



## **PUBLIC DISCLOSURE**

January 04, 2022

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Midwest Heritage Bank, F.S.B.  
Charter Number: 712423

3580 E.P. True Parkway, Suite 100  
West Des Moines, IA 50265

Office of the Comptroller of the Currency

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Omaha, NE 68154-5298

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

**Table of Contents**

Overall CRA Rating.....1  
Description of Institution.....2  
Scope of the Evaluation.....3  
Discriminatory or Other Illegal Credit Practices Review.....3  
State Rating  
    State of Iowa.....5  
    Community Development .....12  
    State of Kansas.....15  
Appendix A: Scope of Examination.....1  
Appendix B: Summary of MMSA and State Ratings.....1  
Appendix C: Definitions and Common Abbreviations.....1  
Appendix D: Tables of Performance Data.....1

## **Overall CRA Rating**

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

**The lending test is rated: Satisfactory**

The major factors that support this rating include:

- Midwest Heritage Bank, Federal Savings Bank's (MHB or bank) loan-to-deposit ratio (LTD) is more than reasonable when considering the bank's size, financial condition, and the credit needs of its assessment areas (AA).
- Management originates and purchases a majority of its loans to customers located in the bank's AAs.
- MHB's distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable.
- MHB's geographic distribution of loans to census tracts (CTs) of different income levels is reasonable.
- There were no complaints regarding the bank's performance in meeting the credit needs of its AA.
- Community development (CD) activities represents adequate responsiveness to AA needs and opportunities.

### ***Loan-to-Deposit Ratio***

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is more than reasonable. MHB's average quarterly LTD ratio was 87.15 percent for the 13 quarters since the previous CRA examination. The ratio ranged from a quarterly low of 68 percent to a quarterly high of 101 percent. Among five similarly situated financial institutions, the quarterly average LTD ratio was 74.70 percent ranging from a low of 57.11 percent to a high of 105.29 percent.

### **Lending in Assessment Area**

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

The bank originated and purchased 55 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank level, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total #</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total \$(000s)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
Home Mortgage Loans	922	54.8	760	45.2	1,682	165,183	51.3	157,058	48.7	322,241
Consumer Loans	14	70.0	6	30.0	20	254	75.5	82	24.5	336
<b>Total</b>	<b>936</b>	<b>55.0</b>	<b>766</b>	<b>45.0</b>	<b>1,702</b>	<b>165,437</b>	<b>51.3</b>	<b>157,140</b>	<b>48.7</b>	<b>322,577</b>

## **Description of Institution**

MHB is an interstate financial institution headquartered in West Des Moines, Iowa. MHB had total assets of \$330 million and tier one capital of \$42 million as of December 31, 2020. MHB is a subsidiary of Hy-Vee, Inc. Hy-Vee, Inc. is a \$4.1 billion corporation located in West Des Moines, Iowa, that owns the Hy-Vee grocery store chain with locations in eight Midwestern states including: Illinois, Iowa, Kansas, Minnesota, Missouri, Nebraska, South Dakota, and Wisconsin. MHB operates seven full branch locations within the bank’s AAs, with five branches located in Hy-Vee grocery stores. MHB operates a loan production office in Overland Park, Kansas, which opened in October 2020. The bank has a combined total of 18 automated teller machines (ATM) and interactive teller machines (ITM), including four cash-dispensing only ATMs and 14 deposit-taking ATM and/or ITMs. A significant portion of the bank’s business is from Hy-Vee affiliated employees throughout the store’s eight-state region.

MHB operates in four AAs: Des Moines metropolitan statistical area (MSA) AA, Ames MSA AA, Lucas County AA, and the Overland Park MSA AA. The Overland Park MSA AA was added with the establishment of a loan production office in October 2020.

MHB offers a full range of deposit and loan products and services to customers. As of December 31, 2020, the bank’s loan portfolio totaled \$244 million, or approximately 74 percent of total assets. The loan portfolio is comprised of \$83 million 1-4 family residential real estate, \$67 million commercial, \$45 million consumer, and \$43 million agricultural.

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

MHB received a Satisfactory rating in its last Performance Evaluation dated November 13, 2018.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

MHB was evaluated under the Small Bank examination procedures, which included a Lending Test for the States of Iowa and Kansas. The Lending Test evaluated MHB's record of meeting the credit needs of its AAs through its lending activities.

