	38.3	20.0	2	50.0	28.2	138	21.1	17.8	20.7
Middle	2	22.2	26.1	207	21.2	22.5	1	25.0	17.7	323	49.3	15.7	24.2
Upper	1	11.1	26.1	353	36.2	45.2	1	25.0	37.9	194	29.7	50.2	36.7
Unknown	0	0.0	5.5	0	0.0	5.9	0	0.0	8.1	0	0.0	11.1	0.0
Total	9	100.0	100.0	975	100.0	100.0	4	100.0	100.0	654	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.7	0	0.0	5.4	0	0.0	14.9	0	0.0	6.4	18.4
Moderate	0	0.0	28.9	0	0.0	18.1	0	0.0	26.9	0	0.0	20.6	20.7
Middle	0	0.0	28.9	0	0.0	32.1	0	0.0	23.9	0	0.0	26.0	24.2
Upper	0	0.0	35.6	0	0.0	44.4	0	0.0	29.9	0	0.0	42.7	36.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	4.5	0	0.0	4.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	2	9.5	16.1	122	4.1	9.3	0	0.0	13.1	0	0.0	7.0	18.4
Moderate	9	42.9	29.5	904	30.0	22.6	5	41.7	31.0	535	31.5	23.9	20.7
Middle	5	23.8	21.1	920	30.5	22.2	2	16.7	20.8	517	30.5	19.8	24.2
Upper	3	14.3	25.3	923	30.6	37.1	5	41.7	24.0	645	38.0	35.2	36.7
Unknown	2	9.5	8.0	149	4.9	8.8	0	0.0	11.1	0	0.0	14.1	0.0
Total	21	100.0	100.0	3,018	100.0	100.0	12	100.0	100.0	1,697	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses Assessment Area: Lawler, IA Non MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
By Revenue											
$1 Million or Less	46	73.0	32.5	3,242	53.0	17.2	43	71.7	4,291	52.4	90.8
Over $1 Million	17	27.0		2,871	47.0		17	28.3	3,899	47.6	7.1
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	2.1
Total	63	100.0		6,113	100.0		60	100.0	8,190	100.0	100.0
By Loan Size											
$100,000 or Less	52	82.5	78.2	2,033	33.3	34.2	42	70.0	1,567	19.1	
$100,001 - $250,000	5	7.9	14.5	1,030	16.8	26.6	9	15.0	1,695	20.7	
$250,001 - $1 Million	6	9.5	7.3	3,050	49.9	39.3	9	15.0	4,928	60.2	
Total	63	100.0	100.0	6,113	100.0	100.0	60	100.0	8,190	100.0	
By Loan Size and Revenues $1 Million or Less											
$100,000 or Less	42	91.3		1,442	44.5		34	79.1	1,111	25.9	
$100,001 - $250,000	2	4.3		350	10.8		4	9.3	652	15.2	
$250,001 - $1 Million	2	4.3		1,450	44.7		5	11.6	2,528	58.9	
Total	46	100.0		3,242	100.0		43	100.0	4,291	100.0	

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

Distribution of 2022 and 2023 Small Farm Lending By Revenue Size of Farms Assessment Area: Lawler, IA Non MSA											
	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
By Revenue											
$1 Million or Less	144	98.0	76.7	13,063	96.7	80.9	135	91.8	12,825	82.5	98.8
Over $1 Million	3	2.0		449	3.3		12	8.2	2,726	17.5	0.9
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	0.2
Total	147	100.0		13,512	100.0		147	100.0	15,551	100.0	100.0
By Loan Size											
$100,000 or Less	106	72.1	69.6	4,506	33.3	25.9	98	66.7	4,129	26.6	
$100,001 - $250,000	27	18.4	18.9	4,634	34.3	33.4	34	23.1	5,781	37.2	
$250,001 - $500,000	14	9.5	11.4	4,372	32.4	40.8	15	10.2	5,641	36.3	
Total	147	100.0	100.0	13,512	100.0	100.0	147	100.0	15,551	100.0	
By Loan Size and Revenues $1 Million or Less											
$100,000 or Less	105	72.9		4,407	33.7		96	71.1	4,036	31.5	
$100,001 - $250,000	25	17.4		4,284	32.8		29	21.5	4,798	37.4	
$250,001 - $500,000	14	9.7		4,372	33.5		10	7.4	3,991	31.1	
Total	144	100.0		13,063	100.0		135	100.0	12,825	100.0	

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

Lawler, IA Non-MSA Community Development Donations July 11, 2022 to September 9, 2024										
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalization and Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
Lawler, IA Non-MSA	1	1,000	2	625	1	500	0	0	4	2,125

