

## **PUBLIC DISCLOSURE**

January 27, 2025

# 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

13710 FNB Parkway Suite 110 Omaha, NE 68154-5298

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

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## **Overall CRA Rating**

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

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- Midwest Heritage Bank, F.S.B.'s (MHB) loan-to-deposit (LTD) ratio is more than reasonable when considering the bank's size, financial condition, and the credit needs of its assessment areas (AAs).
- MHB originates and purchases a majority of its loans in the bank's AAs.
- MHB's distribution of loans across geographies of different income levels is reasonable.
- MHB's distribution of loans to borrowers of different income levels is reasonable.
- MHB did not receive any complaints regarding the bank's performance in meeting the credit needs if its AAs.

#### Loan-to-Deposit Ratio

MHB's LTD ratio is more than reasonable, considering the bank's size, financial condition, and the credit needs of the AAs. The bank's average LTD ratio was 91 percent for the 13 quarters from December 31, 2020 to December 31, 2023. The ratio ranged from a quarterly low of 65 percent to a quarterly high of 109 percent.

MHB's average LTD ratio is comparable to the average LTD ratio of other community banks operating in the bank's AAs. The average quarterly LTD ratio for competitor banks was 76 percent for the 13 quarters from December 31, 2020, to December 31, 2023. The ratio ranged from a quarterly low of 52 percent to a quarterly high of 102 percent.

#### Lending in AA

MHB originated or purchased a majority of the bank's loans inside its AAs.

MHB originated and purchased 50 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the AA										
	]	Number	of Loans			Dollar A	mount o	of Loans \$6	(000s)	
Loan Category	Insi	de	Outs	ide	Total	Insid	de	Outsi	ide	Total
Loan Category	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage	610	50.12	607	49.88	1,217	117,250	43.57	151,881	56.43	269,131
Consumer	19	47.5	21	52.5	40	470	33.74	923	66.26	1,394
Total	629	50.04	628	49.96	1,277	117,720	43.52	152,805	56.48	270,525

#### **Description of Institution**

MHB is an interstate financial institution headquartered in West Des Moines, Iowa. The bank had total assets of \$439 million and tier 1 capital of \$53 million, as of December 31, 2023. MHB is a subsidiary of Hy-Vee, Inc. Hy-Vee, Inc. is a corporation headquartered in West Des Moines, Iowa, that owns the Hy-Vee grocery store chain, which operates store locations in eight Midwestern states including Illinois, Iowa, Kansas, Minnesota, Missouri, Nebraska, South Dakota, and Wisconsin. MHB operates eight branch locations in the bank's AAs including five branches located in Hy-Vee grocery stores. Additionally, MHB operates a loan production office in Overland Park, Kansas. A significant portion of the bank's business is from Hy-Vee affiliated employees throughout the store's eight-state region.

MHB offers a full range of deposit and loan products, and services to customers. As of December 31, 2023, the bank's loan portfolio totaled \$352 million or 80 percent of total assets. The loan portfolio was comprised of \$118 million 1-4 family residential real estate, \$103 million commercial, \$53 million consumer, and \$78 million agricultural loans.

There are no known legal, financial, or other impediments limiting MHB's ability to meet the credit needs of its AAs. MHB received a satisfactory rating on its previous CRA Performance Evaluation dated January 4, 2022.

## **Scope of the Evaluation**

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

The Office of the Comptroller of the Currency (OCC) evaluated MHB under the Small Bank examination procedures, which include a Lending Test for the States of Iowa and Kansas. The Lending Test evaluates the bank's record of meeting the credit needs of its AA through its lending activities.

The Lending Test covers MHB's performance from January 1, 2021, to December 31, 2023. The Lending Test evaluated home mortgage loans originated in the Des Moines Metropolitan Statistical Area (MSA) AA, Ames MSA AA, and Lucas County AA, and consumer loans originated in the Overland Park MSA AA during the evaluation period. These loan types were determined to be the primary loan products originated by MHB from each of their respective AAs during the evaluation period. Examiners used information from MHB's Home Mortgage Disclosure Act (HMDA) loan application register to analyze residential real estate loans and selected a sample of consumer loans originated and purchased during the evaluation period to analyze consumer loans.

