FALL 2021

# COMMUNITY BANKER

THE OFFICIAL PUBLICATION OF THE MONTANA INDEPENDENT BANKERS ASSOCIATION


## STAY ON MISSION:
## A TALE OF CURIOSITY & BIG LIVING, AGAINST THE ODDS

MIB HOSTS EDUARDO GARCIA PRESENTATION TO OVER 500 STUDENTS AT MSU

Montana *independent* Bankers

55 YEARS OF EXCELLENCE

# Contents

FALL 2021







**Montana Independent Bankers**
1812 11th Ave
P.O. Box 4893
Helena, MT 59604-4893
406.449.7444
jbrown@mibonline.org
mibonline.org

# PRESIDENT'S MESSAGE

Andrew West

For those of you who know me, or have read some of my articles, it is no secret I am a fervent advocate of community banking in Montana and a relentless supporter of independent banks across our great state. I believe in the mission of the MIB completely and am always trying to think of ways the MIB can improve its service to the membership. I am fortunate to be part of the MIB board of directors, which is populated with some of the brightest minds in Montana's banking community. Together, we work on issues of concern for Montana's independent community banks and try hard to spread the word regarding the value these banks bring to their cities and towns. To that end, the MIB has embarked on a digital advertising campaign across Montana designed to bring awareness to all our customers of the care we have for them and their financial and personal well-being. When clicked on, the ads bring the customer to an MIB landing page that gives them an option of finding an MIB member bank in their community. Since May, the campaign has delivered close to a million impressions and has generated a click-through rate better than the national average. These customers are getting the message of how we distinguish ourselves from the too big to fail banks — they actively search us out because they value the service and friendship we bring to their lives.

The MIB also offers advocacy at the state legislature on issues that affect community banking in Montana. The MIB works closely with the Independent Community Bankers of America (ICBA) in staying abreast of vital issues that affect community banks. With this national level of support, the MIB has been very effective in having a voice at the state level on issues of concern to Montana's independent community banks. We also offer robust educational webinars, weekly email news, a monthly newsletter, and a professional quarterly magazine that you are presently reading. In addition, there is an annual tradeshow and convention that gives bankers time to re-connect with colleagues and associate members who bring tremendous value to our organizations. The convention is always a fun time and is family-friendly with seminars, activities, and amazing guest speakers. Being a member of the MIB family is beneficial to you in so many ways. It's a group dedicated to preserving your business and your way of life and dedicated to helping the people in the communities we serve. Montana's independent community banks are the economic lifeblood of so many small towns across Montana. We truly make peoples' dreams come true.

With that being said, I would love to hear from our member banks how we could better serve you. Our goal is to bring value to your organization through advocacy, education, literature, activities and more. But there is always more we could be doing. Anything you think would be useful as a value-added component of the MIB will be heard with receptive ears. We have a long and illustrious history of being there for Montana's independent banks, and we will continue our mission well into the future. With the rapid pace of mergers and acquisitions, it is now more important than ever for us to stand together and protect our interests. If you are friends with an independent banker whose bank is not an MIB member, I would ask you to ask them to join our family. There is strength in numbers, and I firmly believe our values are in alignment. We stand for what you stand for. Helping our customers and helping each other be successful in our chosen craft and bettering our communities through the provision of responsible financial service. We give and we help. That's what we do. It's the hallmark of banking in Montana.

Now is the time for us to let our voices be heard on the state and national level, and our membership is key to our ability to stand up for ourselves amid the constant financial and regulatory pressure we endure. If we continue to stand up for ourselves and show our banking brothers and sisters we are here for them and here for our communities, we will always have a place at the table, and our legacies will live on as they should.

Thank you for being a part of the MIB and thank you for encouraging others to be involved as well. Only through dedicated cooperation and purposeful action will we be able to tell our grandkids how we helped keep a precious Montana industry alive and thriving. We've done it so far, and I'm confident we will be here far into the future. All it takes is teamwork and commitment, which is an area where I know you all demonstrate unbelievable excellence. Keep up the good work! I look forward to hearing from you.

Andrew West
MIB President


> For the last two years, Montana's community banks have faithfully served their customers and communities, assisting them through one of the most challenging economic and social periods in American history.

Welcome to the last 2021 edition of the Montana Community Banker magazine. It is hard to believe that another year is drawing to a close. I write this article on a beautiful, bluebird, fall day in Montana. This beautiful "fall" is a welcome relief from one of the hottest, driest, and smokiest Montana summers I can recall.

The fall of 2021 has been another busy time for the Association. In early October, the MIB Board met in Bozeman to discuss, among other things, the financial performance of the Association in 2021, the outcome of the annual state convention, the status of federal and state policies and legislation, and the MIB investment in the Montana State University's community banking program.

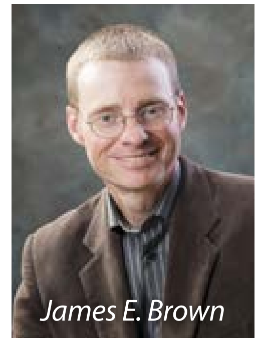
The Board meeting was held in conjunction with the MSU football tailgate party hosted by the Association. The tailgate was held before the Cats game against Northern Colorado, which MSU won, 40-7.

2021 marks the restart of the MIB-hosted Cat/Griz tailgate parties. This member benefit had to be put on hold in 2020 due to the COVID-19 pandemic. Once again, the Association's tailgate parties were sponsored by UBB, a strong supporter of MIB over the years, and we thank them for their continued support. I would also like to recognize MIB member Stockman Bank for generously allowing the Association to use property owned by the bank as the host location for our MSU tailgate party.

You will find within the pages herein photos from our two tailgate parties. I am pleased to write we had strong participation at both the UM and MSU games, with record attendance at the Griz game. Given the success of the tailgates, the Association will continue to host these parties for our membership moving forward. As such, we look forward to seeing you at one of our future tailgate parties and associated Griz/Cat games.

In addition to hosting the tailgates and as evidenced by the front cover of this edition of the magazine, the Association also proudly sponsored a speaker for the Jake Jabs College of Business & Entrepreneurship "E" Series at Montana State University. On September 30, Eduardo Garcia, a longtime Montana resident and the founder of Montana Mex, spoke to over 500 very engaged MSU students on the campus of MSU.

The title of Mr. Garcia's presentation was "Stay on Mission: A tale of curiosity and big living, against the odds." The talk and program


*James E. Brown*

touched on Mr. Garcia's tragic hunting accident, which required the amputation of half of his left arm and the removal of several ribs and his rebound. Despite his physical setbacks and months of recovery, Mr. Garcia today operates the "Montana Mex" brand of foods and dedicates his time to helping those with disabilities succeed. In his motivational talks, he urges his audience to use life's setbacks to build a better personal future for themselves and others.