Lawler, IA Non-MSA Community Development Services July 11, 2022 to September 9, 2024					
Assessment Area	Affordable Housing	Community Service	Economic Development	Revitalization and Stabilization	Total
	Hours	Hours	Hours	Hours	Hours
Lawler, IA Non-MSA	2	0	121	0	123

OSKALOOSA, IOWA Non-MSA – Limited Review

SCOPE OF THE EXAMINATION

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

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

The Oskaloosa, Iowa Non-MSA assessment area consists of Keokuk County, Mahaska County, Marion County, and Wapello County in their entireties. The assessment area is unchanged from the previous evaluation of July 11, 2022. Based on 2023 FFIEC Census data, the assessment area consists of 32 census tracts with the following designations: one low-income, eight moderate-income census tracts, 19 middle-income census tracts, and four upper-income census tracts. Three of the middle-income census tracts, all located in Keokuk County, were also designated as underserved due to being remote and rural as the county's population is considered to be sufficiently small, thin, and distant from a population center and likely to have difficulty financing the fixed costs of meeting essential community needs.

Within the assessment area, the bank operates three branches, each of which contains a cash-only ATM. Two of the branches are located in middle-income census tracts in Mahaska County and one is in an upper-income census tract in Marion County. There were no branch openings or closings since the previous evaluation on July 11, 2022.

According to the June 30, 2023, FDIC Deposit Market Share Report, Bank Iowa ranked seventh among 19 FDIC-insured financial institutions operating in the assessment area with 6.1 percent of the market share. Bank deposits increased from $147.8 million to $159.7 million, or 8.1 percent, for the period of June 30, 2021 to June 30, 2023. The bank's market share increased from 5.9 percent to 6.1 percent though its rank fell from sixth to seventh. The top three leaders in market share in the assessment area account for approximately half of all deposits, including Marion County State Bank (21.0 percent), MidWestOne Bank (15.4 percent), and South Ottumwa Savings Bank (12.1 percent). Overall, the 18 banks competing for deposits and loans with Bank Iowa as of June 30, 2023, have 40 offices in the assessment area which represents a net increase of two banks and three branches compared to June of 2021.

In 2023, the bank ranked seventh among all HMDA-reportable lenders in the assessment area by number of originations in the combined categories of home purchase loans and refinance loans. However, the bank ranked third among FDIC-insured institutions that had a branch presence in the assessment area. In 2022, the bank had ranked tenth in combined home purchase and refinance transactions, however, it was sixth among FDIC-insured institutions that had a bank presence in the assessment area. In 2022 the bank ranked first in the combined number of loans to small businesses and small farms among all CRA-reporters in the assessment area.

Tract Designation Change Data

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 2021 and 2022. Accordingly, lending activity that took place in calendar years up to and including 2021 are evaluated based on ACS income level definitions from the five-year survey data set 2011-2015. Lending activity performed in 2022 and beyond are evaluated based on ACS income level definitions from the five-year survey data set 2016-2020.

Overall, the assessment area remained unchanged geographically, however, the number of census tracts increased from 30 to 32 representing a change from the previous evaluation with both additional tracts located in Marion County. Each of the four counties experienced changes in individual census tract designations as follows. In Keokuk County, one census tract previously designated as middle-income was adjusted to moderate-income. The other three census tracts in the county were unchanged remaining designated as middle-income underserved. In Mahaska Count, one of the county's six middle-income census tracts was adjusted to a designation status of moderate-income. The other six census tracts in the county remained unchanged. In Marion County, the addition of two census tracts expanded the number within the county from eight to ten resulting in the increase of one middle-income and one upper-income census tract. In Wapello County, the number of census tracts remained unchanged at 11, however, one of the county's census tracts changed in designation from moderate-income to low-income and one other tract was adjusted from middle-income to moderate-income.

Census Tract Designation Changes American Community Survey Data (ACS)			
Tract Income Designation	**2021 Designations (#)**	**2022 Designations (#)**	**Net Change (#)**
Low	0	1	0
Moderate	6	8	+2
Middle	21	19	-2
Upper	3	4	+1
Unknown	0	0	0
Total	30	32	+2
Source: U. S. Census Bureau: Decennial Census: American Community Survey Data: 2011-2015 *U.S. Census Bureau: Decennial Census: America Community Survey Data: 2016-2020*			

Additional assessment area demographic information is provided in the following table. Refer to Appendix B for 2022 demographic information.

