

PUBLIC DISCLOSURE

October 18, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Cedar Rapids Bank & Trust Company
RSSD# 3029589

500 1st Avenue NE, Suite 100
Cedar Rapids, Iowa 52401

Federal Reserve Bank of Chicago

230 South LaSalle Street
Chicago, Illinois 60604-1413

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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INSTITUTION’S CRA RATING

Cedar Rapids Bank & Trust Company Overall CRA Rating: Satisfactory

Performance Test Rating Table

The following table indicates the performance level of Cedar Rapids Bank & Trust Company with respect to the lending, investment, and service test.

Cedar Rapids Bank & Trust Company			
Performance Levels	Performance Tests		
	Lending Test	Investment Test	Service Test
Outstanding			
High Satisfactory	✓	✓	✓
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

** Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating*

Summary of Major Factors that Support the Rating

Lending Test:

- Lending levels reflect good responsiveness to assessment area credit needs;
- An adequate percentage of loans are made in the bank’s combined assessment area;
- The geographic distribution of loans reflects excellent penetration throughout the assessment areas;
- The distribution of borrowers reflects, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes;

- The bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses;
- The bank is a leader in making community development loans; and
- The bank uses innovative and flexible lending practices in serving assessment area credit needs.

Investment Test:

- The bank made a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position;
- The bank occasionally uses innovative and complex investments to support community development initiatives; and
- The bank exhibits excellent responsiveness to credit and community development needs.

Service Test:

- Delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its assessment areas;
- The bank's record of opening and closing branches has not adversely affected its delivery systems, particularly to low- and moderate-income geographies and individuals;
- Services do not vary in a way that inconveniences the assessment area, particularly low- and moderate-income geographies and individuals; and
- The bank is a leader in providing community development services.

CEDAR RAPIDS BANK & TRUST COMPANY

DESCRIPTION OF INSTITUTION

Cedar Rapids Bank and Trust Company (CRBT) is a wholly-owned subsidiary of QCR Holdings, Inc., a multi-bank holding company located in Moline, Illinois. In addition to the main office, the bank operates seven full-service branches, nine full-service automated teller machines (ATMs), and one cash-only ATM throughout the Iowa cities of Cedar Rapids, Cedar Falls, Marion, and Waterloo. Since the previous evaluation, the bank opened a new full-service branch office in Cedar Rapids, Iowa (F Ave Branch) and closed the Cedar Hills branch (also located in Cedar Rapids) with the full-service ATM remaining open. In addition, the bank relocated its Marion branch office operations to a remote trailer branch site until the renovations/construction of the original branch is complete. No other branches or ATMs have been opened or closed since the previous evaluation. CRBT currently does not maintain any affiliate relationships.

Provided below is a table detailing the bank’s branch operations.

Cedar Rapids Bank & Trust Company Branch Locations												
Assessment Area	Low-Income		Moderate-Income		Middle-Income		Upper-Income		Unknown-Income		Total Branches (by AA)	
	#	%	#	%	#	%	#	%	#	%	#	%
Cedar Rapids, IA MSA	0	0.0	1	20.0	3	60.0	0	0.0	1	20.0	5	62.5
Waterloo-Cedar Falls, IA MSA	1	33.3	0	0.0	2	66.7	0	0.0	0	0.0	3	37.5
Total Branches (by Census Tract Income Designation)	1	12.5	1	12.5	5	62.5	0	0.0	1	12.5	8	100.0

As of June 30, 2021, CRBT reported assets of approximately \$1.9 billion based on the Uniform Banking Performance Report. The bank continues to offer a full range of loan products including commercial, home mortgage, agricultural, and consumer loans that are available to the communities it serves. Key business strategies are focused on commercial lending, which remains the primary business line for the bank as indicated by its loan portfolio concentration at 85.3 percent. The remainder of the loan portfolio is comprised of other loans (7.7 percent), residential real estate loans (6.5 percent), consumer loans (0.3 percent), and agricultural loans (0.2 percent). The bank is also focused on growing its Specialty Finance Group (SFG) financing and lending activities. SFG specializes and primarily focuses on financing related to low income housing tax credits (LIHTC), structured bond products, and private placement municipal bonds. The bank also offers a variety of standard deposit products including checking, savings, money market, and certificate of deposit accounts.

CRBT promotes its various loan and deposit products and retail services through all marketing channels, including the bank’s website, lobby signs, email, local newspapers, direct mailers, radio,

and social media (i.e. Facebook). Commercial banking is also promoted through print and online ads. Marketing efforts through social media are generally not product/service specific ads and tend to focus on brand awareness and community events and outreach activities. Another key part of the bank’s marketing and outreach efforts is through event sponsorships with non-profit organizations within the community. Since the previous evaluation, CRBT made efforts to expand its community relationships through the creation of a Community Engagement Team.

Details of the loan portfolio composition are provided below.

Composition of Loan Portfolio as of June 30, 2021			
Category	Type	\$ in 000s	%
Commercial	Commercial & Industrial	447,576	32.9
	1-4 Family Res Construction Lns	19,135	1.4
	Other Const Lns & Land Dev & Other	188,111	13.8
	Multifamily	181,946	13.4
	Lns Secured Owner Occupd NonFrm NonRes	146,505	10.7
	Lns Secured by Other NonFrm Non Res	177,464	13.0
	Total Commercial	1,160,737	85.3
Other	Loans to States and Political Divisions	88,413	6.5
	All Other Loans	16,528	1.2
	Total Other	104,941	7.7
Real Estate Secured	1-4 Family Revolving	10,223	0.8
	1-4 Family Res Secured by First Liens	75,059	5.5
	1-4 Family Res Secured by Junior Liens	3,024	0.2
	Total Real Estate Secured	88,306	6.5
Consumer	Loans to Individuals	3,671	0.3
	Total Consumer	3,671	0.3
Agricultural	Farmland	2,262	0.2
	Agricultural	285	0.0
	Total Agricultural	2,547	0.2
Total		1,360,202	100.0
<i>Note: Percentages may not add to 100.0 percent due to rounding.</i>			

There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its communities.

At its previous evaluation conducted on September 10, 2018, the bank was rated Satisfactory under the CRA.

SCOPE OF THE EXAMINATION

CRBT's CRA performance was evaluated using the Federal Financial Institutions Examination Council's Large Institution CRA Examination Procedures. The evaluation was performed in the context of information about the bank and its assessment areas, such as asset size, financial condition, market presence of other financial institutions, the record of aggregate lenders in each assessment area, and economic and demographic characteristics.

The evaluation consisted of a full-scope review of the bank's Cedar Rapids, IA Metropolitan Statistical Area (MSA) #16300 assessment area (Cedar Rapids MSA), which consists of Linn County in its entirety. The evaluation also consisted of a limited-scope review of the bank's Waterloo-Cedar Falls, IA MSA #47940 assessment area (Waterloo-Cedar Falls MSA), which includes Black Hawk County in its entirety, for consistency with the bank's overall performance within the state.

Products reviewed include HMDA- and CRA-reportable loans originated from January 1, 2019 through December 31, 2020. HMDA-reportable loans were used to analyze home mortgage lending activity, specifically home purchase, refinance, and multi-family lending. Home improvement, other purpose lines of credit, other purpose closed/exempt, and loan purpose not applicable loans were not evaluated as the limited volume in each of these categories does not allow for an effective analysis. CRA-reportable loans were used to analyze small business lending activity. Small farm lending was not considered as it comprised only 0.5 percent of all CRA-reportable loans originated during the review period. Also, the evaluation places additional emphasis on CRA-reportable loans due to commercial loans comprising the majority of the bank's lending volume, by number. Equal emphasis was placed on 2019 and 2020 figures to evaluate the bank's performance. Tables for 2020 HMDA lending data are included in each of the assessment area discussions, while 2019 HMDA lending data tables are included in Appendices B and C of this evaluation. Due to 2019 being the most recent year available for aggregate lending data for CRA small business lending, 2019 tables are included in each of the assessment area discussions, while 2020 CRA small business lending data tables are included in Appendices B and C.

The bank's performance was evaluated using the following performance standards:

- ***Lending Activity*** – HMDA-reportable and CRA-reportable small business loans were reviewed to determine the bank's responsiveness to credit needs in its assessment areas from January 1, 2019 through December 31, 2020.
- ***Lending in the Assessment Area*** – HMDA-reportable and CRA-reportable small business loans were reviewed to determine the percentage of loans originated in the combined assessment area from January 1, 2019 through December 31, 2020.
- ***Geographic Distribution of Lending in the Assessment Area*** – HMDA-reportable and CRA-

reportable small business loans were analyzed to determine the extent to which the bank is making loans in census tracts of different income levels, including those designated as low- or moderate-income, from January 1, 2019 through December 31, 2020.

- ***Lending to Borrowers of Different Incomes and Businesses of Different Sizes*** – HMDA-reportable and CRA-reportable small business loans were analyzed to determine the loan distribution among borrowers of different incomes and businesses of different revenue levels from January 1, 2019 through December 31, 2020.
- ***Community Development Lending*** – The number, volume, innovativeness, and complexity of community development loans were reviewed from September 11, 2018 through October 18, 2021.
- ***Innovative or Flexible Lending Practices*** – The degree to which the bank uses innovative and flexible lending practices to address the credit needs of low- and moderate-income individuals, small businesses, and geographies.
- ***Investments*** – Qualified investments from September 11, 2018 through October 18, 2021 were reviewed to determine the bank’s responsiveness to community development needs. Qualified investments were also evaluated to determine the bank’s use of innovative or complex investments.
- ***Services*** – The distribution of the bank’s branch offices, banking services, hours of operation, availability of loan and deposit products, and the extent and innovativeness of community development services were reviewed from September 11, 2018 through October 18, 2021.

In addition, two community representatives were contacted in connection with this examination to provide information regarding local economic and socio-economic conditions in the Cedar Rapids MSA assessment area. The following types of organizations were contacted: affordable housing and economic development.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

CRBT’s performance relative to the Lending Test is rated High Satisfactory based on its performance in the combined assessment area. Factors contributing to the rating include: lending activity reflects good responsiveness to assessment area credit needs; an adequate percentage of loans are made in the bank’s combined assessment area; loans reflect excellent penetration throughout the assessment areas, including low- and moderate-income (LMI) geographies; the bank demonstrates a good distribution of loans among individuals of different income levels and

businesses of different revenue sizes; the bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses; the bank is a leader in making community development loans; and the bank makes use of innovative and flexible lending practices in serving assessment area credit needs.

Level of Lending Activity

The bank’s lending levels reflect good responsiveness to credit needs in its assessment areas, considering the number and amount of HMDA-reportable and CRA small business loans made in its assessment area. The bank is primarily a commercial lender, with the largest portion of its portfolio consisting of commercial-related and industrial loans. During 2019 and 2020, the bank originated a total of 1,418 HMDA-reportable and CRA small business loans totaling approximately \$811.9 million. The bank’s HMDA-reportable lending increased 45.5 percent, by number, since the previous examination, primarily driven by a significant increase in multi-family housing loans. Additionally, the bank’s CRA small business lending increased significantly by 669.1 percent by number of originations. These increases are attributed to the introduction of the bank’s SFG and Paycheck Protection Program (PPP) lending. The growth within its commercial lending portfolio is in line with the bank’s strategy and historical lending patterns. The following table summarizes the bank’s lending activity for HMDA-reportable and CRA small business loans from January 1, 2019 through December 31, 2020. Of note, small farm loans are not included in the table below due to very minimal lending volume.

Summary of Lending Activity				
January 1, 2019 – December 31, 2020				
Loan Type	#	%	\$(000s)	%
Home Improvement	9	0.6	465	0.1
Home Purchase	81	5.7	13,149	1.6
Multi-Family Housing	116	8.2	564,438	69.5
Refinancing	63	4.4	10,537	1.3
Loan Purpose Not Applicable	3	0.2	127	0.0
Total HMDA Related	272	19.2	588,717	76.2
Total Small Business Related	1,146	80.8	223,165	23.8
Total Loans	1,418	100.0	811,882	100.0
<i>Note: Percentages may not total to 100.0 percent due to rounding.</i>				

Assessment Area Concentration

An adequate percentage of loans are made in the bank’s combined assessment area. As the following chart illustrates, the bank originated 59.2 percent of HMDA-reportable loans, by number, and only 8.3 percent, by dollar volume, within the combined assessment area. This is primarily driven by the bank’s SFG lending activities which specializes in and primarily focuses on financing related to LIHTC programs, structured bond products, and private placement municipal bonds. This strategic initiative has a significant impact within the bank’s assessment areas, as well

as nationwide, due to its focus on markets that do not have appropriately sized local banks to make loans that are needed in their communities. Additionally, the SFG is a strong source income for the bank, a portion of which is reserved to be used locally to reinvest in the community through event sponsorships and donations. CRA small business loans originated in the bank’s assessment areas represented 83.7 percent of all small business loan originations by number, and 80.0 percent by dollar amount. By taking out the influx of multi-family housing lending originated outside of the bank’s assessment area through the SFG, performance is consistent with the prior evaluation dated September 10, 2018.