Revised 2020 Census data updating CT income level designations became effective January 1, 2022. Examiners analyzed loan data against the applicable demographic data for each period, resulting in multiple analyses and presentation of data. Examiners analyzed home mortgage loans and consumer loans from January 1, 2021 to December 31, 2021 (2021 Analysis Period), using 2015 American Community Survey (ACS) demographic information. Examiners analyzed home mortgage loans and consumer loans from January 1, 2022 to December 31, 2023 (2022-23 Analysis Period), using updated 2020 Census demographic information. The OCC placed more weight on the 2022-23 Analysis Period as it covered more of the overall evaluation period, and, therefore, reflected higher volumes of lending.

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

In each state where the bank has an office, one or more 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. The State of Iowa rating was weighted more heavily than the rating for the State of Kansas because the State of Iowa accounts for the largest portion of MHB's branch locations, deposit activity, and loan volume.

The state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **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 Consumer Financial Protection Bureau, 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<sup>1</sup>: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- MHB's distribution of loans across geographies of different income levels is reasonable.
- MHB's distribution of loans to borrowers of different income levels is reasonable.

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

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

#### Des Moines MSA AA

The Des Moines MSA AA includes all of Dallas and Polk counties in Iowa. MHB operates six branches, including the main office and three deposit taking interactive teller machines (ITMs) in the AA. MHB reported \$222 million in deposits in the Des Moines MSA AA as of June 30, 2023, representing 70 percent of MHB's total deposits. According to FDIC market share information as of June 30, 2023, MHB ranked 18<sup>th</sup> out of 47 institutions in deposit market share in the AA with a market share of 0.76 percent.

#### 2021 Analysis Period

The Des Moines MSA AA consisted of 113 CTs in total; nine low-income, 29 moderate-income, 45 middle-income, 29 upper-income, and one CT with no income designation. The 2015 ACS reported the population was 527,261, which included 134,194 families and 204,642 households. The 2015 ACS indicated the families in the AA were 21 percent low-income, 17 percent moderate-income, 22 percent middle-income, and 40 percent upper-income. The median family income was \$75,653 with 9 percent of families living below the poverty level. The median housing value was \$164,980.

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<sup>&</sup>lt;sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Table A – Demographic Information of the Assessment Area								
Assessment Area: 2021 Des Moines MSA								
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
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	63,752	3.9	13.5	46.2	36.4	0.1		
Farms by Geography	2,206	1.5	9.8	49.3	39.3	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-West Des Moines, IA MSA		\$75,653	Median Hous	sing Value		\$164,980		
			Median Gros	s Rent		\$825		
			Families Belo	ow Poverty L	evel	8.5%		

Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0%

\*) The NA category consists of geographies that have not been assigned an income classification.

#### 2022-23 Analysis Period

The Des Moines MSA AA consisted of 131 CTs in total; eight low-income, 31 moderate-income, 57 middle-income, 33 upper-income, and two CTs with no income designation. The 2020 U.S. Census reported the population was 592,079, which included 140,627 families and 226,508 households. The Census indicated the families in the AA were 20 percent low-income, 18 percent moderate-income, 21 percent middle-income, and 41 percent upper-income. The median family income was \$89,538 with 7 percent of families living below the poverty level. The median housing value was \$205,607.

Table A – Demographic Information of the AA									
AA:	AA: 2022-2023 Des Moines MSA								
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #			
Geographies (CTs)	131	6.1	23.7	43.5	25.2	1.5			
Population by Geography	592,079	5.3	19.9	44.1	30.0	0.7			
Housing Units by Geography	241,879	5.0	21.1	44.8	28.2	1.0			
Owner-Occupied Units by Geography	153,702	3.4	17.9	46.8	31.5	0.4			
Occupied Rental Units by Geography	72,806	7.6	25.7	41.3	23.2	2.2			
Vacant Units by Geography	15,371	7.9	30.7	40.5	19.3	1.6			
Businesses by Geography	97,020	3.8	14.7	41.1	37.7	2.7			
Farms by Geography	3,110	2.9	10.8	44.2	41.1	1.0			
Family Distribution by Income Level	140,627	19.9	17.8	21.6	40.7	0.0			
Household Distribution by Income Level	226,508	22.1	17.1	19.1	41.8	0.0			
Median Family Income MSA - 19780 Des Moines-West Des Moines, IA MSA		\$89,538	Median Hous	sing Value		\$205,607			
			Median Gros	s Rent		\$960			
			Families Belo	ow Poverty L	evel	6.6%			

Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0%

(\*) The NA category consists of geographies that have not been assigned an income classification.