Mr. Garcia's message of "staying on mission" really hit home for Montana's community banking industry, wherein our industry's sole mission is "relationship banking." Nowhere has that community banking mission been more realized than during the ongoing COVID-19 pandemic. For the last two years, Montana's community banks have faithfully served their customers and communities, assisting them through one of the most challenging economic and social periods in American history. In this vein, MIB is honored to represent our community bank membership and pleased to continue our beneficial partnership with Montana State University.

Speaking of partnerships, MIB is now entering its sixth year of endowing the MSU community banking program. This program has been a great success to date – introducing and placing multiple MSU students into the field of community banking. The program resulted in several MIB banks hiring and retaining new bank employees; this outcome was – and is – the ultimate goal of

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*brian@shieldbanking.com*
*(425) 276-8238*

**Richard Drennen**
Business Development Officer
*richard.drennen@shieldbanking.com*
*(425) 249-7168*

*See a Demo*

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this MIB member benefits program. If you are interested in having your respective bank participate in the program, please feel free to contact me. Or you can contact our friend Gordon Johnson of American Bank, who recently assumed the mantle of Director of the program at the Jake Jabs College of Business and Entrepreneurship.

Coming off our very strong 2021 annual convention and trade show in Billings, the Association reminds you that the state convention is always held annually in July. 2022 will be no different, and Whitefish will be the host location of next year's State Convention at the Whitefish Lake Lodge. The MIB has not hosted our annual convention in the "Flathead" for several years, and we are excited to be returning to Whitefish for the Association's annual event. Interest in our 2022 convention is extremely high, and, consequently, rooms at the Lodge are booking up fast. I encourage you to get your convention hotel reservation in early.

And, finally, since this is the last edition of the Community Banker for the year 2021, I will take this opportunity to remind you that, starting in early December, you will find in your mailbox the MIB's 2022 membership renewal notices. MIB's Board, officers, and staff understand the financial burden placed on Montana's community banks by excessive regulation and growing operating costs. That is why we do our best here at the Association to ensure that you receive the maximum value for your dues while gaining extensive support in the areas that matter. When you receive your renewal notice, we hope our efforts to tighten the Association's belt over the last six years while expanding member services and programs will be foremost in your mind.

If there is anything the MIB Board of Directors, officers, or staff can assist you with, or if there are additional benefits the association can add that would be of service to your business, please let us know.

Finally, in keeping with Mr. Garcia's timeless message to those MSU students, MIB's mission remains as it did at its inception in 1967: to help ensure Montana's community banks have the necessary resources to compete and thrive in an ever-changing business environment.

James Brown, Esq.
MIB Executive Director

# Upcoming Webinars

| | |
|---|---|
| 19-OCT | Job-Specific BSA Training for Senior Management & Directors |
| 20-OCT | Top 10 IRA Rollover Mistakes |
| 21-OCT | Reg E Investigation & Requirements for Debit Card Error Resolution |
| 26-OCT | Adverse Action at Account Opening: Reporting & Documentation |
| 27-OCT | HMDA Reporting Part 2: Collecting Demographic Information |
| 2-NOV | Mastercard Debit Card Chargebacks |
| 3-NOV | Board Secretary Training: Documenting Minutes, Corrections & Disagreements |
| 4-NOV | Robbery Prevention, Response & Resilience |
| 5-NOV | Annual MLO Requirements & SAFE Act Compliance |
| 8-NOV | The FFIEC's 13 Exam Objectives for Business Continuity & Resilience |
| 8-NOV | Countdown to New Debt Collection Rules: Deadline November 30, 2021 |
| 9-NOV | HMDA Reporting Part 3: Commercial Lending Issues |
| 10-NOV | Opening Accounts for Nonresident Aliens |
| 15-NOV | Opening & Managing Certificates of Deposit |
| 16-NOV | Regulator Issues & Update for the Credit Analyst |
| 17-NOV | 1099 Reporting: Foreclosures, Repossessions & Debt Settlements |
| 17-NOV | Seven Keys to Effective Succession Planning |
| 18-NOV | Completing the SAR Line-by-Line |
| 23-NOV | How to Develop a Vaccination Policy |
| 30-NOV | Partnering with Fintech Companies: Due Diligence, Evaluation & Risks |
| 30-NOV | IRA Overview: Traditional, Roth & SEP Plans |
| 1-DEC | Your Depositor Has Died: Actions to Take, Mistakes to Avoid |
| 2-DEC | The Legal Side of Remote Deposit Capture: Risks & Liability |
| 6-DEC | Finding Lost Borrowers: The New World of Skip Tracing |
| 7-DEC | Security Officer Reports to the Board: Timing, Contents & Requirements |
| 9-DEC | Visa Debit Card Chargebacks |
| 14-DEC | Commercial Loan Annual Credit Review |
| 15-DEC | Are You Prepared for CECL? |
| 16-DEC | Opening Multi-Tiered Business Accounts |

COMMUNITY BANKERS Webinar network

fin-ed.info/mib


> We know that despite the frights cyberattacks bring, you continue to flourish by safeguarding the communities you serve.

It strikes me as interesting that both Halloween and Cybersecurity Awareness Month fall in October. After all, the rapid rise in fraud during the pandemic would spook anyone and definitely keeps community bankers up at night, which is why meaningful monitoring and action continue to be necessary.

While community banks have done much to safeguard their institutions, ongoing vigilance is needed. According to the Ransomware Task Force, ransomware gangs stole three times more in 2020 than they did in 2019, and projections indicate that worldwide cybercrime costs will hit $6 trillion for this year.

These statistics are hair-raising, but ICBA and our industry have been working diligently to prevent sweeping impacts. In fact, community bankers like you have instituted processes that help to thwart attacks, including taking actions to halt these scary scenarios. Here are a few examples:

**Educating customers.** Customers are the first line of defense in cyberattacks. The work you have done and continue to do to educate your customers allows them to better take control of their actions, such as not clicking on links or sharing personally identifiable information in emails or texts. If they understand the lengths fraudsters will go to access their accounts, they are better prepared to protect the point of entry.

**Sharing information.** When a cyberattack occurs, community banks share information with peers to help prevent losses. In addition, this knowledge transfer extends internally. All levels of the organization need to be up to speed on cyber risk, how it's being mitigated and the resources available to them.