Lending Inside and Outside the Assessment Area								
January 1, 2019 – December 31, 2020								
Loan Type	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase - Conventional	69	85.2	9,151	69.6	12	14.8	3,998	30.4
Home Improvement	6	66.7	159	34.2	3	33.3	306	65.8
Multi-Family Housing	37	31.9	33,377	5.9	79	68.1	531,061	94.1
Loan Purpose Not Applicable	3	100.0	127	100.0	0	0.0	0	0.0
Refinancing	46	73.0	5,976	56.7	17	27.0	4,561	43.3
Total HMDA Reportable	161	59.2	48,790	8.3	111	40.8	539,926	91.7
Total CRA Small Business	932	83.7	178,495	80.0	182	16.3	44,670	20.0
Total CRA Small Farm	6	85.7	1,023	89.2	1	14.3	124	10.8
Total Loans	1,099	78.9	228,308	28.1	294	21.1	584,720	71.9

Note: Percentages may not total to 100.0 percent due to rounding.

Geographic and Borrower Distribution

The bank’s lending activities reflect excellent distribution throughout its assessment areas. In addition, the bank’s lending activities reflect good distribution, particularly in its assessment areas, of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

CRBT exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses, consistent with safe and sound operations through low-income housing lending, including multi-tenant housing and single room occupancy units which are typically the least expensive housing for single adults.

CRBT makes use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of LMI individuals and geographies through its SFG lending which largely supports the LIHTC program, as well as the bank’s recently implemented CRA Residential Mortgage Loan product designed to increase lending to LMI residents within its combined assessment area. In 2020, the bank originated 15 loans totaling over \$1.5 million for the CRA Residential Mortgage Loan product.

Please refer to the individual assessment areas for more information regarding the bank’s HMDA-reportable and CRA-reportable small business lending performance.

Community Development Lending

The bank is a leader in making community development loans. During the review period, the bank loaned a total of \$312.3 million in 146 loans across its combined assessment area and in the broader statewide area of Iowa, a noteworthy increase from its performance at the previous evaluation during which time it made 30 community development loans worth \$122.7 million. This represents an increase of 386.7 percent, by number, and a 154.5 percent increase by dollar volume. The bank’s loans were highly responsive to assessment area needs, with a large portion revitalizing and stabilizing LMI areas and supporting affordable housing benefitting LMI individuals.

The table below presents the bank’s community development loans throughout its combined assessment area and in the broader statewide area during the review period. More information on the bank’s community development lending activity is provided in the individual assessment area sections to follow.

**Qualified Community Development Loans by Purpose
September 11, 2018 – October 18, 2021**

AA Name	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Total #	Total \$
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)		
Cedar Rapids, IA MSA	15	46,292	18	19,450	9	33,351	75	157,936	117	257,029
Waterloo-Cedar Falls, IA MSA	0	0	4	2,050	8	19,155	12	27,375	24	48,580
Statewide IA – Outside of AA	3	2,440	0	0	1	1,196	1	3,068	5	6,704
Total	18	48,732	22	21,500	18	53,702	88	188,379	146	312,313

Note: Dollar amounts are rounded and not reflective of exact figures.

INVESTMENT TEST

CRBT’s performance relative to the Investment Test is High Satisfactory based on a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. Also, the bank makes occasional use of innovative and/or complex qualified investments to support community development initiatives, as well as demonstrates excellent responsiveness to the credit and community development needs of its assessment areas, especially in the area of affordable housing for LMI individuals.

During the evaluation period, the bank made approximately \$12.3 million in new investments, with \$304,201 outstanding from the prior period. As stated above, the majority of the bank’s current period investments were directed towards investing in affordable housing benefitting LMI individuals. Overall, the bank made a total of approximately \$12.6 million in current and prior period investments across its combined assessment area, a significant improvement from the previous evaluation in which the bank only made one new investment for \$100,000, with \$474,023 in outstanding investments made prior to that evaluation. This represents over a two-thousand percent increase, by dollar volume, compared to the previous evaluation. The bank directed its focus on improving this area of meeting community needs, with innovative and responsive investments in LMI housing and loan funds focusing on small businesses located in LMI areas or otherwise economically distressed communities.

The table below presents the bank’s community development investments throughout its combined assessment area during the review period. More information on the bank’s community development investments activity is provided in the individual assessment area sections to follow.

Qualified Community Development Investments by Purpose September 11, 2018 – October 18, 2021										
AA Name	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Total #	Total \$
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)		
Cedar Rapids, IA – New	11	6,899	0	0	0	0	1	1,000	12	7,899
Cedar Rapids, IA – Prior Period	1	157	0	0	3	148	0	0	4	304
Waterloo-Cedar Falls, IA – New	9	4,154	0	0	2	220	0	0	11	4,374
Waterloo-Cedar Falls, IA – Prior Period	0	0	0	0	0	0	0	0	0	0
Total – New	20	11,053	0	0	2	220	1	1,000	23	12,273
Total – Prior Period	1	157	0	0	3	148	0	0	4	304
Total	21	11,210	0	0	5	368	1	1,000	27	12,577

Note: Dollar amounts are rounded and not reflective of exact figures.

CRBT’s use of contributions and grants to support the missions of non-profit organizations with a community development purpose or community development activities also significantly increased compared to the previous evaluation. Previously, the bank made donations totaling \$455,247 to 46 organizations. During the current review period, the bank more than doubled that amount, making donations totaling approximately \$1.2 million to 88 organizations.

The table below presents the bank’s community development contributions and donations throughout its combined assessment area and the broader statewide area during the review period. More information on the bank’s community development donations activity is provided in

the individual assessment area sections to follow.

Qualified Community Development Contributions/Donations by Purpose September 11, 2018 – October 18, 2021										
AA Name	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Total #	Total \$
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)		
Cedar Rapids, IA	7	40	142	713	22	177	14	128	185	1,058
Waterloo-Cedar Falls, IA	1	0.2	61	84	7	41	6	32	75	157
Statewide IA – Outside of AA	0	0	5	8	0	0	0	0	5	8
Total	8	40	208	805	29	218	20	160	265	1,223
<i>Note: Dollar amounts are rounded and not reflective of exact figures.</i>										

SERVICE TEST

CRBT's performance relative to the Service Test is High Satisfactory based on the following major factors in the assessment areas: delivery systems are readily accessible to the bank's geographies and individuals of different income levels in the combined assessment area; the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals; services do not vary in a way that inconveniences the assessment areas, particularly LMI geographies and individuals; and the bank is a leader in providing community development services.

Retail Services

CRBT's retail delivery services are readily accessible to all portions of the bank's assessment areas, including LMI individuals and geographies. The bank operates a total of eight offices, two of which are located in LMI census tracts (one low-income and one moderate-income). Further, the main office is located in a historically low-income census tract, although it is now an unknown-income census tract. In addition, the bank operates a total of nine full-service ATMs (one of which is a standalone), and one standalone, cash-only ATM, three of which are located in moderate-income census tracts and one is in a low-income census tract. Alternative delivery systems include phone, internet, and mobile banking, and CRBT customers have access to a network of surcharge free ATMs through the Privileged Status Network.

To the extent changes have been made, the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies or to LMI individuals. Since the previous examination, the bank closed a branch located in a moderate-income census tract but continues to operate the full-service ATM at that location. Additionally, subsequent to that closure, the bank opened a new branch also located in a moderate-income census tract in the same assessment area. No other openings or closures have occurred during the evaluation period that would affect accessibility.

Bank hours and services are reasonable and do not vary in a way that inconveniences LMI geographies or individuals. Office hours range from 8:30 and 9:00 a.m. to 5:00 p.m., Monday through Friday. Multiple locations also provide drive-up services with extended hours and services on Saturday. Applications for loan and deposit products are accepted at each location. In addition to branch hours, appointments with lenders for loan applications at the applicant's convenience and internet, phone, and mobile banking services make the bank's products and services accessible to LMI geographies and individuals.

Community Development Services

The bank is a leader in providing community development services. During the review period, the bank provided 3,353.5 hours of community development service, reflecting a substantial increase of 117.8 percent from its performance at the previous evaluation in which it provided 1,540 hours. The bank's services were highly responsive to assessment area needs, with a large portion supporting community services benefitting LMI individuals and economic development efforts to support and fund small businesses and improve employment of the same demographic.

The table below presents the bank's community development service hours throughout its combined assessment area during the review period. More information on the bank's community development services activity is provided in the individual assessment area sections to follow.

Qualified Community Development Service Hours by Purpose September 11, 2018 – October 18, 2021						
AA Name	Affordable Housing	Community Services	Economic Development	Revitalize and Stabilize	Total Hours	% of Total
	Hours	Hours	Hours	Hours		
Cedar Rapids, IA MSA	163	2119	248	184	2714	80.9
Waterloo-Cedar Falls, IA MSA	10	315.5	296	18	639.5	19.1
Total	173	2,434.5	544	202	3,353.5	100.0
<i>Note: Percentages may not total to 100.0 percent due to rounding.</i>						

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

CEDAR RAPIDS MSA – FULL REVIEW

SCOPE OF THE EXAMINATION

The scope for this assessment area is consistent with the scope presented in the overall section of the Performance Evaluation.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE CEDAR RAPIDS MSA

The assessment area consists of Linn County, Iowa, in its entirety, which is one of three counties located in the Cedar Rapids, IA MSA #16300. There have been no changes to the assessment area since the previous evaluation. CRBT operations in the Cedar Rapids MSA assessment area include five branches (including the main office), six full-service ATMs (one standalone), and one standalone, cash-only ATM. One branch is located in a moderate-income census tract, three branches are located within middle-income census tracts, and the main branch is located in a historically low-, but currently unknown-income census tract. Two full-service ATMs and the one standalone cash-only ATM are located in moderate-income census tracts, three full-service ATMs are located in middle-income census tracts, and one operates in the unknown-income census tract. Since the previous evaluation, the bank closed one branch located within a moderate-income census tract in Cedar Rapids, Iowa but continues to operate the full-service ATM at that location. Additionally, the bank opened a new branch in another moderate-income census tract in Cedar Rapids, Iowa.

The bank holds a 19.7 percent deposit market share, ranking first of 26 FDIC-insured financial institutions operating in Linn County, Iowa as of June 30, 2020. By comparison, the other institutions in the top three by market share were U.S. Bank National Association (16.1 percent) and Farmers State Bank (12.9 percent). Specific to HMDA-reportable lending, the bank ranked 32nd out of 218 HMDA reporting institutions by originating 63 HMDA-reportable loans in 2020. As it relates to CRA-reportable lending, CRBT ranked seventh among 66 CRA reporting institutions by originating 215 such loans in 2019. CRBT operates in a competitive market with large national lenders and credit unions, especially for CRA-reportable lending. Top HMDA reporting institutions in the assessment area include Greenstate Credit Union and Collins Community Credit Union, while local and national banks, such as Hills Bank and Trust Company, JPMorgan Chase, and U.S. Bank, make up the top CRA reporting institutions.

The assessment area consists of 45 census tracts, of which two are low-, 11 are moderate-, 25 are middle-, six are upper- and one is an unknown-income census tract. The following table displays information about the assessment area by tract income categories including details on total families, housing units, businesses and farms for the year 2020. Please see Appendix B to review this information for the year 2019.

Assessment Area: 2020 Cedar Rapids, IA MSA 16300								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	4.4	700	1.3	241	34.4	10,170	18.6
Moderate-income	11	24.4	9,724	17.8	1,223	12.6	9,666	17.7
Middle-income	25	55.6	33,050	60.5	1,656	5.0	13,031	23.8
Upper-income	6	13.3	10,965	20.1	197	1.8	21,786	39.9
Unknown-income	1	2.2	214	0.4	99	46.3	0	0.0
Total Assessment Area	45	100.0	54,653	100.0	3,416	6.3	54,653	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,779	587	0.9	33.0	933	52.4	259	14.6
Moderate-income	20,136	11,287	17.6	56.1	7,183	35.7	1,666	8.3
Middle-income	56,853	39,514	61.5	69.5	13,105	23.1	4,234	7.4
Upper-income	14,299	12,758	19.8	89.2	1,120	7.8	421	2.9
Unknown-income	991	128	0.2	12.9	703	70.9	160	16.1
Total Assessment Area	94,058	64,274	100.0	68.3	23,044	24.5	6,740	7.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	478	4.8	403	4.6	73	7.4	2	2.0
Moderate-income	1,739	17.5	1,545	17.5	180	18.3	14	13.7
Middle-income	5,239	52.8	4,727	53.5	462	47.0	50	49.0
Upper-income	1,918	19.3	1,712	19.4	175	17.8	31	30.4
Unknown-income	553	5.6	454	5.1	94	9.6	5	4.9
Total Assessment Area	9,927	100.0	8,841	100.0	984	100.0	102	100.0
Percentage of Total Businesses:			89.1		9.9		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.3	1	0.3	0	0.0	0	0.0
Moderate-income	10	2.7	9	2.5	1	50.0	0	0.0
Middle-income	251	68.6	250	68.7	1	50.0	0	0.0
Upper-income	103	28.1	103	28.3	0	0.0	0	0.0
Unknown-income	1	0.3	1	0.3	0	0.0	0	0.0
Total Assessment Area	366	100.0	364	100.0	2	100.0	0	0.0
Percentage of Total Farms:			99.5		0.5		0.0	
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

Population Characteristics

The table below presents the population trends for the assessment area (i.e. Linn County), the MSA, and the state of Iowa from 2010 to 2015. According to the 2015 U.S. Census Bureau demographic data, the assessment area’s population is 216,640, reflecting an increase of 2.6 percent from 2010. Comparatively, the Cedar Rapids, IA MSA, similar to the state of Iowa, also experienced increases in population of approximately 2.0 percent and 1.6 percent, respectively. A community representative indicated that Linn County, and specifically the city of Cedar Rapids, remains an attractive location for people looking to move out of rural areas, with ample job opportunities and affordable living. The area has seen record growth and revitalization since the 2008 flood disaster, and population is anticipated to continue its steady growth.