The OCC relied on a community representative to gain additional insight on the AA to conduct the examination. The community contact indicated that economic conditions in the AA were mixed as the high interest rate environment is taking a toll on small businesses. Larger businesses are thriving while smaller businesses have struggled. The area needs more affordable housing and single family units. The lack of inventory has driven up rent prices which has negatively impacted affordable housing options. The greatest financing needs are affordable housing and small business lending. The perception of local financial institutions is favorable.

#### Ames MSA AA

The Ames MSA AA includes all of Story County in Iowa. MHB operates one branch in the AA. MHB reported \$18 million in deposits in the Ames MSA AA as of June 30, 2023, representing 5 percent of MHB's total deposits. According to FDIC market share information as of June 30, 2023, MHB ranked 19<sup>th</sup> out of 21 institutions in deposit market share in the AA with a market share of 0.56 percent.

#### 2021 Analysis Period

The Ames MSA AA consisted of 20 CTs in total; two low-income, 14 middle-income, three upper-income, and one CT with no income designation. The 2015 ACS reported the population was 93,586, which included 18,895 families and 35,901 households. The 2015 ACS indicated the families in the AA were 18 percent low-income, 18 percent moderate-income, 25 percent middle-income, and 39 percent upper-income. The median family income was \$74,380 with 6 percent of families living below the poverty level. The median housing value was \$160,985.

Table A – Demographic Information of the AA								
AA: 2021 Ames MSA								
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (CTs)	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	8,480	9.9	0.0	65.8	22.8	1.5		
Farms by Geography	703	3.7	0.0	76.8	19.3	0.1		
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 Hou	sing Value		\$160,985		
			Median Gro	ss Rent		\$764		
			Families Be	low Poverty	Level	6.2%		

Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%

(\*) The NA category consists of geographies that have not been assigned an income classification.

#### 2022-23 Analysis Period

The Ames MSA AA consisted of 27 CTs in total; one low-income, two moderate-income, 13 middle-income, nine upper-income, and two CTs with no income designation. The 2020 U.S. Census reported the population was 98,537, which included 18,911 families and 37,997 households. The Census indicated the families in the AA were 18 percent low-income, 19 percent moderate-income, 22 percent middle-income, and 41 percent upper-income. The median family income was \$90,464 with 5 percent of families living below the poverty level. The median housing value was \$184,293.

Table A – D	Table A – Demographic Information of the AA							
A	AA: 2022-2023 Ames MSA							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (CTs)	27	3.7	7.4	48.1	33.3	7.4		
Population by Geography	98,537	3.8	11.0	48.5	26.5	10.2		
Housing Units by Geography	40,663	2.1	14.0	56.0	25.7	2.3		
Owner-Occupied Units by Geography	20,703	0.0	5.3	64.6	30.1	0.0		
Occupied Rental Units by Geography	17,294	4.5	22.3	48.1	21.4	3.8		
Vacant Units by Geography	2,666	3.3	27.5	40.2	19.1	9.8		
Businesses by Geography	11,700	0.2	12.4	54.0	30.6	2.8		
Farms by Geography	851	0.0	4.1	66.5	29.0	0.4		
Family Distribution by Income Level	18,911	18.0	19.0	21.8	41.2	0.0		
Household Distribution by Income Level	37,997	27.8	14.2	17.8	40.2	0.0		
Median Family Income MSA - 11180 Ames, IA MSA		\$90,464	Median Hou	ising Value		\$184,293		
			Median Gro	ss Rent		\$917		
			Families Be	low Poverty	Level	4.8%		

Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0%

(\*) The NA category consists of geographies that have not been assigned an income classification.

The OCC relied on a community representative to gain additional insight on the AA to conduct the examination. The community contact indicated that the local economy is strong. The area is comprised of young and diverse individuals as a result of the close proximity to Iowa State University. The contact noted that affordable housing in the area is limited as many homeowners are not willing to move due to interest rates. There has been a slowdown in new home construction in the area which further limits affordable housing. The community contact stated that credit needs in the area are being met.

#### Lucas County AA

The Lucas County AA includes all of Lucas County in Iowa. MHB operates one branch and one deposit taking ITM in the Lucas County AA. MHB reported \$84 million in deposits in the AA as of June 30, 2023, representing 26 percent of MHB's total deposits. According to FDIC market share information as of June 30, 2023, MHB ranked 1<sup>st</sup> out of three institutions in deposit market share in the AA with a market share of 53 percent.