2023 Oskaloosa, IA Non MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	3.1	740	2.7	117	15.8	5,648	20.7
Moderate	8	25.0	5,477	20.1	1,119	20.4	5,229	19.2
Middle	19	59.4	16,733	61.5	1,230	7.4	5,963	21.9
Upper	4	12.5	4,274	15.7	68	1.6	10,384	38.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**32**	**100.0**	**27,224**	**100.0**	**2,534**	**9.3**	**27,224**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,422	676	2.3	47.5	521	36.6	225	15.8
Moderate	10,403	5,401	18.5	51.9	3,825	36.8	1,177	11.3
Middle	27,235	18,668	63.9	68.5	6,332	23.2	2,235	8.2
Upper	6,073	4,459	15.3	73.4	1,331	21.9	283	4.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**45,133**	**29,204**	**100.0**	**64.7**	**12,009**	**26.6**	**3,920**	**8.7**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	224	5.1	204	5.1	17	5.7	3	4.7
Moderate	847	19.4	778	19.4	57	19.1	12	18.8
Middle	2,442	55.9	2,240	55.9	162	54.4	40	62.5
Upper	855	19.6	784	19.6	62	20.8	9	14.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4,368**	**100.0**	**4,006**	**100.0**	**298**	**100.0**	**64**	**100.0**
Percentage of Total Businesses:				**91.7**		**6.8**		**1.5**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	0.3	2	0.3	0	0.0	0	0.0
Moderate	60	8.9	58	8.7	1	25.0	1	33.3
Middle	447	66.2	443	66.3	3	75.0	1	33.3
Upper	166	24.6	165	24.7	0	0.0	1	33.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**675**	**100.0**	**668**	**100.0**	**4**	**100.0**	**3**	**100.0**
Percentage of Total Farms:				**99.0**		**0.6**		**0.4**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Assessment Area	Lending Test	Investment Test	Service Test
Oskaloosa, IA Non-MSA	Consistent	Below	Consistent

The institution's lending, investment and service performance in the assessment area is consistent with the institution's lending and service performance overall.

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography
Assessment Area: Oskaloosa, IA Non MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	3.9	0	0.0	2.2	1	2.9	3.8	104	1.7	2.4	2.3
Moderate	5	11.9	19.1	446	7.8	12.8	2	5.7	17.4	171	2.8	11.9	18.5
Middle	30	71.4	60.4	2,955	52.0	59.5	23	65.7	63.2	3,534	56.9	62.6	63.9
Upper	7	16.7	16.5	2,286	40.2	25.5	9	25.7	15.6	2,402	38.7	23.1	15.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	42	100.0	100.0	5,686	100.0	100.0	35	100.0	100.0	6,210	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.7	0	0.0	1.2	0	0.0	4.5	0	0.0	3.3	2.3
Moderate	1	5.9	16.2	29	0.9	8.8	2	13.3	15.5	211	17.0	11.0	18.5
Middle	13	76.5	67.3	2,365	76.3	70.2	12	80.0	64.6	680	54.6	65.6	63.9
Upper	3	17.6	14.8	707	22.8	19.7	1	6.7	15.3	354	28.5	20.1	15.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	17	100.0	100.0	3,101	100.0	100.0	15	100.0	100.0	1,245	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.7	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	2.3
Moderate	2	28.6	11.2	62	13.8	7.7	1	20.0	18.6	10	5.6	16.1	18.5
Middle	4	57.1	65.7	348	77.3	66.6	4	80.0	67.4	168	94.7	65.3	63.9
Upper	1	14.3	22.4	40	8.9	25.5	0	0.0	14.0	0	0.0	18.6	15.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	450	100.0	100.0	5	100.0	100.0	177	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	11.8	0	0.0	5.8	4.0
Moderate	4	26.7	18.5	321	19.9	1.9	1	16.7	17.6	28	1.3	16.1	27.0
Middle	10	66.7	59.3	1,116	69.1	18.5	4	66.7	47.1	805	36.7	37.9	50.1
Upper	1	6.7	22.2	179	11.1	79.6	1	16.7	23.5	1,360	62.0	40.2	18.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	15	100.0	100.0	1,615	100.0	100.0	6	100.0	100.0	2,193	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	2.9	0	0.0	1.8	1	1.6	3.7	104	1.1	2.6	2.3
Moderate	12	14.8	17.5	858	7.9	10.8	6	9.8	16.5	420	4.3	11.9	18.5
Middle	57	70.4	63.2	6,785	62.5	59.8	43	70.5	64.2	5,187	52.8	62.2	63.9
Upper	12	14.8	16.4	3,211	29.6	27.5	11	18.0	15.6	4,116	41.9	23.3	15.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	81	100.0	100.0	10,853	100.0	100.0	61	100.0	100.0	9,826	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography Assessment Area: Oskaloosa, IA Non MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
Low	0	0.0	2.9	0	0.0	2.9	0	0.0	0	0.0	5.1
Moderate	9	9.0	16.4	1,175	9.5	11.8	12	12.0	900	10.9	19.4
Middle	70	70.0	55.8	7,793	62.9	59.4	78	78.0	6,391	77.4	55.9
Upper	21	21.0	23.9	3,427	27.6	25.5	10	10.0	970	11.7	19.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	1.0	0	0.0	0.4	0	0.0	0	0.0	0.0
Total	100	100.0	100.0	12,395	100.0	100.0	100	100.0	8,261	100.0	100.0

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

Distribution of 2022 and 2023 Small Farm Lending By Income Level of Geography Assessment Area: Oskaloosa, IA Non MSA											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
Low	1	0.5	0.2	75	0.3	0.1	0	0.0	0	0.0	0.3
Moderate	9	4.9	11.2	1,052	4.3	12.0	7	4.2	1,201	5.1	8.9
Middle	144	78.3	70.7	18,565	75.7	68.7	146	86.9	20,120	84.7	66.2
Upper	30	16.3	17.9	4,848	19.8	19.2	15	8.9	2,421	10.2	24.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Total	184	100.0	100.0	24,540	100.0	100.0	168	100.0	23,742	100.0	100.0

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level
Assessment Area: Oskaloosa, IA Non MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	5	11.9	10.1	549	9.7	4.8	4	11.4	10.0	482	7.8	5.5	20.7
Moderate	12	28.6	35.1	1,164	20.5	26.8	6	17.1	30.9	762	12.3	23.2	19.2
Middle	8	19.0	19.4	1,110	19.5	19.3	11	31.4	21.9	2,122	34.2	22.9	21.9
Upper	15	35.7	24.4	2,555	44.9	37.5	11	31.4	24.6	2,253	36.3	35.7	38.1
Unknown	2	4.8	11.0	308	5.4	11.6	3	8.6	12.7	591	9.5	12.7	0.0
Total	42	100.0	100.0	5,686	100.0	100.0	35	100.0	100.0	6,210	100.0	100.0	100.0
Refinance Loans													
Low	3	17.6	11.9	189	6.1	6.0	4	26.7	11.9	269	21.6	7.7	20.7
Moderate	2	11.8	23.6	328	10.6	17.2	1	6.7	26.4	40	3.2	22.1	19.2
Middle	2	11.8	27.3	467	15.1	24.9	3	20.0	23.3	180	14.5	21.9	21.9
Upper	8	47.1	29.8	1,824	58.8	40.9	4	26.7	31.8	546	43.9	37.9	38.1
Unknown	2	11.8	7.5	293	9.5	11.0	3	20.0	6.7	210	16.9	10.4	0.0
Total	17	100.0	100.0	3,101	100.0	100.0	15	100.0	100.0	1,245	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	7.5	0	0.0	3.8	0	0.0	11.6	0	0.0	9.6	20.7
Moderate	1	14.3	23.1	5	1.1	21.2	1	20.0	14.0	28	15.8	9.6	19.2
Middle	1	14.3	22.4	43	9.6	22.0	2	40.0	23.3	20	11.1	16.4	21.9
Upper	3	42.9	42.5	340	75.6	50.1	1	20.0	41.9	120	67.8	50.6	38.1
Unknown	2	28.6	4.5	62	13.8	3.0	1	20.0	9.3	10	5.7	13.7	0.0
Total	7	100.0	100.0	450	100.0	100.0	5	100.0	100.0	177	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	8	12.1	10.2	738	8.0	5.0	8	14.5	10.2	751	9.8	5.9	20.7
Moderate	15	22.7	29.7	1,497	16.2	23.6	8	14.5	28.4	830	10.9	22.8	19.2
Middle	11	16.7	22.1	1,620	17.5	20.9	16	29.1	22.7	2,322	30.4	22.5	21.9
Upper	26	39.4	27.9	4,719	51.1	39.0	16	29.1	27.8	2,920	38.2	36.4	38.1
Unknown	6	9.1	10.0	664	7.2	11.4	7	12.7	10.9	811	10.6	12.4	0.0
Total	66	100.0	100.0	9,238	100.0	100.0	55	100.0	100.0	7,633	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses Assessment Area: Oskaloosa, IA Non MSA											
	Bank And Aggregate Loans By Year										Total Businesses %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
By Revenue											
$1 Million or Less	80	80.0	52.0	8,405	67.8	40.0	78	78.0	3,980	48.2	91.7
Over $1 Million	20	20.0		3,990	32.2		22	22.0	4,281	51.8	6.8
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	1.5
Total	100	100.0		12,395	100.0		100	100.0	8,261	100.0	100.0
By Loan Size											
$100,000 or Less	65	65.0	91.3	2,339	18.9	34.9	76	76.0	2,474	29.9	
$100,001 - $250,000	20	20.0	5.1	3,382	27.3	19.4	18	18.0	2,779	33.6	
$250,001 - $1 Million	15	15.0	3.6	6,674	53.8	45.7	6	6.0	3,008	36.4	
Total	100	100.0	100.0	12,395	100.0	100.0	100	100.0	8,261	100.0	
By Loan Size and Revenues $1 Million or Less											
$100,000 or Less	59	73.8		2,004	23.8		68	87.2	2,060	51.8	
$100,001 - $250,000	12	15.0		2,139	25.4		8	10.3	1,010	25.4	
$250,001 - $1 Million	9	11.3		4,262	50.7		2	2.6	910	22.9	
Total	80	100.0		8,405	100.0		78	100.0	3,980	100.0	

