



## **PUBLIC DISCLOSURE**

September 19, 2022

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

American Heritage National Bank  
Charter Number: 15037

24 2nd Street South  
Long Prairie, MN 56347

Office of the Comptroller of the Currency

123 3rd Ave E. Suite 400  
Alexandria, MN 56308-0849

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:

- The bank originated a majority of its loans inside its assessment areas (AAs).
- The bank's loan-to-deposit (LTD) ratio is reasonable.
- The geographic distribution of loans reflects reasonable dispersion throughout census tracts (CTs) of different income levels.
- The bank exhibits excellent distribution of loans to business of different sizes and individuals of different income levels.
- The bank received no CRA related complaints.

## Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and the credit needs of the AAs, the bank's LTD ratio is reasonable.

The bank's LTD ratio averaged 68.83 percent over the prior 12 quarters since the previous CRA examination. The LTD ratio ranged from a low of 58.78 on March 31, 2022 to a high of 82.08 percent on June 30, 2019. The large decline in the LTD ratio is due to deposit growth associated with COVID-19 stimulus programs. The bank strategically invested those funds in short-term securities in anticipation of deposit runoff. The bank ranks fifth among six similarly sized banks. Similarly situated banks are defined as banks operating within the AA with total assets between \$366 million to \$615 million.

<b>Loan-to-Deposit Ratios for Similar Situated Banks</b>		
<b>Bank</b>	<b>Total Assets as of 6/30/2022 \$(000s)</b>	<b>Average LTD Ratio (%)</b>
BankVista	\$453,909	103.85%
Highland Bank	\$623,830	82.33%
Star Bank	\$382,867	80.79%
First Bank Elk River	\$366,491	75.56%
<b>American Heritage</b>	<b>\$533,477</b>	<b>68.83%</b>
The Bank of Elk River	\$615,800	63.79%

## Lending in Assessment Area

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

The bank originated and purchased 69.18 percent by number and 42.23 percent by dollar of its loans inside its AA during the evaluation period. To evaluate the bank's lending inside and outside its AA we sampled 60 business loans and Home Mortgage Disclosure Act (HMDA) data.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	50	83.3	10	16.7	60	6,966	80.9	1,648	19.1	8,614
Home Mortgage	60	60.6	39	39.4	99	20,428	36.3	35,813	63.7	56,240
<b>Total</b>	<b>110</b>	<b>69.18</b>	<b>49</b>	<b>30.82</b>	<b>159</b>	<b>27,394</b>	<b>42.23</b>	<b>37,461</b>	<b>57.76</b>	<b>64,855</b>

*Source: Bank Data, HMDA Data  
Due to rounding, totals may not equal 100.0%*

## Description of Institution

American Heritage National Bank (AHNB) is a \$550 million single state national bank headquartered in Long Prairie, Minnesota. AHNB primarily serves the St. Cloud Metropolitan Statistical Area (MSA), portions of Todd County, and the cities of Clearwater and Clear Lake. AHNB is wholly-owned by American Heritage Holding Company, a one bank holding company located in St. Cloud, Minnesota. The bank does not have any affiliates or subsidiaries. There have been no changes to the bank's branches since the previous CRA evaluation.

The bank is a full-service community bank offering traditional products and services, such as various checking and savings accounts and retail and commercial lending products. As of December 31, 2021, the bank's loan portfolio totaled \$298 million or 54 percent of total assets. Business loans comprised 84 percent, home mortgages totaled 13 percent, farm loans totaled 2 percent, and consumer loans totaled 1 percent of the loan portfolio by dollar value. Tier 1 capital totaled \$48.9 million.

AHNB has one CRA rating area, which consists of the state of Minnesota (MN). The MN rating area includes three AAs: the St. Cloud Metropolitan Statistical Area (MSA) AA, the MN Non-MSA AA, and the Minneapolis MSA AA. The St. Cloud AA consists of Benton County and portions of Stearns County. The MN Non-MSA AA consists of portions of Todd County. The Minneapolis AA consists of a small portion of Sherburne and Wright Counties.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA. The bank received a Satisfactory rating at the prior CRA examination dated July 1, 2019.

## Scope of Evaluation

## **Evaluation Period/Products Evaluated**

We evaluated AHNB performance using small bank performance standards, which consists of the Lending Test. The evaluation period for the LTD ratio analysis covered June 30, 2019 to June 30, 2022. The complaints analysis period was July 2, 2019 to September 19, 2022, which coincides with the time period since the last CRA evaluation. The evaluation period for the remaining portions of the Lending Test covered January 1, 2019 to December 31, 2021.

