



PUBLIC DISCLOSURE

February 3, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Hiawatha National Bank
Charter Number 15698

220 East Oak Street
Glenwood City, WI

Office of the Comptroller of the Currency
222 South Ninth Street, 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

SCOPE OF THE EVALUATION 3

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW 4

STATE RATING 5

 STATE OF WISCONSIN 5

APPENDIX A: SCOPE OF EXAMINATION A-1

APPENDIX B: SUMMARY STATE RATING 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 distribution of loans among businesses of different sizes and borrower income levels is reasonable.
- The distribution of business and home mortgage loans throughout different geographies is excellent.
- The bank's loan-to-deposit (LTD) ratio is more than reasonable.
- The bank originated a majority of its loans inside its assessment areas (AAs).

Loan-to-Deposit Ratio

Hiawatha National Bank's (HNB's) LTD ratio is more than reasonable, considering the bank's size, financial condition, and credit needs of the two AAs, the Minneapolis-St. Paul Wisconsin (MN-WI) MSA and the Wisconsin (WI) Non-MSA.

HNB's net LTD ratio averaged 93.1 percent over the 16 quarters from March 31, 2015 through December 31, 2018. The LTD ratio is calculated on a bank-wide basis. The bank's quarterly LTD ratio ranged from a low of 74.3 percent in the first quarter of 2015 to a high of 100.0 percent in the fourth quarter of 2016. HNB ranks first among six similarly situated banks for average LTD. Similarly situated banks include those operating in or near the bank's AAs with similar asset sizes. The following table shows the bank's LTD ratio compared to similarly situated institutions.

Loan to Deposit Ratio Institution (Headquarters)	Assets as of 12/31/2018 (\$000s)	Average LTD Ratio (%)
Hiawatha National Bank (Hager City, WI)	210,352	93.1
First American Bank, National Association (Hudson, WI)	124,830	90.6
Citizens State Bank (Hudson, WI)	209,945	86.6
First Bank of Baldwin (Baldwin, WI)	177,219	77.1
First National Community Bank (New Richmond, WI)	203,815	70.6
First National Bank of River Falls (River Falls, WI)	277,841	69.0

Source: Call Report data from March 31, 2015 through December 31, 2018.

Lending in Assessment Area

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

We analyzed 40 small business loans and all home mortgage loans originated between January 1, 2016 and December 31, 2018. The bank originated 69.9 percent of its total loans by number inside its AAs. This analysis is performed at the bank, rather than the AA, level. The following table shows the lending inside and outside of the AAs:

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	392	70.6	163	29.4	555	66,087	69.0	29,752	31.0	95,839
Small Business	24	60.0	16	40.0	40	5,677	41.8	7,888	58.2	13,565
Total	416	69.9	179	30.1	595	71,764	65.6	37,640	34.4	109,404

Description of Institution

HNB is a single-state, national bank chartered in Hager City, Wisconsin. As of December 31, 2018, the bank had total assets of \$210.4 million. The bank has a main office in Hager City, a loan production office in Sheboygan, and four full-service branches in Glenwood City, Maiden Rock, Osceola, and Hudson. In addition to the branch locations, the bank operates three automated teller machines (ATMs) in Hager City, Maiden Rock, and a SuperValu grocery store in Glenwood City. The bank has no deposit-taking ATMs. There have been no mergers or acquisitions since the previous CRA exam. HNB is entirely owned by Lake Shore III Corporation, a multibank holding company located in Glenwood City, WI.

HNB offers a variety of traditional products and services for commercial and retail banking. Deposit products include checking and savings accounts, certificates of deposit, health savings accounts, and retirement savings accounts. Loan products include fixed- and adjustable-rate mortgages, vehicle loans, personal and business lines of credit, commercial real estate, and agriculture loans. The bank's lending focuses are business and home mortgage products. As of December 31, 2018, net loans and leases totaled \$160.0 million or 76.1 percent of total assets. Tier one capital represents 13.8 percent of risk-weighted assets.

HNB offers specific products to benefit deaf and hearing-impaired individuals and has focused on this demographic as part of its business strategy. Specifically, HNB offers a "Banking without Barriers" program to engage the underserved market for deaf and hearing-impaired individuals, particularly in mortgage lending.