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

Distribution of 2022 and 2023 Small Farm Lending By Revenue Size of Farms Assessment Area: Oskaloosa, IA Non MSA											
	Bank And Aggregate Loans By Year										Total Farms %
	2022						2023*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	$(000)	$%	$%	#	#%	$(000)	$%	
By Revenue											
$1 Million or Less	152	82.6	62.0	18,310	74.6	71.0	149	88.7	20,725	87.3	99.0
Over $1 Million	32	17.4		6,230	25.4		19	11.3	3,017	12.7	0.6
Revenue Unknown	0	0.0		0	0.0		0	0.0	0	0.0	0.4
Total	184	100.0		24,540	100.0		168	100.0	23,742	100.0	100.0
By Loan Size											
$100,000 or Less	107	58.2	69.4	5,607	22.8	23.3	88	52.4	4,264	18.0	
$100,001 - $250,000	46	25.0	18.3	7,229	29.5	29.8	50	29.8	8,741	36.8	
$250,001 - $500,000	31	16.8	12.3	11,704	47.7	46.9	30	17.9	10,737	45.2	
Total	184	100.0	100.0	24,540	100.0	100.0	168	100.0	23,742	100.0	
By Loan Size and Revenues $1 Million or Less											
$100,000 or Less	99	65.1		5,043	27.5		83	55.7	3,812	18.4	
$100,001 - $250,000	31	20.4		5,004	27.3		38	25.5	6,976	33.7	
$250,001 - $500,000	22	14.5		8,263	45.1		28	18.8	9,937	47.9	
Total	152	100.0		18,310	100.0		149	100.0	20,725	100.0	

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
*Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.*

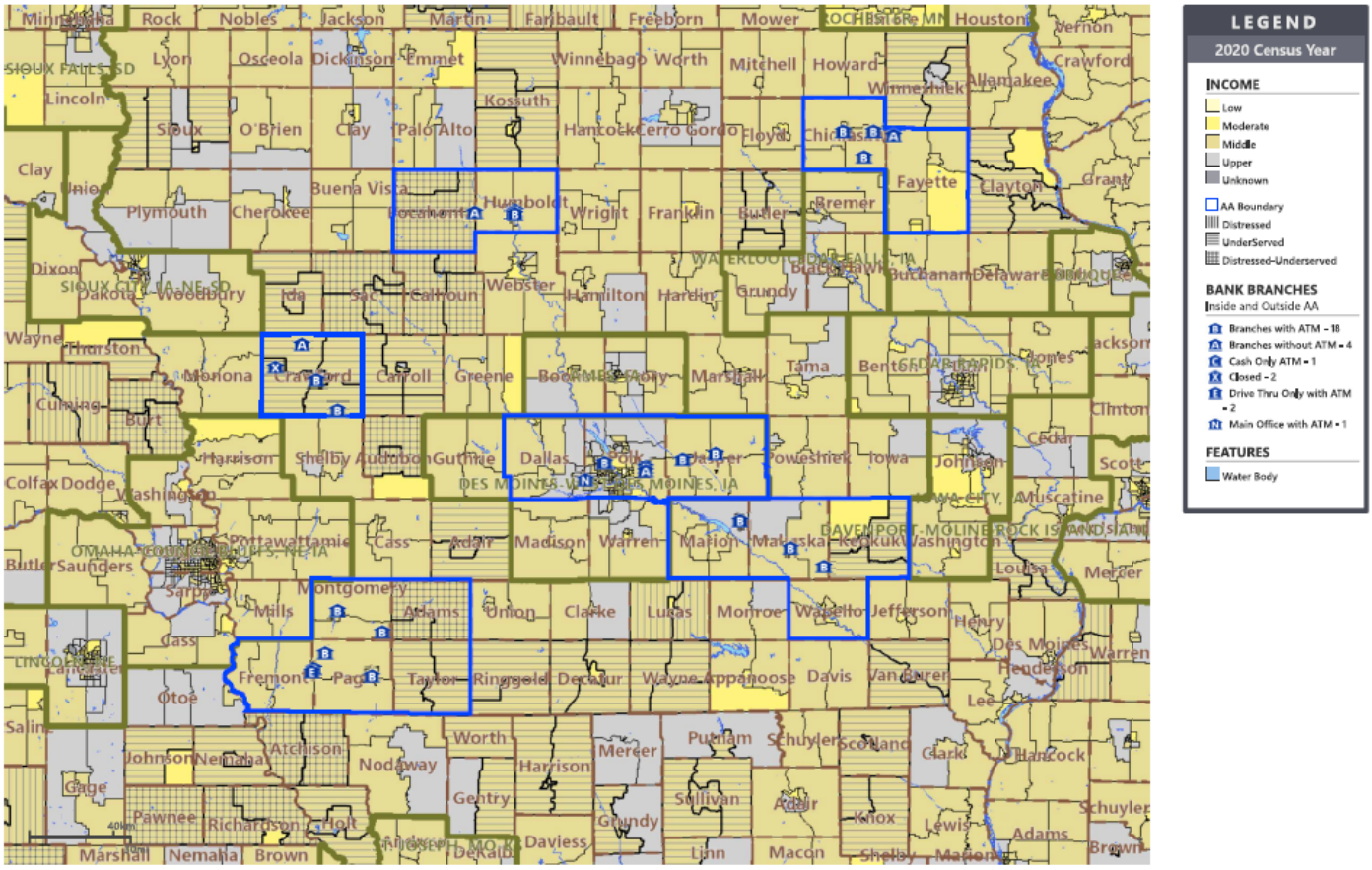
Oskaloosa, IA Non-MSA Community Development Loans (Dollars in 000s) July 11, 2022 to September 9, 2024										
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalization\ Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
Oskaloosa, IA Non-MSA	0	0	0	0	0	0	1	27	1	27

