

# **PUBLIC DISCLOSURE**

January 17, 2023

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

INTRUST Bank, National Association Charter Number: 2782

> 105 N. Main Wichita, KS 67202

Office of the Comptroller of the Currency

2959 N. Rock Road, Suite 510 Wichita, KS 67226

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## **Overall CRA Rating**

Institution's CRA Rating: This institution is rated Outstanding.

The following table indicates the performance level of INTRUST Bank, National Association (INTRUST or bank) with respect to the Lending, Investment, and Service Tests:

	(INTRUST Bank, N.A.) Performance Tests						
Performance Levels	Lending Test*	Investment Test	Service Test				
Outstanding	Х	X	Х				
High Satisfactory							
Low Satisfactory							
Needs to Improve							
Substantial Noncompliance							

<sup>5</sup> The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, good geographic distribution of loans, extensive product innovation and flexibility, and the significantly positive impact of Community Development (CD) lending in Kansas and Oklahoma. Performance in the State of Kansas contributed significantly to the overall rating given that 95 percent of deposits by dollar volume as of December 31, 2021, and 71 percent of total number of loans analyzed during the evaluation period are within the Kansas Assessment Areas (AA).
- The Investment Test rating is based on an excellent level of investment in Kansas and Arkansas, and a good level of investment in Oklahoma. Performance in the State of Kansas contributed significantly to the overall rating.
- The Service Test rating is based on the institution being a leader in providing community development services, and the good distribution of branches and accessibility of delivery systems in Kansas and Oklahoma. Performance in the State of Kansas contributed significantly to the overall rating.

### **Product Innovation and Flexibility**

INTRUST makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank demonstrated the ability to adapt to changing conditions to meet the financial and credit needs of its community. INTRUST originated loans in response to the COVID-19 pandemic through the Small Business Administration's (SBA's) Paycheck Protection Program (PPP). These loans made to small businesses impacted by the pandemic in 2020 and 2021, helped to support and retain LMI jobs. The bank originated 3,444 PPP loans in its AAs, totaling over \$550 million. INTRUST offered payment accommodations, which included loan forbearance and payment modification plans to consumer and commercial borrowers. The bank also suspended foreclosure and repossession activities

in response to the pandemic. Additionally, INTRUST waived consumer loan late fees during the onset of the pandemic from April-June 2020.

INTRUST participates in the SBA's 7A and 504 loan programs, which are flexible loan programs. The bank also participates in the Federal Housing Agency (FHA)/U.S. Department of Veterans Affairs (VA) insured loan programs, which offer flexible, long-term financing with reduced down payment requirements.

#### **Community Development Lending**

The evaluation considered CD loans to organizations that serve two or more states and that directly or indirectly benefit one or more of the bank's AAs. INTRUST funded 13 CD loans totaling \$52.6 million for the benefit of a larger regional area that includes the bank's AAs. INTRUST made five CD loans, totaling \$28.9 million, for revitalization and stabilization projects. The bank also funded four CD loans which helped create affordable housing for low- and moderate-income individuals. INTRUST originated three CD loans which helped support community services for LMI individuals, and one loan for economic development which helped retain jobs for LMI individuals in response to the COVID-19 pandemic.

#### Investments

This evaluation considered regional or statewide investments which served states that include one or more of INTRUST's AAs. INTRUST made twelve qualifying investments totaling \$10.8 million. This included balances on nine prior period investments and three current period investments. The bank made nine investments totaling \$3.2 million that benefit affordable housing initiatives through low-income housing tax syndicators and mortgage-backed securities. Three other investments totaling \$7.6 million were made to facilitate qualifying economic development through entrepreneurship tax credits, helping to start an emergency loan fund for small businesses.

### **Community Development Services**

This evaluation considered regional or statewide CD services which served states that include one or more of INTRUST's AAs. Three employees provided service in the Kansas Statewide region to three organizations which serve the state of Kansas, totaling 220 hours. One employee served as a board member of an SBIC organization that provided loans to small businesses. Another employee served on an operations and investments committee of a non-profit tax credit syndicator for affordable housing. Additionally, one employee provided 12 hours of service in the Oklahoma Statewide region to a non-profit tax credit syndicator by serving on an operations and investments committee and by providing financial expertise.

### **Alternate Delivery Systems**

INTRUST provides free online and mobile banking to all customers. From January 1, 2019, through December 31, 2021, the bank had 5,061 active mobile banking users and 4,290 active online banking customers in LMI branch zip codes within the bank's AAs. INTRUST also cashes government checks for all customers.

### Lending in Assessment Area

A high percentage of the bank's loans are in in its assessment areas (AA).

The bank originated and purchased 75.5 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

By product, 92.2 percent of home mortgages and 69.7 percent of small business loans were made inside the bank's AAs. This performance was positively factored into the overall analysis of the geographic distribution of lending by income level of census tract.

Lending Inside and Ou	tside of the	Assess	ment Area							
Loan Category	Number of Loans					Dollar A	000s)			
	Insic	le	Outside		Total	Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage	2,777	92.2	236	7.8	3,013	454,761	85.1	79,432	14.9	534,193
Small Business	6,018	69.7	2,613	30.3	8,631	892,746	74.4	306,687	25.6	1,199,433
Small Farm	223	72.6	84	27.4	307	27,919	74.1	9,764	25.9	37,683
Total	9,018	75.5	2,933	24.5	11,951	1,375,426	77.7	395,883	22.3	1,771,309

The bank's home mortgage and small business lending volumes are sufficient to conduct an analysis of the geographic distribution of these loan products. The low volume of small farm loans across all AAs, save for the Wichita AA, does not allow for a meaningful analysis of geographic distribution. While the volume of small farm loan originations in the Wichita AA is sufficient to analyze, the low number of originations does not impact the bank's overall lending performance.

## **Description of Institution**

INTRUST is a \$7.5 billion financial institution headquartered in Wichita, Kansas. INTRUST operates one subsidiary, INTRUST Community Development Corporation (ICDC), located in Wichita, Kansas. The bank is wholly owned by INTRUST Financial Corporation (IFC), a one-bank holding company located in Wichita, Kansas.

INTRUST is a multistate institution comprising 40 branches and 117 automated teller machines (ATMs). The bank primarily serves 12 counties within Kansas, Oklahoma, and Arkansas. INTRUST has 33 branches and 109 ATMs in Kansas, six branches and six ATMs in Oklahoma, and one branch with one ATM located in Arkansas. INTRUST has one ATM located outside the bank's AAs, in Kansas City, Missouri. Additionally, INTRUST incorporated the Allpoint ATM network in May 2020 to provide more surcharge-free ATM access to customers. INTRUST is connected to an additional 263 Allpoint ATMs within its AA, including 155 in Kansas, 100 in Oklahoma, and eight in Arkansas.

INTRUST offers a broad range of banking services, including trust, credit, and deposit services to commercial enterprises and consumers of all income levels and sizes. INTRUST's primary business focus is small business and home mortgage lending. The bank is a Small Business Administration (SBA) Preferred Lender Partner, participating in SBA 504 and SBA 7(a) programs. Among the 7(a) offerings

are Express, Export Express, Export Working Capital, CapLines, and International Trade lending. The bank offers SBA 504 loans for larger, long-term purchases or renovations. As of December 31, 2021, net loans and leases represented 44 percent of total assets. The loan portfolio had the following credit composition: 44 percent real estate loans (74 percent commercial, 14 percent residential, 11 percent construction, and two percent farmland), 38 percent commercial and industrial loans, three percent agricultural loans, seven percent consumer loans, and nine percent other loans. Tier one capital totaled \$560.8 million as of December 31, 2021.

INTRUST completed a merger in 2019 which added Harvey County, KS to the bank's AA. The bank is not subject to any pending litigation or other factors impeding its ability to meet the credit needs in its AAs. The bank received a Satisfactory rating in its previous Community Reinvestment Act evaluation dated January 6, 2020.

## Scope of the Evaluation

### **Evaluation Period/Products Evaluated**

Examiners evaluated INTRUST using the Large Bank examination procedures including a lending test, investment test, and service test. Each AA was evaluated based on its primary lending product(s). The primary products included home mortgage loans and small loans to businesses for all AAs. Loans to small farms and consumer loans were not analyzed, as these were not primary loan products. This performance evaluation presents an analysis of home mortgage loans and small loans to businesses originated or purchased between January 1, 2019, and December 31, 2021. To assess the bank's lending performance, we evaluated the bank's HMDA and CRA data for 2019-2021. Lending activity will be evaluated against the 2015 American Community Survey (ACS) census data. This evaluation also includes a review of community development (CD) loans, qualified investments, and CD services between January 1, 2019, and December 31, 2021.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a fullscope review. For purposes of this evaluation, bank-delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank-delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to Appendix A: Scope of Examination for a list of full- and limited-scope AAs.

The AAs in Kansas include the Wichita AA, the Manhattan AA, the Kansas City AA, the Lawrence AA, and the Topeka AA. The Wichita AA and the Manhattan AA received full-scope reviews, and the other Kansas AAs received limited-scope reviews.

Each AA in Arkansas and Oklahoma received full-scope reviews. The Arkansas AA is Benton County, and the Oklahoma AA is the Oklahoma City AA (Canadian, Cleveland, and Oklahoma Counties).

### Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

INTRUST's performance in Kansas is more heavily weighted in the overall bank rating, when compared to performance in Arkansas and Oklahoma. The bank's performance within the Wichita AA also carries substantial weight in the state rating for Kansas. Kansas housed 83 percent of the bank's branches, held 95 percent of total bank deposits, and generated 71 percent of the total number of loans analyzed in this evaluation. The Wichita AA housed 70 percent of the Kansas branches, held 87 percent of total Kansas deposits, and generated 82 percent of the total number of loans analyzed for the state of Kansas.

The Lending Test analysis placed equal weight on home mortgage and small business lending based on the number of loans granted for each product in the Benton County AA in Arkansas. The Lending Test analysis placed slightly more weight on small business lending than on home mortgage lending for all other AAs, based on the number of loans granted for each product in those AAs. During the evaluation period, CRA reportable small business lending represented 70 percent of the number and 74 percent of the dollar volume within the AAs. Home mortgage lending represented approximately 92 percent of the number and 85 percent of the dollar volume within the AAs.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## **State Rating**

### State of Kansas

CRA rating for the State of Kansas<sup>1</sup>: Outstanding The Lending Test is rated: Outstanding The Investment Test is rated: Outstanding The Service Test is rated: Outstanding

The major factors that support this rating include:

- Excellent level of lending activity;
- Good geographic distribution of loans;
- Adequate borrower distribution of loans;
- Leader in CD lending;
- Excellent level of CD investments;
- Retail delivery systems are accessible to geographies and individuals of different income levels within the AA; and
- Excellent level of CD services.

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

INTRUST has five delineated AAs in the state of Kansas. The Kansas AAs include the Wichita AA (Sedgwick, Butler, and Harvey Counties) which is part of the larger Wichita, KS MSA (#48620); the Manhattan AA (Geary and Riley Counties) which is part of the larger Manhattan, KS MSA (#31740); the Kansas City AA (Johnson County) which is part of the larger Kansas City, MO-KS MSA (#28140); the Lawrence AA (Douglas County) which is part of the Lawrence, KS MSA (#29940); and the Topeka AA (Shawnee County) which is part of the larger Topeka, KS MSA (#45820).

The bank has approximately \$6 billion in deposits in Kansas, representing 95 percent of INTRUST's total deposits. The bank operates 33 branches in Kansas, representing 83 percent of the bank's total branches. In Kansas, the bank originated and purchased approximately \$1.43 billion in reportable loans, which was 93.5 percent of the total number of reportable loans that INTRUST originated and purchased during the evaluation period. The primary product types in Kansas are home mortgage and small business loans.

### Wichita AA

INTRUST operates 23 bank branches and 96 ATMs (including 16 multi-service ATMs) in the Wichita AA. As of June 30, 2021, deposits within the AA totaled \$5.2 billion, or 82 percent of the bank's total deposits. During the evaluation period, the bank made 6,828 home mortgage, small business, and CD loans totaling \$1.14 billion within the AA, or about 58 percent of the total number of loans.

<sup>&</sup>lt;sup>1</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

A	ssessment A	rea: 2021 V	Vichita AA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	143	10.5	27.3	31.5	30.8	0.0
Population by Geography	607,456	7.8	22.5	33.8	35.9	0.0
Housing Units by Geography	254,631	8.7	24.3	34.5	32.4	0.0
Owner-Occupied Units by Geography	150,868	4.7	17.4	34.7	43.1	0.0
Occupied Rental Units by Geography	79,947	13.9	33.9	35.4	16.7	0.0
Vacant Units by Geography	23,816	16.3	35.7	30.1	17.9	0.0
Businesses by Geography	42,734	5.0	24.9	30.4	39.7	0.0
Farms by Geography	1,666	2.8	11.2	35.0	51.1	0.0
Family Distribution by Income Level	151,335	20.6	17.8	21.3	40.3	0.0
Household Distribution by Income Level	230,815	23.6	16.6	18.4	41.4	0.0
Median Family Income MSA - 48620 Wichita, KS MSA		\$64,331	Median Housi	ng Value		\$123,970
			Median Gross	Rent		\$744
			Families Belov	w Poverty Lev	vel	10.4%

The Wichita AA consists of 143 census tracts among the three counties. During the evaluation period the AA reflected 15 low-, 39 moderate-, 45 middle-, and 44 upper-income census tracts. The table reflects that LMI tracts total 37.8 percent of the AA. According to the 2015 U.S Census and 2021 D&B Data, the population of the AA is 607,456 and the median family income is \$64,331. The income distribution for families within the AA is 21 percent low-income; 18 percent moderate-income; 21 percent middle-income; and 40 percent upper income.

Demographic data as of 2021 reflects that among the 230,815 households within the AA, approximately 27 percent receive social security, 17 percent are retired, and 14 percent are below the poverty level. Approximately 13 percent of the population comprises persons over the age 65, while 33 percent of the population consists of civilians not in the work force. The median housing value is \$123,976 and 59 percent of the housing units are owner-occupied. The demographic data also reflects a relatively low percentage of home ownership in low-income geographies, with 32 percent of 22,180 housing units in low-income census tracts being owner-occupied. Rental housing units represent a significant level of units in low- and moderate-income census tracts at 50 percent and 44 percent, respectively.

#### Economic Data

According to the October 2022 Moody's Analytics report, Wichita's economy has proven buoyant. While employment growth early in 2022 cooled, the pace for the Wichita economy stabilized even as the national average continues to slow. Near-term growth in the area's manufacturing industry will be limited by labor shortages and supply chain disruptions. These labor constraints and parts delays have capped growth, while competition for skilled labor is putting upward pressure on wages. These pay

raises will help buffer the housing and retail industries amid broader business cycle fluctuations. As labor and parts shortages fade, first-tier aerostructure production will stay an essential piece of Wichita's economy. The low costs of living and doing business, global manufacturing, and aerospace industry are strengths in the Wichita economy. Below-average wages in every industry except manufacturing, low employment diversity, and the aerospace industry's exposure to materials and labor-supply disruptions are noted weaknesses.

The largest employers in the Wichita economy are Spirit AeroSystems Inc., Textron Aviation, Ascension Via Christi Regional Medical Center, and McConnell Air Force Base. The unemployment rate jumped from 3.4 percent in 2019 to 8.1 percent in 2020 amid the COVID-19 pandemic, before declining to 4.4 percent in 2021. Population growth is stagnant at an average growth rate of about 0.2 percent during the evaluation period. According to Moody's Analytics, median household income has increased from \$59,700 to \$64,100, and personal income growth has averaged 5.43 percent per year.

### Housing

Housing affordability ratios in the Wichita AA is comparable to the State of Kansas. The Census' fiveyear (2017-2021) ACS statistics estimates an affordability ratio for Sedgwick County at 2.5 times, and Butler and Harvey Counties at 2.2 times, compared to the State of Kansas at 2.6 times. The U.S average is 3.5 times. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Butler County and Harvey County's homeownership rates of 76.7 percent and 71.7 percent, respectively, exceed the State of Kansas and the U.S. at 66.6 percent and 64.6 percent, respectively. Sedgwick County homeownership at 62.0 percent, is lower than both the state and national rates. Median gross rent levels for all three counties are lower than those of the State of Kansas and the U.S.

#### **Community Contacts**

Our review utilized five existing community contacts to assess the credit needs of the community, and opportunities for financial institutions in the Wichita AA to address those needs. These contacts included four economic development organizations, with one at the county level and three at the city level. One other contact worked within the administration of a local city government office. The contacts communicated that some lending opportunities exist in commercial lending with redevelopment projects taking shape in the Wichita downtown area. Business expansion from both existing and new businesses in the local area also present some lending opportunities. Economic trends have stabilized from the impact of the COVID-19 pandemic on the local economy and the manufacturing industry. All contacts noted that local financial institutions are receptive to community needs and do a good job in meeting these credit needs; however, one contact noted the perception that some banks are less willing to take chances on start-up companies. The contact stated that grants and other financing sources for start-up businesses could be improved. Contacts noted local banks are proactive in funding development within the community.

### Manhattan AA

The bank operates three branches and six ATMs in the Manhattan AA. As of June 30, 2021, deposits within the AA totaled \$148.2 million, or two percent of the bank's total deposits. During the evaluation period, the bank made 365 home mortgage, small business, and CD loans totaling \$51.3 million, or about three percent of the total number of loans.

Ass	essment Ar	ea: 2021 Ma	anhattan AA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	22	0.0	36.4	31.8	22.7	9.
Population by Geography	111,809	0.0	31.9	36.1	29.6	2.4
Housing Units by Geography	44,566	0.0	29.4	39.6	29.8	1.2
Owner-Occupied Units by Geography	16,492	0.0	20.5	38.9	40.1	0.4
Occupied Rental Units by Geography	22,698	0.0	33.8	41.5	22.9	1.8
Vacant Units by Geography	5,376	0.0	38.0	34.1	27.1	0.9
Businesses by Geography	5,814	0.0	32.4	34.8	32.0	0.8
Farms by Geography	295	0.0	26.4	22.7	50.8	0.0
Family Distribution by Income Level	22,993	20.5	22.7	19.6	37.2	0.0
Household Distribution by Income Level	39,190	23.0	18.6	20.4	38.0	0.0
Median Family Income MSA - 31740 Manhattan, KS MSA		\$61,327	Median Housi	ng Value		\$149,360
			Median Gross	Rent		\$927
			Families Belov	w Poverty Lev	vel	8.4%

The Manhattan AA consists of 22 census tracts between Riley and Geary Counties in Central Kansas. Within the MSA is the city of Manhattan which includes Kansas State University (KSU), Junction City, and the adjacent Fort Riley Military Base. During the evaluation period the AA reflected zero low-, eight moderate-, seven middle-, and five upper-income census tracts. The AA also had two census tracts that were NA for income level designation. The table reflects that LMI tracts total 36.4 percent of the AA. According to the 2015 U.S Census and 2021 D&B Data, the population of the AA is 111,809 and the median family income is \$61,327. The income distribution for families within the AA is 21 percent low-income; 23 percent moderate-income; 20 percent middle-income; and 37 percent upper income.

Demographic data as of 2021 reflects that among the 39,190 households within the AA, approximately 18 percent receive social security, 13 percent are retired, and 17 percent are below the poverty level. Approximately eight percent of the population comprises persons over the age 65, while 31 percent of the population consists of civilians not in the work force. The median housing value is \$149,360 and 37 percent of the housing units are owner-occupied. Rental housing units represent a significant level of housing within the AA at 58 percent of the total housing units.

#### Economic Data

The October 2022 Moody's Analytics report for Manhattan shows the business cycle status as being at risk. The risk susceptibility stems from the local economy being hindered in the short-term with stagnant employment growth. Despite the short-term forecast, Moody's presents an optimistic long-term outlook for Manhattan's economy and population growth. Manhattan harbors key advantages that can stimulate swift growth, including low costs of living and doing business, a ready supply of educated labor via

KSU, and Manhattan's cluster of defense facilities and specialized talent. The presence of KSU and defense and military spending are the primary economic drivers for the AA. The report notes that the stabilizing presence of Fort Riley and KSU, an abundance of skilled labor, increasing public and private investments, and the low costs of living and doing business are strengths for the AA's economy. Moody's states that a high concentration of low-wage services, and below average incomes present weaknesses to the Manhattan economy.

The largest employers in the Manhattan AA are Fort Riley and KSU. The unemployment rate increased from 2.8 percent in 2019 to 4.6 percent in 2020 amid the COVID-19 pandemic, before settling back to 2.8 percent in 2021. Population growth was static during the evaluation period with an average growth rate of less than 0.1 percent. According to Moody's Analytics, the median household income has increased from \$51,800 to \$55,700, and personal income growth has averaged about 4.47 percent per year.

### Housing

Housing affordability in the Manhattan AA varies between counties. The Census' five-year (2017-2021) ACS statistics estimates an affordability ratio for Riley and Geary Counties at 4.0 times and 2.6 times, respectively, compared to the State of Kansas at 2.6 times. The U.S average is 3.5 times. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Riley County and Geary County's homeownership rates of 45.4 percent and 43.7 percent, respectively, are lower than both the State of Kansas and the U.S. rates at 66.6 percent and 64.6 percent, respectively. Median gross rent levels for both Riley and Geary Counties are higher than the State of Kansas, but below the national level.

### **Community Contacts**

The OCC utilized two existing community contacts to assess the credit needs of the community, and opportunities for financial institutions in the Manhattan AA to address those needs. Both contacts worked in economic development organizations within their respective communities. The contacts communicated that some lending opportunities exist in commercial lending, with the area having a demand for small business development and start-up lending to entrepreneurs. The contacts noted that the local economy has stabilized, and that financial institutions are active within the community and do a good job in identifying and meeting the credit needs of the area.

### Scope of Evaluation in Kansas

We performed full-scope reviews of the Wichita and Manhattan AAs. The Wichita AA housed 70 percent of the Kansas branches, held 87 percent of total Kansas deposits, and generated 82 percent of the total number of loans analyzed for the state of Kansas. The Manhattan AA housed nine percent of Kansas branches, held approximately three percent of total Kansas deposits, and generated four percent of the total number of loans analyzed for the state of Kansas. Despite these lower levels of the bank's representation, examiners selected the Manhattan AA for a full-scope review to ensure periodic analysis of all AAs, as it had not been evaluated during the previous two CRA examinations. The three other Kansas AAs received limited-scope reviews.

The Lending Test analysis placed slightly more weight on small business lending than on home mortgage lending for all Kansas AAs, based on the number and dollar volume of loans granted for each product in each AA. During the evaluation period, CRA reportable small business lending in the Wichita

AA represented 66.2 percent of the number, and 64.8 percent of the dollar volume of the total reportable lending within the AA. Home mortgage lending represented 33.8 percent of the number, and 35.2 percent of the dollar volume of total reportable lending in the Wichita AA. CRA reportable small business lending in the Manhattan AA represented 75.5 percent of the number, and 67.9 percent of the dollar volume of reportable loans made within the AA during the evaluation period. Home mortgage lending represented 24.5 percent by number, and 32.1 percent by dollar volume of the total reportable loans made within the AA during the evaluation period.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

### LENDING TEST

The bank's performance under the Lending Test in Kansas is rated Outstanding.

Based on full- and limited-scope reviews, the bank's overall lending performance in the State of Kansas is excellent.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Wichita AA is excellent and performance in the Manhattan AA is good.

### **Lending Activity**

Lending levels reflect excellent responsiveness to AA credit needs when considering the number and dollar volume of home mortgages, small business loans, and community development loans relative to its capacity based on deposits, competition, and market presence. INTRUST has 33 branches in Kansas. A substantial majority of the bank's deposits, home mortgage loans, and small loans to businesses by both number and dollar volume are in the Wichita AA. The Manhattan AA comprises a considerably smaller presence for the bank within Kansas. Small farm lending represented just 2.6 percent by number and 1.9 percent by dollar volume of reportable lending in Kansas. Small business loans are greater by both number and dollar volume than home mortgages. Based on these loan volumes, small business lending carries a greater weight for the bank's lending activity within the AA.

Total	2,608	5,603	218	74	8,503	100.0	100.0
Lawrence AA	75	299	0	3	377	4.4	4.7
Kansas City AA	145	488	8	4	645	7.6	4.8
Topeka AA	15	63	0	0	78	0.9	1.3
Manhattan AA	89	274	10	2	375	4.4	2.5
Wichita AA	2,284	4,479	200	65	7,028	82.7	86.8
Area	Mortgage	Business	Farm	Development	Total	Loans	Deposits
Assessment	Home	Small	Small	Community		% State	% State
Number of Loans	*		_				_

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of	Loans*						
Assessment	Home	Small	Small	Community		% State	% State
Area	Mortgage	Business	Farm	Development	Total	Loans	Deposits
Wichita AA	355,871	654,081	23,895	125,717	1,159,564	81.3	86.8
Manhattan AA	15,925	33,698	1,149	1,726	52,498	3.7	2.5
Topeka AA	2,172	18,101	0	0	20,273	1.4	1.3
Kansas City AA	21,739	96,262	1,759	5,914	125,674	8.8	4.8
Lawrence AA	22,574	40,686	0	5,741	69,001	4.8	4.7
Total	418,281**	842,828	26,803	139,098**	1,427,010	100.0	100.0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only. \*\*Due to rounding there may be slight variances in dollar volume.

#### Wichita AA

Lending levels in the Wichita AA reflect excellent responsiveness to credit needs of the AA. As of June 30, 2021, the Wichita AA had 43 financial institutions, which included branches of national and regional banks, and local community banks. The bank ranked first in deposits with a deposit market share of 25.0 percent, putting INTRUST in the 98<sup>th</sup> percentile among depository institutions within the AA. Bank of America, NA, ranked second with a deposit market share of 17.8 percent, and Fidelity Bank, NA, ranked third with a deposit market share of 9.9 percent.

In 2021, INTRUST ranked 13<sup>th</sup> among 375 home mortgage lenders within the AA with a market share of 2.0 percent by number, putting the bank in the 97<sup>th</sup> percentile. The top five home mortgage originators/purchasers within the AA were Rocket Mortgage, Members Mortgage Services, LLC, Meritrust Federal Credit Union, Credit Union of America, and Fidelity Bank, N.A. These five leading institutions had a combined market share of 23.2 percent with individual share percentages ranging from 4.2 percent to 5.6 percent.

INTRUST ranked second among 119 small business lenders within the AA with a market share of 13.7 percent by number, putting the bank in the 98<sup>th</sup> percentile in 2021. The top small business lender was American Express National Bank with a market share of 14.5 percent. JPMorgan Chase Bank, NA, Bank of America, N.A., and Capital One Bank (USA) N.A., round out the top five small business lenders within the AA with respective market shares of 7.2 percent, 7.2 percent, and 6.7 percent. INTRUST had the highest market share percentage at 29.2 percent, when calculating market share by the total dollar amount of loans.

The bank's mortgage and small business market shares and rankings are lower than the bank's deposit market share and ranking within the AA. Still, a more accurate depiction of INTRUST's lending performance relative to competition can be determined by comparing the bank's percentile ranking within its respective markets. The bank's mortgage lending performance is just below its deposit base, relative to the level and nature of competition for home mortgage lending. INTRUST is in the 98<sup>th</sup> percentile for deposits, slightly outpacing its position in the 97<sup>th</sup> percentile for home mortgage lending. Additionally, the bank's small business lending performance is in-line with the deposit base relative to the level and nature of competition for small business lending, as both metrics put the bank in the 98<sup>th</sup> percentile.

### Manhattan AA

Lending activity in the Manhattan AA reflect good responsiveness to credit needs of the AA. As of June 30, 2021, the Manhattan AA had 17 financial institutions, which included branches of national and regional banks, and local community banks. The bank ranked seventh in deposits with a deposit market share of 4.6 percent, putting INTRUST in the 59<sup>th</sup> percentile among depository institutions within the AA. The five banks with the largest market share were KS StateBank, Central National Bank, Commerce Bank, Community First National Bank, and Capitol Federal Savings Bank. The five deposit leaders had a combined deposit market share of 74.3 percent, with individual percentages ranging from 6.1 percent to 41.3 percent.

INTRUST ranked fifth among 54 small business lenders within the AA with a market share of 7.3 percent by number, putting the bank in the 91<sup>st</sup> percentile in 2021. The top four small business lenders were American Express National Bank, KS StateBank, Capital One Bank, N.A., and JPMorgan Chase Bank, N.A. These four lenders had a combined market share of 56.4 percent, with individual percentages ranging from 11 percent to 17.3 percent.

INTRUST's small business lending performance exceeded the bank's deposit market share and ranking within the AA. The bank's small business lending also exceeds its deposit base, relative to the level and nature of competition for small business lending. This is illustrated by the bank being in the 59<sup>th</sup> percentile for deposits, compared to its position in the 91<sup>st</sup> percentile for small business lending.

In 2021, INTRUST ranked 46<sup>th</sup> among 221 home mortgage lenders within the AA with a market share of 0.5 percent by number, putting the bank in the 79<sup>th</sup> percentile. The market is highly competitive and consists of lenders from small community banks, credit unions, mortgage companies, and large banks. The top five home mortgage originators/purchasers were KS StateBank, PennyMac Loan Services LLC, Mortgage Research Center, Fairway Independent Mortgage Corporation, and Landmark National Bank. These five institutions had a combined market share of 26 percent with individual percentages ranging from 4.6 percent to 5.8 percent.

The bank's home mortgage market share and ranking are lower than its deposit market share and ranking within the AA. However, comparing the bank's percentile ranking within its respective markets provides a more accurate assessment of the bank's performance relative to the competition. By this comparison, the bank's home mortgage lending performance exceeds its deposit base relative to the level and nature of competition for home mortgage lending. This is demonstrated by the bank being in the 59<sup>th</sup> percentile for deposits, comparted to its position in the 79<sup>th</sup> percentile for home mortgage lending.

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

The institution exhibits good geographic distribution of loans in its AAs.

### Home Mortgage Loans

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

#### Wichita AA

During the evaluation period, INTRUST exhibited an adequate geographic distribution of home mortgage loans originated or purchased in both low- and moderate-income tracts within the Wichita AA. In analyzing the geographic distribution of home mortgage loans in the Wichita AA, it is important to note that according to Census data, low-income tracts contained 4.7 percent of the total owner-occupied housing units within the AA. Among the total housing units in the low-income tracts, renter-occupied units and vacant units accounted for 50.3 percent and 17.5 percent, respectively. These statistics show that INTRUST had fewer lending opportunities for home mortgage loans within low-income geographies. Accordingly, greater weight was given to the bank's lending performance in the moderate-income tracts when determining the overall geographic distribution conclusion for home mortgage loans.

INTRUST exhibited adequate geographic distribution with 2.3 percent of home mortgage loans originated or purchased in low-income tracts within the AA. Demographic data showed 4.7 percent of owner-occupied housing units within the AA were located in low-income tracts. Aggregate lending data showed 2.6 percent of home mortgage loans were originated or purchased in low-income tracts within the AA.

The bank exhibited adequate geographic distribution with 11.4 percent of home mortgage loans originated or purchased in moderate-income tracts within the AA. Demographic data showed 17.4 percent of owner-occupied housing units within the AA were located in moderate-income tracts. Aggregate lending data showed 13.4 percent of home mortgage loans were originated or purchased in moderate-income tracts within the AA.

### Manhattan AA

During the evaluation period, INTRUST exhibited an excellent geographic distribution of home mortgage loans originated or purchased in moderate-income tracts within the AA. There were no low-income tracts within the AA during the evaluation period.

The bank exhibited excellent geographic distribution with 46.1 percent of home mortgage loans originated or purchased in moderate-income tracts within the AA. This exceeded the demographic data, which showed 20.5 percent of owner-occupied housing units within the AA were located in moderate-income tracts, and the aggregate lending data, which showed 18.3 percent of home mortgage loans were originated or purchased in moderate-income tracts within the AA.

#### Small Loans to Businesses

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

#### Wichita AA

During the evaluation period, INTRUST exhibited an excellent geographic distribution of loans to small businesses to borrowers located in low- and moderate-income tracts within the AA.

The bank exhibited excellent geographic distribution with 5.4 percent of loans to small businesses originated or purchased in low-income tracts within the AA. This exceeded the demographic data, which

showed 5.0 percent of businesses within the AA were in low-income tracts, and aggregate lending data, which showed 5.2 percent of loans to small businesses were originated or purchased in low-income tracts within the AA.

INTRUST exhibited excellent geographic distribution with 30.8 percent of loans to small businesses originated or purchased in moderate-income tracts within the AA. This exceeded the demographic data, which showed 24.9 percent of businesses within the AA were in moderate-income tracts, and aggregate lending data, which showed 23.7 percent of loans to small businesses were originated or purchased in moderate-income tracts within the AA.

### Manhattan AA

During the evaluation period, INTRUST exhibited excellent geographic distribution of loans to small businesses located in moderate-income tracts within the AA. There were no low-income tracts within the AA during the evaluation period.

The bank exhibited excellent geographic distribution with 48.9 percent of loans to small businesses originated or purchased in moderate-income tracts within the AA. This exceeded the demographic data, which showed 32.4 percent of businesses within the AA were in moderate-income tracts, and aggregate lending data, which showed 28.8 percent of loans to small businesses were originated or purchased in moderate-income tracts within the AA.

### Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of the bank's home mortgage and small business loans during the evaluation period. The analysis did not identify any unexplained conspicuous gaps.

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

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

### Home Mortgage Loans

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

### Wichita AA

During the evaluation period, INTRUST exhibited an adequate distribution of home mortgage loans to low- and moderate-income borrowers within the AA.

The distribution of home mortgage loans to low-income borrowers is adequate. INTRUST originated 5.8 percent of home mortgage loans to low-income borrowers within the AA. Lending distribution was lower than the demographic data, which identified 20.6 percent of families within the AA as low-income, and the aggregate lending data, which indicated 6.8 percent of home mortgage loans within the AA were originated to low-income borrowers.

The distribution of home mortgage loans to moderate-income borrowers is adequate. The bank originated 15 percent of home mortgage loans to moderate-income borrowers within the AA. Lending distribution was lower than the demographic data, which identified 17.8 percent of families within the AA as moderate-income, and the aggregate lending data, which indicated 16.9 percent of home mortgage loans within the AA were originated to moderate-income borrowers. Ten percent of the families within the AA are below the poverty level, indicating fewer opportunities to lend to low- and moderate-income borrowers.

#### Manhattan AA

During the evaluation period, INTRUST exhibited adequate distribution of home mortgage loans to borrowers among different income levels within the AA.

The distribution of home mortgage loans to low-income borrowers is good. The bank originated 6.7 percent of home mortgage loans to low-income borrowers within the AA. Lending distribution was lower than the demographic data, which identified 20.5 percent of families within the AA as low-income; however, the bank exceeded the aggregate lending data, which indicated 3.6 percent of home mortgage loans within the AA were originated to low-income borrowers.

The distribution of home mortgage loans to moderate-income borrowers is adequate. The bank originated 12.4 percent of home mortgage loans to moderate-income borrowers within the AA. Lending distribution was lower than the demographic data, which identified 22.7 percent of families within the AA as moderate-income, and the aggregate lending data, which indicated 14.6 percent of home mortgage loans within the AA were originated to moderate-income borrowers.

#### Small Loans to Businesses

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

### Wichita AA

During the evaluation period, INTRUST exhibited an adequate distribution of loans to businesses with revenues less than or equal to \$1 million within the AA.

The bank originated or purchased 46.2 percent of commercial loans to small businesses with revenues less than or equal to \$1 million within the AA. This was significantly lower than demographic data, which showed 83.3 percent of businesses within the AA had revenues equal to or less than \$1 million. INTRUST's lending distribution was also lower than the aggregate lending data, which showed 50.3 percent of commercial loans to small businesses were to businesses with revenues less than or equal to \$1 million; however, it is worth noting that 22.9 percent of the bank's commercial loans were made to businesses with no available revenue information.

### Manhattan AA

During the evaluation period, the bank exhibited an adequate distribution of loans to businesses with revenues less than or equal to \$1 million within the AA.

INTRUST originated or purchased 59.5 percent of commercial loans to small businesses with revenues less than or equal to \$1 million within the AA. This was lower than the demographic data, which showed 80.1 percent of businesses within the AA had revenues equal to or less than \$1 million. The bank's lending distribution exceeded the aggregate lending data, which showed 42.6 percent of commercial loans to small businesses were to businesses with revenues less than or equal to \$1 million; however, it is also worth noting that 17.5 percent of the bank's commercial loans were made to businesses with no available revenue information.

### **Community Development Lending**

The institution is a leader in making CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

INTRUST's CD lending supported revitalization and stabilization of LMI areas, economic development, and organizations that provide community services to LMI individuals and families. The bank's CD lending also created affordable housing for LMI individuals. INTRUST's level of CD lending is excellent and had a significant positive impact on the overall Lending Test. During the evaluation period, the bank originated 74 CD loans, totaling \$139.1 million in its Kansas AAs. The OCC also considered CD loans that benefited broader statewide and regional areas as INTRUST has met credit needs within the AA.

#### Wichita AA

INTRUST originated 65 CD loans within the AA, totaling \$125.7 million during the evaluation period. The bank made 40 CD loans totaling \$76.3 million to provide support for revitalization and stabilization needs; 13 CD loans totaling \$35.3 million for the primary purpose of community services to assist LMI individuals; seven CD loans totaling \$6.8 million to facilitate affordable housing for LMI individuals; and five loans totaling \$7.3 million for economic development within the AA.

Noteworthy examples of CD lending include:

- Forty-three Paycheck Protection Program loans totaling \$75.8 million to support job retention.
- Two loans totaling \$3.5 million to an organization that provides healthcare services to special needs LMI children.
- Seven loans to five organizations totaling \$6.8 million to address affordable housing needs for LMI households within the AA.

### Manhattan AA

INTRUST originated two CD loans totaling more than \$1.7 million within the AA during the evaluation period. One CD loan provided support for revitalization and stabilization needs, while the other loan provided affordable housing for LMI individuals.

### Kansas Statewide

The bank originated twelve CD loans totaling \$51.2 million in the state of Kansas but outside the bank's AAs. INTRUST originated four loans totaling more than \$27.5 million to provide support for revitalization and stabilization needs; four loans totaling \$9.8 million to facilitate affordable housing for LMI individuals; three loans totaling \$12.9 million for the primary purpose of community services primarily benefitting LMI public school students; and one PPP loan over \$1 million for economic development through job retention for LMI employees.

### **Product Innovation and Flexibility**

In addition to the institution's innovative and/or flexible lending practices noted in the Overall CRA Rating section of this performance evaluation, INTRUST originated loans in response to the COVID-19 pandemic through the SBA's PPP. These loans made to small businesses impacted by the pandemic in 2020 and 2021, helped to support and retain LMI jobs. The bank originated 3,186 PPP loans within the Kansas AAs, totaling \$529.2 million. PPP loans accounted for 57 percent of the bank's small business loans by number within the Kansas AAs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Topeka AA, Lawrence AA, and Kansas City AA is consistent with the bank's overall performance under the Lending Test in the full-scope areas.

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

### **INVESTMENT TEST**

The bank's performance under the Investment Test in Kansas is rated Outstanding.

During the evaluation period, INTRUST made \$51.5 million in total qualifying investments and donations in the Kansas AAs. The bank made \$49.6 million in investments and donations that supported affordable housing, \$1.8 million to organizations that provide community services to LMI individuals, and \$100,000 to an organization that helps stimulate economic development for LMI individuals. We also considered qualified investments that benefited the broader statewide or regional areas that include the bank's AAs. INTRUST made \$10.9 million in total qualifying investments and donations, including balances on prior period investments in the broader statewide region. The bank made nine investments totaling \$3.2 million that benefit affordable housing initiatives, three investments totaling \$7.6 million which fund qualifying economic development initiatives, and \$121,450 to organizations that provide community services to LMI individuals.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on a full-scope review, the bank's performance in the Wichita AA is excellent. The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits excellent

responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Based on a full-scope review, the bank's performance in the Manhattan AA is adequate. The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investmen	nts									
	Pri	or Period*	Curr	ent Period			Total		Ur	nfunded
Assessment Area					Con				Comn	nitments**
	#	\$(000's)	#	\$(000's)	#	% of	\$(000's)	% of	#	\$(000's)
						Total #		Total \$		
Full-Scope:										
Wichita AA	3	1,019	81	35,607	84	53.5	36,626	58.7	0	0
Manhattan AA	1	19	16	1,757	17	10.8	1,776	2.8	0	0
Limited-Scope:										
Kansas City AA	1	58	14	9,534	15	9.6	9,592	15.4	0	0
Lawrence AA	1	19	9	2,087	10	6.4	2,106	3.4	0	0
Topeka AA	0	0	6	1,389	6	3.8	1,389	2.2	0	0
Kansas Statewide	9	9,646	16	1,268	25	15.9	10,914	17.5	0	0

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

#### Wichita AA

INTRUST has an excellent level of qualified investments, particularly those that are not routinely provided by private investors, often in a leadership position. CD qualified investments and donations made within the AA totaled \$36.6 million during the evaluation period.

The bank purchased 13 investments totaling \$33.7 million within the AA during the evaluation period. All investments supported affordable housing initiatives for LMI individuals. INTRUST also had three prior period investments with a total balance of \$1 million. INTRUST made 68 qualifying donations totaling \$1.9 million to 37 organizations within the AA during the evaluation period. Donations supported community service organizations that provide services for LMI individuals, organizations that provide affordable housing for LMI individuals, and an organization that assists economic development for LMI individuals. Examples of qualified donations provided by the bank include:

- Provided funding to an organization that supports LMI individuals by providing advocacy and therapy services to adult survivors of trafficking.
- Funding to a community-based organization that assists LMI individuals through emergency shelter, meals, and other support services to homeless families.
- Provided funding to an organization that builds affordable housing for LMI individuals.

#### Manhattan AA

INTRUST has an adequate level of qualified investments, particularly those that are not routinely provided by private investors, occasionally in a leadership position. CD qualified investments and donations made within the AA totaled \$1.8 million during the evaluation period.

The bank purchased six investments totaling more than \$1.7 million within the AA during the evaluation period. All investments supported affordable housing initiatives for LMI individuals. INTRUST also had one prior period investment with a total balance of \$19,369. INTRUST made 10 qualifying donations totaling \$28,650 to six different organizations within the AA during the evaluation period. Donations supported community service organizations that provide various services for LMI individuals. Examples of qualified donations provided by the bank include:

- Funding to a community-based organization that provides assistance to LMI individuals for prescription medications, utility assistance, and homeless services.
- Provided funding to a community-based health care center that administers primary health care services in underserved areas for LMI individuals.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Topeka AA, Lawrence AA, and the Kansas City AA is consistent with the bank's overall performance under the Investment Test in the full-scope areas. All investments were to support affordable housing, with a combined total of \$13 million. Donations combined for \$73,833 supporting various community service organizations in the area.

### SERVICE TEST

The bank's performance under the Service Test in Kansas is rated High Satisfactory.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Wichita AA is good and performance in the Manhattan AA is excellent.

### **Retail Banking Services**

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of	Branch Deli	very System										
	Deposits		Branches						Population			
	% of	# of	% of	Loc	ation of I	Branches	by	% of	% of Population within Each			
	Rated	BANK	Rated	Incon	ne of Geo	graphies	(%)		Geog	graphy		
Assessment	Area	Branches	Area									
Area	Deposits		Branches	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
	in AA		in AA									
Full-Scope Rev	iew:											
Wichita AA	86.8	23	69.7	0.0	26.1	34.8	39.1	7.8	22.5	33.8	35.9	
Manhattan AA	2.5	3	9.1	0.0	33.3	66.7	0.0	0.0	31.9	36.1	29.6	
Limited-Scope	<b>Review:</b>											
Topeka AA	1.3	1	3.0	100.0	0.0	0.0	0.0	8.2	18.8	39.7	33.3	
Kansas City	4.8	4	12.1	0.0	0.0	0.0	100.0	0.9	7.7	32.8	58.5	
Lawrence AA	4.7	2	6.1	50.0	0.0	0.0	50.0	10.2	29.2	31.9	28.6	

#### Wichita AA

INTRUST provides good access to services. As of December 31, 2021, INTRUST operates 23 branches within the Wichita AA. The bank has 96 ATMs, including 16 multi-service ATMs within the AA. In addition to cash dispensing, account transfers, and balance inquiry, the 16 full-service ATMs accept cash and check deposits. INTRUST does not have any branches located in low-income census tracts within the AA, despite 7.8 percent of the AA population living in low-income geographies. Still, the bank has five ATMs, or 5.2 percent of the AA ATMs, located in low-income tracts, which helps provide additional access in these low-income tracts. INTRUST has six branches, or 26.1 percent of the AA branch locations, in moderate-income tracts. INTRUST also has 39 ATMs, or 40.6 percent of AA ATMs, located in moderate-income tracts, which exceeds the AA population that lives in moderate-income tracts, which exceeds the AA population that lives in moderate-income tracts, which exceeds the AA population that lives in moderate-income tracts, which exceeds the AA population that lives in moderate-income tracts, which exceeds the AA population that lives in moderate-income tracts, which exceeds the AA population that lives in moderate-income tracts, which exceeds the AA population that lives in moderate-income tracts, which exceeds the AA population that lives in moderate-income tracts, representing 6.3 percent and 18.8 percent of this type of ATMs, respectively. This is reasonable when compared to the population in low- and moderate-income geographies of 7.8 percent, respectively. Among the bank's ATMs within the AA, 45.8 percent are in LMI tracts. This exceeds the combined AA population of 30.3 percent in those LMI tracts.

In addition to the institution's ATMs, INTRUST added the Allpoint ATM network in May 2020 to provide more surcharge-free ATM access to their customers. The Wichita AA has 64 Allpoint ATMs, including 18 within LMI census tracts.

### Manhattan AA

INTRUST provides excellent access to services within the AA. As of December 31, 2021, INTRUST operates three branches within the Manhattan AA. The AA has no low-income census tracts. The bank has one branch in a moderate-income tract, with the two remaining branches in middle-income tracts. At 33.3 percent, INTRUST's distribution of branches in moderate-income tracts exceeds the 31.9 percent of the AA population that lives in moderate-income tracts. The bank has six ATMs within the AA, with two, or 33.3 percent, of the ATMs located in moderate-income tracts. This also exceeds the 31.9 percent of AA population located in moderate-income tracts. With the addition of the Allpoint ATM network, the AA also has seven Allpoint ATMs with surcharge-free customer access. Two Allpoint ATMs are in moderate-income tracts.

Distribution of Br	anch Openin	gs/Closings								
			Branch Oper	ings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	······································							
			Low	Mod	Mid	Upp				
Full Review:										
Wichita AA	4	8	-1	1	-2	-2				
Manhattan AA	0	0	0	0	0	0				
Limited Review:										
Topeka AA	0	0	0	0	0	0				
Kansas City AA	0	0	0	0	0	0				
Lawrence AA	0	0	0	0	0	0				

#### Wichita AA

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income tracts and/or to low- and moderate-income individuals. INTRUST made the following changes within the Wichita AA during the evaluation period:

- INTRUST opened four branches in November 2019. Two of the branches are in moderate-income census tracts, one branch is in a middle-income tract, and one branch is in an upper-income tract.
- The bank closed eight branches located inside Dillons stores in November 2020. Among the closures was one branch in a low-income tract, and one branch in a moderate-income tract. The impact to customers was minimal as all closed locations maintain ATMs at the previous branch locations inside the Dillons stores. Customer impact was also mitigated as the bank consolidated operations of the moderate-income Dillons branch with the Newton Main branch, located a half mile away in the same moderate-income tract. The closest INTRUST branch to the low-income tract closure was 2.5 miles away, so the bank placed a deposit taking ATM in place of the previous Dillons branch to lessen the impact of the closure.

Services, including business hours, do not vary in a way that inconveniences its AA, particularly lowand moderate-income tracts and/or individuals. INTRUST offers a wide range of loan and deposit products, including overdraft protection, safe deposit boxes, mortgage loans, and a variety of consumer, commercial, agri-business, and small business loans. INTRUST's hours of operation are generally uniform with the AA: Monday through Friday from 9:00 a.m. to 6:00 p.m. and Saturday from 9:00 a.m. to 12:00 p.m. Standard drive-up hours are Monday through Friday from 8:00 a.m. to 6:00 p.m. and Saturday from 9:00 a.m. to 12:00 p.m. INTRUST has two branches with reduced business hours in retirement communities offering services to residents. INTRUST reviews traffic patterns, technology trends, consumer preferences, and customer needs when assessing or adjusting business hours.

INTRUST compliments its traditional service delivery methods with alternative delivery systems, including free online and mobile banking to all customers. From January 1, 2019, through December 31, 2021, the bank had 4,377 active mobile banking users in LMI branch zip codes within the AA. INTRUST also cashes government checks for all customers. These services, coupled with ATMs, provide increased access to banking services within the AA.

#### Manhattan AA

INTRUST did not open or close any branches in the Manhattan AA during the evaluation period.

Services, including business hours, do not vary in a way that inconveniences its AA, particularly lowand moderate-income tracts and/or individuals. INTRUST offers a wide range of loan and deposit products, including overdraft protection, safe deposit boxes, mortgage loans, and a variety of consumer, commercial, agri-business, and small business loans. INTRUST's hours of operation within the AA are uniform: Monday through Friday from 9:00 a.m. to 5:00 p.m. and Saturday from 9:00 a.m. to 12:00 p.m. Standard drive-up hours are Monday through Friday from 8:00 a.m. to 6:00 p.m. and Saturday from 9:00 a.m. to 12:00 p.m.

INTRUST offers free online and mobile banking to all customers. During the evaluation period the bank had 312 active mobile banking users in the moderate-income branch zip code within the AA. INTRUST

also cashes government checks for all customers. These services, coupled with ATMs, provide increased access to banking services throughout the AA.

### **Community Development Services**

The institution is a leader in providing CD services.

### Wichita AA

INTRUST is a leader in providing CD services within the Wichita AA. The bank had 87 different employees provide 5,150 hours of CD services to 50 different organizations. One employee provided service to an organization helping to revitalize/stabilize LMI census tracts, totaling 60 hours of service during the evaluation period. The remaining 5,090 service hours were to organizations with a purpose of community service, economic development, or affordable housing. Examples of service hours include the following:

- Serving an organization that provides housing for low- and moderate- income households.
- Serving as a mentor in an LMI youth mentoring program.
- Serving on the board of directors and member of the finance committee for a family crisis center.

### Manhattan AA

INTRUST provided an adequate level of CD services in the Manhattan AA. Five different INTRUST employees provided 288 hours of CD services to five different organizations. Examples of service hours include the following:

- Serving as a board member to an organization that works to improve the health and well-being of women with limited resources who have immediate needs not met by traditional funding resources within the community.
- Serving as a board member to an emergency shelter for the homeless.
- Serving as a board member to an organization that assists LMI individuals by providing financial, educational, and health services and resources.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Topeka AA, Lawrence AA, and the Kansas City AA is consistent with the bank's overall performance under the Service Test in the full-scope areas.

## **State Rating**

### **State of Arkansas**

**CRA rating for the State of Arkansas<sup>2</sup>:** Satisfactory **The Lending Test is rated:** Needs to Improve **The Investment Test is rated:** Outstanding **The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- Adequate level of lending activity relative to deposits within the AA;
- Poor geographic distribution of loans;
- Adequate borrower distribution of loans;
- No CD lending, which has a negative impact on the Lending Test;
- Excellent level of CD investments;
- Retail delivery systems are reasonably accessible to geographies and individuals of different income levels within the AA; and
- Relatively high level of CD services.

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

INTRUST delineated one AA in Arkansas. The AA is Benton County, which is part of the larger Fayetteville-Springdale-Rogers, AR MSA (#22220). As of June 30, 2021, INTRUST's only branch within the AA held \$25.3 million of deposits, representing 0.4 percent of the bank's total deposits and 2.5 percent of the bank's total branches. INTRUST has one ATM in the Arkansas AA, located within the bank's branch. The bank also utilizes the Allpoint ATM network, which provides surcharge-free access to an additional eight ATMs within the AA.

The Rogers banking center began as a loan production office that offered international letters of credit due to demand from businesses in the area supplying products to Walmart from China. INTRUST continues to do international letters of credit; however, the location is now a full banking center. INTRUST's primary focus within the AA has shifted to commercial lending. The bank originated and purchased \$12.9 million within the AA, or 0.9 percent of the total number of reportable loans and CD loans originated during the evaluation period. Home mortgage loans (51.9 percent) and small business loans (48.1) comprise the bank's lending activity within the AA.

 $<sup>^{2}</sup>$  This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Demographic Characteristics	#	Low	Moderate	Middle	Upper	NA*
	"	% of #	% of #	% of #	% of #	% of #
Geographies (Census Tracts)	49	2.0	8.2	55.1	34.7	0.
Population by Geography	238,198	1.6	7.4	54.8	36.1	0.0
Housing Units by Geography	96,389	1.7	7.1	55.1	36.0	0.0
Owner-Occupied Units by Geography	57,386	0.8	6.5	53.9	38.8	0.0
Occupied Rental Units by Geography	28,284	3.7	8.7	56.6	30.9	0.0
Vacant Units by Geography	10,719	1.3	6.3	57.9	34.5	0.0
Businesses by Geography	16,135	2.0	7.0	48.8	42.2	0.0
Farms by Geography	495	1.6	5.9	58.6	33.9	0.0
Family Distribution by Income Level	63,549	17.4	17.1	21.1	44.3	0.0
Household Distribution by Income Level	85,670	17.8	15.0	19.1	48.1	0.0
Median Family Income MSA - 22220 Fayetteville-Springdale-Rogers, AR MSA		\$60,876	Median Housi	ng Value		\$157,212
			Median Gross	Rent		\$812
			Families Below	w Poverty Lev	/el	8.9%

#### Benton County AA

The Benton County AA consists of 49 census tracts, including one low-, four moderate-, 27 middle-, and 17 upper-income geographies. The table reflects that LMI tracts total 10.2 percent of the AA. According to the 2015 U.S Census and 2021 D&B Data, the population of the AA is 238,198 and the median family income is \$60,876. The income distribution for families within the AA is 17 percent low-income; 17 percent moderate-income; 21 percent middle-income; and 44 percent upper income.

Demographic data as of 2021 reflects that among the 85,670 households within the AA, approximately 28 percent receive social security, 15 percent are retired, and 11 percent are below the poverty level. Approximately 13 percent of the population comprises persons over the age 65, while 36 percent of the population consists of civilians not in the work force. The median housing value is \$157,212 with 60 percent of the housing units being owner-occupied. The population in LMI census tracts is low at 9 percent. The demographic data also reflects a relatively low percentage of home ownership in low-income geographies, with 27 percent of 1,645 housing units in low-income census tracts being owner-occupied. Rental housing units also represent a significant level in low-income census tracts at 64 percent of all units.

### Economic Data

According to the January 2023 Moody's Analytics report, the Fayetteville-Springdale-Rogers' (FAY) economy has lost its momentum but will continue to outpace the nation's economic activity in the coming year. FAY's ability to maintain above-average gains in professional/business services, alongside

a stable manufacturing/logistics sector will keep growth ahead of the national average. FAY has seen moderating wage growth; however, it remains a top performer in the region. Despite slowed expansion in manufacturing and logistics, growth in the MSA is expected to outpace the national average as more than 70 percent of manufacturing employment is in nondurable goods production. Demand for food is less elastic than that of durable goods, making FAY's manufacturing sector more sheltered from the impact of the slowing economy. The high educational attainment and large concentration of high-wage management jobs continue to be strengths for FAY. The workforce is educated with approximately one-third of the population having at least a bachelor's degree. The reliance on a single large-employer and above-average employment volatility are noted weaknesses.

Professional/business services drives FAY's growth and employs more than one-fifth of the workforce. The largest employers in FAY, and specifically Benton County, are Walmart Inc., Tyson Foods, and J.B Hunt Transport Services. Per capita income for FAY is much higher than the rest of the state of Arkansas and marginally higher than the rest of the U.S. The unemployment rate increased from 2.5 percent in 2019 to 4.6 percent in 2020 amid the COVID-19 pandemic, before declining to 2.9 percent in 2021. Population growth is steady at an average growth rate of about 1.8 percent during the evaluation period. According to Moody's Analytics, median household income has increased from \$61,400 to \$69,500, and personal income growth has averaged 4.33 percent per year.

### Housing

Housing affordability in the Benton County AA is comparable to the State of Arkansas. The Census' five-year (2017-2021) ACS statistics estimates an affordability ratio for Benton County at 2.7 times, compared to the State of Arkansas at 2.7 times and the U.S average at 3.5 times. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Benton County's homeownership rate of 67 percent exceeds the State of Arkansas and the U.S at 66.1 percent and 64.6 percent, respectively. Median gross rent at \$1,002 is higher when compared to the overall State of Arkansas at \$803, but below the national level of \$1,163.

### **Community Contacts**

We reviewed two existing community contacts to determine the credit needs of the community, and opportunities for financial institutions within the AA to address those needs. The contacts included a person who works in a regional economic development organization, and an individual who works in an organization that assists low-income families with attaining homeownership. One contact communicated that some lending opportunities exist in small business lending and start-up lending to entrepreneurs. The contact noted that the area has seen an influx of new residents, with many of these new inhabitants choosing to open businesses in the area. The other contact noted there is a need for affordable housing, especially for LMI individuals. The region's housing market has been booming, and the surge in demand has created a barrier to entry for many potential home buyers due to cost. The contacts noted that local financial institutions are receptive to community needs and do a good job in meeting these credit needs. The contacts noted the local lending environment is competitive, and institutions are proactive in providing funding to the community.

### **Scope of Evaluation in Arkansas**

INTRUST maintains deposit operations in only Benton County in the State of Arkansas. As such, Benton County received a full-scope review. Benton County is the bank's smallest AA based on branches, deposits, and loans by dollar volume. Benton County housed 2.5 percent of total branches, held 0.4 percent of total deposits, and generated 0.9 percent of the total number of loans analyzed inside all AAs. Given the very low volume of deposits, performance in the State of Arkansas has minimal impact on the overall CRA performance rating.

The Lending Test analysis placed equal weight on home mortgage lending and small business lending based on the number and dollar volume of loans granted for each product within the AA. During the evaluation period, home mortgage lending represented 51.9 percent of the number, and 57.5 percent of the dollar volume of total reportable lending within the AA. CRA reportable small business lending represented 48.1 percent of the number, and 42.5 percent of the dollar volume of the total reportable lending within the AA during the evaluation period.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARKANSAS

### LENDING TEST

The bank's performance under the Lending Test in Arkansas is rated Needs to Improve.

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

Based on a full-scope review, the bank's performance in the Benton County AA is poor.

### **Lending Activity**

Lending levels reflect adequate responsiveness to AA credit needs. The bank has one location in Arkansas. While loan volumes are low in comparison to other AAs, we performed an analysis of both home mortgage and small business loans. Equal weight was given to each loan product.

Number of Loans*							
	Home	Small	Small	Community		% State	% State
Assessment Area	Mortgage	Business	Farm	Development	Total	Loans	Deposits
Benton County AA	42	39	0	0	81	100	100

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*									
	Home	Small	Small	Community		% State	% State		
Assessment Area	Mortgage	Business	Farm	Development	Total	Loans	Deposits		
Benton County AA	7,402	5,465	0	0	12,867	100	100		

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The Benton County AA consists of 27 financial service providers, which includes branches of national and regional banks, and local community banks. As of June 30, 2021, the bank ranked 22<sup>nd</sup> in deposits with its deposit market share of 0.3 percent, putting INTRUST in the 19<sup>th</sup> percentile among depository institutions within the AA. The top five depository institutions include Arvest Bank, Bank of America,

NA, Bank OZK, Grand Savings Bank, and First Western Bank with a combined market share of 71.5 percent. Arvest Bank comprises the majority of deposits at 54.2 percent.

In 2021, INTRUST ranked 125<sup>th</sup> among 416 lenders in home mortgages with a market share of 0.07 percent by number, putting the bank in the 70<sup>th</sup> percentile. The top five mortgage originators/ purchasers within the AA, holding 31.3 percent market share, were Arvest Bank, Rocket Mortgage, Wells Fargo Bank, NA, PennyMac Loan Services, LLC, and US Bank, NA. The five leaders market share percentages ranged from 2.84 percent to 15.42 percent.

INTRUST ranked 43rd among 104 small business lenders in 2021, with a market share of 0.15 percent by number, putting the bank in 59<sup>th</sup> percentile. The top five small business lenders were Arvest Bank, American Express National Bank, JPMorgan Chase Bank, NA, Synchrony Bank, and Capital One Bank (USA), NA. These five lenders had a combined market share of 60.8 percent, ranging from 5.5 percent to 27.5 percent.

The bank's home mortgage and small business market shares and rankings are lower than the bank's deposit market share and ranking. Still, a more accurate depiction of INTRUST's lending performance relative to competition can be determined by comparing the bank's percentile ranking within its respective markets. The bank's home mortgage and small business lending performance exceeds its deposit base, relative to the level and nature of competition for both home mortgage and small business lending. INTRUST is in the 59<sup>th</sup> percentile for home mortgage lending and the 69<sup>th</sup> percentile for small business lending. Both ranking percentiles exceed the bank's position in the 18<sup>th</sup> percentile for deposits.

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

The bank exhibits a poor geographic distribution of loans in its AA.

### Home Mortgage Loans

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

During the evaluation period, INTRUST exhibited poor geographic distribution with 0 percent of home mortgage loans originated or purchased in both low- and moderate-income tracts within the Benton County AA. In analyzing the geographic distribution of home mortgage loans within the AA, it is important to note that according to Census data, low- and moderate-income tracts contained 0.8 percent and 6.5 percent, respectively, of the total owner-occupied housing units within the AA.

Aggregate lending data showed 0.3 percent of home mortgage loans were originated or purchased in low-income tracts within the AA, and 4.8 percent of home mortgage loans were originated or purchased in moderate-income tracts within the AA. Additionally, renter-occupied units and vacant units account for 64.4 percent and 8.3 percent, respectively, of total housing units in the low-income tracts within the AA. While moderate-income tracts presented a slightly higher proportion of potential borrowers, these statistics show that INTRUST had fewer lending opportunities for home mortgage loans within low- and moderate-income tracts.

#### Small Loans to Businesses

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

During the evaluation period, INTRUST exhibited a poor geographic distribution of loans to small businesses within the AA.

The bank exhibited poor geographic distribution with 0 percent of loans to small businesses originated or purchased in low-income tracts within the AA. It is important to note that the bank's lending opportunities were limited, as demographic data showed only 2.0 percent of businesses were in low-income tracts within the AA. INTRUST was below the aggregate lending data, which showed 1.6 percent of loans to small businesses were originated or purchased in low-income tracts within the AA.

INTRUST exhibited adequate geographic distribution with 5.1 percent of loans to small businesses originated or purchased in moderate-income tracts within the AA. This was below the demographic data, which showed 7.0 percent of businesses were in moderate-income tracts within the AA, and the aggregate lending data, which showed 5.9 percent of loans to small businesses were originated or purchased in moderate-income tracts within the AA.

### Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of the bank's home mortgage and small business loans during the evaluation period. The analysis did not identify any unexplained conspicuous gaps.

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

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

### Home Mortgage Loans

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

During the evaluation period, INTRUST exhibited adequate distribution of home mortgage loans to borrowers among different income levels.

The distribution of home mortgage loans to low-income borrowers is poor. The bank originated 2.4 percent of home mortgage loans to low-income borrowers within the AA. Lending distribution was lower than the demographic data, which identified 17.4 percent of families within the AA as low-income, and the aggregate lending data, which indicated 4.9 percent of home mortgage loans within the AA were originated to low-income borrowers.

The distribution of home mortgage loans to moderate-income borrowers is adequate. The bank originated 9.5 percent of home mortgage loans to moderate-income borrowers within the AA. Lending

distribution was lower than the demographic data, which identified 17.1 percent of families within the AA as moderate-income, and the aggregate lending data, which indicated 12.7 percent of home mortgage loans within the AA were originated to moderate-income borrowers.

While INTRUST has increased its loan volumes among low- and moderate-income borrowers during the evaluation period, the volume of originations is still short of the demographic and aggregate lending data for the AA. Still, improvement in the bank's distribution is evident as originations are short of aggregate lending levels within these respective income groups by only one loan each, based on total originations. Given that INTRUST originated 42 home mortgages within the AA between January 1, 2019, and December 31, 2021, the difference of one loan is reasonable. Additionally, 14.3 percent of originations (six loans) went to borrowers with income information that was not available.

### Small Loans to Businesses

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

During the evaluation period, INTRUST exhibited adequate distribution of loans to businesses with revenues less than or equal to \$1 million within the AA.

INTRUST originated or purchased 48.7 percent of commercial loans to small businesses with revenues less than or equal to \$1 million within the AA. This was significantly lower than the demographic data, which showed 83.8 percent of businesses within the AA had revenues equal to or less than \$1 million. The bank's lending distribution exceeded the aggregate lending data, which showed 42.9 percent of commercial loans to small businesses were to businesses with revenues less than or equal to \$1 million.

### **Community Development Lending**

The institution has made few if any CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank did not make any CD loans within the AA during the evaluation period. The lack of community development lending had a negative impact on the lending test. The bank made one \$1.42 million loan outside the AA, but within the bank's regional area.

### **Product Innovation and Flexibility**

In addition to the institution's innovative and/or flexible lending practices noted in the Overall CRA Rating section of this performance evaluation, INTRUST originated loans in response to the COVID-19 pandemic through the SBA's PPP. These loans made to small businesses impacted by the pandemic in 2020 and 2021, helped to support and retain LMI jobs. The bank originated 19 PPP loans within the Benton County AA, totaling \$3.4 million. PPP loans accounted for 49 percent of the bank's small business loans by number within the AA.

### **INVESTMENT TEST**

The bank's performance under the Investment Test in Arkansas is rated Outstanding.

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

Based on a full-scope review, the bank's performance in the Benton County AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investment	ts										
	Prior Period* Current Period			Total					Unfunded		
Assessment Area									Co	mmitments**	
	#	\$(000's)	#	\$(000's)	#	% of	\$(000's)	% of	#	\$(000's)	
						Total #		Total \$			
Benton County AA	0	0	8	1,977	8	80.0	1,977	99.7	0	0	
Arkansas Statewide	0	0	2	5	2	20.0	5	0.3	0	0	

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

During the evaluation period, INTRUST made \$1.98 million in total qualifying investments and donations in the Benton County AA. All investments supported affordable housing for low- and moderate-income individuals. The bank made three qualifying donations totaling \$10,200 to organizations that provide community services to LMI individuals. The bank also made two qualifying donations totaling \$5,100 in the broader statewide region to an organization that provides community services to LMI individuals.

### SERVICE TEST

The bank's performance under the Service Test in Arkansas is rated Low Satisfactory.

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

Based on a full-scope review, the bank's performance in the Benton County AA is adequate.

### **Retail Banking Services**

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Br	anch Delivery	System										
	Deposits		Branches						Population			
Assessment Area	% of Rated Area					% of Population within Each Geography						
Assessment Area	Deposits in	Branches	in AA	meon								
	AA			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Benton County	100.0	1	100.0	0.0	0.0	0.0	100.0	7.0	25.5	37.7	29.9	

INTRUST provides reasonable access to services. The distribution of the bank's branches in LMI census tracts is less than the distribution of population living in these geographies. Still, this does not present a concern as the AA contains one low-income tract and four moderate-income tracts, with only 9 percent of the AA population residing in these tracts. INTRUST's only AA branch location and ATM are in an upper-income tract. In addition to the bank's ATM, INTRUST added the Allpoint ATM network in May 2020 to provide more surcharge-free ATM access to their customers. The AA has eight Allpoint ATMs, including one located in a moderate-income tract.

Distribution of Branch Openings/Closings									
	Branch Openings/Closings								
	# of Branch	# of Branch	Net change in Location of Branches (+ or - )						
Assessment Area	Openings	Closings	Low	Mod	Mid	Upp			
Benton County AA	0	0	0	0	0	C			

INTRUST did not open or close any branches within the AA during the evaluation period.

Services, including business hours, do not vary in a way that inconveniences its AA, particularly lowand moderate-income tracts and/or individuals. INTRUST offers a wide range of loan and deposit products, including overdraft protection, safe deposit boxes, mortgage loans, and a variety of consumer, commercial, agri-business, and small business loans. INTRUST offers free online and mobile banking to all customers. In addition, INTRUST cashes government checks for all customers. These services coupled with ATMs provide increased access to banking services throughout the AA.

### **Community Development Services**

The institution provides a relatively high level of CD services.

INTRUST provided a relatively high-level of CD services in the Benton County AA. Two INTRUST employees provided 171 hours of CD services to four different organizations with purposes of affordable housing and community services. The organizations work to support homeless families and LMI single parents as they work towards self-sufficiency. Examples of service hours include the following:

- Serving as a board member and providing financial education for an organization offering financial literacy and credit counseling services to LMI individuals.
- Serving as Treasurer and Finance Committee Chair for an organization that provides scholarships to LMI single parents.

## **State Rating**

### State of Oklahoma

CRA rating for the State of Oklahoma<sup>3</sup>: Satisfactory The Lending Test is rated: High Satisfactory The Investment Test is rated: High Satisfactory The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Good level of lending activity;
- Excellent geographic distribution of loans;
- Good borrower distribution of loans;
- Leader in CD lending;
- Significant level of CD investments;
- Retail delivery systems are readily accessible to geographies and individuals of different income levels within the AA; and
- Adequate level of CD services.

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

INTRUST delineated one AA in Oklahoma. The AA is the Oklahoma City AA (Canadian, Cleveland, and Oklahoma Counties), which is part of the larger Oklahoma City, OK MSA (#36420). INTRUST operates six branches and six cash dispensing ATMs within the state of Oklahoma. The primary product types in Oklahoma are home mortgage and small business loans.

The bank has approximately \$319.2 million in deposits in Oklahoma, representing five percent of INTRUST's total deposits. The bank operates 6 branches within the AA, representing 15 percent of the bank's total branches. Within the AA, the bank originated and purchased approximately \$89.7 billion, or 5.6 percent of the total number of reportable loans that INTRUST originated and purchased during the evaluation period. Due to the limited size and business generation in the Oklahoma City AA, less weight will be given to the state of Oklahoma rating within the overall CRA rating.

Oklahoma City AA

Table A – Demographic Information of the Assessment AreaAssessment Area: 2021 Oklahoma City AA									
Geographies (Census Tracts)	332	8.4	29.8	35.2	23.8	2.7			
Population by Geography	1,149,287	7.0	25.2	37.7	29.9	0.3			
Housing Units by Geography	482,612	6.9	27.3	37.4	28.0	0.3			
Owner-Occupied Units by Geography	270,023	3.9	19.3	40.4	36.4	0.1			

<sup>&</sup>lt;sup>3</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Charter Number: 2782

			Families Belo	w Poverty Le	vel	11.5%
			Median Gross	Rent		\$808
Median Family Income MSA - 36420 Oklahoma City, OK MSA	\$64,058	Median Hous	\$139,259			
Household Distribution by Income Level	433,729	23.5	16.7	17.9	41.8	0.0
Family Distribution by Income Level	278,956	21.5	17.3	20.3	40.9	0.0
Farms by Geography	4,079	3.8	17.5	37.9	39.7	1.1
Businesses by Geography	155,450	4.7	21.5	34.2	36.5	3.0
Vacant Units by Geography	48,883	11.3	36.4	34.0	17.7	0.6
Occupied Rental Units by Geography	163,706	10.7	37.9	33.7	17.1	0.7

The Oklahoma City AA consists of 332 census tracts among Canadian, Cleveland, and Oklahoma Counties in Central Oklahoma. During the evaluation period the AA reflected 28 low-, 99 moderate-, 117 middle-, and 79 upper-income census tracts. The AA also had 9 census tracts that were NA for income level designation. The table reflects that LMI tracts total 38.2 percent of the AA. According to the 2015 U.S Census and 2021 D&B Data, the population of the AA is 1,149,287 and the median family income is \$64,058. The income distribution for families within the AA is 22 percent low-income; 17 percent moderate-income; 20 percent middle-income; and 41 percent upper income.

Demographic data as of 2021 reflects that among the 433,729 households within the AA, approximately 26 percent receive social security, 18 percent are retired, and 15 percent are below the poverty level. Approximately 12 percent of the population comprises persons over the age 65, while 34 percent of the population consists of civilians not in the work force. The median housing value is \$139,259 and 56 percent of the housing units are owner-occupied.

### Economic Data

The January 2023 Moody's Analytics report for Oklahoma City shows a positive short- and long-term forecast. Oklahoma City is seeing slow employment growth, but still outperforming the state average. The area has a concentration of energy businesses, which are seeing the benefits of elevated oil and gas prices in the short-term. