



PUBLIC DISCLOSURE

October 19, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank Minnesota
Charter Number 1794

226 West Nassau Street
St Peter, MN 56082

Office of the Comptroller of the Currency
222 9th Street S, Suite 800
Minneapolis, MN 55402

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.....	4
State of Minnesota Rating.....	4
Lending Test	8
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of 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 supporting this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable.
- The bank originated a majority of its loans inside its assessment area (AA).
- The distribution of loans to borrowers of different income levels is reasonable.
- The distribution of loans to geographies of different income levels and business of different sizes is reasonable.

Loan-to-Deposit Ratio

First National Bank Minnesota's (FNB MN) LTD ratio is reasonable considering the bank's size, financial condition, and credit needs of its AAs.

FNB MN's LTD ratio averaged 79.4 percent over the 19 quarters since the previous CRA evaluation, with a low of 68.6 percent in the second quarter of 2015 and a high of 93.2 percent in the first quarter of 2019. FNB MN ranked third out of five similarly situated institutions. Similarly situated institutions operate in or near the bank's AAs and have a similar asset size. The following table shows the bank's LTD ratio compared to similarly situated institutions.

Institution (Headquarters)	Total Assets (\$000s)	Average LTD Ratio (%)
Community Bank Mankato (Vernon Center, MN)	\$333,412	99.7
Minnstar Bank NA (Lake Crystal, MN)	\$142,744	93.9
First National Bank Minnesota (St Peter, MN)	\$214,578	79.4
Cornerstone State Bank (Montgomery, MN)	\$174,136	70.4
Progrowth Bank (Nicollet, MN)	\$148,659	66.0

Source: Total assets are based on December 31, 2019, Call Report data.

Lending in Assessment Area

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

FNB MN originated and purchased 75 percent of its total loans by number and 85.5 percent by dollar volume inside its AAs during the evaluation period. This analysis is performed at the bank level, rather than the AA level. To determine lending inside the AA, we analyzed 20 home mortgage, 20 small business, and 60 consumer loans originated between January 1, 2017, and December 31, 2019. Refer to the table below to view lending inside and outside of the bank's AA.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total#	Dollar Amount of Loans \$(000s)				Total\$ (000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	19	95.0	1	5.0	20	1,892	95.7	85	4.3	1,977
Small Business	8	40.0	12	60.0	20	2,016	79.2	529	20.8	2,545
Consumer	48	80.0	12	20.0	60	739	80.6	177	19.4	916
Total	75	75.0	25	25.0	100	4,647	85.5	791	14.5	5,438

**Source: Home mortgage, small business, and consumer loan samples*

Description of Institution

FNB MN is a single-state, national bank headquartered in Saint Peter, Minnesota (MN). As of December 31, 2019, the bank had total assets of approximately \$215 million. FNB MN is wholly owned by its holding company, Banccommunity Service Corporation, also headquartered in Saint Peter, MN. FNB MN did not have any merger or acquisition activity during the evaluation period. The bank does not operate any subsidiaries or affiliates.

During the evaluation period, FNB MN operated three full-service branches located in Gaylord, Mankato, and Saint Peter, MN. See the Description of Operations in the State of Minnesota section of this performance evaluation for additional branch and ATM information. For CRA purposes, FNB MN operates only within the State of MN. The MN rating area consists of the Mankato MSA AA, the Minneapolis MSA AA, and the MN Non-MSA AA.

FNB MN offers a variety of traditional banking products and services. The bank's primary lending focus is commercial loans. Available commercial products include commercial real estate, term loans, and revolving lines of credit. FNB MN also offers consumer lending products including home mortgage loans (i.e. home construction, home purchase, home equity), installment loans (i.e. new and used auto, recreational vehicles), and revolving lines of credit.

As of December 31, 2019, net loans and leases represented 77.7 percent of total assets. Based on dollar volume outstanding, the loan portfolio was comprised of 54.7 percent commercial loans, 21.6 percent home mortgage loans, 19.6 percent agriculture loans, and 4.1 percent consumer loans. Tier 1 capital totaled \$19.7 million and represented 9.2 percent of total assets at the end of the evaluation period.