Population Change			
Area	2010 Population	2011-2015 Population	Percentage Change (%)
Linn County, IA	211,226	216,640	2.6
Cedar Rapids, IA MSA	257,940	263,003	2.0
State of Iowa	3,046,355	3,093,526	1.6
<i>Source: 2010 – U.S. Census Bureau: Decennial Census 2011-2015 – U.S. Census Bureau: American Community Survey</i>			

Income Characteristics

According to the U.S. Census Bureau’s 2015 American Community Survey (ACS) data, the assessment area is comprised of 54,653 families, of which 18.6 percent are designated as low-income, 17.7 percent are moderate-income, 23.8 percent are middle-income, and 39.9 percent are upper-income. Further, 6.3 percent of families residing within the assessment area live below the poverty line, slightly below the state of Iowa poverty rate of 8.1 percent and on par with the poverty rate of the Cedar Rapids, IA MSA. According to the 2011-2015 ACS data, the median family income (MFI) for the assessment area is \$77,036, which remains slightly above the Cedar Rapids, IA MSA at \$75,812, and notably higher than the state of Iowa MFI at \$67,466. Both the assessment area and the Cedar Rapids, IA MSA experienced a greater rate of income growth, 2.2 percent, and 2.4 percent, respectively, when compared to the state of Iowa (0.2 percent).

The table below presents income characteristics between 2010 and 2015 in the assessment area (Linn County), the Cedar Rapids, IA MSA, and the state of Iowa.

Median Family Income Change			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change (%)
Linn County	\$75,410	\$77,036	2.2
Cedar Rapids, IA MSA	\$74,017	\$75,812	2.4
State of Iowa	\$67,302	\$67,466	0.2
<i>Source: 2006-2010 – U.S. Census Bureau: American Community Survey 2011-2015 – U.S. Census Bureau: American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.</i>			

Housing Characteristics

Based on 2015 ACS data, there are a total of 94,058 housing units within the assessment area, the majority of which are owner-occupied at 68.3 percent. Rental units comprise 24.5 percent of total housing units, with the remaining 7.2 percent being vacant. The housing unit vacancy rate within the assessment area is consistent with the percentage of vacant units within the state of Iowa and the Cedar Rapids, IA MSA at 8.7 and 7.4 percent, respectively.

A method for understanding housing affordability is through an analysis of housing cost burden. For reference, the U.S. Department of Housing and Urban Development (HUD) defines cost-burdened households as those who pay more than 30.0 percent of their income for housing. Based on HUD 2011-2015 Comprehensive Housing Affordability Strategy data, low-income renters and owners across all areas are significantly more cost-burdened than moderate-income and aggregate renters and owners. More specifically, 69.0 percent of low-income renters and 61.0 percent of low-income owners in the assessment area spend more than 30.0 percent of their household income on housing. This is aligned with the percentage of cost-burdened low-income renters and owners in the Cedar Rapids, IA MSA and the state of Iowa. The significant percentage of low-income renters and owners who face housing cost burden in the assessment area further support comments from a community representative who noted the need for more affordable housing options in the area. The table below illustrates the percentage of renters and owners that face housing cost burden within the assessment area, the Cedar Rapids, IA MSA, and the state of Iowa.

2011-2015 Housing Cost Burden						
Area	Cost Burden (%) - Renters			Cost Burden (%) - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Linn County, IA	69.0	16.0	40.0	61.0	28.0	17.0
Cedar Rapids, IA MSA	69.0	15.0	39.0	59.0	27.0	16.0
State of Iowa	71.0	20.0	39.0	57.0	26.0	16.0

Cost Burden is housing cost that equals 30 percent or more of household income.

Source: U.S. Department of Housing and Urban Development (HUD), 2011-2015 Comprehensive Housing Affordability Strategy

Employment Conditions

The following table presents the unemployment trends for the assessment area, the Cedar Rapids, IA MSA, and the state of Iowa from 2015 to 2020. The unemployment rates for Linn County, the MSA, and the state of Iowa continued to decline from 2015-2018, only increasing slightly in 2019. The significant rise in unemployment rates in 2020 is largely due to the COVID-19 pandemic and its impact on local businesses. Rates were generally aligned across all areas. A community representative reiterated the significant increase in the unemployment rate in March 2020 at the beginning of the COVID-19 pandemic, but noted that the unemployment rate since has continued to decline to its pre-pandemic levels, despite difficulties re-attracting workers.

Recent Unemployment Rates (%)						
Area	2015	2016	2017	2018	2019	2020
Linn County	3.8	3.6	3.3	2.9	2.9	6.4
Cedar Rapids, IA MSA	3.8	3.7	3.4	2.9	3.0	6.2
State of Iowa	3.7	3.6	3.1	2.6	2.8	5.3

Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics

Industry Characteristics

According to the Bureau of Labor Statistics (BLS), the assessment area contains a diverse employment base and is most heavily impacted by the industries of manufacturing, healthcare and social assistance, retail trade and government. More specifically, the BLS Quarterly Census of Employment and Wages data indicated that as of Q3 2020, manufacturing, healthcare and social assistance, retail trade, and government jobs collectively employed 57,001 employees comprising 47.2 percent of total employees (120,877) across all industries. As expected due to the COVID-19 pandemic, the number of employees across all industries declined from Q1 to Q3 2020. However, the number of establishments in government and private sector industries slightly increased during the same time period, with 191 and 6,938 total establishments, respectively, as of Q3 2020. Community representatives mentioned that businesses most impacted by the pandemic were in the service and retail industries, as well as non-profit organizations. In addition, the representative noted that many food distribution companies experienced adverse effects as an influx of orders were coming through due to more residents remaining at home.

Community Representatives

Two community representatives, with a focus on affordable housing and economic development, were contacted to provide information about credit needs and market conditions within the assessment area. Despite challenges related to the COVID-19 pandemic and the derecho in 2020, representatives noted that economic conditions within the assessment area have remained stable and growth has occurred in some areas such as revitalization and population. Nonetheless, the pandemic resulted in increased challenges for small businesses. For reference, the derecho was a

powerful storm that caused high winds and tornadoes throughout the Midwest, predominantly in eastern Nebraska, Iowa, Illinois, Wisconsin, and Indiana, in August of 2020. Affordable housing options and skilled laborers continue to be primary needs within the assessment area. Overall, representatives noted that local banks have been responsive to the credit needs of the community, especially in light of the COVID-19 pandemic. Opportunities for local financial institutions to get more involved include increasing connections of local businesses to financial resources through government-funded programs and continuing to participate in LIHTC programs to increase the availability of affordable housing in the area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CEDAR RAPIDS MSA

LENDING TEST

CRBT's performance relative to the Lending Test in the Cedar Rapids MSA assessment area is High Satisfactory based on the following factors: loans reflect excellent penetration throughout the assessment area, including LMI geographies; the bank demonstrates a good distribution of loans among individuals of different income levels and businesses of different revenue sizes; the bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses; the bank is a leader in making community development loans; and the bank makes use of innovative and flexible lending practices in serving assessment area credit needs.

Geographic Distribution of Loans

The bank's lending activities reflect excellent distribution throughout the assessment area.

An analysis of the geographic distribution was conducted to determine the overall dispersion of loans among the census tracts within the assessment area. Specific to HMDA-reportable lending, CRBT originated loans in 73.3 percent of the 45 census tracts in the assessment area in 2020. HMDA loan originations penetrated both of the low-income census tracts and eight of the 11 moderate-income census tracts. As it relates to CRA-reportable lending, the bank made loans in 95.6 percent of the 45 census tracts in the assessment area with only two of the 25 middle-income census tracts not being penetrated. The bank originated CRA-reportable loans in all LMI census tracts in the assessment area in 2020. The bank's performance in 2019 was similar to that of 2020, but less dispersion of CRA-reportable loans occurred. More specifically, while HMDA-reportable lending resulted in the same penetration overall (73.3 percent of tracts), CRA-reportable loans were slightly less dispersed, with the bank making loans in 73.3 percent of the 45 census tracts. The bank's HMDA- and CRA-reportable lending activity in 2019 penetrated all low-income census tracts, with only four and three moderate-income census tracts not being penetrated, respectively. Overall, there were no conspicuous gaps in HMDA- and CRA-reportable lending across the bank's assessment area.

A breakdown of the bank's HMDA- and CRA-reportable lending is discussed in more detail below

by individual products. Specific to HMDA-reportable lending, due to limited lending activity only home purchase, refinance, and multi-family loans will be discussed. As it relates to CRA-reportable lending, only small business loans are discussed as the bank only originated one CRA small farm loan in the assessment area during the review period.

HMDA-Reportable Lending

Home Purchase Loans

In 2020, the bank originated 6.7 percent of its home purchase loans, in low-income census tracts. This was above the percentage made by aggregate lenders at 1.7 percent and the percentage of owner-occupied units in low-income census tracts at 0.9 percent. There are more limited opportunities to lend in low-income census tracts given that 52.4 percent of the housing units are rental properties and 14.6 percent of the properties are listed as vacant. The bank made 23.3 percent of its home purchase loans in moderate-income census tracts in 2020. The bank's lending in moderate-income census tracts was also above both the percentage made by aggregate lenders and the percentage of owner-occupied units within these tracts, at 18.0 percent and 17.6 percent, respectively.

The bank made 53.3 percent of its home purchase loans in middle-income census tracts, which was consistent with the percentage made by aggregate lenders (55.7 percent) and below the percentage of owner-occupied units within these tracts (61.5 percent). As it relates to upper-income census tracts, the bank made 16.7 percent of its home purchase loans in these tracts, which was also below the percentage made by aggregate lenders (24.5 percent) and the percentage of owner-occupied units within these tracts (19.8 percent).

Refinance Loans

In 2020, the bank made 5.0 percent of its refinance loans in low-income census tracts. This was above the performance of aggregate lenders at 0.6 percent and the percentage of owner-occupied units in low-income census tracts at 0.9 percent. The bank made 20.0 percent of its refinance loans in moderate-income census tracts, which exceeded the percentage of loans made by aggregate lenders at 9.1 percent and the percentage of owner-occupied units in these tracts at 17.6 percent.

The bank made 45.0 percent of its refinance loans in middle-income census tracts in 2020. This was substantially below the percentage made by aggregate of lenders at 56.8 percent and the percentage of owner-occupied units at 61.5 percent. Specific to upper-income tracts, the bank's performance was below the percentage made by aggregate lenders (33.5 percent) and above the percentage of owner-occupied units (19.8 percent) within these census tracts by originating 25.0 percent of its refinance loans in these tracts.

Multi-Family Loans

In 2020, the bank made 22.2 percent of its multi-family loans in low-income census tracts. This significantly exceeded the performance by aggregate lenders at 7.0 percent and the percentage of owner-occupied multi-family units in low-income census tracts at 4.4 percent. The bank also made 22.2 percent of its multi-family loans in moderate-income census tracts, performing significantly below the percentage of loans made by aggregate lenders at 41.0 percent and below the percentage of owner-occupied, multi-family units in these tracts at 30.5 percent.

The bank made the remaining 55.6 percent of its multi-family loans, by number, in middle-income census tracts in 2020. This was above the performance of aggregate lenders which made 48.0 percent of these loans in middle-income census tracts and below the percentage of owner-occupied, multi-family units in these tracts at 59.9 percent. The bank did not originate any multi-family loans in upper-income census tracts in 2020, performing below the percentage made by aggregate lenders at 3.0 percent and the percentage of owner-occupied, multi-family units in these tracts at 2.3 percent.