We selected the primary loan products based on the number and dollar volume of loan originations during the evaluation period. We determined AHNB's primary products to be business loans and home mortgage loans in the St. Cloud AA and business loans in the MN Non-MSA and Minneapolis AAs. We relied on HMDA Data and a random sample of business loans originated during the evaluation period to complete the Lending Test analysis.

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

The St. Cloud AA and the MN Non-MSA AA were selected for full-scope reviews as the vast majority of lending and deposit volume occurs in these AAs. The Minneapolis AA was selected for limited-scope review given the low volume of lending in this AA. The Minneapolis AA holds 3.90 percent of total loans by dollar volume and 2.56 percent of the bank's deposits.

## **Ratings**

The bank's overall rating is based on the lending performance in the state of Minnesota rating area. The Minnesota rating area performance is based on the performance in all three AAs. We evaluated lending performance using five performance criteria: the LTD ratio, lending in the AA, lending to borrowers of different sizes, the geographic distribution of loans, and responses to CRA-related complaints.

## **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 Minnesota**

#### **CRA rating for the State of Minnesota: Satisfactory**

#### **The Lending Test is rated: Satisfactory**

The major factors that support this rating include:

- The overall geographic distribution reflects reasonable dispersion throughout the AAs.
- The overall borrower distribution of loans reflects excellent penetration throughout the AAs.
- The bank received no CRA related complaints.

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

AHNB has three AAs in the state of Minnesota including a large portion of the St. Cloud MSA, six CTs in Todd County, and three CTs in the Minneapolis-St. Paul MSA. The bank operates six full-service branches in the state of Minnesota. Three branches are located within the St. Cloud AA, including two in St. Cloud and one in Avon. The St. Cloud AA consists of 37 total CTs, including four moderate-income tracts. AHNB operates two branches in the MN Non-MSA AA. These branches are located in Long Prairie and Browerville. The bank's Todd County non-MSA AA includes six total CTs where the bank's branches have a presence and target their products and services. All six CTs are middle income tracts. AHNB operates one in the Minneapolis AA in the community of Clearwater. This AA consists of three CTs, two of which are middle-income and one is moderate-income. The bank does not operate any deposit-taking ATMs.

Competition within the bank's market is strong. The Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, as of June 30, 2021, states there are 54 deposit-taking institutions within the bank's three AAs. Of those 54 institutions, AHNB is ranked seventh with 3.94 percent of the market's deposit share. Competitors include several regional and large banks, including Wells Fargo, US Bank, and Bremer Bank. Those three banks have a combined market share of 27.96 percent.

We contacted a local member of the community to understand the market and credit needs of the AAs. The contact indicated good participation by banks in the area in meeting credit needs and providing assistance to non-profit organizations. Our contact referenced the importance of direct financial contributions and assistance in providing financial literacy information to residents in the AA by local financial institutions. The contact noted most credit needs were being met but identified a need for more low-income housing.

The following tables provide information on the demographic composition of the St. Cloud and MN Non-MSA AAs.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: MN - St Cloud - 2021 MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	37	0.0	10.8	75.7	13.5	0.0
Population by Geography	188,302	0.0	12.9	71.1	16.0	0.0
Housing Units by Geography	77,375	0.0	13.6	72.6	13.8	0.0
Owner-Occupied Units by Geography	49,914	0.0	8.0	75.9	16.0	0.0
Occupied Rental Units by Geography	21,609	0.0	26.7	63.3	10.0	0.0
Vacant Units by Geography	5,852	0.0	13.0	78.8	8.2	0.0
Businesses by Geography	16,245	0.0	14.3	68.0	17.7	0.0
Farms by Geography	1,213	0.0	2.9	88.6	8.5	0.0
Family Distribution by Income Level	46,426	20.0	17.4	23.0	39.7	0.0
Household Distribution by Income Level	71,523	23.6	16.0	19.3	41.1	0.0
Median Family Income MSA - 41060 St. Cloud, MN MSA		\$69,359	Median Housing Value			\$166,094
			Median Gross Rent			\$744
			Families Below Poverty Level			7.7%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: MN - Todd - 2021 Non-MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	6	0.0	0.0	100.0	0.0	0.0
Population by Geography	18,563	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	10,110	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	6,195	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,212	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	2,703	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	1,289	0.0	0.0	100.0	0.0	0.0
Farms by Geography	229	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	5,040	19.6	20.1	26.0	34.3	0.0
Household Distribution by Income Level	7,407	24.8	16.6	20.5	38.1	0.0
Median Family Income Non-MSAs - MN		\$63,045	Median Housing Value			\$154,577
			Median Gross Rent			\$572
			Families Below Poverty Level			8.4%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## **Scope of Evaluation in Minnesota**

The Minnesota state rating is based on the results of the St. Cloud, MN Non-MSA, and Minneapolis AAs. The St. Cloud and MN Non-MSA AAs were selected for full-scope review. The St. Cloud AA represents the largest portion of the bank's branches, deposits, and loan volume within the state. The St. Cloud AA holds 78 percent of the bank's loans by number and 71 percent of the bank's deposits. For those reasons, the St. Cloud AA carried the most weight in determining the state rating. We performed a limited-scope review of the Minneapolis AA given the AA represents the smallest portion of loan and deposit volume within the state. Refer to Appendix A for additional information on the AAs under review.

Business loans represented the largest proportion of lending activity within all AAs. By dollar volume, business loans represent 79 percent of all loan originations and purchases during the evaluation period. Therefore, business loans received the most weight when determining Lending Test conclusions for these AAs.

## **LENDING TEST**

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

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

Based on full-scope reviews, the bank's performance is excellent in both the St. Cloud AA and the MN Non-MSA AA.

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

AHNB exhibits reasonable geographic distribution of loans in the State of MN. The geographic distribution conclusion is based on the bank's performance of lending to individuals and businesses located in geographies of different income levels within the St. Cloud AA. There are no LMI CTs in the MN Non-MSA AA. Therefore, an analysis of the geographic distribution of loans within the MN Non-MSA AA is not meaningful.

### ***Small Loans to Businesses***

Refer to Table Q in the state of Minnesota section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of business loans in different income level CTs in the St. Cloud AA is reasonable. AHNB's performance lending to businesses in moderate-income CTs was near to the percentage of businesses located in moderate-income CTs and peer aggregate lending performance.

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

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



The geographic distribution of home mortgage loans in different income level CTs in the St. Cloud AA is excellent. AHNB's performance lending to individuals in moderate-income CTs exceeded peer aggregate lending performance and the percentage of individuals located in those tracts.

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

AHNB's exhibits excellent distribution of loans among business of different sizes and individuals of different income levels.

#### ***Small Loans to Businesses***

Refer to Table R in the state of Minnesota section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

#### **St. Cloud AA**

The distribution of loans to businesses of different sizes in the St. Cloud AA is excellent. The bank's performance lending to small businesses is significantly higher than aggregate lending performance and is near the percentage of small businesses located in the AA.

#### **MN Non-MSA AA**

The distribution of loans to businesses of different sizes in the MN Non-MSA AA is excellent. The bank's performance lending to small businesses exceeds the percentage of small businesses located in the AA and aggregate lending data.

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

Refer to Table P in the state of Minnesota section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of home mortgage loans.

The distribution of loans to individuals of different income levels in the St. Cloud AA is poor. The bank's performance lending to individuals of different income levels is significantly lower than the demographics and aggregate lending data.

### **Responses to Complaints**

AHNB did not receive any CRA related complaints during the review period.

### **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Lending Test in the Minneapolis AA is weaker than the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance in the Minneapolis AA is weaker than the overall state rating due to poor borrower and geographic distribution of loans to small businesses.

Refer to Tables O through R in the state of Minnesota section of Appendix D for the facts and data that support these conclusions.

## 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”.

<b>Time Period Reviewed:</b>	<b>(07/02/2019 to 09/19/2022)</b>	
<b>Bank Products Reviewed:</b>	Home mortgage Small business	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None.		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Minnesota</b>		
St. Cloud AA	Full-Scope	Benton County Stearns County (partial) Includes CTs: 3.01, 3.02, 4.01, 4.02, 5, 6.01, 6.02, 7.01, 8.01, 9.01, 10.01, 101.01, 101.02, 102, 104.01, 104.02, 104.03, 105, 106, 110, 111, 112, 113.01, 113.02, 113.04, 114, 115, 116
MN Non-MSA AA	Full-Scope	Todd County (partial) Includes CTs: 7903, 7904, 7905, 7906, 7907, 7908
Minneapolis AA	Limited	Sherburne County (partial) Includes CTs: 303, 315 Wright County (partial) Includes CTs: 1003

## Appendix B: Summary of MMSA and State Ratings

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<b>RATINGS American Heritage National Bank</b>	
Overall Bank:	Lending Test Rating
<b>American Heritage National Bank</b>	<b>Satisfactory</b>
State:	
<b>Minnesota</b>	<b>Satisfactory</b>

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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



<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2019-21</b>	
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 AA	6	1,982	10.0	1,094	0.0	0.0	0.0	22.2	50.0	21.6	77.8	50.0	78.4	0.0	0.0	0.0	0.0	0.0	0.0		
St Cloud AA	52	18,376	86.7	9,718	0.0	0.0	0.0	8.0	13.5	9.2	75.9	75.0	71.8	16.0	11.5	19.1	0.0	0.0	0.0		
MN Non-MSA AA	2	69	3.3	722	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0		
<b>Total</b>	<b>60</b>	<b>20,428</b>	<b>100.0</b>	<b>11,534</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>8.3</b>	<b>16.7</b>	<b>9.8</b>	<b>78.5</b>	<b>73.3</b>	<b>74.2</b>	<b>13.1</b>	<b>10.0</b>	<b>16.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2019-21</b>	
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 AA	6	1,982	10.0	1,094	24.5	0.0	13.5	20.4	0.0	24.2	23.0	16.7	21.3	32.0	0.0	22.8	0.0	83.3	18.2		
St. Cloud AA	52	18,377	86.7	9,718	20.0	0.0	7.8	17.4	3.8	23.2	23.0	15.4	22.0	39.7	13.5	29.4	0.0	67.3	17.5		
MN Non-MSA AA	2	69	3.3	722	19.6	0.0	10.4	20.1	50.0	23.0	26.0	0.0	17.7	34.3	50.0	34.8	0.0	0.0	14.1		

<b>Total</b>	<b>60</b>	<b>20,428</b>	<b>100.0</b>	<b>11,534</b>	<b>20.3</b>	<b>0.0</b>	<b>8.5</b>	<b>17.9</b>	<b>5.0</b>	<b>23.3</b>	<b>23.3</b>	<b>15.0</b>	<b>21.7</b>	<b>38.6</b>	<b>13.3</b>	<b>29.1</b>	<b>0.0</b>	<b>66.7</b>	<b>17.4</b>
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Source: 2015 ACS ; 01/01/2019 - 12/31/2021 Bank Data, 2021 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** **2019-21**

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
Minneapolis MSA	17	\$2,681	29.8	258	0.0	0.00	0.0	17.4	5.9	11.6	82.6	94.1	88.4	0.0	--	0.0	0.0	--	0.0
St Cloud MSA	20	\$4,401	35.1	2,908	0.0	0.00	0.0	14.3	10.0	14.5	68.0	85.0	68.6	17.7	5.0	16.9	0.0	--	0.0
MN Non-MSA	20	\$576	35.1	145	0.0	0.00	0.0	0.0	0.00	0.0	100.0	100.0	100.0	0.0	--	0.0	0.0	--	0.0
<b>Total</b>	<b>57</b>	<b>\$7,658</b>	<b>100.0</b>	<b>3,311</b>	<b>0.0</b>	<b>0.00</b>	<b>0.0</b>	<b>13.6</b>	<b>5.3</b>	<b>13.7</b>	<b>71.2</b>	<b>93.0</b>	<b>71.5</b>	<b>15.2</b>	<b>1.7</b>	<b>14.8</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>

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%

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2019-21</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	
Minneapolis MSA	17	\$2,681	29.8	258	91.1	29.4	46.5	3.7	70.6	5.3	--	
St Cloud MSA	20	\$4,401	35.1	2,908	84.6	80.0	37.3	5.4	20.0	10.0	--	
MN Non-MSA	20	\$576	35.1	145	87.9	95.0	51.0	2.7	5.0	9.4	--	
<b>Total</b>	<b>57</b>	<b>\$7,658</b>	<b>100.0</b>	<b>3,311</b>	<b>85.3</b>	<b>70.2</b>	<b>38.6</b>	<b>5.1</b>	<b>29.8</b>	<b>9.6</b>	<b>--</b>	

*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%*