

## **PUBLIC DISCLOSURE**

November 28, 2022

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Manning Charter 3455

> 401 Main Street Manning, Iowa 51455

Office of the Comptroller of the Currency

13710 FNB Parkway Suite 110 Omaha, Nebraska 68154

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	2
Discriminatory or Other Illegal Credit Practices Review	3
State Rating	4
State of Iowa	۷
Lending Test	5
Appendix A: Scope of Examination	A-1
Appendix B: Summary of MMSA and State Ratings	B-1
Appendix C: Definitions and Common Abbreviations	C-1
Appendix D: Tables of Performance Data	D-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:

- The Lending Test rating is based on performance in the State of Iowa.
- The First National Bank of Manning's (FNB) loan-to-deposit (LTD) ratio is reasonable when considering the bank's size, financial condition, and the credit needs of its assessment area (AA).
- FNB originates a majority of its loans to customers located inside the AA.
- The borrower distribution of loans to farms of different sizes is satisfactory.
- There were no complaints regarding FNB's performance in meeting the credit needs of its AA.

#### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and the credit needs of the AA, FNB's loan-to-deposit ratio is reasonable. FNB's average quarterly LTD ratio is 58 percent for the twelve quarters from March 31, 2019 to December 31, 2021. The ratio ranged from an average quarterly low of 37 percent, to an average quarterly high of 78 percent.

FNB's LTD ratio is below the average quarterly LTD ratio of 76 percent for three similarly situated institutions. The similarly situated banks utilized for comparison purposes are community banks serving the AA, are of similar asset size, and have similar primary loan products. All institutions used in the LTD ratio analysis experienced a declining LTD ratio quarter-to-quarter over the evaluation period. FNB's lending level is reasonable and meets the criteria for satisfactory performance.

#### **Lending in Assessment Area**

A majority of FNB's loans were originated inside its AA.

FNB originated and purchased 70 percent of its total loans to farms inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
	Number of Loans				Total	Dollar .	Total			
Loan Category	Ir	side	le Outside		Total "	Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Small Farm	14	70	6	30	20	2,385	74	836	26	3,221
Total	14	70	6	30	20	2,385	74	836	26	3,221

#### **Description of Institution**

FNB is a single-state, single-branch \$90 million bank headquartered in Manning, Iowa. The only branch has a drive-up facility and an automated teller machine (ATM). Manning is located in Carroll County, Iowa, which has a population of approximately 21,000 people. FNB is owned by Manning Financial Services, Inc., a one-bank holding company also headquartered in Manning, Iowa. As of December 31, 2021, the holding company had total assets of \$14.9 million. FNB has not opened or closed any locations since the last CRA examination.

FNB's primary business focus is consistent with the traditional community bank model. The bank offers a full range of credit products within its AA, including agricultural, commercial, home mortgage, and consumer loans. As of December 31. 2021, FNB reported \$16.6 million in agricultural loans, \$8.8 million in commercial loans, \$4.8 million in home mortgage loans, and \$1.0 million in consumer loans.

For the purposes of CRA, FNB operates with one rating area and one AA. FNB's rating area is the State of Iowa. The AA includes parts of Carroll, Crawford, Audubon, and Shelby counties, which are not included in a metropolitan statistical area (MSA). The AA will be referred to as the Iowa Non-MSA AA for the purpose of this evaluation.

There are no legal or financial impediments limiting the bank's ability to help meet community credit needs. FNB was rated "Satisfactory" at the last CRA examination dated August 6, 2018.

## **Scope of the Evaluation**

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

FNB was evaluated under the Small Bank examination procedures, which includes a Lending Test for the state of Iowa. The Lending test evaluates the bank's record of meeting the credit needs of its AA through lending activities. The Small Bank examination procedures do not include the Community Development Test.

The Lending Test covers FNB's performance from January 1, 2019 to December 31, 2021. The Office of the Comptroller of the Currency (OCC) reviewed agricultural loans, as this loan type was determined to be the primary loan product originated by FNB in the AA during the evaluation period. Examiners reviewed a sample of 20 agricultural loans to complete the lending analysis.

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

Percentage of Loan Originations (January 1, 2019 through December 31, 2021)								
Loan Type Percentage by Number Percentage by Dollar								
Business Loans	27%	27%						
Consumer Loans	30%	6%						
Home Loans	5%	9%						
Agricultural Loans	38%	58%						

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

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

In each state where FNB has an office, one or more of the AAs within that state were 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**

FNB's overall rating is based on performance in the State of Iowa, as this is the only rating area.

The state rating is based on performance in FNB's one AA. Refer to the "Scope" section under each state.

## **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 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 to farms of different sizes is reasonable.