The Lending Test covers MHB's performance from January 1, 2018 to December 31, 2020. The Lending Test evaluated home mortgage and consumer loans in the Ames MSA AA, Des Moines MSA AA, Lucas County AA, and Overland Park MSA AA. The primary products were determined through an analysis of loans originated during the evaluation period and strategy discussions held with bank management.

To evaluate lending performance, examiners used information from the bank's Home Mortgage Disclosure Act (HMDA) loan application register (LAR) to analyze residential real estate loans. Examiners also selected a sample of 20 consumer loans originated or purchased in each AA during the evaluation period.

The CD Test covers MHB's performance from January 1, 2018 to December 31, 2020. Due to the bank's status as a small bank for CRA purposes, the CD test was not required to be performed. However, management requested that our Office perform a CD test to further support the bank's CRA activities. We reviewed all CD loans, investments, donations, and services submitted by management to ensure these activities met the regulatory definition of CD.

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

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

### **Ratings**

The bank's overall rating is a blend of the state ratings. However, for this evaluation period, the rating for the State of Iowa was given full weight as examiners were unable to provide a meaningful analysis for the State of Kansas due to a lack of loan originations. The bank's presence in Kansas commenced in October 2020, which only allowed them three months to demonstrate CRA performance during this evaluation period. Please refer to the State of Kansas evaluation for additional details.

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

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

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

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

## **State Rating**

### **State of Iowa**

**CRA rating for the State of Iowa: Satisfactory**

**The Lending Test is rated: Satisfactory**

The major factors that support this rating include:

- The distribution of loans across geographies of different income levels is reasonable.
- The distribution of loans to individuals of different income levels is reasonable.
- MHB's CD activities demonstrate adequate responsiveness to the CD needs in its AAs.

### **Description of Institution's Operations in Iowa**

MHB operates three AAs in Iowa including the Des Moines MSA AA, Ames MSA AA, and the Lucas County AA.

#### Des Moines MSA AA

MHB operates five branches, including the main office and two deposit-taking ITMs within the Des Moines MSA AA. MHB reported \$181 million of deposits in the AA as of June 30, 2020, which represents 66 percent of the bank's total deposits as of that date. According to the June 30, 2020 FDIC Market Share Report, MHB ranked seventh of out 42 financial institutions with a deposit market share of 0.85 percent.

The Des Moines MSA AA is comprised of Dallas and Polk counties, consisting of 113 CTs. Nine of the CTs are low-income, 29 are moderate-income, 45 are middle-income, 27 are upper-income, and one with no income designation. According to the 2015 ACS U.S. Census data, 21 percent of families in the AA were low-income, 17 percent were moderate-income, 22 percent were middle-income, and 40 percent were upper-income. The median family income was \$76 thousand and approximately nine percent of families were below the poverty level. The median housing value was \$165 thousand. Community contacts identified small business credit, including start-ups as a credit need in the AA.

The following table provides a summary of demographics, including housing and business information for the Des Moines AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Des Moines</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	113	8.0	25.7	39.8	25.7	0.9
Population by Geography	527,261	5.7	21.6	39.5	33.2	0.0
Housing Units by Geography	218,577	5.1	21.7	41.5	31.7	0.0
Owner-Occupied Units by Geography	140,780	2.8	18.8	41.4	37.0	0.0
Occupied Rental Units by Geography	63,862	9.1	26.7	41.3	22.9	0.0
Vacant Units by Geography	13,935	9.6	28.6	43.0	18.7	0.0
Businesses by Geography	54,797	3.7	13.4	47.0	35.9	0.1
Farms by Geography	1,835	1.2	9.8	51.0	38.0	0.0
Family Distribution by Income Level	134,194	20.7	17.1	21.6	40.6	0.0
Household Distribution by Income Level	204,642	23.3	16.2	19.4	41.1	0.0
Median Family Income MSA - 19780 Des Moines, IA MSA		\$75,653	Median Housing Value			\$164,980
			Median Gross Rent			\$825
			Families Below Poverty Level			8.5%
<i>Source: 2015 ACS and 2020 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Ames MSA AA

MHB operates one branch location within the Ames MSA AA. MHB reported \$15 million of deposits in the AA as of June 30, 2020, which represents six percent of the bank’s total deposits as of that date. According to the June 30, 2020 FDIC Market Share Report, MHB ranked eighteenth out of 19 financial institutions with a deposit market share of 0.54 percent.