Oskaloosa, IA Non-MSA Community Development Donations July 11, 2022 to September 9, 2024										
Assessment Area	Affordable Housing		Community Service		Economic Development		Revitalization and Stabilization		Total	
	#	$	#	$	#	$	#	$	#	$
Oskaloosa, IA Non-MSA	1	250	7	8,433	6	21,150	0	0	14	29,833

Oskaloosa, IA Non-MSA Community Development Services July 11, 2022 to September 9, 2024					
Assessment Area	Affordable Housing	Community Service	Economic Development	Revitalization and Stabilization	Total
	Hours	Hours	Hours	Hours	Hours
Oskaloosa, IA Non-MSA	2	203	103	25	333

APPENDIX A – Map of Assessment Area

Bank Iowa 187947
Combined Assessment Area



APPENDIX B – 2022 Demographic Tables

2022 Des Moines-West Des Moines, IA MSA 19780 AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	8	5.7	6,644	4.4	1,584	23.8	30,460	20.2
Moderate	35	24.8	30,519	20.3	3,767	12.3	27,638	18.3
Middle	62	44.0	70,088	46.5	3,321	4.7	32,546	21.6
Upper	33	23.4	42,842	28.4	1,209	2.8	59,993	39.8
Unknown	3	2.1	544	0.4	0	0.0	0	0.0
Total AA	**141**	**100.0**	**150,637**	**100.0**	**9,881**	**6.6**	**150,637**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	11,974	5,219	3.2	43.6	5,542	46.3	1,213	10.1
Moderate	58,655	31,988	19.4	54.5	20,952	35.7	5,715	9.7
Middle	116,942	78,492	47.7	67.1	31,531	27.0	6,919	5.9
Upper	68,209	48,361	29.4	70.9	16,884	24.8	2,964	4.3
Unknown	2,436	592	0.4	24.3	1,591	65.3	253	10.4
Total AA	**258,216**	**164,652**	**100.0**	**63.8**	**76,500**	**29.6**	**17,064**	**6.6**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,123	4.1	958	3.8	154	6.4	11	3.6
Moderate	4,833	17.5	4,332	17.4	459	19.0	42	13.7
Middle	12,174	44.0	11,156	44.8	895	37.1	123	40.2
Upper	8,724	31.6	7,807	31.3	790	32.7	127	41.5
Unknown	787	2.8	669	2.7	115	4.8	3	1.0
Total AA	**27,641**	**100.0**	**24,922**	**100.0**	**2,413**	**100.0**	**306**	**100.0**
Percentage of Total Businesses:				**90.2**		**8.7**		**1.1**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	11	1.2	10	1.2	1	6.3	0	0.0
Moderate	53	6.0	51	5.9	2	12.5	0	0.0
Middle	539	60.8	531	61.1	7	43.8	1	100.0
Upper	279	31.5	275	31.6	4	25.0	0	0.0
Unknown	4	0.5	2	0.2	2	12.5	0	0.0
Total AA	**886**	**100.0**	**869**	**100.0**	**16**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.1**		**1.8**		**0.1**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2022 Southwest IA Non MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,182	19.4
Moderate	2	11.1	1,326	11.8	172	13.0	2,306	20.5
Middle	16	88.9	9,900	88.2	711	7.2	2,677	23.8
Upper	0	0.0	0	0.0	0	0.0	4,061	36.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**18**	**100.0**	**11,226**	**100.0**	**883**	**7.9**	**11,226**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	2,877	1,499	11.2	52.1	879	30.6	499	17.3
Middle	18,093	11,916	88.8	65.9	3,745	20.7	2,432	13.4
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 AA	**20,970**	**13,415**	**100.0**	**64.0**	**4,624**	**22.1**	**2,931**	**14.0**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	305	14.8	274	14.7	27	19.9	4	6.7
Middle	1,754	85.2	1,589	85.3	109	80.1	56	93.3
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 AA	**2,059**	**100.0**	**1,863**	**100.0**	**136**	**100.0**	**60**	**100.0**
Percentage of Total Businesses:				**90.5**		**6.6**		**2.9**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	6	0.9	5	0.8	1	14.3	0	0.0
Middle	626	99.1	619	99.2	6	85.7	1	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 AA	**632**	**100.0**	**624**	**100.0**	**7**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**98.7**		**1.1**		**0.2**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2022 Denison, IA Non MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,081	23.9
Moderate	1	16.7	1,630	36.1	455	27.9	860	19.0
Middle	4	66.7	2,251	49.9	186	8.3	910	20.2
Upper	1	16.7	634	14.0	49	7.7	1,664	36.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**6**	**100.0**	**4,515**	**100.0**	**690**	**15.3**	**4,515**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	2,106	1,242	28.0	59.0	762	36.2	102	4.8
Middle	3,864	2,608	58.8	67.5	752	19.5	504	13.0
Upper	1,098	583	13.2	53.1	441	40.2	74	6.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**7,068**	**4,433**	**100.0**	**62.7**	**1,955**	**27.7**	**680**	**9.6**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	303	38.8	271	38.7	30	51.7	2	9.5
Middle	380	48.7	342	48.8	19	32.8	19	90.5
Upper	97	12.4	88	12.6	9	15.5	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**780**	**100.0**	**701**	**100.0**	**58**	**100.0**	**21**	**100.0**