The table below presents the 2020 geographic distribution of HMDA-reportable loans in the assessment area. The 2019 geographic distribution table of HMDA-reportable loans can be found in Appendix B. Overall, the geographic distribution of HMDA-reportable lending in 2019 was generally consistent with the bank's performance in 2020, but the volume of multi-family loan originations was notably higher in 2019.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Cedar Rapids, IA MSA 16300								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		Count		Dollar				
		Bank	Agg	Bank	Agg	Agg		
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	2	6.7	1.7	203	4.7	1.1	0.9
	Moderate	7	23.3	18.0	841	19.6	11.6	17.6
	Middle	16	53.3	55.7	2,182	50.9	54.0	61.5
	Upper	5	16.7	24.5	1,058	24.7	33.3	19.8
	Unknown	0	0.0	0.1	0	0.0	0.1	0.2
	Total	30	100.0	100.0	4,284	100.0	100.0	100.0
Refinance	Low	1	5.0	0.6	75	2.6	0.4	0.9
	Moderate	4	20.0	9.1	351	12.4	5.2	17.6
	Middle	9	45.0	56.8	1,047	37.0	54.2	61.5
	Upper	5	25.0	33.5	1,310	46.3	40.2	19.8
	Unknown	1	5.0	0.1	48	1.7	0.0	0.2
	Total	20	100.0	100.0	2,831	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.6	0	0.0	0.9	0.9
	Moderate	1	50.0	12.1	12	40.0	6.8	17.6
	Middle	1	50.0	58.2	18	60.0	55.1	61.5
	Upper	0	0.0	28.9	0	0.0	36.7	19.8
	Unknown	0	0.0	0.2	0	0.0	0.5	0.2
	Total	2	100.0	100.0	30	100.0	100.0	100.0
Multi-Family	Low	2	22.2	7.0	3,416	19.1	18.8	Multi-Family 4.4
	Moderate	2	22.2	41.0	109	0.6	12.2	30.5
	Middle	5	55.6	48.0	14,364	80.3	68.4	59.9
	Upper	0	0.0	3.0	0	0.0	0.5	2.3
	Unknown	0	0.0	1.0	0	0.0	0.1	3.0
	Total	9	100.0	100.0	17,889	100.0	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.9
	Moderate	0	0.0	8.6	0	0.0	5.4	17.6
	Middle	0	0.0	60.2	0	0.0	56.5	61.5
	Upper	0	0.0	31.2	0	0.0	38.1	19.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.2
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	2.5	0	0.0	1.4	0.9
	Moderate	0	0.0	14.2	0	0.0	8.8	17.6
	Middle	0	0.0	60.8	0	0.0	62.1	61.5
	Upper	0	0.0	22.5	0	0.0	27.7	19.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.2
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	1.9	0	0.0	1.1	0.9
	Moderate	0	0.0	22.6	0	0.0	17.6	17.6
	Middle	0	0.0	62.5	0	0.0	60.7	61.5
	Upper	0	0.0	12.5	0	0.0	20.3	19.8
	Unknown	0	0.0	0.5	0	0.0	0.3	0.2
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	5	8.2	1.1	3,694	14.8	1.3	0.9
	Moderate	14	23.0	13.1	1,313	5.2	8.0	17.6
	Middle	31	50.8	56.5	17,611	70.3	54.7	61.5
	Upper	10	16.4	29.1	2,368	9.5	35.9	19.8
	Unknown	1	1.6	0.1	48	0.2	0.0	0.2
	Total	61	100.0	100.0	25,034	100.0	100.0	100.0

Originations & Purchases
2016 FFIEC Census Data
Note: Percentages may not add to 100.0 percent due to rounding

CRA-Reportable Small Business Lending

In 2019, the most recent year with aggregate lending data available at the time of this evaluation, the bank originated 14.3 percent of its CRA-reportable small business loans in low-income census tracts, performing significantly above the percentage made by aggregate lenders (4.8 percent) and the percentage of total businesses within low-income census tracts (4.7 percent). The bank made 16.9 percent of its CRA-reportable small business loans in moderate-income census tracts. This was comparable to both the percentage made by aggregate lenders (17.1 percent) and the percentage of total businesses located in moderate-income census tracts (17.2 percent).

In 2019, the bank made 35.9 percent of its CRA-reportable small business loans, by number, in middle-income census tracts. This was significantly below the percentage made by aggregate lenders at 49.8 percent and the percentage of total businesses that are located in these tracts at 53.1 percent. The bank made 24.5 percent of its CRA-reportable small business loans in upper-income census tracts, which was consistent with the percentage made by aggregate lenders at 23.0 percent and the percentage of total businesses in these census tracts at 19.3 percent.

The table below presents the geographic distribution of CRA-reportable small business loans in the assessment area in 2019. The lending table showing geographic distribution of CRA-reportable small business loans in 2020 can be found in Appendix B. The geographic distribution of CRA-reportable small business lending in 2019 was consistent with the bank’s performance in 2020, but the volume of small business loans was significantly higher in 2020.

Geographic Distribution of Small Business Loans							
Assessment Area: 2019 Cedar Rapids, IA MSA 16300							
	Tract Income Levels	Bank & Aggregate Lending Comparison					Total Businesses
		2019					
		Count		Agg	Dollar		
		Bank	Agg	Bank	Agg		
		#	%	%	\$ (000s)	\$ %	\$ %
Small Business	Low	34	14.3	4.8	7,405	14.5	7.7
	Moderate	40	16.9	17.1	7,097	13.9	18.8
	Middle	85	35.9	49.8	22,931	44.9	44.8
	Upper	58	24.5	23.0	10,523	20.6	21.8
	Unknown	20	8.4	4.3	3,142	6.1	6.7
	Tr Unknown			1.0			0.2
	Total		237	100.0	100.0	51,098	100.0

Originations & Purchases
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

Lending to Borrowers of Different Income Levels and Lending to Businesses of Different Sizes

The bank's lending activities reflect good distribution, particularly in its assessment area, of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

A breakdown of the bank's HMDA- and CRA-reportable lending is discussed in more detail below by individual products. As mentioned in the previous section, due to limited or no lending activity occurring in some HMDA-reportable loan categories, only home purchase, refinance, and multi-family loans will be discussed. As it relates to CRA-reportable lending, only small business loans are discussed as the bank only originated one CRA small farm loan in the assessment area during the review period.

HMDA-Reportable Lending

Home Purchase Loans

In 2020, the bank made 23.3 percent of its home purchase loans to low-income borrowers, exceeding the percentage made by aggregate lenders at 14.5 percent and the demographic figure, at 18.6 percent, which details the percentage of low-income families in the assessment area. The bank made 10.0 percent of its home purchase loans to moderate-income borrowers which was significantly below the percentage made by aggregate lenders at 24.6 percent and below the percentage of moderate-income families within the assessment area at 17.7 percent.

In 2020, the bank made 16.7 percent of its home purchase loans, by number, to middle-income borrowers, which was below the percentage made by aggregate lenders at 20.6 percent and the percentage of middle-income families in the assessment area at 23.8 percent. The bank made 36.7 percent of its home purchase loans to upper-income borrowers, significantly exceeding the percentage made by aggregate lenders at 22.5 percent but below the percentage of upper-income families in the assessment area at 39.9 percent.

Refinance Loans

In 2020, the bank made 10.0 percent of its refinance loans, by number, to low-income borrowers, which was above the percentage made by aggregate lenders at 6.1 percent. However, the bank's refinance lending was below the percentage of low-income families within the assessment area at 18.6 percent. The bank made 20.0 percent of its refinance loans to moderate-income borrowers. This exceeded both the percentage made by aggregate lenders at 16.3 percent and the percentage of moderate-income families in the assessment area at 17.7 percent.

In 2020, the bank made 20.0 percent of its refinance loans to middle-income borrowers, which was

consistent to the percentage made by aggregate lenders at 19.7 percent but below the percentage of middle-income families in the assessment area at 23.8 percent. The bank made 25.0 percent of its refinance loans to upper-income borrowers, which fell below both the percentage made by aggregate lenders (37.6 percent) and the percentage of upper-income families within the assessment area (39.9 percent).

Multi-Family Loans

In 2020, the bank made no multi-family loans to low-, moderate- or middle-income borrowers, which was comparable to the percentages made by aggregate lenders at 2.0, 0.0, and 1.0 percent, respectively. However, performance was significantly below the percentages of low-, moderate-, and middle-income families in the assessment area, at 18.6, 17.7, and 23.8 percent, respectively.

In 2020, the bank made 11.1 percent of its multi-family loans to upper-income borrowers, which exceeded the percentage made by aggregate lenders at 2.0 percent but was below the percentage of upper-income families at 39.9 percent. The remaining 88.9 percent of its multi-family loans, by number, were made to unknown-income borrowers, which was below the percentage made by aggregate lenders 95.0 percent. The significant percentage of multi-family loans made to borrowers of unknown-income is due to the fact that most of these loans were not made to natural persons (e.g. made to businesses) and as such, income information was not required to be collected or reported.

The table below presents the borrower distribution of HMDA-reportable loans in the assessment area in 2020. The table for borrower distribution of HMDA-reportable loans in 2019 can be found in Appendix B. Overall, the borrower distribution of HMDA-reportable lending in 2019 was generally consistent with the bank's performance in 2020, but the volume of multi-family loan originations was notably higher in 2019. In addition, the bank increased its home purchase and refinance lending to LMI borrowers in 2020 when compared to 2019. The bank's increased lending performance to LMI borrowers in 2020 shows positive trends that resulted from management's intentional efforts to enhance performance through targeted marketing and ongoing monitoring of lending performance to ensure its meeting the credit needs of its assessment area, including LMI borrowers.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Cedar Rapids, IA MSA 16300								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2020			Dollar			
		Count Bank		Agg %	Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	%
Home Purchase	Low	7	23.3	14.5	971	22.7	8.4	18.6
	Moderate	3	10.0	24.6	296	6.9	19.0	17.7
	Middle	5	16.7	20.6	796	18.6	20.7	23.8
	Upper	11	36.7	22.5	1,836	42.9	31.5	39.9
	Unknown	4	13.3	17.8	385	9.0	20.4	0.0
	Total	30	100.0	100.0	4,284	100.0	100.0	100.0
Refinance	Low	2	10.0	6.1	116	4.1	3.1	18.6
	Moderate	4	20.0	16.3	298	10.5	11.1	17.7
	Middle	4	20.0	19.7	1,109	39.2	17.1	23.8
	Upper	5	25.0	37.6	460	16.2	46.2	39.9
	Unknown	5	25.0	20.3	848	30.0	22.5	0.0
	Total	20	100.0	100.0	2,831	100.0	100.0	100.0
Home Improvement	Low	0	0.0	9.1	0	0.0	5.5	18.6
	Moderate	2	100.0	17.5	30	100.0	13.2	17.7
	Middle	0	0.0	23.8	0	0.0	16.8	23.8
	Upper	0	0.0	43.2	0	0.0	50.5	39.9
	Unknown	0	0.0	6.4	0	0.0	14.0	0.0
	Total	2	100.0	100.0	30	100.0	100.0	100.0
Multi-Family	Low	0	0.0	2.0	0	0.0	0.2	18.6
	Moderate	0	0.0	0.0	0	0.0	0.0	17.7
	Middle	0	0.0	1.0	0	0.0	0.2	23.8
	Upper	1	11.1	2.0	54	0.3	1.2	39.9
	Unknown	8	88.9	95.0	17,835	99.7	98.4	0.0
	Total	9	100.0	100.0	17,889	100.0	100.0	100.0
Other Purpose LOC	Low	0	0.0	8.4	0	0.0	6.2	18.6
	Moderate	0	0.0	16.2	0	0.0	11.8	17.7
	Middle	0	0.0	25.7	0	0.0	23.5	23.8
	Upper	0	0.0	45.8	0	0.0	53.8	39.9
	Unknown	0	0.0	3.9	0	0.0	4.6	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	13.3	0	0.0	9.1	18.6
	Moderate	0	0.0	19.2	0	0.0	13.9	17.7
	Middle	0	0.0	25.8	0	0.0	20.5	23.8
	Upper	0	0.0	38.3	0	0.0	55.0	39.9
	Unknown	0	0.0	3.3	0	0.0	1.6	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	18.6
	Moderate	0	0.0	0.0	0	0.0	0.0	17.7
	Middle	0	0.0	0.0	0	0.0	0.0	23.8
	Upper	0	0.0	0.0	0	0.0	0.0	39.9
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	9	14.8	9.5	1,087	4.3	5.0	18.6
	Moderate	9	14.8	19.3	624	2.5	13.6	17.7
	Middle	9	14.8	20.0	1,905	7.6	17.8	23.8
	Upper	17	27.9	31.4	2,350	9.4	38.9	39.9
	Unknown	17	27.9	19.7	19,068	76.2	24.7	0.0
	Total	61	100.0	100.0	25,034	100.0	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

CRA-Reportable Small Business Lending

In 2019, the bank made 38.0 percent of its CRA-reportable small business loans to businesses reporting annual revenues of \$1.0 million or less, which was below the percentage made by aggregate lenders at 48.2 percent. Of these loans, 67.8 percent had a loan amount of \$100,000 or less, which is reflective of loans most responsive to the smallest businesses. Businesses reporting annual revenues of \$1.0 million or less represented 88.8 percent of assessment area businesses. Area competition may contribute to the bank’s small business lending performance being significantly below the percentage of small businesses within the assessment area. This is further evidenced by the fact the top CRA reporters in the assessment area are larger national banks. In addition, there is a significant number of businesses reporting annual revenues of \$1.0 million or less within the assessment area, making comparison to the percentage by aggregate lenders more appropriate and weighted heavier in determining the borrower distribution conclusion for CRA-reportable small business loans.

The table below presents the borrower distribution of small business loans in the assessment area in 2019. The borrower distribution table for small business loans in 2020 can be found in Appendix B. The borrower distribution of CRA-reportable small business lending in 2020 reflected a notable increase in total originations, as well as increased lending to businesses with revenues of \$1.0 or less when compared to 2019.

Small Business Lending By Revenue & Loan Size								
Assessment Area: 2019 Cedar Rapids, IA MSA 16300								
Product Type		Bank & Aggregate Lending Comparison						
		2019			2019			Total Businesses
		Count		Agg	Dollar		Agg	
#	%	%	\$ 000s	\$ %	\$ %	%		
Revenue	\$1 Million or Less	90	38.0	48.2	13,166	25.8	28.0	88.8
	Over \$1 Million	147	62.0	51.8	37,932	74.2	72.0	10.2
	Unknown	0	0.0		0	0.0		1.0
	Total	237	100.0	100.0	51,098	100.0	100.0	100.0
Small Business Loan Size	\$100,000 or Less	124	52.3	87.0	5,472	10.7	25.0	
	\$100,001 - \$250,000	39	16.5	6.2	7,429	14.5	16.6	
	\$250,001 - \$1 Million	74	31.2	6.8	38,197	74.8	58.4	
	Total	237	100.0	100.0	51,098	100.0	100.0	
Small Business Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	61	67.8		3,081	23.4		
	\$100,001 - \$250,000	13	14.4		2,093	15.9		
	\$250,001 - \$1 Million	16	17.8		7,992	60.7		
	Total	90	100.0		13,166	100.0		
Originations & Purchases								
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

CRBT exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses, consistent with safe and sound operations, through low-income housing lending, including multi-tenant housing and single room occupancy units which are typically the least expensive housing for single adults. Additionally, the bank has increased its lending percentage of smaller loans (\$100,000 or less) to businesses reporting revenue \$1.0 million or less, which is reflective of loans most responsive to the smallest businesses.