The Ames MSA AA is comprised of Story County, consisting of 20 CTs. Two CTs are low-income, 14 are middle-income, three are upper-income, and one with no income designation. According to the 2015 ACS U.S. Census data, 19 percent of families in the AA were low-income, 18 percent were moderate-income, 25 percent were middle-income, and 38 percent upper-income. The median family income was \$75 thousand and approximately six percent of families were below the poverty level. The median housing value was \$161 thousand. Community contacts identified a need for start-up funding for small businesses, and loans for affordable housing.



The following table provides a summary of demographics, including housing and business information for the Ames MSA AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Ames MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	20	10.0	0.0	70.0	15.0	5.0
Population by Geography	93,586	8.7	0.0	66.5	18.9	5.8
Housing Units by Geography	37,688	9.7	0.0	72.6	17.8	0.0
Owner-Occupied Units by Geography	19,186	3.0	0.0	76.4	20.6	0.0
Occupied Rental Units by Geography	16,715	17.3	0.0	67.8	14.8	0.0
Vacant Units by Geography	1,787	10.1	0.0	75.8	14.1	0.0
Businesses by Geography	7,566	10.3	0.0	66.1	21.9	1.7
Farms by Geography	618	3.6	0.0	76.2	20.1	0.2
Family Distribution by Income Level	18,895	18.6	17.7	24.9	38.8	0.0
Household Distribution by Income Level	35,901	28.0	13.4	16.0	42.6	0.0
Median Family Income MSA - 11180 Ames, IA MSA		\$74,380	Median Housing Value			\$160,985
			Median Gross Rent			\$764
			Families Below Poverty Level			6.2%
<i>Source: 2015 ACS and 2020 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Lucas County AA

MHB operates one branch location and one deposit-taking ITM within the Lucas County AA. MHB reported \$80 million of deposits in the AA as of June 30, 2020, which represents 29 percent of the bank’s total deposits as of that date. According to the June 30, 2020 FDIC Market Share Report, MHB ranked first out of three financial institutions with a deposit market share of 50.65 percent.

The Lucas County AA is comprised of Lucas County, consisting of four CTs. One CT is moderate-income, and three CTs are middle-income. According to the 2015 ACS U.S. Census data, 23 percent of families in the AA were low-income, 19 percent were moderate-income, 28 percent were middle-income, and 30 percent were upper-income. The median family income was \$62 thousand and approximately 10 percent of families were below the poverty level. The median housing value was \$90 thousand. Community contacts identified the greatest need in the community to be affordable housing.

The following table provides a summary of demographics, including housing and business information for the Lucas County AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Lucas County</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	4	0.0	25.0	75.0	0.0	0.0
Population by Geography	8,731	0.0	22.8	77.2	0.0	0.0
Housing Units by Geography	4,208	0.0	23.1	76.9	0.0	0.0
Owner-Occupied Units by Geography	2,915	0.0	24.1	75.9	0.0	0.0
Occupied Rental Units by Geography	763	0.0	28.2	71.8	0.0	0.0
Vacant Units by Geography	530	0.0	10.0	90.0	0.0	0.0
Businesses by Geography	702	0.0	18.9	81.1	0.0	0.0
Farms by Geography	129	0.0	3.9	96.1	0.0	0.0
Family Distribution by Income Level	2,356	22.5	19.3	28.3	29.9	0.0
Household Distribution by Income Level	3,678	28.7	15.3	20.4	35.6	0.0
Median Family Income Non-MSAs - IA		\$61,681	Median Housing Value			\$89,580
			Median Gross Rent			\$565
			Families Below Poverty Level			9.9%
<i>Source: 2015 ACS and 2020 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Iowa

The rating for the State of Iowa is based on a full-scope review of the three AAs within the state. The State of Iowa rating is based on performance in all three of these AAs with more weight given to the Des Moines MSA AA, as the AA accounts for the largest portion of branch locations, deposit activity, and loan activity. The examiners also placed more weight on home mortgage lending performance than consumer lending, as the bank’s level of mortgage lending is more substantial.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN IOWA

### LENDING TEST

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

### Conclusions for Areas Receiving Full-Scope Reviews.

Based on full-scope reviews of all three AAs, the bank’s performance in the State of Iowa is reasonable.

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

The bank exhibits a reasonable geographic distribution of loans in the State of Iowa.