**Resourcing teams appropriately.** Cybersecurity is an area that has to be constantly managed to keep up with the threats. Having the right team – whether through internal resources, external solution providers or a combination – is so important. It's about finding the best mix for your bank and making sure you're supporting the team to stay on top of emerging risks.

In addition to these efforts, ICBA reinforces your cybersecurity activities through the Operational Risk Resource Center (icba.org/solutions/operational-risk). This center offers tools to help you navigate cybersecurity. Beyond that, this month's issue of Independent Banker is dedicated to the topic and will give you additional ideas to help you on your cybersecurity journey.

Our goal is to support you in your efforts to mitigate cyberattacks and their effects on your community. Because we know that, despite the frights cyberattacks bring, you will continue to flourish by safeguarding the communities you serve.

*Rebeca Romero Rainey, President and CEO, ICBA*

Educated customers form stronger relationships with their community banks. They are more likely to repay loans, live within their means and maintain higher balances.

When I first came into community banking, I quickly learned that our jobs are as much about education as they are about finance. While community bankers have deep knowledge of financial topics, most people don't have that background. Statistics support that sentiment: The National Financial Educators Council reports that on the U.S. national financial literacy test, the average score hovers around 68%.

To this day, financial literacy is a passion of mine. Our philosophy at Tioga State Bank is to coach our customers into better financial standings. There are times when we have to turn people down for a loan for any number of reasons, but we go the extra mile to make sure they understand why they are being declined and what they can do to remedy the situation.

While those are hard conversations, they're worth having because they can help transform people's financial situations. In fact, I've had customers come back and thank me for saying no. After they gained a better understanding of their financial status, they realized they weren't in a position to take on more debt. Our honesty helped protect them from some potentially dire consequences.

We also have had many cases where a customer applied for a mortgage that was initially declined, but they followed our advice and qualified to purchase a home a year later. It's rewarding to help a customer strengthen their financial position and accomplish a goal in the process.

Educated customers form stronger relationships with their community banks. They are more likely to repay loans, live within their means and maintain higher balances. They understand the importance of saving for retirement, education and other big-ticket efforts. They are less likely to fall victim to fraud or catch it sooner because of regular balance checks. And they are loyal customers, particularly if you support their positive financial journey.

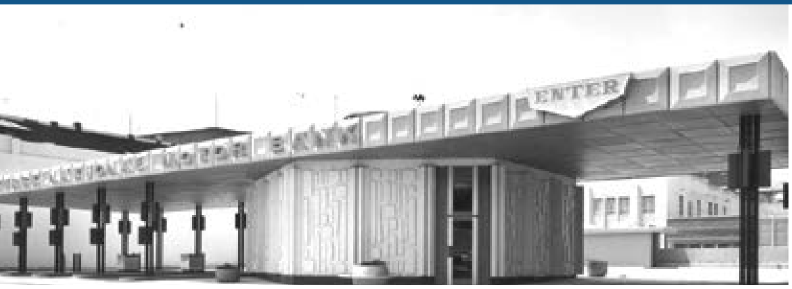
In my mind, financial literacy serves as the basis for all we do. As we address more complex topics like cybersecurity and financial planning, highlighted in this issue, it pays to have built a strong foundation with our customers. Being armed with that baseline knowledge helps them to better prepare for their financial futures. So, I encourage you to consider partnering with your local schools or offering webinars or lunch-and-learns to help educate current and future customers. As community banks, we strive to build better communities. Helping consumers and businesses strengthen their financial well-being is critically important to achieving that goal.

### My Top Three

The primary things I look forward to in autumn include:

1. Fall foliage
2. College football
3. Apple pie

*Robert Fisher is president, CEO and chairman of Tioga State Bank in Spencer, N.Y. To connect with him, go to Robert@RobertMFisher.com.*





# The Importance of Creating a Collaborative Project Team

In our 64 years of providing Architecture and Design services throughout Montana, CWG Architecture & Interiors has seen the full evolution of banking facilities. Whether it was a lavish lobby with a long teller line, the advent of drive-thru banking, or facilitating virtual banking, we have helped clients adapt to the changing needs of the industry. While banking and construction have evolved at a blistering pace over the last six decades, at least one item has remained consistent. A successful project starts with a cohesive team.

As architects, one of our main roles is to build a project team and facilitate working together to achieve a successful outcome. At CWG, we are there to be an advocate for the project owner. As an advocate, we must mitigate issues before they arise and help correct unforeseen problems. We believe the best way to do this is by having the project team involved in the earliest phases of the design process. The construction industry is a complex sector that involves many players at various stages. The stakeholders typically include the Owner, Contractor, Architect, Interior Designer, Engineer, and any other specialized consultants necessary to meet the owner's needs.

Traditionally, construction is considered a fragmented industry with separation between the design and construction phase, commonly referred to as the design-bid-build process. In this process, the Owner typically engages an Architect to develop the design and construction documents, then the project is competitively bid and awarded to the Contractor with the lowest cost. This lack of continuity between designers and contractors often results in inefficiencies during the construction phase, such as design changes, increasing costs, and longer construction duration.

At CWG, we believe that using the unique skills and expertise of all project partners is the best way to overcome obstacles and keep a project on track. When team integration and communication are prioritized, it allows everyone to incorporate their knowledge and influence design decisions before construction documents are finalized. Thus, saving the owner time and money as the project moves into the construction phase.

As the actual builder of the facility, the Contractor is an essential part of the project team. To ensure that the design is as cost and time-efficient as possible, it is crucial to have the Contractor involved in the preliminary design phase. Contractors will assist in providing initial construction budgets, schedules, material lead times, and value engineering options. Construction sequencing and phasing are critical in delivering a completed project on schedule, and the Contractor is the expert on this subject. Having early access to a Contractor's diverse skills and expertise helps the project team meet the complex needs of banking facilities.

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### Benefits of Early Collaboration

- The Owner's needs and goals are defined and understood by all members of the project team
- Establishes initial design and construction schedule to help avoid delays
- Contractor can estimate the construction budget in the preliminary design phase and provide value engineering alternatives
- Design strategies are synchronized to maximize construction efficiencies
- Project Team coordinates with subcontractors and suppliers during design to specify materials that avoid supply chain delays
- Incorporates bank equipment and furniture in the building design to improve functionality of the space
- Minimizes contractor's bid phase schedule
- Utilizes a diverse knowledge pool for overall improvement of project performance
- Minimizes disputes and disagreements between the Architecture/Engineering team and Contractor, resulting in fewer change orders during construction
- Initiates State, City, or subdivision review processes as early as possible to avoid delays

One misconception about the traditional design-bid-build contracting practice is that having the design and construction teams function as two separate entities will raise the quality of the work. In our experience working as a cohesive project team, we have seen the increased quality and a more client-focused, efficient project delivery.