FNB MN staff are active in the communities the bank serves. Several bank employees volunteer with local organizations including those supporting low- and moderate-income (LMI) individuals and school districts located in LMI geographies. FNB MN also made donations to organizations supporting LMI individuals and geographies.

There are no known financial, legal, or other factors impeding FNB MN's ability to help meet its AA's credit needs. FNB MN received an 'Outstanding' rating in its previous CRA performance evaluation, dated June 22, 2015.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the LTD ratio analysis covered June 30, 2015, to December 31, 2019. The Lending Test and the complaint review evaluation periods covered January 1, 2017 to December 31, 2019. We reviewed samples of commercial, home mortgage, and consumer loans from the evaluation period. We determined the bank's primary loan products by reviewing the number and dollar volume of loan originations and purchases during the evaluation period. The primary products for the Mankato MSA AA are commercial and consumer. The primary products for the Gaylord branch (Minneapolis MSA AA in 2017-2018 and MN Non-MSA AA in 2019) are home mortgage and consumer. Refer to the table below to view the bank's total loan originations and purchases by dollar and number during the evaluation period:

Total Loan Originations by Product Type		
	Percentage by Dollar Volume	Percentage by Number of Loans
Agriculture	24.5	11.0
Commercial	48.9	27.4
Consumer	8.0	50.1
Home Mortgage	18.6	11.5
Total	100.0	100.0

Demographic data is used in part to determine the bank's lending performance. All consumer and home mortgage loans originated or purchased are compared to the 2015 American Community Survey (ACS) data, and all commercial loans originated are compared to the Dunn and Bradstreet business data for the origination year.

We reviewed each AA's financial, economic, and environmental factors to determine the bank's lending performance. We also contacted two community members with knowledge of the area's economic conditions and demographics to gather additional insight on lending needs in the AAs.

With a December 31, 2019, evaluation period end date, qualifying activities performed in response to the significant impact the coronavirus pandemic has had on economies across the United States is not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

Ratings

FNB MN's overall CRA rating is based solely on the State of MN rating, as it is the bank's only rating area. We evaluated lending performance using five performance criteria: the LTD ratio; lending in the AAs; distribution of loans to geographies of different income levels; lending to borrowers of different income levels and businesses of different sizes; and responses to CRA-related complaints.

The Mankato MSA AA received the most weight because 91 percent of total bank loans by number and 89 percent of deposits are from the Mankato MSA AA. Commercial loans received the most weight in the Lending Test analysis as they are the largest loan portfolio by dollar volume and had a large percentage of the bank's total volume of loans originated and purchased during the evaluation period. Consumer loans received the second most weight as they represented the highest number of originations

and purchases during the evaluation period. Home mortgage loans are a primary product for the Gaylord branch (Minneapolis MSA AA in 2017-2018 and MN Non-MSA AA in 2019) because they represented 61 percent of total loans by dollar and 23 percent by number for the Gaylord branch during the evaluation period; however, home mortgage loans receive the least weight in the analysis.

FNB MN has three AAs: the Mankato MSA AA; the Minneapolis MSA AA; and the MN Non-MSA AA. Refer to Appendix A-1 for an outline of the examination scope.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) in determining a national bank's 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 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 Minnesota

CRA rating for the State of Minnesota: Satisfactory

The Lending Test is rated: Satisfactory

The major factors supporting this rating include:

- The distribution of loans throughout geographies of different income levels is reasonable.
- The distribution of loans among borrowers of different income levels and businesses of different sizes is reasonable.
- The bank received no CRA-related complaints during the evaluation period.

Description of Institution's Operations in Minnesota

Mankato MSA AA

The Mankato MSA AA consists of 23 census tracts (CTs) in Blue Earth and Nicollet counties. FNB MN operates two full-service branches in the Mankato MSA, located in Mankato and Saint Peter, MN. These two branches account for 67 percent of the bank's branch network.

The June 30, 2019, FDIC Deposit Market Share Report indicated FNB MN had \$162.7 million or 89.2 percent of its deposits in the Mankato MSA AA. FNB MN ranks fifth of 22 deposit-taking institutions in the AA with a 6.7 percent deposit market share. The market leader is Wells Fargo, NA, with a 23 percent market share, followed by Community Bank Mankato and US Bank, NA, with an 11 percent market share each.

The bank's primary business focus in the Mankato MSA is commercial loans followed by consumer loans. Considering all loans originated and purchased in the Mankato MSA AA during the evaluation period, commercial loans represented 29.7 percent by number and 49.9 percent by dollar volume, and consumer loans represented 47.8 percent by number and 7.6 percent by dollar volume.

We contacted a community member working for the city of North Mankato. The contact indicated the overall economy is good and jobs are available for qualified workers; however, some unemployed workers do not qualify for available jobs or wages are lower than some workers desire. The contact also stated housing is a significant need in the area due to the growing population, low supply, and high prices.

The following table provides information on the Mankato MSA's demographic composition for 2019.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Mankato MSA - 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.0	17.4	78.3	4.3	0.0
Population by Geography	98,211	0.0	15.0	81.2	3.9	0.0
Housing Units by Geography	39,974	0.0	14.3	82.1	3.6	0.0
Owner-Occupied Units by Geography	25,266	0.0	7.7	87.3	5.0	0.0
Occupied Rental Units by Geography	12,210	0.0	26.9	72.2	0.9	0.0
Vacant Units by Geography	2,498	0.0	19.8	77.1	3.1	0.0
Businesses by Geography	7,020	0.0	19.1	77.5	3.5	0.0
Farms by Geography	724	0.0	3.3	85.9	10.8	0.0
Family Distribution by Income Level	22,825	19.7	17.6	23.8	38.8	0.0
Household Distribution by Income Level	37,476	24.1	16.5	17.7	41.7	0.0
Median Family Income MSA - 31860 Mankato, MN MSA		\$71,814	Median Housing Value			\$165,158
<i>Source: 2015 ACS and 2019 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.</i>			Median Gross Rent			\$745
			Families Below Poverty Level			8.1%

Minneapolis MSA

The Minneapolis MSA AA consists of 50 CTs in Carver, Le Sueur, Scott, and Sibley counties. FNB MN operated one full-service branch in the Minneapolis MSA AA in 2017-2018. The branch is located in Gaylord, MN, and accounts for 33 percent of the bank's branch network.

The June 30, 2018, FDIC Deposit Market Share Report indicated FNB MN had \$19.5 million or 10.9 percent of its deposits in the Minneapolis MSA AA. FNB MN ranks 35th of 37 deposit-taking institutions in the AA with a deposit market share of 0.4 percent. The market leaders are Klein Bank and Wells Fargo, NA, with 26.7 percent and 16.9 percent, respectively.

The bank's primary business focus in the Minneapolis MSA AA is consumer and home mortgage loans. Considering all loans originated and purchased in the Minneapolis MSA AA during the evaluation period, consumer loans represented 75.9 percent by number and 37.0 percent by dollar volume, and home mortgage loans represented 18.5 percent by number and 53.1 percent by dollar volume.

We contacted a community member who is an employee with the City of Gaylord. The contact stated the local economy is good, and individuals seeking work have been able to find and maintain jobs. The contact stated one of the area's largest employers is planning to expand operations and add jobs. The contact also stated there is a need for affordable housing due to population growth in the local area.