The bank received a Satisfactory rating at prior CRA evaluation dated February 17, 2015. There are no financial, legal, or other factors that impede the bank's ability to meet its CRA obligations.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated HNB's CRA performance using small bank performance standards consisting of the Lending Test, which evaluates the bank's record of meeting the credit needs of its AAs. The evaluation period for the LTD ratio analysis covered March 31, 2015 through December 31, 2018 and the complaint review portion covered March 31, 2015 through September 31, 2019. The evaluation period for the remaining portions of the Lending Test covered January 1, 2016 through December 31, 2018.

To determine the bank's lending performance for each AA, we selected primary products based on number and dollar of loan originations during the evaluation period. HNB's primary products were home mortgage loans and business loans. The tables below show loan origination and purchase details for HNB.

Bank Loan Originations and Purchases in 2016-2018		
<i>Loan Type</i>	<i>Volume by #</i>	<i>Volume by \$</i>
Home Mortgage	57.0%	44.0%
Business	16.5%	39.6%
Consumer	16.3%	1.8%
Agricultural	10.2%	14.6%

Source: Bank loan origination reports for 2016-18

Demographic data is used in part to determine the bank's lending performance. The U.S. Census Bureau released updated demographic data from the 2015 American Community Survey (ACS) effective January 1, 2017. We analyzed 2016 loans separately from 2017-2018 loans given the changes in the demographic data of the AAs. Loans originated or purchased in 2016 were compared to 2010 U.S. Census data, and loans originated or purchased in 2017 and 2018 were compared to ACS survey data.

For the borrower and geographic distribution analysis, the business loan sample consisted of 20 randomly selected loans from 2016 in the MN-WI MSA AA and 20 loans from the MN-WI MSA AA and 20 loans from the WI Non-MSA AA from 2017-2018. For home mortgage loans, we utilized the bank's Home Mortgage Disclosure Act (HMDA) data for 2016 through 2018 to evaluate the bank's lending performance.

We also reviewed the financial, economic, and environmental factors in the AAs to determine the bank's lending performance. In addition, we contacted community members with knowledge of the economic conditions and demographics to gain insight on the credit needs of the AAs.

Selection of Areas for Full-Scope Review

HNB's MN-WI MSA AA and WI Non-MSA AA were selected for full scope reviews. Refer to the "Scope" section under the State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full-scope AAs.

Ratings

HNB's overall rating is based on the bank's lending performance in the state of Wisconsin. We evaluated lending performance using five performance criteria: The LTD ratio, lending in the AA, lending to borrowers of different income levels, distribution of loans to geographies of different income levels, and responses to CRA-related complaints. The 2017-2018 lending performance received more weight because it was more recent and had more loan volume than the 2016 period. Home mortgage loans received more weight than business loans due to higher origination volumes both by number and dollar. The MN-WI MSA and WI Non-MSA AAs were weighted equally, given even distribution of branch locations on county borders between the AAs.

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 Wisconsin

CRA rating for the State of Wisconsin: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank's loans reflect reasonable distribution among borrowers of different income levels and businesses of different sizes.
- The distribution of loans reflects excellent dispersion throughout geographies of different income levels.
- The bank received no CRA-related complaints during the evaluation period.

Description of Institution's Operations in Wisconsin

HNB has two AAs within the State of Wisconsin. The AAs include the MN-WI MSA AA and the WI Non-MSA AA. Both AAs received full-scope reviews.

Minneapolis-St. Paul, Wisconsin MSA:

The MN-WI MSA AA, which is part of the Minneapolis-St. Paul, Wisconsin MSA, consists entirely of Pierce and St. Croix Counties. The MN-WI MSA AA is comprised of 22 census tracts (CTs). In 2017-18, there were five moderate-income CTs, 15 middle-income CTs, and two upper-income CTs. The CTs differ compared to 2016, where there were one moderate-income CT, 20 middle-income CTs, and one upper-income CT. There are no low-income CTs in the MN-WI MSA AA during 2016-18. Bank branches within this AA include Hager City and Maiden Rock in Pierce County and Hudson and Glenwood City in St. Croix County.

Bank competition within the MN-WI MSA AA remains strong. Per the June 30, 2018 FDIC Deposit Market Share Report, there are 16 deposit-taking institutions within St. Croix and Pierce counties. HNB ranks fifth in market share, holding 7.6 percent of the market. The leader of the market is Associated Bank, N.A. with 18.4 percent of the market share. The bank also faces competition from local credit unions, which were not included in the report.

We contacted one community representative in the MN-WI MSA AA as part of this evaluation. The contact is the Executive Director for a non-profit economic development corporation. The contact reported low unemployment and general business expansion. Credit needs in the AA are generally met with local financial institutions involved throughout the community.

Table A – Demographic Information of the Assessment Area						
Assessment Area: MN-WI MSA AA - 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	22	0.0	4.5	90.9	4.5	0.0
Population by Geography	125,364	0.0	2.3	93.6	4.1	0.0
Housing Units by Geography	49,423	0.0	2.6	94.3	3.2	0.0
Owner-Occupied Units by Geography	36,132	0.0	2.7	93.2	4.0	0.0
Occupied Rental Units by Geography	10,509	0.0	1.9	97.0	1.0	0.0
Vacant Units by Geography	2,782	0.0	2.8	97.2	0.0	0.0
Businesses by Geography	6,822	0.0	2.2	92.4	5.4	0.0
Farms by Geography	826	0.0	4.0	94.1	1.9	0.0
Family Distribution by Income Level	33,569	17.2	19.8	26.8	36.1	0.0
Household Distribution by Income Level	46,641	20.7	16.3	22.1	40.9	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$79,301	Median Housing Value			\$218,399
			Median Gross Rent			\$771
			Families Below Poverty Level			4.6%
<i>Source: 2010 U.S. Census and 2016 D&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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: MN-WI MSA AA - 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	22	0.0	22.7	68.2	9.1	0.0
Population by Geography	126,917	0.0	20.8	71.5	7.6	0.0
Housing Units by Geography	50,688	0.0	21.9	71.7	6.5	0.0
Owner-Occupied Units by Geography	35,992	0.0	19.1	72.7	8.1	0.0
Occupied Rental Units by Geography	11,644	0.0	30.7	67.3	2.0	0.0
Vacant Units by Geography	3,052	0.0	20.5	76.0	3.5	0.0
Businesses by Geography	7,233	0.0	21.1	70.3	8.6	0.0
Farms by Geography	755	0.0	25.8	66.0	8.2	0.0
Family Distribution by Income Level	34,195	19.4	20.0	25.1	35.5	0.0
Household Distribution by Income Level	47,636	22.2	17.1	20.6	40.1	0.0
Median Family Income MSA – 33460 Minneapolis -St. Paul-Bloomington, MN-WI MSA		\$85,636	Median Housing Value			\$202,068
			Median Gross Rent			\$839
			Families Below Poverty Level			5.0%
<i>Source: 2015 ACS Census and 2018 D&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>						

Wisconsin Non-MSA AA:

The WI Non-MSA AA consists of Dunn, Polk, and Pepin Counties. This AA includes 20 CTs, all of which are middle-income. There were no changes to CT income designations between 2016 and 2017-18. The bank has one branch in the WI Non-MSA AA located in Osceola in Polk County.

Bank competition within the WI Non-MSA AA remains strong. Per the June 30, 2018 FDIC Deposit Market Share Report, there are 20 deposit-taking institutions within the AA. HNB ranks thirteenth with 2.2 percent of the deposit market share. The leader of the market is Bremer Bank N.A. with 30.7 percent of the market share. The bank also faces competition from local credit unions, which were not included in the report.

We contacted one community representative in the WI Non-MSA AA as part of this evaluation. The contact is the Executive Director for a local, nonprofit economic development corporation. The contact indicated that economic conditions are generally good, in line with small communities around the United States. Businesses are doing well and are looking to expand. However, growth is impacted as employers are experiencing a lack of labor supply due to people migrating to metro areas. The contact indicated the primary credit needs in the community include home mortgages and small business loans. General banking needs of the population are met. The contact noted local banks are engaged throughout the community.

Table A – Demographic Information of the Assessment Area						
Assessment Area: WI Non-MSA AA – 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	0.0	0.0	100.0	0.0	0.0
Population by Geography	95,531	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	45,392	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	28,569	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	8,555	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	8,268	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	5,142	0.0	0.0	100.0	0.0	0.0
Farms by Geography	860	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	24,993	16.6	18.4	23.7	41.3	0.0
Household Distribution by Income Level	37,124	20.4	16.5	19.6	43.5	0.0
Median Family Income Non-MSAs - WI		\$57,005	Median Housing Value			\$161,549
			Median Gross Rent			\$653
			Families Below Poverty Level			7.2%

Source: 2010 U.S. Census and 2016 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.

Table A – Demographic Information of the Assessment Area						
Assessment Area: WI Non-MSA AA – 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	0.0	0.0	100.0	0.0	0.0
Population by Geography	95,103	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	45,932	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	27,385	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	10,004	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	8,543	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	5,042	0.0	0.0	100.0	0.0	0.0
Farms by Geography	775	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	24,802	17.6	19.5	22.8	40.1	0.0
Household Distribution by Income Level	37,389	21.7	16.9	18.6	42.8	0.0
Median Family Income Non-MSAs - WI		\$60,911	Median Housing Value			\$153,042
			Median Gross Rent			\$701
			Families Below Poverty Level			7.4%
<i>Source: 2015 ACS Census and 2018 D&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 Wisconsin

The State of Wisconsin rating is based on the lending performance in the MN-WI MSA AA and WI Non-MSA AA.

Refer to Appendix A for additional information on the AAs under review.

LENDING TEST

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

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the State of Wisconsin.

Geographic distribution performance is based on the results of the MN-WI MSA AA. The WI Non-MSA AA geographic distribution was not meaningful because there were no low- or moderate-income CTs in the WI Non-MSA AA during the evaluation period.

Home Mortgage Loans

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

The distribution of home mortgage loans to geographies of different income levels in the MN-WI MSA AA is excellent. In 2017-18, the bank's home mortgage lending in moderate-income CTs exceeds both the aggregate data and demographic comparator. In 2016, HNB's lending in moderate-income CTs exceeds the aggregate data and is near the demographic comparator.

Small Loans to Businesses

Refer to Table Q in the State of Wisconsin 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 distribution of business loans in CTs of different income levels in the MN-WI MSA AA is excellent. HNB's lending in moderate-income tracts exceeds both the aggregate data and demographic comparator for 2016 and 2017-18.

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.

Home Mortgage Loans

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

MN-WI MSA AA

The distribution of home mortgage loans to borrowers of different income levels is excellent. In 2017-18, the bank's portion of home mortgage loans to low-income borrowers exceeds aggregate data and is near the demographic comparator. HNB's home mortgage lending to moderate-income borrowers exceeds both aggregate data and the demographic comparator. In 2016, HNB's lending to low-income and moderate-income borrowers exceeds both the aggregate data and demographic comparators.

WI Non-MSA AA

The distribution of home mortgage loans to borrowers of different income levels is reasonable. In 2017-18, the bank's home mortgage lending to moderate-income borrowers exceeds the demographic comparator and is near aggregate data. HNB's lending to low-income borrowers is below aggregate data and significantly below the demographic comparator. In 2018, 7.4 percent of families were below the poverty level, making it difficult to originate home loans to low-income borrowers as they are less likely to qualify for a home mortgage loan. In 2016, HNB's home mortgage lending to moderate-income borrowers exceeds both the aggregate data and demographic comparator. HNB's lending to low-income borrowers is significantly below the demographic comparator and below the aggregate data. This is explained by 7.2 percent of families falling below the poverty levels in the 2016, making it difficult to originate home loans to low-income borrowers as they are less likely to qualify for a home mortgage loan.

Small Loans to Businesses

Refer to Table R in the State of Wisconsin section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

MN-WI MSA AA

The distribution of loans to small businesses is reasonable. In 2016 and 2017-18, HNB's lending to small businesses is near the demographic comparators and significantly exceeds aggregate data.

WI Non-MSA AA

The distribution of loans to small businesses is reasonable. In 2017-18, HNB's lending to small businesses is near the demographic comparator and exceeds aggregate data. We did not complete borrower distribution analysis on business loans originated in 2016. The bank originated only six small business loans inside the AA in 2016, which is insufficient for meaningful analysis.

Responses to Complaints

During the evaluation period, HNB did not receive any complaints related to performance in meeting the credit needs of its AAs.

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 MN-WI MSAs and WI non-MSAs that received comprehensive examination review, designated by the term “full-scope”.