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

FNB operates one branch with a drive-thru teller and one ATM located in Manning, Iowa in Carroll County. The city of Manning is situated in western Iowa and has a strong agricultural presence. FNB's AA consists of five census tracts (CTs) among the four counties of Shelby, Crawford, Carroll, and Audubon.

All five CTs in the AA are designated as middle-income, remote rural, and underserved geographies. Additionally, CT 701 in Audubon County is designated as distressed and affected by population loss. The total population of the AA is 11,672, with 3,349 families and 4,843 households, according to the 2015 ACS U.S. Census. Approximately 17 percent of families are low-income, 16 percent are moderate-income, 24 percent are middle-income, and 43 percent are upper income. The median family income is \$61,681 and 6.2 percent of families live below the poverty level. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies. A map of the AA can be found in FNB's CRA public file.

Competition in the AA is moderate. FNB reported approximately \$64 million in deposits as of June 30, 2021. Seventeen other deposit-taking financial institutions with 49 branches serve the State of Iowa Non-MSA AA. FNB holds the 14<sup>th</sup> largest deposit market share of the 18 institutions operating in the AA with 2.44 percent of total deposits.

The OCC relies on community representatives to gain additional insight of the AA during the examination. Representatives from two organizations involved in the economic development of western Iowa were interviewed. Both representatives report agriculture as the main industry in the AA and describe the local economy as strong and stable. The sources identify the primary financial needs of the area are agricultural lending, start-up lending, and affordable housing. It is the opinion of both contacts that the financial institutions are meeting the credit needs in the area and are unaware of any discriminatory or unlawful practices.

#### **State of Iowa Non-MSA**

Table A – Demographic Information of the Assessment Area										
Assessment Area: State of Iowa Non-MSA										
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #				
Geographies (Census Tracts)	5	0.0	0.0	100.0	0.0	0.0				
Population by Geography	11,672	0.0	0.0	100.0	0.0	0.0				
Housing Units by Geography	5,311	0.0	0.0	100.0	0.0	0.0				
Owner-Occupied Units by Geography	3,814	0.0	0.0	100.0	0.0	0.0				
Occupied Rental Units by Geography	1,029	0.0	0.0	100.0	0.0	0.0				
Vacant Units by Geography	468	0.0	0.0	100.0	0.0	0.0				
Businesses by Geography	1,281	0.0	0.0	100.0	0.0	0.0				
Farms by Geography	449	0.0	0.0	100.0	0.0	0.0				
Family Distribution by Income Level	3,349	16.7	16.4	23.8	43.1	0.0				
Household Distribution by Income Level	4,843	21.2	14.5	19.5	44.8	0.0				
Median Family Income Non-MSAs - IA		\$61,681	Median Hou	sing Value		\$100,523				
			Median Gro	ss Rent		\$522				
			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.

### **Scope of Evaluation in Iowa**

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

Refer to the table in Appendix A for a description of the AA under review.

#### LENDING TEST

FNB's performance under the Lending Test in Iowa is rated Satisfactory.

## Conclusions for State of Iowa Non-MSA AA Receiving a Full-Scope Review

Based on a full-scope review, FNB's performance in the State of Iowa Non-MSA AA is reasonable.

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

An analysis of the geographic distribution of loans by income level of the geography was not meaningful as the AA does not contain any low- or moderate-income geographies.

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

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

#### Small Loans to Farms

The distribution of loans to farms of different sizes reflects reasonable penetration. The majority of FNB's agricultural loans, 75 percent by number and 60 percent by dollar, are to farms with gross annual revenues of \$1 million or less. FNB's performance exceeds the aggregate performance by banks in the AA of 67 percent by number. In our sample of 20 agricultural loans, zero were to farms with gross revenues greater than \$1 million, and revenue data was unavailable for 25 percent of the sample.

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

#### **Responses to Complaints**

There were no complaints relating to FNB's CRA performance 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:	01/01/2019 - 12/31/2021	
Bank Product Reviewed:	Small farm	
List of Assessment Areas and Ty	oe of Examination	
Rating and Assessment Areas	Type of Exam	Other Information
State of Iowa Non-MSA	Full-scope	Includes census tracts in Audubon, Carroll, Crawford, and Shelby Counties.

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

RATINGS First National Bank of Manning								
Overall Bank: Lending Test Rating								
First National Bank of Manning	Satisfactory							
MMSA or State:								
State of Iowa	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/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**

#### **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 30th 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 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.** 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 upperincome geographies to the percentage distribution of households in those geographies.
- **Table V.** Assessment Area Distribution of Consumer Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2019-21											
		Total Loans to Farms				Farms with Revenues <= 1MM			Revenues >	Farms with Revenues Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
State of Iowa Non MSA	20	4,115	100	324	98.7	75	67.0	0.7	0	0.7	25
Total	20	4,115	100	324	98.7	75	67.0	0.7	0	0.7	25

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