The first step toward creating a trusted project team is thinking of the design and construction process as a united approach, rather than a linear system where the goal is to simply design a building at the lowest bid. Banks who frequently complete facility remodels and construction projects likely already have a team in place and can begin facilitating early collaboration within this group. Owners who do not have a team in place can start by asking industry peers for references or check with Contractors, Architects, or Engineers who are existing bank customers. Whichever path is chosen when creating a project team, consider the experience of the team members. Each project is a learning experience, and the more projects your team has completed, the more knowledge they have to offer. The integrated design team process helps put the Owner's mind at ease, knowing there is an entire team solving problems and working toward a common goal. The process is incredibly fun and rewarding as the project progresses and finally opens for business.

***Want to learn more about working with a collaborative project team? Contact CWG Architecture & Interiors at cwg-architects.com for more information.***

# Portfolios Morph:

## Investment securities have undergone big changes this year

**By Jim Reber**

If there's a constant in the world of a community bank investment manager, it's disappointment. If you buy a bond today and yields go down tomorrow, you wish you'd have bought more; if yields go up, you wish you had bought none. If your overall portfolio has unrealized gains, you lament the poor yields that are available; if you are presented with attractive rates on new offerings, it means you've got losses on the balance sheet.

As we navigate the volatile rate environment of 2021, I'd like to convey some data that we've gathered about community bank portfolios. The motive is expressly not in the vein of misery loves company, but rather to share what your peers' portfolios, sector weightings and yields look like.

I am also pleased that we have two great reference points by which to measure performance: Dec. 31, 2020, and June 30. 2021. That six-month period saw a rise in interest rates and a steepening of the curve, and more than a 50 basis-point shock (0.50%) in the middle of the maturity range. The five-year Treasury note started 2021 at 0.36% and six months later was 0.89%.

### Crowd favorites

Our sample portfolio, which I've used often in this space over the years, is the Vining Sparks bond accounting client base. Vining Sparks, ICBA Securities' exclusive broker, provides this service for about 400 community banks, with an average portfolio size of $140 million, 46% larger than pre-pandemic levels.

These portfolios have more than half of their dollars in some type of mortgage security. Fixed-rate mortgage-backed securities (MBSs) comprise 31% of the total, fixed-rate collateralized mortgage obligations (CMOs) are 14%, and floating rate MBSs are 7%. Right around 29% of the investments are in municipals. The bulk of the remainder, 8%, is in government agency bonds.

### Stretched out

While the sector weightings are essentially unchanged over the past year, there are two stark differences: duration and market values. On Dec. 31, 2020, the average portfolio had a duration of 3.2 years. (Duration is a major yardstick for investment managers, as it affects cash flow and market risk. The higher the duration, the greater the risk.) Six short months later, duration had risen to 4.3 years. So, portfolios, at least in theory, have 34% more risk than at year-end.

This duration growth was the result of two separate events. The first was the rise in longer-term rates. I think we've come to realize that higher rates move average durations out on the curve, as prepayments of amortizing securities tend to slow, and other callable securities don't get called. The second – and more salient – cause was the very deliberate extension of average maturities as portfolio managers have tried to sop up the excess liquidity residing on community bank balance sheets.

Something else that's changed as a result is the unrealized profit. Back in December 2020, the average portfolio was sitting on a 2.7% gain. By June, that number had shrunk to 1.0%. What this means, in effect, is that most banks currently own some bonds at gains and some at losses, which can be seen as condition that affords maximum flexibility.

### Plug the leak

Many portfolio managers are now focused on limiting further extension risk. That should not be terribly

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difficult to do, as most securities that have any seasoning to them have already been repriced to a longer expected maturity. Prepayment "speeds" have slowed from their peaks in the spring, and most models are predicting relatively consistent speeds for the near future.

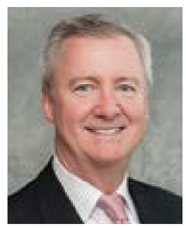
Nonetheless, not all MBSs are created equally. Collateral with 10- to 20-year finals typically can continue to prepay with some consistency even if interest rates rise. Of course, the scheduled principal repayments will be much greater for shorter pools than for 30-year pools, independent of prepays.

A variation on this theme is to buy "structure," which usually means a CMO. Recently issued CMOs have low pass-through rates ("coupons") relative to the borrowers' rates on the underlying collateral. This allows investors to keep their book prices closer to par, which will preserve book yields if prepayments were to kick back into high gear.

So, there you have a revisiting of the portfolio changes during 2021. By being on top of the changing complexion of your community bank's investments, you can minimize your disappointments. Avoiding the constant sorrow of portfolio management — with apologies to the Soggy Bottom Boys — can be your milestone accomplishment of the year.

**Bond accounting solution**

ICBA Securities' exclusive broker, Vining Sparks, provides state-of-the-art bond accounting services for nearly 400 community banks at competitive prices. For more information, contact your Vining Sparks sales rep.



*Jim Reber (jreber@icbasecurities.com) is president and CEO of ICBA Securities, ICBA's institutional, fixed-income broker-dealer for community banks.*

# Is Your Bank Ready for a Ransomware Demand?

**By Tim Henry, Vice President/Managing Agent, UBA**

Ransomware attacks are very much in the news in 2021. Every organization should prepare in advance for the steps it must take should a ransomware event occur. While attacks against municipalities, educational facilities, healthcare organizations, the retail industry, and pipelines pepper the news, ransomware attacks have targeted community banks and will continue to do so in the future.

Ransomware is malware that employs encryption to hold data at ransom. Early on, ransom demands were relatively modest, and victims were inclined to pay the demands to quickly return their companies to operational.

To counter the threat of ransomware demands, among other steps taken by organizations, was to beef up backups to ensure that data could be restored in the event of a disaster, including a ransomware attack.

Ever opportunistic, fraudsters have shifted their focus to **managed service providers** (MSPs), which serve many clients at once, under the theory that if the fraudster can access one client, they can access many, many more. Another focus shift was to the **remote workforce** and their access tools with the presumed lower levels of security utilized.

**Double extortion tactics and increased demands.** Cybercriminals have amped up the stakes and now use a two-pronged extortion tactic: 1) locking up company data and systems; and 2) threatening to leak private and confidential data publicly unless the ransom is paid.

A reported third prong being used by some extortionists is to send ransom demands to customers, users or third parties who would be hurt by the leaked data of the threatened organization.

Now it's not enough to simply turn one's back on a ransomware demand and rely on rock-solid data backups to restore the bank's system to normal.