Time Period Reviewed:	01/01/2016 – 12/31/2018	
Bank Products Reviewed:	Home mortgage loans, small business loans	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Wisconsin		
MN-WI MSA AA	Full-scope	Counties of Pierce and St. Croix
WI Non-MSA AA	Full-scope	Counties of Dunn, Polk, and Pepin

Appendix B: Summary State Rating

RATING - Hiawatha National Bank	
Overall Bank:	Lending Test Rating
Hiawatha National Bank	Satisfactory
State:	
Wisconsin	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 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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2016
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	
MN WI MSA	45	7,824	29.8	5,810	0.0	0.0	0.0	2.7	2.2	1.6	93.2	95.6	93.7	4.0	2.2	4.7	0.0	0.0	0.0	
WI Non-MSA	106	18,596	70.2	2,873	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	
Total	151	26,420	100.0	8,683	0.0	0.0	0.0	1.5	0.7	1.1	96.2	98.7	95.8	2.3	0.7	3.2	0.0	0.0	0.0	

Source: 2010 U.S Census, 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-18
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	
MN-WI MSA	75	12,261	31.1	5,517	0.0	0.0	0.0	19.1	33.3	19.6	72.7	65.3	73.6	8.1	1.3	6.8	0.0	0.0	0.0	
WI Non-MSA	166	27,406	68.9	3,166	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	
Total	241	39,667	100.0	8,683	0.0	0.0	0.0	10.9	10.4	12.5	84.5	89.2	83.3	4.6	0.4	4.3	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																			2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
MN-WI MSA	45	7,824	29.8	5,810	17.2	22.2	8.2	19.8	24.4	20.8	26.8	17.8	25.2	36.1	33.3	31.1	0.0	2.2	14.8
WI Non-MSA	106	18,596	70.2	2,873	16.6	3.8	5.5	18.4	18.9	17.1	23.7	12.3	21.8	41.3	65.1	41.7	0.0	0.0	14.0
Total	151	26,420	100.0	8,683	17.0	9.3	7.3	19.2	20.5	19.5	25.5	13.9	24.1	38.3	55.6	34.6	0.0	0.7	14.5

*Source: 2010 U.S Census, 01/01/2016 - 12/31/2016 Bank Data, 2016 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																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
MN-WI MSA	75	12,261	31.1	5,517	19.4	16.0	8.9	20.0	22.7	21.9	25.1	25.3	26.1	35.5	33.3	28.5	0.0	2.7	14.7
WI Non-MSA	166	27,406	68.9	3,166	17.6	6.6	6.8	19.5	21.7	22.1	22.8	21.7	22.0	40.1	50.0	37.1	0.0	0.0	12.2
Total	241	39,667	100.0	8,683	18.6	9.5	8.1	19.8	22.0	22.0	24.1	22.8	24.6	37.4	44.8	31.6	0.0	0.8	13.8

*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																			2016
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
MN-WI MSA	20	4,782	100.0	2,163	0.0	0.0	0.0	2.2	15.0	1.7	92.4	85.0	92.8	5.4	0.0	5.5	0.0	0.0	0.0
Total	20	4,782	100.0	2,163	0.0	0.0	0.0	2.2	15.0	1.7	92.4	85.0	92.8	5.4	0.0	5.5	0.0	0.0	0.0

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA 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																			2017-18
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
MN-WI MSA	20	3,352	50.0	1,996	0.0	0.0	0.0	21.1	30.0	17.2	70.3	70.0	72.5	8.6	0.0	10.3	0.0	0.0	0.0
WI Non-MSA	20	5,307	50.0	1,237	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
Total	40	8,659	100.0	3,233	0.0	0.0	0.0	12.4	15.0	10.6	82.5	85.0	83.0	5.0	0.0	6.3	0.0	0.0	0.0

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 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												2016
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	
MN-WI MSA	20	4,782	100.0	2,163	82.9	80.0	49.3	6.3	15.0	10.9	5.0	
Total	20	4,782	100.0	2,163	82.9	80.0	49.3	6.3	15.0	10.9	5.0	

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0
There were less than 20 small business loans originated in the 2016 Non-MSA AA, therefore, the distribution testing was not completed.*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-18
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	
MN-WI MSA	20	3,352	50.0	1,996	83.0	80.0	51.8	6.2	20.0	10.9	0.0	
WI Non-MSA	20	5,307	50.0	1,237	80.1	75.0	47.9	6.4	25.0	13.4	0.0	
Total	40	8,659	100.0	3,233	81.8	77.5	50.3	6.3	22.5	11.9	0.0	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0