### ***Home Mortgage Loans***

Refer to Table O in the State of Iowa section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

#### Des Moines MSA AA

The distribution of home mortgage loans originated or purchased in the Des Moines MSA AA reflects reasonable distribution.

During the evaluation period, MHB originated 1.3 percent of home mortgage loans to borrowers located in low-income CTs which is below demographic data showing that 2.8 percent of owner-occupied units are in low-income CTs. However, the bank's performance is in-line with aggregate market data, which shows that 1.3 percent of aggregate home mortgage loans are originated in low-income CTs.

MHB originated 9.8 percent of home mortgage loans to borrowers located in moderate-income CTs, which is below demographic data showing that 18.8 percent of owner-occupied units are in moderate-income CTs. However, the bank's performance is in-line with aggregate market data, which shows 10.5 percent of aggregate home mortgage loans are originated in low-income CTs.

#### Ames MSA AA

The distribution of home mortgage loans originated or purchased in the Ames MSA AA reflects excellent distribution. During the evaluation period, MHB originated 5.2 percent of home mortgage loans to borrowers located in low-income CTs which exceeds demographic data showing that 3.0 percent of owner-occupied units are in low-income CTs. The bank's performance also exceeds aggregate market data, which shows 1.3 percent of aggregate home mortgage loans are originated in low-income CTs. The Ames MSA AA does not include any moderate-income CTs.

#### Lucas County AA

The distribution of home mortgage loans originated or purchased in the Lucas County AA reflects excellent distribution. During the evaluation period, MHB originated 34.3 percent of home mortgage loans to borrowers located in moderate-income CTs which exceeds demographic data showing that 24.1 percent of owner-occupied units are in moderate-income CTs. The bank's performance also exceeds aggregate data which shows 28.4 percent of aggregate home mortgage loans are originated in moderate-income CTs. The Lucas County AA does not include any low-income CTs.

### ***Consumer Loans***

Refer to Table U in the State of Iowa section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

#### Des Moines MSA AA

The distribution of consumer loans originated or purchased in the Des Moines MSA AA reflects reasonable distribution. Zero percent of consumer loans in the sample were made to borrowers in low-income CTs, while 30 percent of consumer loans in the sample were made to borrowers in moderate-income CTs. In the Des Moines MSA AA, demographic data shows that 4.8 percent of households are in low-income CTs and 21.3 percent of households are in moderate-income CTs. While our sample showed no loans made in low-income CTs, MHB exceeded demographic data for loans made in moderate-income CTs.

#### Ames MSA AA

The distribution of consumer loans originated or purchased in the Ames MSA AA reflects reasonable distribution. Ten percent of the consumer loans in the sample were made to borrowers in low-income CTs. The banks performance is slightly above demographic data which shows that 9.6 percent of households are in low-income CTs.

#### Lucas County AA

The distribution of consumer loans originated or purchased in the Lucas County AA reflects reasonable distribution. Twenty-five percent of consumer loans in the sample were made to borrowers in moderate-income CTs. The banks performance is directly in line with demographic data which shows that 25 percent of households are in moderate-income CTs.

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

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

### ***Home Mortgage Loans***

Refer to Table P in the State of Iowa section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

#### Des Moines MSA AA

The distribution of home mortgage loans to borrowers of different income levels in the Des Moines MSA AA reflects reasonable penetration. During the evaluation period, MHB originated 5.0 percent of home mortgage loans to low-income borrowers, which is below aggregate data of 6.3 percent and demographic data of 20.7 percent. MHB originated 11.8 percent of home mortgage loans to moderate-income borrowers, which is below aggregate data of 16.5 percent and demographic data of 17.1 percent.

Examiner conversations with MHB's management and a community contact noted the lack of affordable housing in the Des Moines MSA AA which prevents low- and moderate-income (LMI) borrowers from entering the housing market. This limits the opportunity that MHB has to lend to LMI income borrowers. The Des Moines MSA AA demographic data shows that the median gross rent is \$825 with a median housing value of \$164,980. A 30-year mortgage at 4 percent interest on a \$165 thousand loan would result in a monthly P&I payment of \$788. The property tax in Dallas County is 1.54 percent which would result in a monthly tax payment of \$212 for a \$165 thousand home. This results in a monthly payment of \$1,000 which illustrates that renting is more affordable than owning a home which deters LMI income individuals from purchasing a home. Costs associated with home maintenance and homeowner's insurance would further deter LMI individuals from purchasing a home. Given these mitigating factors, the distribution of home mortgage loans to borrowers of different income levels in the Des Moines MSA AA reflects reasonable penetration.