#### 2021 Analysis Period

The Lucas County AA consisted of four CTs in total; one moderate-income and three middle-income. The 2015 ACS reported the population was 8,731, which included 2,356 families and 3,678 households. The 2015 ACS indicated the families in the AA were 23 percent low-income, 19 percent moderate-income, 28 percent middle-income, and 30 percent upper-income. The median family income was \$61,681 with 10 percent of families living below the poverty level. The median housing value was \$89,580.

Table A – Do	Table A – Demographic Information of the AA							
AA: 2021 Lucas County								
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (CTs)	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	768	0.0	18.2	81.8	0.0	0.0		
Farms by Geography	136	0.0	3.7	96.3	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 Hou	sing Value	;	\$89,580		
	_		Median Gro	ss Rent		\$565		
			Families Be	low Povert	y Level	9.9%		

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

(\*) The NA category consists of geographies that have not been assigned an income classification.

#### 2022-23 Analysis Period

The Lucas County AA consisted of four CTs in total; one moderate-income and three middle-income. The 2020 U.S. Census reported the population was 8,634, which included 2,540 families and 3,718 households. The Census indicated the families in the AA were 22 percent low-income, 17 percent moderate-income, 27 percent middle-income, and 34 percent upper-income. The median family income was \$71,763 with 11 percent of families living below the poverty level. The median housing value was \$100,399.

Table A – D	Table A – Demographic Information of the AA							
AA	AA: 2022-2023 Lucas County							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (CTs)	4	0.0	25.0	75.0	0.0	0.0		
Population by Geography	8,634	0.0	22.8	77.2	0.0	0.0		
Housing Units by Geography	4,199	0.0	23.5	76.5	0.0	0.0		
Owner-Occupied Units by Geography	2,843	0.0	22.4	77.6	0.0	0.0		
Occupied Rental Units by Geography	875	0.0	29.7	70.3	0.0	0.0		
Vacant Units by Geography	481	0.0	18.5	81.5	0.0	0.0		
Businesses by Geography	986	0.0	16.9	83.1	0.0	0.0		
Farms by Geography	146	0.0	5.5	94.5	0.0	0.0		
Family Distribution by Income Level	2,540	22.0	16.8	26.9	34.4	0.0		
Household Distribution by Income Level	3,718	25.9	15.0	18.3	40.7	0.0		
Median Family Income Non-MSAs - IA		\$71,763	Median Ho	using Value	,	\$100,399		
			Median Gr	oss Rent		\$675		
			Families B	elow Povert	y Level	10.9%		

Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0%

The OCC relied on a community representative to gain additional insight on the AA to conduct the examination. The community contact indicated that there is a need for small business lending, particularly for new and expanding businesses. Small businesses in the area are hurting due to inflation and there is concern about the future viability of many small businesses. The contact stated that local financial institutions are meeting the credit needs of the community.

## Scope of Evaluation in Iowa

The rating for the State of Iowa is based on a full-scope review of the three AAs in the state. The OCC placed more weight on the Des Moines MSA AA, as this AA accounts for the largest portion of branch locations, as well as deposit and loan activity.

#### LENDING TEST

MHB'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, MHB's performance in the State of Iowa is reasonable. MHB did not originate enough home mortgage loans in the Ames MSA AA during the 2022-23 Analysis Period to perform a meaningful analysis.

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

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

MHB's distribution of loans across geographies of different income levels in the state of Iowa is reasonable.

#### Home Mortgage Loans

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

#### Des Moines MSA AA

MHB's distribution of home mortgage loans across geographies of different income levels is reasonable.

#### 2021 Analysis Period

MHB originated 1 percent of home mortgage loans to borrowers in low-income CTs. This performance is near to the demographic data, which indicates 3 percent of owner-occupied housing units are located in low-income CTs, and comparable to the 2 percent aggregate performance of other lenders in the AA.

MHB originated 12 percent of home mortgage loans to borrowers in moderate-income CTs. This performance is below the demographic data, which indicates 19 percent of owner-occupied housing units are located in moderate-income CTs, and comparable to the 13 percent aggregate performance of other lenders in the AA.

#### 2022-23 Analysis Period

MHB originated 3 percent of home mortgage loans to borrowers in low-income CTs. This performance is comparable to demographic data, which indicates 3 percent of owner-occupied housing units are located in low-income CTs, and comparable to the 4 percent aggregate performance of other lenders in the AA.