The bank makes use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of LMI individuals or geographies through its SFG which specializes in LIHTC programs, as well as the bank's recently implemented CRA Residential Mortgage Loan product designed to increase lending to LMI residents within the assessment area. Additionally, the bank participated in the Paycheck Protection Program (PPP) to assist small businesses during the pandemic. PPP loans were incredibly beneficial to the community as they were exclusively for payroll or income replacement. This is deemed as a positive impact on the surrounding community as it helps replenish the income loss due to the pandemic.

Community Development Lending

The bank is a leader in making community development loans. During the review period, the bank made 117 such loans totaling approximately \$257.0 million in the assessment area. When compared to the previous evaluation where the bank made 26 loans totaling \$115.1 million, the bank increased the number of loans by 350.0 percent, and increased the dollar volume by 123.3 percent. Of the bank's qualified community development loans, 75 loans were originated totaling \$158.0 million for revitalization and stabilization purposes, 15 of which were PPP loans. These loans were designed to assist the efforts of small businesses and to keep these businesses' workforce employed during the COVID-19 pandemic. Through these PPP loans, the bank was responsive to the specific credit needs of the assessment area during a difficult time. Eighteen loans were originated totaling approximately \$19.5 million for community service purposes; 15 loans totaling approximately \$46.3 million were made for affordable housing, which were particularly responsive to the need of affordable housing to LIHTC recipients and multi-tenant housing for the extremely impoverished; and 9 loans totaling around \$33.4 million were made for economic development purposes. Of the 117 community development loans originated, 68 were new originations totaling \$155.2 million. The remaining 49 loans were renewals of credit relationships established prior to the evaluation period.

The table below presents the bank's community development loans in the assessment area during the review period.

Qualified Community Development Loans by Purpose September 11, 2018 – October 18, 2021										
AA Name	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Total #	Total \$
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)		
Cedar Rapids, IA MSA #16300	15	46,292	18	19,450	9	33,351	75	157,936	117	257,029

INVESTMENT TEST

CRBT's performance relative to the Investment Test in the Cedar Rapids MSA is High Satisfactory based on the following: the bank made a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position; the bank makes occasional use of innovative and/or complex investments to support community initiatives; and the bank demonstrates excellent responsiveness to credit and community development needs, especially in the area of affordable housing to LMI individuals.

During the evaluation period, CRBT made 16 qualified investments, consisting of \$7.9 million current period and \$304,201 prior period for an approximate total of \$8.2 million, a substantial increase compared to the previous evaluation where only four (one new) qualified investments totaling \$574,023 were made. New investments in the current evaluation period included mortgage pools for affordable home loan financing, Neighborhood Finance Corporation (NFC) investments, Section 42 Housing Tax Credit funds, and disaster recovery.

The bank also made 185 qualified donations totaling approximately \$1.1 million in the current evaluation period. The donations were made to organizations who serve a variety of purposes including those focused on affordable housing, community service, economic development, and revitalization/stabilization. This was also a notable increase when compared to the previous evaluation of qualified donations totaling \$410,564.

The table below presents the bank's community development investments in the assessment area during the review period.

Qualified Community Development Investments by Purpose September 11, 2018 – October 18, 2021										
AA Name	Affordable Housing		Community Services		Economic Development		Revitalize and Stabilize		Total #	Total \$
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)		
Cedar Rapids, IA MSA #16300 - New	11	6,899	0	0	0	0	1	1,000	12	7,899
Cedar Rapids, IA MSA #16300 – Prior Period	1	157	0	0	3	148	0	0	4	304

SERVICE TEST

CRBT's performance relative to the Service Test in the Cedar Rapids MSA is High Satisfactory. The bank's retail delivery services are readily accessible to geographies and individuals of different income levels in its assessment area. To the extent changes have been made, its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals. Lastly, its services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and individuals.

Retail Services

CRBT's retail delivery services are readily accessible to all portions of the bank's assessment area, including LMI individuals and geographies. The bank operates a total of five offices, one of which is located in a moderate-income census tract. The main branch is located in a historically low-income census tract (although technically designated as an unknown-income tract). In addition, the bank operates a total of six full-service ATMs (one standalone), and one standalone, cash-only ATM, three of which are located in moderate-income census tracts. Alternative delivery systems include phone, internet, and mobile banking, and CRBT customers have access to a network of surcharge free ATMs through the Privileged Status Network.

To the extent changes have been made, the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies or to LMI individuals. Since the previous examination, the bank closed a branch located in a moderate-income census tract but continues to operate the full-service ATM at that location. Additionally, subsequent to that closure, the bank opened a new branch also located in a moderate-income census tract. No other openings or closures have occurred during the evaluation period that would affect accessibility.

Bank hours and services are reasonable and do not vary in a way that inconveniences LMI geographies or individuals. Office hours range from 8:30 and 9:00 a.m. to 5:00 p.m., Monday

through Friday. Multiple locations also provide drive-up services with extended hours and services on Saturday. Applications for loan and deposit products are accepted at each location. In addition to branch hours, appointments with lenders for loan applications at the applicant’s convenience and internet, phone, and mobile banking services make the bank’s products and services accessible to LMI individuals and geographies.

The table below presents the distribution the bank’s office locations and ATMs in the assessment area by the income designation of census tracts.

Branch and ATM Locations					
Tract Income	Branch Locations		ATMs		Census Tracts
	#	%	#	%	%
Low	0	0.0	0	0.0	4.5
Moderate	1	20.0	3	42.9	24.4
Middle	3	60.0	3	42.9	55.6
Upper	0	0.0	0	0.0	13.3
Unknown	1	20.0	1	14.2	2.2
Total	5	100.0	7	100.0	100.0

Community Development Services

The bank is a leader in providing community development services in its assessment area. The bank contributed 2,714 hours of service in the Cedar Rapids MSA assessment area. This is a 90.6 percent increase in hours contributed since the previous evaluation, during which time the bank contributed 1,424 hours of service to its community. Although the bank faced challenges as a result of the COVID-19 pandemic that started in 2020 which limited opportunities for the bank to provide many of the services that would have previously been provided in an in-person environment, the bank was able to remain responsive to the assessment area by providing essential services virtually.

The vast majority of hours served, 2,119, fell into the community services designation. Bank employees served on nonprofit boards of directors, donating their time and technical knowledge to these local organizations. An additional 248 hours of community development services went to economic development purposes, 184 hours went to revitalization and stabilization, and 163 hours to affordable housing purposes.

Qualified Community Development Services by Purpose					
September 11, 2018 – October 18, 2021					
AA Name	Affordable Housing	Community Services	Economic Development	Revitalize and Stabilize	Total Hours
	Hours	Hours	Hours	Hours	
Cedar Rapids, IA MSA #16300	163	2,119	248	184	2,714

WATERLOO-CEDAR FALLS MSA – LIMITED REVIEW

SCOPE OF THE EXAMINATION

CRBT’s operations in the Waterloo-Cedar Falls MSA received a limited-scope review. The scope of this assessment area is consistent with the scope of examination presented in the overall section of the Performance Evaluation.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE WATERLOO-CEDAR FALLS MSA

The bank’s Waterloo-Cedar Falls MSA assessment area is comprised of Black Hawk County in its entirety. Bremer and Grundy Counties are also part of the Waterloo-Cedar Falls, IA MSA #47940 but are excluded from the bank’s assessment area. The assessment area is comprised of 38 total census tracts. Based on 2015 ACS data, four census tracts are designated low-income, nine census tracts are moderate-income, 18 census tracts are considered middle-income, and six upper-income census tracts are in the assessment area. In addition, there is one census tract in the assessment area with an unknown income, which is also where the University of Northern Iowa campus is located. The bank operates three branches and three full-service ATMs within the assessment area. Since the previous evaluation, there have been no changes to the assessment area.

The following table details the branch and ATM distribution within the assessment area.

Distribution of Branches, ATMs, and Demographics				
Tract Income Level	# of Branches	% of Branches	# of ATMs	% of ATMs
Low	1	33.3	1	33.3
Moderate	0	0.0	0	0.0
Middle	2	66.7	2	66.7
Upper	0	0.0	0	0.0
Unknown	0	0.0	0	0.0
Total	3	100.0	3	100.0

The Federal Deposit Insurance Corporation’s (FDIC) Deposit Market Share Report dated June 30, 2020, ranks CRBT seventh among 13 FDIC-insured institutions operating in the assessment area. During this time, the bank held a 6.0 percent market share, compared to the market leader Farmers State Bank, which held 30.5 percent of the assessment area’s deposits. The bank ranked 32nd out of 168 HMDA reporting institutions by originating 15 HMDA-reportable loans in 2020. As it relates to CRA-reportable lending, CRBT ranked 10th among 61 CRA reporting institutions by originating 56 such loans in 2019. CRBT operates in a competitive market with large national lenders and credit unions, especially for CRA-reportable lending. Top HMDA reporting institutions in the assessment area include Veridian Credit Union and Greenstate Credit Union, while national

banks, such as U.S. Bank and JPMorgan Chase, are top CRA reporting institutions.

The following table displays information about the assessment area by tract income categories including details on total families, housing units, businesses and farms for the year 2020. Please see Appendix C to review this information for the year 2019.

Assessment Area: 2020 Waterloo-Cedar Falls, IA MSA 47940									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	4	10.5	1,438	4.6	556	38.7	6,500	21.0	
Moderate-income	9	23.7	5,947	19.2	809	13.6	5,904	19.1	
Middle-income	18	47.4	16,685	53.9	1,074	6.4	7,231	23.3	
Upper-income	6	15.8	6,814	22.0	361	5.3	11,349	36.6	
Unknown-income	1	2.6	100	0.3	4	4.0	0	0.0	
Total Assessment Area	38	100.0	30,984	100.0	2,804	9.0	30,984	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied			Rental		Vacant		
		#	%	%	#	%	#	%	
Low-income	3,326	1,105	3.1	33.2	1,751	52.6	470	14.1	
Moderate-income	11,253	5,907	16.7	52.5	4,160	37.0	1,186	10.5	
Middle-income	29,026	20,407	57.7	70.3	7,006	24.1	1,613	5.6	
Upper-income	12,489	7,876	22.3	63.1	3,754	30.1	859	6.9	
Unknown-income	497	63	0.2	12.7	381	76.7	53	10.7	
Total Assessment Area	56,591	35,358	100.0	62.5	17,052	30.1	4,181	7.4	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	371	7.1	322	7.0	46	8.9	3	5.1	
Moderate-income	896	17.2	778	16.8	112	21.7	6	10.2	
Middle-income	2,630	50.6	2,358	51.0	240	46.4	32	54.2	
Upper-income	1,271	24.5	1,138	24.6	116	22.4	17	28.8	
Unknown-income	30	0.6	26	0.6	3	0.6	1	1.7	
Total Assessment Area	5,198	100.0	4,622	100.0	517	100.0	59	100.0	
		Percentage of Total Businesses:		88.9		9.9		1.1	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	4	1.2	4	1.3	0	0.0	0	0.0	
Moderate-income	2	0.6	2	0.6	0	0.0	0	0.0	
Middle-income	222	68.9	220	69.2	1	33.3	1	100.0	
Upper-income	94	29.2	92	28.9	2	66.7	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	322	100.0	318	100.0	3	100.0	1	100.0	
		Percentage of Total Farms:		98.8		0.9		0.3	
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS									
Note: Percentages may not add to 100.0 percent due to rounding									

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WATERLOO-CEDAR FALLS MSA

Assessment Area	Lending Test	Investment Test	Service Test
Waterloo-Cedar Falls, IA MSA #47490	Consistent	Consistent	Consistent

The bank's lending and community development performance in the assessment area is consistent with its overall performance. Please see the lending and community development tables below for more detail. Additional lending tables for the assessment area can be found in Appendix C.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Waterloo-Cedar Falls, IA MSA 47940								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		2020		2020				
		Count Bank	Agg %	Dollar Bank \$ (000s)	Agg %	Agg \$ %		
		#	%	%	\$ %	\$ %		
Home Purchase	Low	1	14.3	1.2	121	21.6	0.4	3.1
	Moderate	2	28.6	13.5	140	25.0	9.0	16.7
	Middle	3	42.9	57.9	285	50.8	52.0	57.7
	Upper	1	14.3	27.2	15	2.7	38.4	22.3
	Unknown	0	0.0	0.2	0	0.0	0.1	0.2
	Total		7	100.0	100.0	561	100.0	100.0
Refinance	Low	0	0.0	0.6	0	0.0	0.1	3.1
	Moderate	1	33.3	9.1	8	5.6	6.1	16.7
	Middle	2	66.7	51.1	135	94.4	44.4	57.7
	Upper	0	0.0	38.9	0	0.0	49.1	22.3
	Unknown	0	0.0	0.3	0	0.0	0.2	0.2
	Total		3	100.0	100.0	143	100.0	100.0
Home Improvement	Low	0	0.0	2.2	0	0.0	1.3	3.1
	Moderate	0	0.0	12.3	0	0.0	8.0	16.7
	Middle	0	0.0	62.3	0	0.0	58.7	57.7
	Upper	0	0.0	23.1	0	0.0	31.8	22.3
	Unknown	0	0.0	0.2	0	0.0	0.2	0.2
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	11.4	0	0.0	16.0	Multi-Family 7.2
	Moderate	2	100.0	31.4	3,923	100.0	16.9	19.1
	Middle	0	0.0	39.3	0	0.0	22.9	41.0
	Upper	0	0.0	16.4	0	0.0	43.6	30.8
	Unknown	0	0.0	1.4	0	0.0	0.5	1.9
	Total		2	100.0	100.0	3,923	100.0	100.0
Other Purpose LOC	Low	0	0.0	3.1	0	0.0	1.7	3.1
	Moderate	0	0.0	7.7	0	0.0	5.3	16.7
	Middle	0	0.0	54.1	0	0.0	51.1	57.7
	Upper	0	0.0	35.1	0	0.0	41.9	22.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.2
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	1.8	0	0.0	1.5	3.1
	Moderate	0	0.0	17.2	0	0.0	7.4	16.7
	Middle	0	0.0	56.8	0	0.0	53.1	57.7
	Upper	0	0.0	23.7	0	0.0	37.8	22.3
	Unknown	0	0.0	0.6	0	0.0	0.3	0.2
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	2	66.7	5.5	92	72.4	3.2	3.1
	Moderate	1	33.3	32.9	35	27.6	24.7	16.7
	Middle	0	0.0	54.8	0	0.0	59.7	57.7
	Upper	0	0.0	6.8	0	0.0	12.4	22.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.2
	Total		3	100.0	100.0	127	100.0	100.0
HMDA Totals	Low	3	20.0	1.3	213	4.5	2.7	3.1
	Moderate	6	40.0	11.8	4,106	86.4	8.8	16.7
	Middle	5	33.3	54.5	420	8.8	44.2	57.7
	Upper	1	6.7	32.1	15	0.3	44.1	22.3
	Unknown	0	0.0	0.3	0	0.0	0.2	0.2
	Total		15	100.0	100.0	4,754	100.0	100.0