#### Ames MSA AA

The distribution of home mortgage loans to borrowers of different income levels in the Ames MSA AA reflects reasonable penetration. During the evaluation period, MHB originated 7.5 percent of home mortgage loans to low-income borrowers, which is below demographic data showing that 18.6 percent of families within the AA are low-income. However, the bank's performance is above aggregate data of 6.2 percent. MHB originated 19 percent of home mortgage loans to moderate-income borrowers. The bank's performance is slightly above demographic data which shows that 17.7 percent of families within the AA are moderate-income and is in-line with aggregate data which shows that 19.1 percent of aggregate home mortgage loans were made to moderate-income borrowers.

#### Lucas County AA

The distribution of home mortgage loans to borrowers of different income levels in the Lucas County AA reflects reasonable penetration. During the evaluation period, MHB originated 5.1 percent of home mortgage loans to low-income borrowers. This compares unfavorably to demographic data which shows that 22.5 percent of families within the AA are low-income. The bank's performance is also below aggregate peer performance of 10.1 percent. However, MHB originated 25.4 percent of home mortgage loans to moderate-income borrowers, which exceeds demographic data which shows that 19.3 percent of families within the AA are moderate-income.

#### ***Consumer Loans***

Refer to Table V in the State of Iowa section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

#### Des Moines MSA AA

The distribution of consumer loans to borrowers of different income levels in the Des Moines MSA AA reflects excellent penetration. Within our sample, 30 percent of loans were made to low-income borrowers and 25 percent were made to moderate-income borrowers. This compared favorably to demographic data which shows that 28.0 percent of households in the AA are low-income and 13.4 percent are moderate-income.

#### Ames MSA AA

The distribution of consumer loans to borrowers of different income levels in the Ames MSA AA reflects excellent penetration. Within our sample, 35 percent of loans were made to low-income borrowers and 25 percent were made to moderate-income borrowers. This compared favorably to demographic data which shows that 23.3 percent of households in the AA are low-income and 16.2 percent are moderate-income.

Lucas County AA

The distribution of consumer loans to borrowers of different income levels in the Lucas County AA reflects reasonable penetration. Within our sample, 20 percent of loans were made to low-income borrowers which is below demographic data which shows that 28.7 percent of households in the AA are low-income. However, 30 percent of loans in our sample were made to moderate-income borrowers which is significantly above demographic data which shows that 15.3 percent of households in the AA are moderate-income.

**Responses to Complaints**

There have been no complaints received related to the bank’s CRA performance during the evaluation period.

**Community Development Test**

While not required due to the MHB’s status as a small bank, management submitted optional CD activities for the examiners to consider. As the CD test is optional, it can only have a neutral or positive affect on the bank’s rating.

Based on a full-scope review, the bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for CD in the bank’s AAs. Performance related to CD activities had a neutral effect on the bank’s rating in the State of Iowa.

**Number and Amount of Community Development Loans**

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

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Des Moines	19	24	2,794	34.5
Lucas	64	76	5,294	65.5

Des Moines MSA AA

MHB originated 19 CD loans totaling more than \$2.7 million during the evaluation period.

Lucas County AA

MHB originated 59 CD loans totaling more than \$5.3 million during the evaluation period.

**Number and Amount of Qualified Investments**

Lucas County AA

MHB made one qualified investment of \$500 in the Lucas County AA during the evaluation period. The investment was given to a local community group that aids LMI individuals with necessary housing repairs.

Statewide

MHB made one qualified investment of \$450 that was given to a state-wide organization in Iowa that helps build affordable housing developments for low and moderate-income individuals.

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

Des Moines MSA AA

In response to the economic distress caused by the COVID-19 pandemic, the bank waived 248 excessive withdrawal fees totaling \$1,172.

Ames MSA AA

In response to the economic distress caused by the COVID-19 pandemic, the bank waived 9 excessive withdrawal fees totaling \$45.

Lucas County AA

Two bank employees provided 34 service hours to three different qualified organizations during the evaluation period. Specific examples of qualified services provided in the AA include:

- One employee serves on the board of a local non-profit that helps LMI families make housing repairs.
- One employee provided financial education to students at a school where the majority of children are on free or reduced lunches.

In response to the economic distress caused by the COVID-19 pandemic, the bank waived 645 excessive withdrawal fees totaling \$3,129.