MHB originated 14 percent of home mortgage loans to borrowers in moderate-income CTs. This performance is near to the demographic data, which indicates 18 percent of owner-occupied housing units are located in moderate-income CTs, and comparable to the 16 percent aggregate performance of other lenders in the AA.

#### Ames MSA AA

MHB's distribution of home mortgage loans across geographies of different income levels is reasonable.

#### 2021 Analysis Period

MHB originated 4 percent of home mortgage loans to borrowers in low-income CTs. This performance is comparable to the demographic data, which indicates 3 percent of owner-occupied housing units are located in low-income CTs, and exceeds the 2 percent aggregate

performance of other lenders in the AA.

The Ames MSA AA did not have any moderate income CTs during the 2021 Analysis period.

2022-23 Analysis Period

MHB did not originate or purchase enough home mortgage loans in the Ames MSA AA to make a geographic analysis meaningful for this analysis period.

#### Lucas County AA

MHB's distribution of home mortgage loans across geographies of different income levels is excellent.

2021 Analysis Period

The Lucas County AA did not have any low-income CTs during the 2021 Analysis Period.

MHB originated 32 percent of home mortgage loans to borrowers in moderate-income CTs. This performance exceeds the demographic data, which indicates 24 percent of owner-occupied housing units are located in moderate-income CTs, and significantly exceeds the 23 percent aggregate performance of other lenders in the AA.

2022-23 Analysis Period

The Lucas County AA did not have any low-income CTs during the 2022-23 Analysis Period.

MHB originated 32 percent of home mortgage loans to borrowers in moderate-income CTs. This performance significantly exceeds the demographic data, which indicates 22 percent of owner-occupied housing units are located in moderate-income CTs, and exceeds the 28 percent aggregate performance of other lenders in the AA.

#### Lending Gap Analysis

The OCC analyzed MHB's geographic lending patterns for home mortgage loans throughout the AAs and did not identify any unexplained conspicuous lending gaps.

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

MHB exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered.

#### Home Mortgage Loans

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

#### Des Moines MSA AA

MHB's distribution of home mortgage loans to borrowers of different income levels is reasonable.

#### 2021 Analysis Period

MHB originated 6 percent of home mortgage loans to low-income borrowers. This performance is significantly below the demographic data, which indicates 21 percent of families in the AA are low-income, but is comparable to the 8 percent aggregate performance of other lenders in the AA.

MHB originated 17 percent of home mortgage loans to moderate income borrowers. This performance is comparable to the demographic data, which indicates 17 percent of families in the AA are moderate-income, and comparable to the 19 percent aggregate performance of other lenders in the AA.

#### 2022-23 Analysis Period

MHB originated 8 percent of home mortgage loans to low-income borrowers. This performance is significantly below the demographic data, which indicates 20 percent of families in the AA are low-income, but comparable to the 10 percent aggregate performance of other lenders in the AA.

MHB originated 17 percent of home mortgage loans to moderate income borrowers. This performance is comparable to the demographic data, which indicates 18 percent of families in the AA are moderate-income, and near to the 21 percent aggregate performance of other lenders in the AA.

#### Ames MSA AA

MHB's distribution of home mortgage loans to borrowers of different income levels is reasonable.

#### 2021 Analysis Period

MHB originated 4 percent of home mortgage loans to low-income borrowers. This performance is significantly below the demographic data which indicates 19 percent of families in the AA are low-income, but near to the 7 percent aggregate performance of other lenders in the AA.

MHB originated 19 percent of home mortgage loans to moderate income borrowers. This performance is comparable to the demographic data, which indicates 18 percent of families in the AA are moderate-income, and comparable to the 18 percent aggregate performance of other lenders in the AA.

#### Lucas County AA

MHB's distribution of home mortgage loans to borrowers of different income levels is reasonable.

#### 2021 Analysis Period

MHB originated 10 percent of home mortgage loans to low-income borrowers. This performance is significantly below the demographic data, which indicates 23 percent of families in the AA are low-income, but comparable to the 11 percent aggregate performance of other lenders in the AA.

MHB originated 24 percent of home mortgage loans to moderate income borrowers. This performance exceeds the demographic data, which indicates 19 percent of families in the AA are moderate-income, and exceeds the 22 percent aggregate performance of other lenders in the AA.

#### 2022-23 Analysis Period

MHB originated 17 percent of home mortgage loans to low-income borrowers. This performance is near to the demographic data, which indicates 22 percent of families in the AA are low-income, but exceeds the 12 percent aggregate performance of other lenders in the AA.