The following table provides information on the Minneapolis MSA AA's demographic composition for 2018.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Minneapolis MSA - 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	50	0.0	20.0	40.0	40.0	0.0
Population by Geography	275,765	0.0	13.1	45.5	41.4	0.0
Housing Units by Geography	103,608	0.0	15.6	46.4	38.0	0.0
Owner-Occupied Units by Geography	80,128	0.0	12.8	44.4	42.8	0.0
Occupied Rental Units by Geography	17,951	0.0	22.2	56.1	21.7	0.0
Vacant Units by Geography	5,529	0.0	34.4	42.9	22.6	0.0
Businesses by Geography	19,336	0.0	11.6	43.9	44.5	0.0
Farms by Geography	1,510	0.0	23.4	49.3	27.3	0.0
Family Distribution by Income Level	73,392	14.7	17.1	22.9	45.3	0.0
Household Distribution by Income Level	98,079	17.5	14.2	18.5	49.8	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN- WI MSA		\$85,636	Median Housing Value			\$244,082
<i>Source: 2015 ACS and 2018 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.</i>			Median Gross Rent		\$953	
			Families Below Poverty Level		4.0%	

MN Non-MSA

The MN Non-MSA AA consists of four CTs in Sibley county. Due to the US Office of Management and Budget MSA boundary changes, the bank's Gaylord, MN branch is evaluated under the MN Non-MSA AA for 2019.

The June 30, 2019, FDIC Deposit Market Share Report indicated that FNB MN had \$19.7 million or 10.8 percent of its deposits in the MN Non-MSA AA. FNB MN ranks sixth of 10 deposit-taking institutions in the AA with a deposit market share of 7.5 percent. The market leader is Minnwest Bank with a 24 percent market share, followed by Arlington State Bank and ProGrowth Bank with a 17 percent market share each.

FNB MN's primary business focus in the MN Non-MSA AA is consumer and home mortgages loans. Considering all loans originated and purchased in the MN Non-MSA AA during the evaluation period, consumer loans represented 68.4 percent by number and 16.1 percent by dollar volume, and home mortgage loans represented 31.6 percent by number and 83.9 percent by dollar volume.

Since this AA has the same branch location as the Minneapolis MSA AA above, we did not complete a separate community contact.

The following table provides information on the MN Non-MSA AA's demographic composition for 2019.

Table A – Demographic Information of the Assessment Area							
Assessment Area: MN Non-MSA - 2019							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	4	0.0	0.0	100.0	0.0	0.0	
Population by Geography	15,021	0.0	0.0	100.0	0.0	0.0	
Housing Units by Geography	6,538	0.0	0.0	100.0	0.0	0.0	
Owner-Occupied Units by Geography	4,732	0.0	0.0	100.0	0.0	0.0	
Occupied Rental Units by Geography	1,282	0.0	0.0	100.0	0.0	0.0	
Vacant Units by Geography	524	0.0	0.0	100.0	0.0	0.0	
Businesses by Geography	946	0.0	0.0	100.0	0.0	0.0	
Farms by Geography	290	0.0	0.0	100.0	0.0	0.0	
Family Distribution by Income Level	4,122	25.3	25.6	26.4	22.7	0.0	
Household Distribution by Income Level	6,014	28.8	19.6	22.4	29.2	0.0	
Median Family Income Non-MSAs - MN		\$63,045	Median Housing Value			\$132,427	
<i>Source: 2015 ACS and 2019 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.</i>			Median Gross Rent			\$640	
			Families Below Poverty Level			7.4%	

Scope of Evaluation in Minnesota

We completed full-scope reviews for the Mankato MSA AA, the Minneapolis MSA AA, and the MN Non-MSA AA.

The Mankato MSA AA received the most weight due to the volume of branches, deposits, and loan originations located in this AA.

Refer to Appendix A-1 for additional information.

LENDING TEST

The bank's performance under the Lending Test in Minnesota is rated Satisfactory.

Distribution of Loans by Income Level of the Geography

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

Small Loans to Businesses

The bank exhibits satisfactory geographic distribution of loans to small businesses in the State of MN. Refer to Table Q in the State of MN section of Appendix D-4 for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Mankato MSA (2017 – 2019)

The geographic distribution of small loans to businesses in CTs of different income levels in the Mankato MSA AA is adequate. FNB MN's loans to small businesses located in a moderate-income geography is somewhat lower than both the demographic and aggregate comparators. Low-income CTs were not considered in our analysis because there were no low-income CTs within the AA during the evaluation period.