## **State Rating**

### **State of Kansas**

**CRA rating for the State of Kansas:** Satisfactory

**The Lending Test is rated:** Satisfactory

The major factors that support this rating include:

- The overall bank LTD ratio is more than reasonable
- The majority of bank loans, by both dollar and number, were originated inside the AAs.

### **Description of Institution's Operations in Kansas**

#### Overland Park MSA AA

MHB operates one loan production office with one deposit-taking ITM within the Overland Park MSA AA. No financial information was available for analysis as the AA was created in October 2020.

The Overland Park MSA AA is comprised of Johnson County, consisting of 130 CTs. Two CTs are low-income, 12 CTs are moderate-income, 42 CTs are middle-income, 71 CTs are upper-income, and three CTs have no income designation. According to the 2015 ACS U.S. Census data, 12 percent of families in the AA were low-income, 14 percent were moderate-income, 19 were percent middle-income, and 55 percent were upper-income. The median family income was \$73 thousand and approximately four percent were below the poverty level. The median housing value was \$230 thousand. Community contacts identified the greatest need in the community to be affordable housing.



The following table provides a summary of demographics, including housing and business information for the Overland Park MSA AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Johnson County</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	130	1.5	9.2	32.3	54.6	2.3
Population by Geography	566,814	0.9	7.7	32.8	58.5	0.0
Housing Units by Geography	231,029	1.2	8.3	35.4	55.2	0.0
Owner-Occupied Units by Geography	152,762	0.3	4.5	31.3	63.9	0.0
Occupied Rental Units by Geography	66,973	3.2	16.0	43.4	37.5	0.0
Vacant Units by Geography	11,294	2.0	14.6	42.1	41.2	0.0
Businesses by Geography	49,475	1.2	7.1	26.9	61.6	3.3
Farms by Geography	1,125	1.1	6.3	31.6	60.4	0.6
Family Distribution by Income Level	149,562	12.0	13.6	19.0	55.3	0.0
Household Distribution by Income Level	219,735	14.7	13.5	16.7	55.0	0.0
Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$72,623	Median Housing Value			\$229,855
			Median Gross Rent			\$975
			Families Below Poverty Level			4.0%
<i>Source: 2015 ACS and 2020 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Kansas

Examiners completed a full-scope review of the bank’s AA in Kansas, which includes the entirety of Johnson County. There are no limited-scope areas. All weight for the State of Kansas rating is on this AA. Refer to Appendix A for more information.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

### LENDING TEST

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

The rating for the State of Kansas is based on the bank’s overall ratings related to the LTD ratio and the in/out ratio for the entire bank. MHB did not originate a sufficient volume of mortgage or consumer loans in the AA to perform a meaningful geographic or borrower distribution analysis. In October 2020, the bank opened a loan production office in Kansas and installed a deposit-taking ITM. Prior to October 2020, the bank did not have a presence in Kansas and did not have sufficient time in the evaluation period to demonstrate CRA performance in this new AA.

### ***Home Mortgage Loans***

Refer to Table O and Table P in the State of Kansas section of Appendix D for the facts and data used to evaluate the geographic and borrower distribution of the bank's originations and purchases of home mortgage loans.

### ***Consumer Loans***

Refer to Table U and Table V in the State of Kansas section of appendix D for the facts and data used to evaluate the geographic and borrower distribution of the bank's originations and purchases of consumer loans.

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

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

<b>Time Period Reviewed:</b>	Lending Test: 01/01/2018 – 12/31/2020 Community Development: 01/01/2018 – 12/31/2020	
<b>Bank Products Reviewed:</b>	Home Mortgage and Consumer Loans (Community development loans, qualified investments, community development services)	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	NA	NA
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State: Iowa</b>		
Des Moines MSA AA	Full Scope	Polk County and Dallas County
Ames MSA AA	Full Scope	Story County
Lucas County AA	Full Scope	Lucas County
<b>State: Kansas</b>		
Overland Park MSA AA	Full Scope	Johnson County

## Appendix B: Summary of MMSA and State Ratings

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RATINGS	Midwest Heritage Bank, F.S.B
Overall Bank:	Lending Test Rating
Midwest Heritage Bank, F.S.B	Satisfactory
MMSA or State:	
Iowa	Satisfactory
Kansas	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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