MHB originated 20 percent of home mortgage loans to moderate income borrowers. This performance exceeds the demographic data, which indicates 17 percent of families in the AA are moderate-income, and is near to the 24 percent aggregate performance of other lenders in the AA.

#### **Responses to Complaints**

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

## **State Rating**

#### **State of Kansas**

CRA rating for the State of Kansas<sup>2</sup>: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

• MHB's distribution of loans across geographies of different income levels is reasonable.

• MHB's distribution of loans to borrowers of different income levels is excellent.

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

MHB has designated one AA in the State of Kansas, referred to as the Overland Park MSA AA.

The Overland Park MSA AA includes all of Johnson County in Kansas. MHB operates one loan production office and one deposit taking ITM in the Overland Park MSA AA. MHB reported no deposits in the Overland Park MSA AA as of June 30, 2023. According to FDIC market share information as of June 30, 2023, MHB ranked 61<sup>st</sup> out of 61 financial institutions in deposit market share in the AA with a market share of 0 percent.

#### 2021 Analysis Period

The Overland Park MSA AA consisted of 130 CTs in total; two low-income, 12 moderate-income, 42 middle-income, 71 upper-income, and three CTs with no income designation. The 2015 ACS reported the population was 566,814, which included 149,562 families and 219,735 households. The 2015 ACS indicated the families in the AA were 12 percent low-income, 14 percent moderate-income, 19 percent middle-income, and 55 percent upper-income. The median family income was \$72,623 with 4 percent of families living below the poverty level. The median housing value was \$229,855.

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<sup>&</sup>lt;sup>2</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Table A – Demographic Information of the AA								
AA: 20	AA: 2021 Overland Park MSA							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (CTs)	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	62,366	1.1	6.8	26.4	62.8	2.9		
Farms by Geography	1,433	1.2	6.0	30.6	61.5	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 Hou	ısing Value	;	\$229,855		
			Median Gro	ss Rent		\$975		
			Families Be	low Povert	y Level	4.0%		

Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0%

(\*) The NA category consists of geographies that have not been assigned an income classification.

#### 2022-23 Analysis Period

The Overland Park MSA AA consisted of 154 CTs in total; two low-income, 13 moderate-income, 54 middle-income, 80 upper-income, and five CTs with no income designation. The 2020 U.S. Census reported the population was 609,863, which included 158,351 families and 233,599 households. The Census indicated the families in the AA were 12 percent low-income, 13 percent moderate-income, 20 percent middle-income, and 55 percent upper-income. The median family income was \$86,562 with 3 percent of families living below the poverty level. The median housing value was \$294,425.

Table A – Demographic Information of the AA								
AA: 2022-2023 Overland Park MSA								
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	154	1.3	8.4	35.1	51.9	3.2		
Population by Geography	609,863	1.0	6.8	35.8	56.4	0.0		
Housing Units by Geography	244,796	1.3	6.9	38.6	53.2	0.0		
Owner-Occupied Units by Geography	161,108	0.3	4.7	34.2	60.7	0.0		
Occupied Rental Units by Geography	72,491	3.4	11.1	48.3	37.1	0.0		
Vacant Units by Geography	11,197	0.9	10.6	39.2	49.1	0.1		
Businesses by Geography	76,601	0.7	5.0	28.8	62.2	3.2		
Farms by Geography	1,770	0.5	4.6	31.9	62.3	0.8		
Family Distribution by Income Level	158,351	11.5	13.2	20.4	54.9	0.0		
Household Distribution by Income Level	233,599	14.4	13.2	17.3	55.1	0.0		
Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$86,562	Median Hou	ising Value		\$294,425		
_			Median Gro	ss Rent		\$1,162		
			Families Be	low Poverty	Level	3.2%		

Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0%

(\*) The NA category consists of geographies that have not been assigned an income classification.

The OCC relied on a community representative to gain additional insight on the AA to conduct the examination. The community contact indicated that there is a need for small business lending, particularly for start-ups, as small businesses are struggling to find quality hires, access capital, and access affordable childcare. There are also some concerns regarding vacant office space. The contact was not aware of any discriminatory practices by local area financial institutions and stated they are more conservative with their lending practices so many small businesses struggle to find adequate financing.

#### **Scope of Evaluation in Kansas**

The rating for the State of Kansas is based on a full-scope review of the one AA in the state.

#### LENDING TEST

MHB's performance under the Lending Test in Kansas is rated Satisfactory.