Percentage of Total Businesses:				**89.9**		**7.4**		**2.7**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	11	6.0	11	6.0	0	0.0	0	0.0
Middle	164	89.1	164	89.1	0	0.0	0	0.0
Upper	9	4.9	9	4.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**184**	**100.0**	**184**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2022 Humboldt, IA Non MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	924	20.8
Moderate	0	0.0	0	0.0	0	0.0	844	19.0
Middle	7	100.0	4,442	100.0	325	7.3	953	21.5
Upper	0	0.0	0	0.0	0	0.0	1,721	38.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**7**	**100.0**	**4,442**	**100.0**	**325**	**7.3**	**4,442**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
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	8,398	5,526	100.0	65.8	1,796	21.4	1,076	12.8
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 AA	**8,398**	**5,526**	**100.0**	**65.8**	**1,796**	**21.4**	**1,076**	**12.8**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
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	942	100.0	842	100.0	73	100.0	27	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 AA	**942**	**100.0**	**842**	**100.0**	**73**	**100.0**	**27**	**100.0**
Percentage of Total Businesses:				**89.4**		**7.7**		**2.9**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
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	349	100.0	346	100.0	3	100.0	0	0.0
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 AA	**349**	**100.0**	**346**	**100.0**	**3**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.1**		**0.9**		**0.0**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2022 Lawler, IA Non MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,534	18.4
Moderate	3	27.3	2,240	26.8	180	8.0	1,729	20.7
Middle	8	72.7	6,113	73.2	318	5.2	2,025	24.2
Upper	0	0.0	0	0.0	0	0.0	3,065	36.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**11**	**100.0**	**8,353**	**100.0**	**498**	**6.0**	**8,353**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	4,606	2,671	26.0	58.0	1,182	25.7	753	16.3
Middle	10,702	7,614	74.0	71.1	1,855	17.3	1,233	11.5
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 AA	**15,308**	**10,285**	**100.0**	**67.2**	**3,037**	**19.8**	**1,986**	**13.0**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	404	26.1	373	26.5	22	20.0	9	28.1
Middle	1,146	73.9	1,035	73.5	88	80.0	23	71.9
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 AA	**1,550**	**100.0**	**1,408**	**100.0**	**110**	**100.0**	**32**	**100.0**
Percentage of Total Businesses:				**90.8**		**7.1**		**2.1**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	66	15.3	66	15.5	0	0.0	0	0.0
Middle	364	84.7	360	84.5	3	100.0	1	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 AA	**430**	**100.0**	**426**	**100.0**	**3**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**99.1**		**0.7**		**0.2**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2022 Oskaloosa, IA Non MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	3.1	740	2.7	117	15.8	5,648	20.7
Moderate	8	25.0	5,477	20.1	1,119	20.4	5,229	19.2
Middle	19	59.4	16,733	61.5	1,230	7.4	5,963	21.9
Upper	4	12.5	4,274	15.7	68	1.6	10,384	38.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**32**	**100.0**	**27,224**	**100.0**	**2,534**	**9.3**	**27,224**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,422	676	2.3	47.5	521	36.6	225	15.8
Moderate	10,403	5,401	18.5	51.9	3,825	36.8	1,177	11.3
Middle	27,235	18,668	63.9	68.5	6,332	23.2	2,235	8.2
Upper	6,073	4,459	15.3	73.4	1,331	21.9	283	4.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**45,133**	**29,204**	**100.0**	**64.7**	**12,009**	**26.6**	**3,920**	**8.7**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	227	5.2	206	5.2	18	6.0	3	4.7
Moderate	847	19.5	773	19.4	61	20.2	13	20.3
Middle	2,421	55.7	2,220	55.7	162	53.6	39	60.9
Upper	855	19.7	785	19.7	61	20.2	9	14.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4,350**	**100.0**	**3,984**	**100.0**	**302**	**100.0**	**64**	**100.0**
Percentage of Total Businesses:				**91.6**		**6.9**		**1.5**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	0.3	2	0.3	0	0.0	0	0.0
Moderate	61	9.0	59	8.8	1	25.0	1	33.3
Middle	447	66.0	443	66.1	3	75.0	1	33.3
Upper	167	24.7	166	24.8	0	0.0	1	33.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**677**	**100.0**	**670**	**100.0**	**4**	**100.0**	**3**	**100.0**
Percentage of Total Farms:				**99.0**		**0.6**		**0.4**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX C – Scope of Examination