Originations & Purchases
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of Small Business Loans								
Assessment Area: 2019 Waterloo-Cedar Falls, IA MSA 47940								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Businesses
		2019						
		Count		Dollar				
		Bank	Agg	Bank		Agg		
		#	%	%	\$ (000s)	\$ %	\$ %	%
Small Business	Low	8	13.8	6.7	2,047	20.2	8.5	6.9
	Moderate	16	27.6	16.3	1,431	14.2	19.3	17.6
	Middle	18	31.0	46.9	4,108	40.6	42.7	50.7
	Upper	16	27.6	28.4	2,527	25.0	28.9	24.3
	Unknown	0	0.0	0.3	0	0.0	0.1	0.6
	Tr Unknown			1.4			0.5	
	Total		58	100.0	100.0	10,113	100.0	100.0
Originations & Purchases 2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Waterloo-Cedar Falls, IA MSA 47940								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2020						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	1	14.3	13.9	92	16.4	7.7	21.0
	Moderate	4	57.1	25.7	333	59.4	19.7	19.1
	Middle	0	0.0	22.1	0	0.0	22.3	23.3
	Upper	1	14.3	25.9	15	2.7	36.1	36.6
	Unknown	1	14.3	12.4	121	21.6	14.3	0.0
	Total		7	100.0	100.0	561	100.0	100.0
Refinance	Low	0	0.0	4.5	0	0.0	2.1	21.0
	Moderate	2	66.7	15.8	18	12.6	10.5	19.1
	Middle	1	33.3	21.1	125	87.4	18.1	23.3
	Upper	0	0.0	41.0	0	0.0	50.3	36.6
	Unknown	0	0.0	17.7	0	0.0	19.1	0.0
	Total		3	100.0	100.0	143	100.0	100.0
Home Improvement	Low	0	0.0	11.5	0	0.0	7.7	21.0
	Moderate	0	0.0	23.6	0	0.0	16.1	19.1
	Middle	0	0.0	28.1	0	0.0	27.7	23.3
	Upper	0	0.0	35.6	0	0.0	47.6	36.6
	Unknown	0	0.0	1.2	0	0.0	1.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	0.7	0	0.0	0.1	21.0
	Moderate	0	0.0	2.9	0	0.0	0.3	19.1
	Middle	0	0.0	0.7	0	0.0	0.0	23.3
	Upper	0	0.0	11.4	0	0.0	0.8	36.6
	Unknown	2	100.0	84.3	3,923	100.0	98.8	0.0
	Total		2	100.0	100.0	3,923	100.0	100.0
Other Purpose LOC	Low	0	0.0	11.2	0	0.0	7.5	21.0
	Moderate	0	0.0	21.6	0	0.0	16.1	19.1
	Middle	0	0.0	22.8	0	0.0	20.9	23.3
	Upper	0	0.0	40.9	0	0.0	50.9	36.6
	Unknown	0	0.0	3.5	0	0.0	4.6	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	20.1	0	0.0	8.2	21.0
	Moderate	0	0.0	25.4	0	0.0	24.1	19.1
	Middle	0	0.0	22.5	0	0.0	19.5	23.3
	Upper	0	0.0	31.4	0	0.0	47.8	36.6
	Unknown	0	0.0	0.6	0	0.0	0.3	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	21.0
	Moderate	0	0.0	0.0	0	0.0	0.0	19.1
	Middle	0	0.0	0.0	0	0.0	0.0	23.3
	Upper	0	0.0	0.0	0	0.0	0.0	36.6
	Unknown	3	100.0	100.0	127	100.0	100.0	0.0
	Total		3	100.0	100.0	127	100.0	100.0
HMDA Totals	Low	1	6.7	9.1	92	1.9	3.9	21.0
	Moderate	6	40.0	20.2	351	7.4	12.3	19.1
	Middle	1	6.7	21.4	125	2.6	16.9	23.3
	Upper	1	6.7	33.5	15	0.3	37.8	36.6
	Unknown	6	40.0	15.8	4,171	87.7	29.1	0.0
	Total		15	100.0	100.0	4,754	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

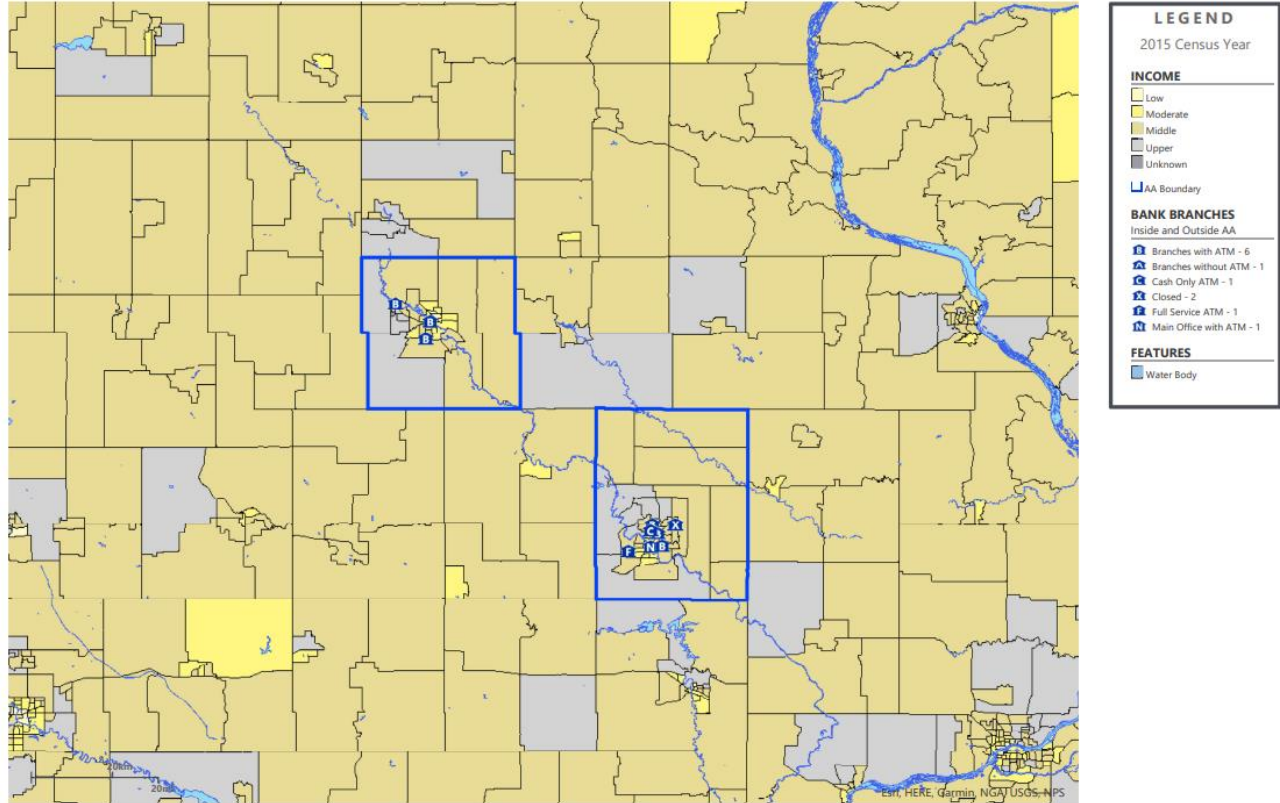
Small Business Lending By Revenue & Loan Size								
Assessment Area: 2019 Waterloo-Cedar Falls, IA MSA 47940								
Product Type		Bank & Aggregate Lending Comparison						
		2019			2019		Total	
		Count		Agg %	Dollar		Agg \$ %	Businesses %
Bank #	%	Bank \$ 000s	\$ %					
Revenue	\$1 Million or Less	34	58.6	48.7	4,920	48.7	43.7	89.0
	Over \$1 Million	24	41.4	51.3	5,193	51.3	56.3	9.9
	Unknown	0	0.0		0	0.0		1.0
	Total	58	100.0	100.0	10,113	100.0	100.0	100.0
Small Business Loan Size	\$100,000 or Less	33	56.9	88.0	1,478	14.6	26.8	
	\$100,001 - \$250,000	12	20.7	6.2	2,082	20.6	19.3	
	\$250,001 - \$1 Million	13	22.4	5.7	6,553	64.8	53.9	
	Total	58	100.0	100.0	10,113	100.0	100.0	
Small Business Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	18	52.9		700	14.2		
	\$100,001 - \$250,000	10	29.4		1,715	34.9		
	\$250,001 - \$1 Million	6	17.6		2,505	50.9		
	Total	34	100.0		4,920	100.0		

Originations & Purchases
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

Waterloo-Cedar Falls, IA MSA Community Development Activities										
September 11, 2018, through October 18, 2021										
	Affordable Housing		Community Services		Economic Development		Revitalize/Stabilize		Total #	Total \$(000s)
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)		
Loans	0	0	4	2,050	8	19,155	12	27,375	24	48,581
Investments	9	4,154	0	0	2	220	0	0	11	4,374
Grants	1	0.2	61	84	7	41	6	32	75	157
	Affordable Housing		Community Services		Economic Development		Revitalize/Stabilize		Total	
	# Events	Hours	# Events	Hours	# Events	Hours	# Events	Hours	# Events	Hours
Services	6	10	94	316	56	296	9	18	165	640

APPENDIX A – Map of Combined Assessment Area

Cedar Rapids Bank and Trust Company 3029589 Combined Assessment Area



APPENDIX B – Additional Demographic and Lending Tables - Full Scope Review

Assessment Area: 2019 Cedar Rapids, IA MSA 16300								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	4.4	700	1.3	241	34.4	10,170	18.6
Moderate-income	11	24.4	9,724	17.8	1,223	12.6	9,666	17.7
Middle-income	25	55.6	33,050	60.5	1,656	5.0	13,031	23.8
Upper-income	6	13.3	10,965	20.1	197	1.8	21,786	39.9
Unknown-income	1	2.2	214	0.4	99	46.3	0	0.0
Total Assessment Area	45	100.0	54,653	100.0	3,416	6.3	54,653	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	1,779	587	0.9	33.0	933	52.4	259	14.6
Moderate-income	20,136	11,287	17.6	56.1	7,183	35.7	1,666	8.3
Middle-income	56,853	39,514	61.5	69.5	13,105	23.1	4,234	7.4
Upper-income	14,299	12,758	19.8	89.2	1,120	7.8	421	2.9
Unknown-income	991	128	0.2	12.9	703	70.9	160	16.1
Total Assessment Area	94,058	64,274	100.0	68.3	23,044	24.5	6,740	7.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	466	4.7	390	4.4	75	7.4	1	1.0
Moderate-income	1,707	17.2	1,509	17.1	183	18.1	15	14.4
Middle-income	5,271	53.1	4,740	53.8	482	47.6	49	47.1
Upper-income	1,919	19.3	1,711	19.4	174	17.2	34	32.7
Unknown-income	566	5.7	462	5.2	99	9.8	5	4.8
Total Assessment Area	9,929	100.0	8,812	100.0	1,013	100.0	104	100.0
	Percentage of Total Businesses:			88.8		10.2		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	1	0.3	1	0.3	0	0.0	0	0.0
Moderate-income	8	2.0	8	2.1	0	0.0	0	0.0
Middle-income	274	70.1	272	69.9	2	100.0	0	0.0
Upper-income	106	27.1	106	27.2	0	0.0	0	0.0
Unknown-income	2	0.5	2	0.5	0	0.0	0	0.0
Total Assessment Area	391	100.0	389	100.0	2	100.0	0	0.0
	Percentage of Total Farms:			99.5		0.5		0.0