**Impact on cyber insurance.** To add to the problem, average ransomware payments have increased to $312,000, and reportedly, ransomware victims paid a total of $350 million in 2020. The huge dollars involved have resulted in higher cyber insurance premiums, higher deductibles, lower coverage limits, coverage restrictions, and in some cases, non-renewals.

**Refer to your IT professionals for ransomware prevention.** The best way to counteract ransomware attacks is to prevent them. Consult with your IT professionals and MSPs to tighten up your security measures.

**Educate your users.** Many attacks begin with a phishing email that looks legitimate but contains a malicious attachment or URL. Constant education of your employees is necessary for our "click first, read later" environment.

**Department of Treasury Advisory.** On Oct. 1, 2020, the Department of Treasury's Office of Foreign Assets Control (OFAC) issued an advisory prohibiting the

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payment of ransom demands to individuals on the OFAC Specialty Designated Nationals and Blocked Persons List (SDN List) and other specified persons and countries. (Please see the advisory at https://home.treasury.gov for a complete list of prohibited parties.)

**Steps to take in the event of an attack.** Both the FBI and the Federal Financial Institutions Examination Council (FFIEC) encourage ransomware victims to notify law enforcement immediately. In addition, the FFIEC recommends notifying your appropriate bank regulator and filing a Suspicious Activity Report, if appropriate.

**Insurance Implications.** Notice of a potential ransomware matter should be given to the bank's insurance company(ies) immediately. Typically, a breach coach will be assigned to your case to determine the appropriate steps to take to deal with the ransomware demand and associated potential breach. Not only does the carrier work with designated vendors with specific expertise in the type of breach the bank has incurred, but costs incurred by the bank without carrier approval are not necessarily covered by the insurer. Various coverages are available to mitigate the bank's expenses, and the bank should review its exposures and the appropriate coverages/limits to purchase with its experienced insurance advisor.

> "The best way to counteract ransomware attacks is to prevent them. Consult with your IT professionals and MSPs to tighten up your security measures."

United Bankers' Agency (UBA) offers cyber insurance to protect your community bank in the event of a security breach. Our community bank-specific insurance solutions will ensure you have the right coverage in place. In addition, UBA provides a full suite of identity theft protection products for your customers, from basic consultation restoration to web watcher, idINTEGRITY Scan. For more information or to schedule a consultation, go to ubb.com/insurance.

# Your Balance Sheet: Put it to Work!

By John Biestman, Vice President, Senior Relationship Manager in the Member Solutions Department

There's the ancient story of an agitated boss exclaiming to an employee, "You missed work yesterday, didn't you?" Tersely, the employee replied, "No, not particularly."

Similarly, your balance sheet, and specifically your cash, needs to get to work. The persistence of excess liquidity in the financial system remains an understatement. The recently released FDIC Quarterly Banking Profile for the Second Quarter of 2021 described a challenging environment for federally insured banks. These select items are telling:

Q2 2021 vs. Q2 2020:

- 10.4% increase in deposits
- 0.8% decrease in net loans
- Net Interest Margin on Average Assets: 2.50% vs. 2.81%
- Cash and Equivalent Balances: +25.0%
- Loan-to-Deposit Ratio: 56.9% vs. 63.4%

So, what should you do in this environment of margin pressure and excess liquidity? Put the cash to work and get it out the door. That may seem easier said than done with the federally insured bank composite loan-to-deposit ratio now standing at 56.9%, the lowest level on record. It's a no-brainer that there's an urgency to expeditiously deploy excess cash into safe and profitable loans and investments.

Community banks, particularly those that are asset-sensitive, have been executing a variety of growth strategies of late, including: i) increasing their portfolio of fixed-rate mortgages; ii) developing innovative product line extensions; iii) pre-funding pending investment maturities; and iv) extending asset durations and funding short. What do we see the neutral or liability-sensitive credit unions doing? Many are "blending-and-extending" their existing borrowings, including Federal Home Loan Bank advances.

- When funding mortgages, consider using a mix of duration-certain borrowings along with shares and deposits. A blended funding structure can mitigate interest and extension risk. Symmetrical and forward-start borrowing structures should also be modeled. Blended funding can be used to attain spreads in excess of 200 basis points alongside embedded interest rate risk protection, even in today's market.
- Innovate! Market home office loans as a specific niche. Consider unique lending programs such as fully-amortizing 10-year mortgages that are designed for those that are soon-to-retire. As many borrowers desire a debt-free retirement, "forced" savings sure beat close-to-zero investment returns in the current rate environment.
- Build a commercial real estate portfolio using amortizing borrowing structures to fund customized multiple amortization loan terms.
- Now that the PPP program is winding down, build your C&I loan portfolio with blended and amortizing borrowing structures. In the current environment, dividend-adjusted blended funding rates are well below 1% inside of seven-year maturities.

It's important to remain as close to fully invested as possible. Grow the balance sheet with prudent credit risk. Mitigate rate risk by funding intelligently and diversifying your funding sources. Your shares and deposits support uncertain durations. Blend them with funding sources, i.e., borrowings, that support duration certainty. Liquidity and interest rate conditions are always subject to change. If there was ever a time to preserve future earnings streams and counter unrelenting margin pressure, it's now. Put that cash to work. You won't miss it!

To discuss how these strategies could work with your institution, contact Eric Jensen, Vice President, Senior Relationship Manager, at ejensen@fhlbdm.com or 206.340.2489.

*This article was authored by John Biestman, Vice President, Senior Relationship Manager in the Member Solutions Department, where he works with our regional bank members in the western region.*

# Finding Growth Opportunities in a Changing Landscape

**By Danny Baker, Vice President, Market Strategy, Fiserv and**
**Brett Sturman, Senior Solutions Engineer, Syntellis Performance Solutions**

## With the right tools, financial institutions can overcome new challenges.

Financial institutions are facing margin pressure from continued low-interest rates, a decline in traditional fee income and increasing competition from new financial players. That has made diversifying revenue streams with noninterest-income sources even more important.

In its 2021 Financial Institutions Finance and Technology Trends survey, Syntellis Performance Solutions found that more than half of respondents expected their financial institution's profitability to decline or remain flat in 2021.

Banks are facing a variety of challenges that could be tempering expectations. Those challenges include:

- **Digital transformation —** The COVID-19 pandemic shifted consumer expectations for purchasing methods and digital experiences, from food delivery to remote work. Consumers want the same personalized, convenient experience from their financial institutions. However, many banks aren't equipped with the data, analytics and artificial intelligence needed to deliver those experiences.
- **Interest rates —** In 2020, financial institutions saw a dramatic plunge in interest rates, which affected loan yields and added significant margin pressure. Overall, U.S. bank profits fell 36.5% in 2020 compared to 2019. Revenue may not recover for two to four years, testing financial institutions' operational resilience.
- **Tightening regulations —** Fee income was already in decline, but that dip has accelerated amid increasing regulatory scrutiny around penalty fees, including those for overdrafts.

## Identify Market Opportunities

The shifts in the market present significant challenges, but not all the changes are grim. Positive changes include:

- **Influx in deposit balances —** Many consumers saved relief and stimulus money and had a surplus due to reduced discretionary spending. That left financial institutions with high cash levels they can lend against at a lower cost compared with borrowed funds.

- **Drop-in provision for credit losses —** Pandemic-level loan-loss provisions were often generous. As people return to work, there is a reduced risk of default, so financial institutions can recapture large amounts of loan-loss reserves.

- **Active homebuying market —** Purchase originations in 2021 are on pace to increase 16% to a record $1.67 trillion. Increased origination fees can drive yields.

- **Accelerating card use and contactless payment adoption —** The pandemic drove more people to use cards and contactless payments. Globally, nearly eight in 10 people surveyed in 2020 said they were using some form of contactless payment, including tap-and-go credit cards and mobile wallets such as Apple Pay, according to consumer polling by Mastercard. Increased card use presents the opportunity for fee generation as an additional source of noninterest income.

## Analyze Revenue Possibilities

Based on the current environment, financial institutions have several opportunities to develop strategies to survive and thrive:

- Accelerate the shift to contactless and digital payments with flexible personalization options
- Enable merchants with digital capabilities to create omnichannel experiences
- Modernize infrastructure to enable faster, secure cross-border payments
- Encourage simpler, more accessible payment options for the underbanked and unbanked
- Consider revitalizing your loan programs

Fee-based income can be a helpful offset against weaker net-interest income. And with the move to digitization, wire income, ACH fee income, and ATM and debit card interchange fee income are all expected to continue to rise. Additional opportunities could come from increases in fee income in other loan-related areas, as well as from wealth management.

## Understand Profitability Analysis Tools

Profitability analysis can help financial institutions assess revenue mix and evaluate the changes that

> Relationship-based pricing for new business is another example of leveraging best-of-breed technology. Pricing tools capture the most up-to-date assumptions while leveraging funds-transfer pricing solutions to project forward-looking profitability.

drive the most value. But it's important to have the right technology to support accurate and timely analysis to identify promising revenue streams.

Advanced profitability analysis tools provide views of separate components — such as net-interest income, provision, noninterest income and expenses — from a summary level. They also can drill into specific details.

Comprehensive reporting capabilities can enable financial institutions to create a wide variety of reports, analyses and data visualizations to gain insight into potential profitability drivers. For example, dynamic visualizations can be used to support profitability analysis. With that type of visual, banks can isolate a particular area of focus, such as noninterest income, to see its role in calculating the return on assets.

Relationship-based pricing for new business is another example of leveraging best-of-breed technology. Pricing tools capture the most up-to-date assumptions while leveraging funds-transfer pricing solutions to project forward-looking profitability.

Financial institutions can model pricing scenarios in real time by applying different combinations of loan terms, fees and deposit requirements. They also can consider changing factors such as customer risk profiles, loan provision requirements, and capital allocation to best balance client needs with institution goals.

## Turn Challenges Into Success Stories

The past year introduced many challenges for the banking industry. Reducing loan-loss provisions, ramping up mortgage lending, and progressing toward digitizing card and cashless transactions can help financial institutions turn those scenarios into opportunities.

# FALL 2021 Compliance Q&A

**By Bill Showalter, Senior Consultant, Young & Associates, Inc.**

**TILA. Q: I am working on a Loan Estimate (LE) for a purchase transaction on which we have not yet received a purchase agreement. The lender would like to include all of the seller fees on the LE so we would not have to redisclose the LE in the event we get a purchase agreement saying the buyer must pay all seller fees.**

**Is there any harm in doing this?**

**A:** The LE intends to inform applicants of costs they are likely to incur as part of their loans. If there is some likelihood that the buyer will agree to pay the seller's fees (such as if that is happening with some frequency in your market due to real estate market conditions), then it would probably be fine to include those normally seller's fees on the buyer's LE, showing to be paid by buyer/borrower.

If there is no basis for believing it likely that the buyer will agree to pay the seller's fees, it may or may not be compliant to disclose those fees on the LE as to be paid by the buyer/borrower.

Regulation Z requires that these disclosures be made in "good faith." The lender may need to probe a bit further to determine who will be paying these fees. Overdisclosing merely to avoid producing a revised LE is probably not a reasonable basis for "good faith" disclosures.

**EFTA/TISA. Q: We are researching increasing our international wire transfer fee. We are having a debate whether this would require 30-day prior notice to customers. The reason for the debate is that the fee is disclosed in our current Terms & Conditions. My position is that it would not be required because it is not a fee connected to an account but a service we provide, even if the person doesn't have an account.**

**Can you provide some clarification for us? Do we need to give prior notice to the customer?**

**A:** You are correct. If the fee is not charged "in connection with" the account or with making/receiving electronic fund transfers, then Regulation E and Regulation DD do not require that it be disclosed.

While neither rule prohibits the bank from disclosing these non-account-related fees (allowing banks and thrifts to have consolidated fee schedules that they give with their regulatory disclosures), the mere inclusion of such fees in consolidated fee schedules does not make future increases subject to the rules' advance notice requirements.

**Insider Credit. Q: We have an executive officer (EO) whose stepdaughter is applying for a car loan. The EO's wife will be co-signing for the car loan. Being that we are in Wisconsin, a community property state, does this loan need board approval?**

**A:** Maybe not. If the loan proceeds are not transferred to the EO or used for their direct benefit, and the loan is to be repaid from the separate income of either the stepdaughter and/or the wife, then the loan is not considered an "extension of credit" to the EO. There is a Federal Reserve Staff Opinion on this type of issue (though it deals with the spouse's business rather than their stepdaughter, the logic and reasoning seem to apply to this scenario).

In such a situation, prior approval by the board would not be necessary (under Regulation O) since this would not be an "extension of credit" to the EO. However, if there is some direct benefit, etc., for the EO and other criteria are met, prior approval would be required.

**TILA. Q: Can we do a balloon loan for a loan secured by non-real estate investments? The applicants are purchasing real estate. Is there anything special we would need to do? I know on real estate loans that we would need to know that they could pay the loan without the investments and have the funds to pay the balloon. I don't believe that it is the same for non-real estate loans.**

**A:** A legal question is whether the bank can extend a balloon loan secured by non-real estate investments. You will need to check with the bank's legal counsel on that one.

Even though this loan is to be used to purchase real estate, since a dwelling does not secure it, the "ability to pay/qualified mortgage" (ATR/QM) rules in Regulation Z will not apply. If the loan is for a personal, family, or household (consumer) purpose, then "regular" Regulation Z disclosures ("Fed box") will be required. If it is not for a consumer purpose, then Regulation Z does not come into play.

**ECOA/FCRA. Q: One of my branch managers recently asked me if we're required to send out a notice of action when denying someone a deposit account. Can you send me some guidance on this?**

**A:** There is no Regulation B-like requirement for sending a notice of the action taken and disclosing the adverse action taken and the reason(s) for it. (There is also nothing to prohibit giving such notice.)

However, like with credit applications, if banks take adverse action for a deposit account application based on a "consumer report," then the Fair Credit Reporting Act (FCRA) does require that notice be given to the applicant. This notice would include the information about using a credit reporting agency and its name, address, etc. That is normally included in the second part of our credit adverse action notices.

So, the answer is yes and no. Yes, an FCRA adverse action notice must be sent if third-party information is used at all in making the decision. But no, a Regulation B-like notice of the action taken and reasons does not have to be given (but maybe).

**EFTA. Q: If a customer calls the bank and says his son stole his debit card and used it, do we still need to file Visa chargebacks per Regulation E for this customer or does this customer need to get law enforcement involved?**

**A:** This customer's call is a notification of unauthorized use and must be handled and investigated by the bank just like any other such notice would be. Before beginning its investigation, the bank may not require the customer to file a police report, etc. The investigation may be easy since the customer is providing much of the information needed. Whether to involve law enforcement is up to the bank, probably in consultation with your customer.

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Continued from page 19

**Correction:** An eagle-eyed reader of our last set of Q&A spotted that our answer to one question left out some detail involved in the situation discussed. The Q&A, as printed, stated the following.

**Flood Insurance. Q: We have a current loan in process in which the borrower is contesting the flood determination on his property. The situation is a bit unusual for us in that the house itself is not located in the flood area, but other structures on the property are. The flood determination shows the house just out of the flood zone. We are leaning on the side of caution. If we are going to make the loan, flood insurance is required. Is there an exception that we might be missing?**

**A:** The lender has the responsibility to make a flood hazard determination (using a third party that guarantees its results is fine) and is permitted to be "cautious." From your description, it sounds like the outbuildings are clearly in Zone A, so flood insurance is not optional for them. The house is barely out of Zone A, so flood insurance coverage is not mandated by law/regulation – but the bank is not prohibited from requiring it in such a case.

For the house, it is up to the lender. For the outbuildings, there is no option (unless you can find some way to exclude them from the security interest – with the bank's legal counsel).

Our reader said they think that is not quite right. They noted that they believed the bank can exclude outbuildings if by due diligence it can show there are no living quarters in them (i.e., no bathroom/kitchen/sleeping areas). Also, they were skeptical that whether the outbuildings are included in the security interest is a consideration for requiring flood insurance.

We looked at the issue again and replied that the flood rules could be a bit troublesome at times, and it looks like we trimmed some detail (use of outbuildings, for example) we should have kept. The reader was correct that an outbuilding detached from the dwelling and is part of the residential property (e.g., a detached garage) may be excluded from flood coverage if it is not also a residence (e.g., has an apartment upstairs) or is not used for agricultural or commercial purposes (e.g., storing farm equipment or serving as a workshop for a business, etc.). Although, a lender is always free to require flood coverage to protect all of its collateral, even if the rule does not mandate it in a particular situation (such as this).

Regarding the security interest issue, this is the heart of the whole issue concerning the definition of "designated loan." If a structure is not security for the loan, then flood insurance is not a consideration. However, not being attorneys, we do not know how (or if) a building affixed to a particular parcel of land can be excluded from a security interest (mortgage or deed of trust) encumbering that parcel. If it can be done, then flood insurance would not be required by regulation (though it would still probably be prudent to have).

*Young & Associates provides banks and thrifts with support for their compliance programs, independent reviews, and in-bank training, as well as a full menu of management consulting, loan review, IT consulting, and policy systems.*

# Opportunity Bank of Montana Celebrates 100 Years of Community Banking

Opportunity Bank of Montana opened its doors in August 1922 as American Building and Loan with a single office in Helena, Montana. Growth and charter changes led to several name changes over the last century. In 2014, the Opportunity Bank brand was born because that's what we're passionate about: creating opportunities for Montanans.

Today, Opportunity Bank is the fourth-largest banking institution headquartered in Montana and one of the largest serving Montana exclusively. The bank currently operates 23 full-service branch locations in 16 unique communities across the state and a Community Banking Office (DPO) in Winifred, Montana. The bank is a leading Farm Services Agency guaranteed lender and a leading residential mortgage lender in Montana.

We're celebrating our 100th year in business, and we're calling it the Big 100. It's a celebration of this community, the good people who live here, and the businesses we've helped build across a hundred years. We want to make our 100th anniversary more than just a date on our timeline; we want it to be a yearlong celebration of our history, our values, and our love for Montana.

During this time, we will:

- **Tell 100 Stories.** We will tell the stories of Opportunity Bank of Montana, our people, the places we serve, and the impact we've made.
- **Share 100 lessons.** We will share 100 lessons learned in 100 years of business. Lessons learned by employees in business and life.
- **Give 100 Gifts.** Through donations or gifts of time and talent, we will make 100 gifts to the communities we serve.

The history of Opportunity Bank is one of resilience and growth, one that illustrates the value of investing in community. For more information about Opportunity Bank, visit opportunitybank.com. To share in our celebration, visit opportunity100.com.

# For the Love of Banking

In Butte America, there is a woman who inspires with her get-it-done, Butte-tough work ethic and quick sense of humor. That woman is Joan Ray, a member of the First Montana Bank family since the day the branch opened its doors in 1995.

Having recently celebrated her 85th birthday, Joan says the secret to keeping up with the busy pace is that she truly enjoys her work, adding that the social aspect of the job and being around staff and customers keep her young, too.

She and her beloved pup, Pepper, are a mainstay of the family atmosphere at the bank. When asked what she enjoys most about working at First Montana Bank, she replied, "The people I work with, the job that I do, and the customers I get to meet with every week."

Ryan Nielsen, Market President, commented, "Joan is more than just an employee here. She is family to everyone."

Asked if she had ever thought about retirement, she replied in true Joan fashion, "No. Not yet." Bank on, Joan. Bank on!