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

## State of Iowa

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																	<b>2018-20</b>		
<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Ames MSA AA	58	9,696	6.4	3.0	5.2	1.3	0.0	0.0	0.0	76.4	70.7	75.6	20.6	24.1	23.1	0.0	0.0	0.0	
Des Moines MSA AA	676	135,301	74.9	2.8	1.3	1.3	18.8	9.8	10.5	41.4	36.8	37.4	37.0	52.1	50.8	0.0	0.0	0.0	
Lucas County AA	169	15,689	18.7	0.0	0.0	0.0	24.1	34.3	28.4	75.9	65.7	71.6	0.0	0.0	0.0	0.0	0.0	0.0	
<b>Total</b>	<b>903</b>	<b>160,687</b>	<b>100.0</b>	<b>2.7</b>	<b>1.3</b>	<b>1.3</b>	<b>16.7</b>	<b>13.7</b>	<b>9.7</b>	<b>46.2</b>	<b>44.4</b>	<b>40.8</b>	<b>34.4</b>	<b>40.5</b>	<b>48.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																	<b>2018-20</b>		
	<b>Total Home Mortgage Loans</b>			<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
Ames MSA AA	58	9,696	7.5	18.6	7.5	6.2	17.7	19.0	19.1	24.9	27.6	23.3	38.8	37.9	36.6	0.0	9.4	14.8	
Des Moines MSA AA	676	135,301	74.9	20.7	5.0	6.3	17.1	11.8	16.5	21.6	20.9	21.2	40.6	47.9	38.8	0.0	14.3	17.2	
Lucas County AA	169	15,689	18.7	22.5	6.3	10.1	19.3	25.4	29.3	28.3	18.9	22.6	29.9	34.3	25.0	0.0	16.6	13.0	
<b>Total</b>	<b>903</b>	<b>160,687</b>	<b>100.0</b>	<b>20.5</b>	<b>5.1</b>	<b>6.3</b>	<b>17.2</b>	<b>14.8</b>	<b>16.8</b>	<b>22.1</b>	<b>20.9</b>	<b>21.4</b>	<b>40.2</b>	<b>44.7</b>	<b>38.6</b>	<b>0.0</b>	<b>14.4</b>	<b>16.9</b>	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2018-20</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available-Income Tracts</b>		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Ames MSA AA	20	217	33.33	9.6	10.0	0.0	0.0	72.4	80.0	17.9	10.0	0.0	0.0	
Des Moines MSA AA	20	286	33.33	4.8	0.0	21.3	30.0	41.4	35.0	32.6	35.0	0.0	0.0	
Lucas County AA	20	273	33.33	0.0	0.0	25.0	25.0	75.0	75.0	0.0	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data. Due to rounding, totals may not equal 100.0

<b>Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>												<b>2018-20</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>
Ames MSA AA	20	217	33.33	28.0	30.0	13.4	25.0	16.0	30.0	42.6	15.0	0.0	0.0
Des Moines MSA AA	20	286	33.33	23.3	35.0	16.2	25.0	19.4	25.0	41.1	15.0	0.0	0.0
Lucas County AA	20	273	33.33	28.7	20.0	15.3	30.0	20.4	20.0	20.4	30.0	0.0	0.0

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data. Due to rounding, totals may not equal 100.0*

## State of Kansas

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																	<b>2020</b>		
<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Overland Park MSA AA	4	960	100.0	0.3	0.0	0.2	4.5	0.0	3.3	31.3	0.0	26.2	63.9	100.0	70.3	0.0	0.0	0.0	

*Source: 2015 ACS Census; 09/01/2020 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																	<b>2020</b>		
<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
Overland Park MSA AA	4	960	100.0	12.0	0.0	3.0	13.6	0.0	13.2	19.0	0.0	21.2	55.3	100.0	49.5	0.0	0.0	13.2	

*Source: 2015 ACS Census; 09/01/2020 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.*

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2020</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Overland Park MSA AA	4	49	100	1.2	0.0	8.0	0.0	35.0	50.0	55.9	50.0	0.0	0.0	

*Source: 2015 ACS Census; 09/01/2020 - 12/31/2020 Bank Data.  
Due to rounding, totals may not equal 100.0%*

<b>Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2020</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Overland Park MSA AA	4	49	100	14.7	0.0	13.5	50.0	16.7	0.0	55.0	50.0	0.0	0.0	

*Source: 2015 ACS Census; 09/01/2020 - 12/31/2020 Bank Data.  
Due to rounding, totals may not equal 100.0%*