## Conclusions for the Area Receiving a Full-Scope Review

Based on a full-scope review, MHB's performance in the State of Kansas is reasonable. The bank's rating for Kansas is based solely on the 2022-23 Analysis Period as MHB did not originate enough consumer loans in the 2021 Analysis Period to perform a meaningful analysis.

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

MHB distribution of loans across geographies of different income levels in the state of Kansas is reasonable.

#### Consumer Loans

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

MHB's distribution of consumer loans across geographies of different income levels in the Overland Park MSA AA is reasonable.

2021 Analysis Period

MHB did not originate or purchase enough consumer loans in the Overland Park MSA AA to make a geographic distribution analysis meaningful for this analysis period.

2022-23 Analysis Period

MHB originated 0 percent of consumer loans to borrowers in low-income CTs. This performance is comparable to the demographic data, which indicates 1 percent of households are located in low-income CTs.

MHB originated 5 percent of consumer loans to borrowers in moderate-income CTs. This performance is comparable to the demographic data, which indicates 7 percent of households are located in moderate-income CTs.

#### Lending Gap Analysis

The OCC analyzed MHB's geographic lending patterns for consumer loans throughout the AA and did not identify any unexplained conspicuous lending gaps.

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

MHB exhibits excellent distribution of loans to individuals of different income levels in the Overland Park MSA AA.

#### Consumer Loans

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

MHB's distribution of consumer loans to borrowers of different income levels is excellent.

2021 Analysis Period

MHB did not originate or purchase enough consumer loans in the Overland Park MSA AA to make a borrower distribution analysis meaningful for this analysis period.

#### 2022-23 Analysis Period

MHB originated 15 percent of consumer loans to low-income borrowers. This performance is comparable to the demographic data, which indicates 14 percent of families in the AA are low-income.

MHB originated 25 percent of consumer loans to moderate-income borrowers. This performance significantly exceeds the demographic data, which indicates 13 percent of families in the AA are moderate-income.

#### **Responses to Complaints**

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

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

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".

Time Period Reviewed:	01/01/2021 to 12/31/2023				
Bank Products Reviewed:	Home mortgage, consumer loans				
Affiliate(s)	Affiliate Relationship   Products Reviewed				
None					
List o	of AAs and Type of Exar	nination			
Rating and AAs	Type of Exam	Other Information			
States					
Iowa	Full Scope	Includes all of Dallas, Polk, Story, and Lucas Counties in Iowa			
Kansas	Full Scope	Includes all of Johnson County in Kansas			

## **Appendix B: Summary of MMSA and State Ratings**

RATINGS Midwest Heritage Bank					
Overall Bank: Lending Test Rating					
Midwest Heritage Bank	Satisfactory				
MMSA or State:					
State of Iowa	Satisfactory				
State of Kansas	Satisfactory				

## **Appendix C: Definitions and Common Abbreviations**

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/AA.

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 MSA 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/AA.

**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 MSA 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**

#### **Content of Standardized Tables**

A separate set of tables is provided for each state. All MMSAs, 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/AA. 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. AA 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 upperincome 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.** AA 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/AA. The table also presents aggregate peer data for the years the data is available.
- **Table U.** AA 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. AA 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/AA.

Table O: A	Asses	sment Area	Distrib	oution of	Home M	lortgag	ge Loans l	y Incom	e Cate	gory of th	e Geogra	phy							2021
	7	Гotal Home Mo	rtgage I	oans	Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$	% of Total	Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	00 0	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		00 0
2021 Ames MSA	27	4,580,873	8.5	3,978	3.0	3.7	1.7	0.0	0.0	0.0	76.4	74.1	75.6	20.6	22.2	22.7	0.0	0.0	0.0
2021 Des Moines MSA	230	46,455,591	72.1	42,658	2.8	1.3	1.6	18.8	12.2	13.0	41.4	35.2	38.6	37.0	51.3	46.7	0.0	0.0	0.0
2021 Lucas County	62	6,032,575	19.4	235	0.0	0.0	0.0	24.1	32.3	22.6	75.9	67.7	77.4	0.0	0.0	0.0	0.0	0.0	0.0
Total	319	57,069,039	100.0	46,871	2.7	1.3	1.6	16.7	15.0	12.0	46.2	44.8	41.9	34.4	38.9	44.5	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.