# United Bankers' Bank and RiskScout Announce Partnership to Provide Turnkey Solution to Safely and Effectively Enter New Growth Markets

United Bankers' Bank (UBB), the nation's first bankers' bank, and RiskScout, the nation's leading onboarding and due diligence fintech platform announced their unique partnership to provide streamlined compliance solutions surrounding hemp and other emerging markets existing in our communities.

Through this collaboration, UBB's community banks will have the ability to offer financial services to underserved businesses – private ATMs, cash intermediaries, money services businesses, hemp, cannabis, cryptocurrency, and others – that often pose a challenge to roll out this sort of business line due to the sheer magnitude of enhanced regulatory obligations that come with banking them.

Says Justin Fischer, CEO and Co-Founder of RiskScout, "We are beyond thrilled to partner with UBB to help community bankers bank more community businesses. There's a massive underserved market of commercial businesses in emerging spaces right in a bank's backyard. Our technology, developed by a deep bench of former technologists, BSA officers and bank examiners, is an equal parts growth and compliance play. It's all about opening larger deposits, fees and loan opportunities – leveraging the resources banks already have."

"We are so happy to have the ability to deliver a new product line to our community banks up and down America's main streets," says John Peterson, UBB's Executive Vice President and Chief Marketing Officer. "This growth product will empower our community banks to remain viable and competitive by generating additional fee revenue, deposits, lending and merchant opportunities; it allows them to continue to thrive and serve the communities to which they have built trusting and lasting relationships over many years."

The partnership with RiskScout will involve direct collaboration between UBB and the high-risk banking solution firm to align the needs of UBB's community bank customers with the services provided by RiskScout. Detailed information about this exciting, new, cost-saving service can be found at ubb.formstack.com/forms/riskscout.

# Working Together to Serve Montana Small Businesses

**By Brent Donnelly, District Director, SBA Montana District Office**

In April 2020, the federal government established the Paycheck Protection Program (PPP), a new $349 billion program with the mission to keep people on payroll, keep businesses in business, and help the economy recover as quickly as possible. Within hours of the program announcement, Montana lenders were filling my teams' inboxes for requests for information, eager to do their part in serving our state's small business community.

That commitment has never stopped, and the Montana lender community's steadfast support of Small Business Administration (SBA) programs has been unrelenting. Amid program modifications and the challenges of the pandemic, our state's banks, credit unions, and financial institutions have remained focused and steady, stepping up to work long hours to connect small businesses with much-needed capital.

In the Montana District Office, we place a significant emphasis on cultivating and sustaining relationships with lenders across the state. The SBA has a range of incredible programs, but we rely on the partnership of lenders to make them a reality for small businesses. This is more important for our state than many others as a majority of Montana is classified as rural; many counties are deemed frontier counties. It is imperative for the SBA to intentionally work with lenders to ensure businesses in these most sparsely populated communities have equal access to SBA funding. We couldn't do it on our own.

Take Garrett Scott and Yellowstone Bank, for example. For more than a decade, Garrett has worked closely with Tom White and Rena Carlson, Lender Relationship Specialists in the Montana SBA Office. Over the years, they have developed a rapport where they bounce ideas off each other and shoot texts back and forth for quick information access. When the pandemic began stretching resources for lenders, businesses, and even our office, this partnership was key, and they relied on each other more than ever as rules changed and programs evolved. Garrett said the trust and availability of the SBA was a key factor that enabled the bank to process nearly 1,500 loans, amounting to approximately $114 million.

We could brag on our lenders all day long. In Montana alone, the work between SBA and local lenders led to over $2.6 billion in aid with over 47,000 small businesses loans through the Paycheck Protection Program. For many, these funds were the factor that allowed them to keep their doors open, preserving jobs for thousands of workers. The new Restaurant Revitalization Fund also extended assistance to Montana diners, caterers, bakeries, bars, and eateries that experienced significant revenue loss because of the pandemic. Economic Injury Disaster Loans will continue helping entrepreneurs, including agriculture businesses and nonprofit organizations, with cash flow challenges until the program closes December 31. None of this would have been possible without the tireless work of our lender community.

I could not be more sincere in my appreciation for the individuals who partner with the SBA to provide resources for small businesses, and we are always looking to find more lenders willing to help us get SBA dollars into the hands of small business owners. Scott Garrett said it best: "Our relationship with the SBA is crucial to the community around us. There are so many customers we wouldn't be able to serve without the assistance of the SBA. They're an incredible tool for getting a deal done and providing an option for small businesses that may need an extra leg up. Learning about these programs enables us to get into the weeds so our customers don't have to."

At the SBA, we will always work to ensure our lending programs are mutually beneficial for lenders and business owners. SBA loan programs are guaranteed, helping mitigate financial risk while offering borrowers more flexible terms. The programs also help increase customer loyalty and retention with the option of alternative financing when traditional avenues are not available. Most importantly, SBA loans can help communities grow and thrive.

You've heard it before, but it's worth repeating. Small businesses are the backbone of our economy and each community in Big Sky Country. By investing in local businesses, lenders help create jobs that funnel money into schools, roads, and the community's future.

Our SBA Montana Office is absolutely committed to partnering with you to best serve our state's small businesses. To learn more about becoming an SBA lender or to connect with a member of our team, visit sba.gov or call the Montana District Office at 406.441.1081.

# Stay on Mission:
## A Tale of Curiosity & Big Living, Against the Odds

On September 30th, Eduardo Garcia, the founder of Montana Mex, spoke to over 500 MSU students as part of the Jabs E Series at Montana State University.

The title of Mr. Garcia's talk was "Stay on Mission: A tale of curiosity & big living, against the odds." To learn more, please visit chargedfilm.com.

MIB sponsored Mr. Garcia's talk. The talk and program were a hit, and MIB is pleased to continue our excellent partnership with Montana State University.

# Thank You Vendors

We would like to thank the vendors who joined us in Billings at the MIB Annual Convention and Trade Show. ICBA, ICBA Securities, Select Bankcard, Crescent Mortgage, FPS Gold, United Bankers Bank, Bankers Healthcare Group, Holtmeyer & Monson, Small Business Association, Leavitt Great West Insurance, Bankers' Bank of the West, Anderson ZurMuehlen & Co., P.C., First Call Computer Solutions, Big Sky Finance, Community Bankers Webinar Network, Cushing Terrell, Shazam.

Associate Member UBB cosponsored the MIB tailgate parties in Missoula and Bozeman. Both events were well attended. Great food, great conversation and of course custom cornhole boards were the big prize.

## UM




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** 2021 CBC Program*

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