2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2019 Cedar Rapids, IA MSA 16300								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		2019			Dollar			
		Count Bank	Agg	Dollar Bank	Agg	Owner Occupied		
		#	%	%	\$ (000s)	\$ %	\$ %	% of Units
Home Purchase	Low	3	10.0	1.3	583	14.4	0.8	0.9
	Moderate	4	13.3	17.4	214	5.3	11.5	17.6
	Middle	14	46.7	59.8	1,487	36.7	58.2	61.5
	Upper	9	30.0	21.3	1,770	43.7	29.4	19.8
	Unknown	0	0.0	0.2	0	0.0	0.1	0.2
	Total		30	100.0	100.0	4,054	100.0	100.0
Refinance	Low	0	0.0	1.0	0	0.0	0.7	0.9
	Moderate	5	21.7	12.1	233	7.7	6.6	17.6
	Middle	13	56.5	57.5	2,192	73.0	56.2	61.5
	Upper	5	21.7	29.4	577	19.2	36.4	19.8
	Unknown	0	0.0	0.1	0	0.0	0.1	0.2
	Total		23	100.0	100.0	3,002	100.0	100.0
Home Improvement	Low	1	25.0	1.4	10	7.7	2.0	0.9
	Moderate	0	0.0	16.4	0	0.0	11.7	17.6
	Middle	3	75.0	58.6	119	92.3	59.2	61.5
	Upper	0	0.0	23.2	0	0.0	26.8	19.8
	Unknown	0	0.0	0.4	0	0.0	0.3	0.2
	Total		4	100.0	100.0	129	100.0	100.0
Multi-Family	Low	3	12.5	9.8	351	6.6	4.8	Multi-Family 4.4
	Moderate	4	16.7	22.8	1,256	23.6	11.5	30.5
	Middle	12	50.0	55.4	2,590	48.7	81.9	59.9
	Upper	2	8.3	6.5	194	3.6	0.7	2.3
	Unknown	3	12.5	5.4	926	17.4	1.1	3.0
	Total		24	100.0	100.0	5,318	100.0	100.0
Other Purpose LOC	Low	0	0.0	1.4	0	0.0	0.8	0.9
	Moderate	0	0.0	11.8	0	0.0	7.5	17.6
	Middle	0	0.0	55.8	0	0.0	50.1	61.5
	Upper	0	0.0	31.0	0	0.0	41.6	19.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.2
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	0.9	0	0.0	0.5	0.9
	Moderate	0	0.0	9.6	0	0.0	8.2	17.6
	Middle	0	0.0	63.8	0	0.0	62.5	61.5
	Upper	0	0.0	25.2	0	0.0	28.1	19.8
	Unknown	0	0.0	0.5	0	0.0	0.7	0.2
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	3.4	0	0.0	2.1	0.9
	Moderate	0	0.0	39.8	0	0.0	29.1	17.6
	Middle	0	0.0	50.0	0	0.0	55.0	61.5
	Upper	0	0.0	6.8	0	0.0	13.8	19.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.2
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	7	8.6	1.2	944	7.6	1.1	0.9
	Moderate	13	16.0	15.4	1,703	13.6	9.6	17.6
	Middle	42	51.9	58.7	6,388	51.1	58.9	61.5
	Upper	16	19.8	24.5	2,541	20.3	30.2	19.8
	Unknown	3	3.7	0.2	926	7.4	0.1	0.2
	Total		81	100.0	100.0	12,503	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Business Loans						
Assessment Area: 2020 Cedar Rapids, IA MSA 16300						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2020 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	75	14.1	13,513	14.0	4.8
	Moderate	101	19.0	22,380	23.2	17.5
	Middle	194	36.5	37,570	38.9	52.8
	Upper	121	22.8	17,772	18.4	19.3
	Unknown	40	7.5	5,249	5.4	5.6
	Total	531	100.0	96,484	100.0	100.0
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2019 Cedar Rapids, IA MSA 16300								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2019			Dollar			
		Count Bank		Agg	Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	3	10.0	15.9	130	3.2	9.6	18.6
	Moderate	1	3.3	26.1	50	1.2	21.0	17.7
	Middle	4	13.3	23.1	443	10.9	24.3	23.8
	Upper	19	63.3	20.3	2,792	68.9	29.3	39.9
	Unknown	3	10.0	14.5	639	15.8	15.8	0.0
	Total		30	100.0	100.0	4,054	100.0	100.0
Refinance	Low	0	0.0	9.3	0	0.0	4.7	18.6
	Moderate	2	8.7	17.9	72	2.4	12.6	17.7
	Middle	8	34.8	21.5	588	19.6	19.2	23.8
	Upper	7	30.4	31.1	1,641	54.7	40.9	39.9
	Unknown	6	26.1	20.1	700	23.3	22.5	0.0
	Total		23	100.0	100.0	3,002	100.0	100.0
Home Improvement	Low	0	0.0	10.3	0	0.0	6.8	18.6
	Moderate	0	0.0	22.3	0	0.0	15.9	17.7
	Middle	0	0.0	23.0	0	0.0	21.9	23.8
	Upper	2	50.0	37.4	75	58.2	44.9	39.9
	Unknown	2	50.0	7.0	54	41.8	10.6	0.0
	Total		4	100.0	100.0	129	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	18.6
	Moderate	0	0.0	0.0	0	0.0	0.0	17.7
	Middle	1	4.2	1.1	57	1.1	0.0	23.8
	Upper	0	0.0	1.1	0	0.0	0.0	39.9
	Unknown	23	95.8	97.8	5,261	98.9	99.9	0.0
	Total		24	100.0	100.0	5,318	100.0	100.0
Other Purpose LOC	Low	0	0.0	13.7	0	0.0	8.9	18.6
	Moderate	0	0.0	22.0	0	0.0	14.5	17.7
	Middle	0	0.0	22.5	0	0.0	19.7	23.8
	Upper	0	0.0	39.3	0	0.0	52.0	39.9
	Unknown	0	0.0	2.5	0	0.0	5.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	12.4	0	0.0	7.8	18.6
	Moderate	0	0.0	23.4	0	0.0	16.8	17.7
	Middle	0	0.0	23.9	0	0.0	25.5	23.8
	Upper	0	0.0	37.6	0	0.0	38.4	39.9
	Unknown	0	0.0	2.8	0	0.0	11.6	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	18.6
	Moderate	0	0.0	1.1	0	0.0	0.6	17.7
	Middle	0	0.0	1.1	0	0.0	4.2	23.8
	Upper	0	0.0	0.0	0	0.0	0.0	39.9
	Unknown	0	0.0	97.7	0	0.0	95.2	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	3	3.7	12.9	130	1.0	6.9	18.6
	Moderate	3	3.7	22.4	122	1.0	16.1	17.7
	Middle	13	16.0	22.2	1,088	8.7	20.5	23.8
	Upper	28	34.6	25.8	4,508	36.1	32.3	39.9
	Unknown	34	42.0	16.7	6,654	53.2	24.2	0.0
	Total		81	100.0	100.0	12,503	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2020 Cedar Rapids, IA MSA 16300							
Product Type		Bank & Demographic Comparison					
		2020		2020		Total Businesses %	
#	%	\$ 000s	\$ %	Count			
				Bank	Bank		
Small Business	Revenue	\$1 Million or Less	303	57.1	28,512	29.6	89.1
		Over \$1 Million	228	42.9	67,972	70.4	9.9
		Unknown	0	0.0	0	0.0	1.0
		Total	531	100.0	96,484	100.0	100.0
	Loan Size	\$100,000 or Less	293	55.2	10,302	10.7	
		\$100,001 - \$250,000	101	19.0	16,730	17.3	
		\$250,001 - \$1 Million	137	25.8	69,452	72.0	
		Total	531	100.0	96,484	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	241	79.5	7,648	26.8	
		\$100,001 - \$250,000	31	10.2	4,703	16.5	
		\$250,001 - \$1 Million	31	10.2	16,161	56.7	
		Total	303	100.0	28,512	100.0	

Originations & Purchases
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

APPENDIX C – Additional Demographic and Lending Tables - Limited Scope Review

Assessment Area: 2019 Waterloo-Cedar Falls, IA MSA 47940									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	4	10.5	1,438	4.6	556	38.7	6,500	21.0	
Moderate-income	9	23.7	5,947	19.2	809	13.6	5,904	19.1	
Middle-income	18	47.4	16,685	53.9	1,074	6.4	7,231	23.3	
Upper-income	6	15.8	6,814	22.0	361	5.3	11,349	36.6	
Unknown-income	1	2.6	100	0.3	4	4.0	0	0.0	
Total Assessment Area	38	100.0	30,984	100.0	2,804	9.0	30,984	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	%	#	%	#	%	
Low-income	3,326	1,105	3.1	33.2	1,751	52.6	470	14.1	
Moderate-income	11,253	5,907	16.7	52.5	4,160	37.0	1,186	10.5	
Middle-income	29,026	20,407	57.7	70.3	7,006	24.1	1,613	5.6	
Upper-income	12,489	7,876	22.3	63.1	3,754	30.1	859	6.9	
Unknown-income	497	63	0.2	12.7	381	76.7	53	10.7	
Total Assessment Area	56,591	35,358	100.0	62.5	17,052	30.1	4,181	7.4	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	356	6.9	308	6.7	45	8.7	3	5.7	
Moderate-income	915	17.6	796	17.2	115	22.3	4	7.5	
Middle-income	2,629	50.7	2,355	51.0	243	47.1	31	58.5	
Upper-income	1,258	24.3	1,134	24.6	110	21.3	14	26.4	
Unknown-income	29	0.6	25	0.5	3	0.6	1	1.9	
Total Assessment Area	5,187	100.0	4,618	100.0	516	100.0	53	100.0	
	Percentage of Total Businesses:			89.0		9.9		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	4	1.2	4	1.2	0	0.0	0	0.0	
Moderate-income	2	0.6	2	0.6	0	0.0	0	0.0	
Middle-income	230	70.1	228	70.6	1	25.0	1	100.0	
Upper-income	92	28.0	89	27.6	3	75.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	328	100.0	323	100.0	4	100.0	1	100.0	
	Percentage of Total Farms:			98.5		1.2		0.3	