Midwest Heritage Bank FSB (10000712423) excluded from Aggregate.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: A	Asses	sment Area	Distrib	ution of	Home M	[ortgag	ge Loans b	y Income	e Cate	gory of the	e Geograp	phy							2022-23
	7	Гotal Home Mo	rtgage L	oans	Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$	% of Total	Overall Market	% 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
2022- 2023 Ames MSA	14	2,359,789	5.1	1,628	0.0	0.0	0.0	5.3	0.0	4.4	64.6	71.4	65.8	30.1	28.6	29.5	0.0	0.0	0.2
2022- 2023 Des Moines MSA	193	44,416,417	71.0	17,852	3.4	2.6	3.5	17.9	13.5	16.2	46.8	34.2	43.8	31.5	48.7	36.1	0.4	1.0	0.4
2022- 2023 Lucas County	65	9,678,064	23.9	197	0.0	0.0	0.0	22.4	32.3	27.9	77.6	67.7	72.1	0.0	0.0	0.0	0.0	0.0	0.0
Total	272	56,454,269	100.0	19,677	2.9	1.8	3.1	16.5	17.3	15.3	49.4	44.1	45.9	30.8	36.0	35.2	0.3	0.7	0.4

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: A	Assess	sment Area I	Distrib	ution of	Home M	ortgag	e Loans by	y Income	<b>Categ</b>	ory of the	Borrow	er							2021	
	,	Total Home Mo	rtgage L	oans	Low-Income Borrowers			Moderate	Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
2021 Ames MSA	27	4,580,873	8.5	3,978	18.6	3.7	6.7	17.7	18.5	18.2	24.9	22.2	22.6	38.8	40.7	34.4	0.0	14.8	18.2	
2021 Des Moines MSA	230	46,455,591	72.1	42,658	20.7	5.7	8.1	17.1	16.5	18.5	21.6	20.9	20.5	40.6	46.1	32.3	0.0	10.9	20.6	
2021 Lucas County	62	6,032,575	19.4	235	22.5	9.7	10.6	19.3	24.2	21.7	28.3	19.4	25.5	29.9	27.4	24.7	0.0	19.4	17.4	
Total	319	57,069,039	100.0	46,871	20.5	6.3	8.0	17.2	18.2	18.5	22.1	20.7	20.7	40.2	42.0	32.4	0.0	12.9	20.4	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.

Midwest Heritage Bank FSB (10000712423) excluded from Aggregate.

Table P: A	sses	sment Area I	Distribu	ıtion of l	Home M	ortgage	e Loans by	Income	Categ	ory of the	Borrowe	er							2022-23
		Total Home Mo	rtgage L	oans	Low-I	ncome B	orrowers	Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
2022-2023 Ames MSA	14	2,359,789	5.1	1,628	18.0	21.4	13.2	19.0	21.4	23.9	21.8	14.3	24.3	41.2	14.3	24.6	0.0	28.6	14.1
2022-2023 Des Moines MSA	193	44,416,417	71.0	17,852	19.9	7.8	9.9	17.8	16.6	21.1	21.6	15.0	22.1	40.7	37.8	29.6	0.0	22.8	17.3
2022-2023 Lucas County	65	9,678,064	23.9	197	22.0	16.9	11.7	16.8	20.0	23.9	26.9	18.5	21.8	34.4	32.3	31.5	0.0	12.3	11.2
Total	272	56,454,269	100.0	19,677	19.7	10.7	10.2	18.0	17.6	21.3	21.7	15.8	22.2	40.7	35.3	29.2	0.0	20.6	17.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2022-23

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	Tota	al Consumer Lo	oans	Low-Incom	e Tracts	Moderate-Inco	ome Tracts	Middle-Incor	me Tracts	Upper-Incon	ne Tracts	Not Available Tract	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans						
2022-2023 Overland Park MSA	20	1,156,812	100	1.3	0.0	6.7	5.0	38.6	10.0	53.4	85.0	0.0	0.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data.

Due to rounding, totals may not equal 100.0%.

Table V - Asses	ssment A	rea Distri	bution of	Consumer	Loans b	y Income (	Category	of the Born	ower				2022-23
	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income	e Borrowers	Upper-Income	Borrowers	Not Available-Income Borrowers	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
2022-2023 Overland Park MSA	20	1,156,812	100	14.4	15.0	13.2	25.0	17.3	0.0	55.1	60.0	0.0	0.0
Total	20	1,156,812	100	14.4	15.0	13.2	25.0	17.3	0.0	55.1	60.0	0.0	0.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data.

Due to rounding, totals may not equal 100.0%.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.