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED	Lending: January 1, 2022 to December 31, 2023 Community Development Activity: July 11, 2022 to September 9, 2024		
FINANCIAL INSTITUTION Bank Iowa			**PRODUCTS REVIEWED** HMDA-Reportable Loans CRA-Reportable Loans
AFFILIATE(S)	**AFFILIATE RELATIONSHIP**		**PRODUCTS REVIEWED**
None	**None**		**None**
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	**TYPE OF EXAMINATION**	**BRANCHES VISITED**	**OTHER INFORMATION**
1. Des Moines-West Des Moines, Iowa MSA #19780 **2. Southwest, Iowa Non-MSA** **3. Denison, Iowa Non-MSA** **4. Humboldt, Iowa Non-MSA**	**Full Scope**	**N/A**	**N/A**
1. Lawler, Iowa Non-MSA **2. Oskaloosa, Iowa Non-MSA**	**Limited Scope**	**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, includes loans for home improvement purposes not secured by a dwelling, and other consumer unsecured loan, includes loans for home improvement purposes not secured.

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

Fair market rent: Fair market rents (FMRs) are gross rent estimates. They include the shelter rent plus the cost of all tenant-paid utilities, except telephones, cable or satellite television service, and internet service. HUD sets FMRs to assure that a sufficient supply of rental housing is available to their program participants. To accomplish this objective, FMRs must be both high enough to

permit a selection of units and neighborhoods and low enough to serve as many low-income families as possible. The level at which FMRs are set is expressed as a percentile point within the rent distribution of standard-quality rental housing units. The current definition used is the 40th percentile rent, the dollar amount below which 40 percent of the standard-quality rental housing units are rented. The 40th percentile rent is drawn from the distribution of rents of all units occupied by recent movers (renter households who moved to their present residence within the past 15 months). HUD is required to ensure that FMRs exclude non-market rental housing in their computation. Therefore, HUD excludes all units falling below a specified rent level determined from public housing rents in HUD's program databases as likely to be either assisted housing or otherwise at a below-market rent, and units less than two years old.

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

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

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

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

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

Income Level: Income level means:

1) Low-income – an individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a census tract;
2) Moderate-income – an individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent in the case of a census tract;

3) Middle-income – an individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent in the case of a census tract; and
4) Upper-income – an individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent in the case of a census tract.

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

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

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

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

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

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development (HUD) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

Wholesale Bank: This term refers to a bank that is not in the business of extending home mortgage, small business, small farm, or consumer loans to retail customers, and for which a designation as a wholesale bank is in effect, in accordance with section 228.25(b).