2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2019 Waterloo-Cedar Falls, IA MSA 47940								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		2019			Dollar			
		Count Bank		Agg	Bank			Agg
#	%	%	\$ (000s)	\$ %	\$ %			
Home Purchase	Low	0	0.0	1.3	0	0.0	0.5	3.1
	Moderate	1	50.0	13.6	105	41.7	8.7	16.7
	Middle	0	0.0	56.6	0	0.0	49.8	57.7
	Upper	1	50.0	28.3	147	58.3	40.8	22.3
	Unknown	0	0.0	0.2	0	0.0	0.2	0.2
	Total		2	100.0	100.0	252	100.0	100.0
Refinance	Low	0	0.0	0.9	0	0.0	0.3	3.1
	Moderate	0	0.0	11.4	0	0.0	6.6	16.7
	Middle	0	0.0	55.2	0	0.0	48.2	57.7
	Upper	0	0.0	32.4	0	0.0	44.9	22.3
	Unknown	0	0.0	0.1	0	0.0	0.1	0.2
	Total		0	0.0	100.0	0	0.0	100.0
Home Improvement	Low	0	0.0	2.5	0	0.0	2.1	3.1
	Moderate	0	0.0	16.0	0	0.0	11.6	16.7
	Middle	0	0.0	55.1	0	0.0	52.4	57.7
	Upper	0	0.0	26.4	0	0.0	33.9	22.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.2
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	13.7	0	0.0	6.5	Multi-Family 7.2
	Moderate	0	0.0	20.0	0	0.0	9.3	19.1
	Middle	1	50.0	48.4	6,132	98.2	56.3	41.0
	Upper	1	50.0	13.7	115	1.8	25.2	30.8
	Unknown	0	0.0	4.2	0	0.0	2.6	1.9
	Total		2	100.0	100.0	6,247	100.0	100.0
Other Purpose LOC	Low	0	0.0	2.4	0	0.0	1.0	3.1
	Moderate	0	0.0	15.0	0	0.0	10.5	16.7
	Middle	0	0.0	57.1	0	0.0	49.0	57.7
	Upper	0	0.0	25.5	0	0.0	39.5	22.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.2
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	3.5	0	0.0	2.9	3.1
	Moderate	0	0.0	21.2	0	0.0	13.6	16.7
	Middle	0	0.0	57.6	0	0.0	55.7	57.7
	Upper	0	0.0	17.7	0	0.0	27.8	22.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.2
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	1.8	0	0.0	1.0	3.1
	Moderate	0	0.0	40.0	0	0.0	34.7	16.7
	Middle	0	0.0	50.9	0	0.0	54.3	57.7
	Upper	0	0.0	7.3	0	0.0	10.0	22.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.2
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	0	0.0	1.6	0	0.0	1.2	3.1
	Moderate	1	25.0	13.8	105	1.6	8.3	16.7
	Middle	1	25.0	55.9	6,132	94.4	50.1	57.7
	Upper	2	50.0	28.4	262	4.0	40.0	22.3
	Unknown	0	0.0	0.2	0	0.0	0.4	0.2
	Total		4	100.0	100.0	6,499	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Business Loans						
Assessment Area: 2020 Waterloo-Cedar Falls, IA MSA 47940						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2020 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	20	16.0	2,648	12.7	7.1
	Moderate	28	22.4	4,746	22.8	17.2
	Middle	48	38.4	6,830	32.8	50.6
	Upper	29	23.2	6,576	31.6	24.5
	Unknown	0	0.0	0	0.0	0.6
	Total	125	100.0	20,800	100.0	100.0
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2019 Waterloo-Cedar Falls, IA MSA 47940								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2019			2019			
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	16.0	0	0.0	8.9	21.0
	Moderate	0	0.0	25.5	0	0.0	19.9	19.1
	Middle	1	50.0	22.3	105	41.7	22.3	23.3
	Upper	0	0.0	24.2	0	0.0	34.8	36.6
	Unknown	1	50.0	12.1	147	58.3	14.0	0.0
	Total		2	100.0	100.0	252	100.0	100.0
Refinance	Low	0	0.0	9.3	0	0.0	4.0	21.0
	Moderate	0	0.0	19.1	0	0.0	12.5	19.1
	Middle	0	0.0	22.2	0	0.0	20.2	23.3
	Upper	0	0.0	34.0	0	0.0	45.7	36.6
	Unknown	0	0.0	15.5	0	0.0	17.7	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Home Improvement	Low	0	0.0	18.8	0	0.0	13.0	21.0
	Moderate	0	0.0	22.9	0	0.0	18.8	19.1
	Middle	0	0.0	26.6	0	0.0	25.5	23.3
	Upper	0	0.0	29.6	0	0.0	37.2	36.6
	Unknown	0	0.0	2.1	0	0.0	5.5	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	21.0
	Moderate	0	0.0	1.1	0	0.0	0.1	19.1
	Middle	0	0.0	2.1	0	0.0	1.7	23.3
	Upper	0	0.0	3.2	0	0.0	0.8	36.6
	Unknown	2	100.0	93.7	6,247	100.0	97.4	0.0
	Total		2	100.0	100.0	6,247	100.0	100.0
Other Purpose LOC	Low	0	0.0	16.2	0	0.0	11.9	21.0
	Moderate	0	0.0	25.8	0	0.0	18.3	19.1
	Middle	0	0.0	23.7	0	0.0	24.5	23.3
	Upper	0	0.0	31.8	0	0.0	43.4	36.6
	Unknown	0	0.0	2.4	0	0.0	1.9	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	21.7	0	0.0	11.8	21.0
	Moderate	0	0.0	29.8	0	0.0	26.5	19.1
	Middle	0	0.0	21.7	0	0.0	20.9	23.3
	Upper	0	0.0	25.8	0	0.0	39.3	36.6
	Unknown	0	0.0	1.0	0	0.0	1.5	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	21.0
	Moderate	0	0.0	1.8	0	0.0	1.4	19.1
	Middle	0	0.0	0.0	0	0.0	0.0	23.3
	Upper	0	0.0	1.8	0	0.0	0.2	36.6
	Unknown	0	0.0	96.4	0	0.0	98.4	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	0	0.0	13.9	0	0.0	6.4	21.0
	Moderate	0	0.0	22.9	0	0.0	15.2	19.1
	Middle	1	25.0	22.1	105	1.6	19.3	23.3
	Upper	0	0.0	27.5	0	0.0	34.9	36.6
	Unknown	3	75.0	13.6	6,394	98.4	24.2	0.0
	Total		4	100.0	100.0	6,499	100.0	100.0
Originations & Purchases								
2016 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2020 Waterloo-Cedar Falls, IA MSA 47940							
Product Type		Bank & Demographic Comparison					
		2020		2020		Total Businesses %	
Revenue	Loan Size	Count Bank		Dollar Bank			
		#	%	\$ 000s	\$ %		
Small Business	Revenue	\$1 Million or Less	84	67.2	9,061	43.6	88.9
		Over \$1 Million	41	32.8	11,739	56.4	9.9
		Unknown	0	0.0	0	0.0	1.1
		Total	125	100.0	20,800	100.0	100.0
	Loan Size	\$100,000 or Less	80	64.0	3,043	14.6	
		\$100,001 - \$250,000	19	15.2	3,173	15.3	
		\$250,001 - \$1 Million	26	20.8	14,584	70.1	
		Total	125	100.0	20,800	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	70	83.3	2,404	26.5	
		\$100,001 - \$250,000	5	6.0	702	7.7	
		\$250,001 - \$1 Million	9	10.7	5,955	65.7	
		Total	84	100.0	9,061	100.0	
Originations & Purchases							
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

APPENDIX D – Scope of Examination

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED		HMDA-Reportable Lending: January 1, 2019 – December 31, 2020 CRA-Reportable Small Business Lending: January 1, 2019 – December 31, 2020 Community Development Activity: September 11, 2018 – October 18, 2021	
FINANCIAL INSTITUTION		PRODUCTS REVIEWED	
Cedar Rapids Bank & Trust Company		<ul style="list-style-type: none"> • HMDA- and CRA-Reportable Small Business Loans • Community Development Loans, Investments, and Services 	
AFFILIATE(S)	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
None	N/A		N/A
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Cedar Rapids, IA MSA #16300	Full scope review	None	None
Waterloo/Cedar Falls, IA MSA #46940	Limited scope review	None	None

APPENDIX E – Glossary

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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Affordability ratio: To determine housing affordability, the affordability ratio is calculated by dividing median household income by median housing value. This ratio allows the comparison of housing affordability across assessment areas and/or communities. An area with a high ratio generally has more affordable housing than an area with a low ratio.

Aggregate lending: The number of loans originated and purchased by all lenders subject to reporting requirements as a percentage of the aggregate number of loans originated and purchased by all lenders in the MSA/assessment area.

American Community Survey Data (ACS): The American Community Survey (ACS) data is based on a nationwide survey designed to provide local communities with reliable and timely demographic, social, economic, and housing data each year. The Census Bureau first released data for geographies of all sizes in 2010. This data is known as the “five-year estimate data.” The five-year estimate data is used by the FFIEC as the base file for data used in conjunction with consumer compliance and CRA examinations.¹

Area Median Income (AMI): AMI means –

1. The median family income for the MSA, if a person or geography is located in an MSA, or for the metropolitan division, if a person or geography is located in an MSA that has been subdivided into metropolitan divisions; or
2. The statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment area: Assessment area means a geographic area delineated in accordance with section 228.41

Automated teller machine (ATM): An automated teller machine means an automated, unstaffed banking facility owned or operated by, or operated exclusively for, the bank at which deposits are received, cash dispersed or money lent.

Bank: Bank means a state member as that term is defined in section 3(d)(2) of the Federal Deposit Insurance Act (12 USC 1813(d)(2)), except as provided in section 228.11(c)(3), and includes an

¹ Source: FFIEC press release dated October 19, 2011.

uninsured state branch (other than a limited branch) of a foreign bank described in section 228.11(c)(2).

Branch: Branch refers to a staffed banking facility approved as a branch, whether shared or unshared, including, for example, a mini-branch in a grocery store or a branch operated in conjunction with any other local business or nonprofit organization.

Census tract: Small subdivisions of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. They usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Combined Statistical Area (CSAs): Adjacent metropolitan statistical areas/metropolitan divisions (MSA/MDs) and micropolitan statistical areas may be combined into larger Combined Statistical Areas based on social and economic ties as well as commuting patterns. The ties used as the basis for CSAs are not as strong as the ties used to support MSA/MD and micropolitan statistical area designations; however, they do bind the larger area together and may be particularly useful for regional planning authorities and the private sector. Under Regulation BB, assessment areas may be presented under a Combined Statistical Area heading; however, all analysis is conducted on the basis of median income figures for MSA/MDs and the applicable state-wide non metropolitan median income figure.

Community Development: The financial supervisory agencies have adopted the following definition for community development:

1. Affordable housing, including for multi-family housing, for low- and moderate-income households;
2. Community services tailored to meet the needs of low- and moderate-income individuals;
3. Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or
4. Activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definitions of community development. Activities that revitalize or stabilize:

- 1) Low- or moderate-income geographies;
- 2) Designated disaster areas; or
- 3) Distressed or underserved nonmetropolitan middle-income geographies

designated by the Board, Federal Deposit Insurance Corporation and Office of the Comptroller of the Currency based on:

- a. Rates of poverty, unemployment or population loss; or
- b. Population size, density and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density and dispersion if they help to meet essential community services including the needs of low- and moderate-income individuals.

Community Development Loan: A community development loan means a loan that:

- 1) Has as its primary purpose community development; and
- 2) Except in the case of a wholesale or limited purpose bank –
 - a. Has not been reported or collected by the bank or an affiliate for consideration in the bank’s assessment as a home mortgage, small business, small farm, or consumer loan, unless it is a multi-family housing loan (as described in the regulation implementing the Home Mortgage Disclosure Act); and
 - b. Benefits the bank’s assessment area(s) or a broader statewide or regional area that includes the bank’s assessment area(s).

Community Development Service: A community development service means a service that:

- 1) Has as its primary purpose community development; and
- 2) Is related to the provision of financial services.

Consumer loan: 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 of loans: motor vehicle, credit card, other consumer secured loan, includes loans for home improvement purposes not secured by a dwelling, and other consumer unsecured loan, includes loans for home improvement purposes not secured.

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).

Fair market rent: Fair market rents (FMRs) are gross rent estimates. They include the shelter rent plus the cost of all tenant-paid utilities, except telephones, cable or satellite television service, and internet service. HUD sets FMRs to assure that a sufficient supply of rental housing is available to their program participants. To accomplish this objective, FMRs must be both high enough to

permit a selection of units and neighborhoods and low enough to serve as many low-income families as possible. The level at which FMRs are set is expressed as a percentile point within the rent distribution of standard-quality rental housing units. The current definition used is the 40th percentile rent, the dollar amount below which 40 percent of the standard-quality rental housing units are rented. The 40th percentile rent is drawn from the distribution of rents of all units occupied by recent movers (renter households who moved to their present residence within the past 15 months). HUD is required to ensure that FMRs exclude non-market rental housing in their computation. Therefore, HUD excludes all units falling below a specified rent level determined from public housing rents in HUD's program databases as likely to be either assisted housing or otherwise at a below-market rent, and units less than two years old.

Full review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and amount of qualified investments) and qualitative factors (for example, innovativeness, complexity and responsiveness).

Geography: A census tract delineated by the U.S. Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act: The statute that requires certain mortgage lenders that do business or have banking offices in metropolitan statistical areas to file annual summary reports of their mortgage lending activity. The reports include data such as the race, gender and income of the applicant(s) and the disposition of the application(s) (for example, approved, denied, and withdrawn).

Home mortgage loans: Are defined in conformance with the definitions of home mortgage activity under the Home Mortgage Disclosure Act and include closed end mortgage loans secured by a dwelling and open-end lines of credit secured by a dwelling. This includes loans for home purchase, refinancing and loans for multi-family housing. It does not include loans for home improvement purposes that are not secured by a dwelling.

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.

Income Level: Income level means:

- 1) Low-income – an individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a census tract;
- 2) Moderate-income – an 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 census tract;

- 3) Middle-income – an 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 census tract; and
- 4) Upper-income – an 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 census tract.

Additional Guidance: .12(m) Income Level: The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately every five years (.12(m) Income Level).

Limited-purpose bank: This term refers to a bank that offers only a narrow product line such as credit card or motor vehicle loans to a regional or broader market and for which a designation as a limited-purpose bank is in effect, in accordance with section 228.25(b).

Limited review: Performance under the Lending, Investment and Services test is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, amount of investments and branch office distribution).

Loan location: Under this definition, a loan is located as follows:

- 1) Consumer loan is located in the census tract where the borrower resides;
- 2) Home mortgage loan is located in the census tract where the property to which the loan relates is located;
- 3) Small business and small farm loan is located in the census tract where the main business facility or farm is located or where the loan proceeds have been applied as indicated by the borrower.

Loan product office (LPO): This term refers to a staffed facility, other than a branch, that is open to the public and that provides lending-related services, such as loan information and applications.

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 MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development (HUD) 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 it and half below it.

Metropolitan Area: A metropolitan statistical area (MSA) or a metropolitan division (MD) as

defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a single core population of at least 2.5 million may be divided into MDs. A metropolitan statistical area that crosses into two or more bordering states is called a multistate metropolitan statistical area.

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

Nonmetropolitan area: This term refers to any area that is not located in a metropolitan statistical area or metropolitan division. Micropolitan statistical areas are included in the definition of a nonmetropolitan area; a micropolitan statistical area has an urban core population of at least 10,000 but less than 50,000.

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: This term refers to any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: This term refers to a state or multistate metropolitan area. For institutions with domestic branch offices in one state only, the institution's CRA rating is the state's rating. If the institution maintains domestic branch offices in more than one state, the institution will receive a rating for each state in which those branch offices are located. If the institution maintains domestic branch offices in at least two states in a multistate metropolitan statistical area, the institution will receive a rating for the multistate metropolitan area.

Small Bank: This term refers to a bank that as of December 31 of either of the prior two calendar years, had assets of less than \$1.322 billion. Intermediate small bank means a small bank with assets of at least \$330 million as of December 31 of both of the prior two calendar years and less than \$1.322 billion as of December 31 of either of the prior two calendar years.

Annual Adjustment: The dollar figures in paragraph (u)(1) of this section shall be adjusted annually and published by the Board, based on the year-to-year change in the average of the Consumer Price Index for Urban Wage Earners and Clerical Workers, not seasonally adjusted, for each 12-month period ending in November, with rounding to the nearest million.

Small Business Loan: This term refers to a loan that is included in "loans to small businesses" as defined in the instructions for preparation of the Consolidated Report of Condition and Income. The loans have original amounts of \$1 million or less and are either secured nonfarm, nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: This term refers to a loan that is included in “loans to small farms” as defined in the instructions for preparation of the Consolidated Report of Condition and Income. These loans have original amounts of \$500 thousand or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Wholesale Bank: This term refers to a bank that is not in the business of extending home mortgage, small business, small farm or consumer loans to retail customers, and for which a designation as a wholesale bank is in effect, in accordance with section 228.25(b).