Consumer Loans

The bank exhibits satisfactory distribution of consumer loans in the State of MN. Refer to Tables U1 – U3 in the State of MN section of Appendix D-5 for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Mankato MSA (2017 – 2019)

The distribution of consumer loans to geographies of different income levels in the Mankato MSA AA is adequate. FNB MN's consumer loan originations in moderate-income geographies is lower than the demographic comparator. The AA's moderate-income CTs are located in downtown Mankato, and there are no moderate-income CTs in Nicollet county where the bank's St Peter branch is located. Low-income CTs were not considered in our analysis because there were no low-income CTs within the AA during the evaluation period.

Minneapolis MSA (2017 – 2018)

The distribution of consumer loans to geographies of different income levels in the Minneapolis MSA AA is excellent. FNB MN's consumer loan originations in moderate-income geographies significantly exceeds the demographic comparator. Low-income CTs were not considered in our analysis because there were no low-income CTs within the AA during the evaluation period.

MN Non-MSA (2019)

The geographical distribution test is not meaningful for the MN Non-MSA because there were no low- or moderate-income CTs within the AA during the evaluation period.

Home Mortgage Loans

The bank exhibits excellent geographic distribution of home mortgage loans in the State of MN. Refer to Table O in the State of MN section of Appendix D-3 for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Minneapolis MSA (2017 – 2018)

The geographic distribution of home mortgage loans to geographies of different income levels in the Minneapolis MSA AA is excellent. FNB MN's home mortgage loan originations in moderate-income geographies significantly exceeds both the demographic and aggregate comparators. Low-income CTs were not considered in our analysis because there were no low-income CTs within the AA during the evaluation period.

Minnesota Non-MSA (2019)

The bank only originated 12 home mortgage loans in the Minnesota Non-MSA AA. While this represented 84 percent of the Gaylord branch's dollar volume of originations for 2019, the number of home mortgage loans is too low to complete a meaningful analysis.

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 of different sizes.

Small Loans to Businesses

The bank exhibits a satisfactory distribution of loans to businesses of different sizes in the State of MN. Refer to Table R in the State of MN section of Appendix D-4 for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Mankato MSA (2017 – 2019)

The distribution of loans to businesses of different sizes in the Mankato MSA is adequate. FNB MN's loans to small businesses is lower than the demographic comparator and somewhat lower than the aggregate comparator. FNB MN also originated 20 percent of loans in our sample to businesses without financial information, which significantly exceeds the demographic comparator. The loans were made through a local leasing company that underwrites and guarantees the loans, so FNB MN does not receive financial information for these customers.

Consumer Loans

The bank exhibits an excellent distribution of loans to individuals of different income levels in the State of MN. Refer to Tables V1-V3 in the State of MN section of Appendix D-6 for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Mankato MSA (2017 – 2019)

The borrower distribution of consumer loans to borrowers of different income levels in the Mankato MSA AA is excellent. FNB MN's consumer loan originations to low-income borrowers is lower than the demographic comparator, but originations to moderate-income borrowers significantly exceeds the demographic comparator.

Minneapolis MSA (2017 – 2018)

The borrower distribution of consumer loans to borrowers of different income levels in the Minneapolis MSA AA is excellent. FNB MN's consumer loan originations to low- and moderate-income borrowers both significantly exceed the demographic comparators.

MN Non-MSA (2019)

The borrower distribution of consumer loans to borrowers of different income levels in the MN Non-MSA AA is good. FNB MN's consumer loan originations to low-income borrowers is lower than the demographic comparator, but originations to moderate-income borrowers significantly exceeds the demographic comparator.

Home Mortgage Loans

The bank exhibits excellent distribution of loans to individuals of different income levels in the State of MN. Refer to Table P in the State of MN section of Appendix D-3 for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Minneapolis MSA (2017 – 2018)

The borrower distribution of home mortgage loans to borrowers of different income levels in the Minneapolis MSA AA is excellent. FNB MN's home mortgage originations to both low- and moderate-income borrowers significantly exceeds both the demographic and aggregate comparators.

Minnesota Non-MSA (2019)

The bank only originated 12 home mortgage loans in the Minnesota Non-MSA AA. While this represented 84 percent of the Gaylord branch's dollar volume of originations for 2019, the number of home mortgage loans is too low to complete a meaningful analysis.

Responses to Complaints

FNB MN did not receive any CRA related complaints during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation and loan products considered. The table also reflects the AAs 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:	1/1/2017 – 12/31/2019	
Bank Products Reviewed:	Home mortgage, small business, consumer loans	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Minnesota		
Mankato MSA	Full-Scope	Counties of Blue Earth and Nicollet
Minneapolis MSA	Full-Scope	Counties of Carver, Le Sueur, Scott, and Sibley
MN Non-MSA	Full-Scope	County of Sibley

Appendix B: Summary of State Ratings

RATING – First National Bank Minnesota	
Overall Bank	Lending Test Rating
Satisfactory	Satisfactory
State:	
Minnesota	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.

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.

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 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.

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.

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. 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 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 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 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.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-2018		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% 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		
Minneapolis MSA 2017-2018	18	1,493	100	12,791	0.0	0.0	0.0	12.8	88.9	9.3	44.4	11.1	43.5	42.8	0.0	47.2	0.0	0.0	0.0		
Total	18	1,493	100	12,791	0.0	0.0	0.0	12.8	88.9	9.3	44.4	11.1	43.5	42.8	0.0	47.2	0.0	0.0	0.0		

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-2018		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Minneapolis MSA 2017-2018	18	1,493	100	12,791	14.7	22.2	7.6	17.1	38.9	19.3	22.9	27.8	23.2	45.3	11.1	34.4	0.0	0.0	15.5		
Total	18	1,493	100	12,791	14.7	22.2	7.6	17.1	38.9	19.3	22.9	27.8	23.2	45.3	11.1	34.4	0.0	0.0	15.5		

*Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-2019		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Mankato MSA 2017-2019	20	2,995	100	1,497	0.0	0.0	0.0	19.1	15.0	20.0	77.5	80.0	75.6	3.5	5.0	4.3	0.0	0.0	0.0		
Total	20	2,995	100	1,497	0.0	0.0	0.0	19.1	15.0	20.0	77.5	80.0	75.6	3.5	5.0	4.3	0.0	0.0	0.0		

*Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Mankato MSA 2017-2019	20	2,995	100	1,497	80.3	35.0	49.2	6.3	45.0	13.3	20.0		
Total	20	2,995	100	1,497	80.3	35.0	49.2	6.3	45.0	13.3	20.0		

*Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table U-1: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-2019	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Mankato MSA 2017-2019	60	1,286	100	0.0	0.0	13.9	5.0	82.4	95.0	3.7	0.0	0.0	0.0	
Total	60	1,286	100	0.0	0.0	13.9	5.0	82.4	95.0	3.7	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0%

Table U-2: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-2018	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Minneapolis MSA 2017-2018	20	526	100	0.0	0.0	14.6	95.0	46.6	5.0	38.9	0.0	0.0	0.0	
Total	20	526	100	0.0	0.0	14.6	95.0	46.6	5.0	38.9	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0%

Table U-3: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2019	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
MN Non-MSA 2019	23	150	100	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0	
Total	23	150	100	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Mankato MSA 2017-2019	60	1,286	100	24.1	16.7	16.5	33.3	17.7	28.3	41.7	21.7	0.0	0.0
Total	60	1,286	100	24.1	16.7	16.5	33.3	17.7	28.3	41.7	21.7	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Minneapolis MSA 2017-2018	20	526	100	17.5	35.0	14.2	30.0	18.5	15.0	49.8	20.0	0.0	0.0
Total	20	526	100	17.5	35.0	14.2	30.0	18.5	15.0	49.8	20.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
MN Non-MSA 2019	23	150	100	28.8	8.7	19.6	39.1	22.4	13.0	29.2	39.1	0.0	0.0
Total	23	150	100	28.8	8.7	19.6	39.1	22.4	13.0	29.2	39.1	0.0	0.0

Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0%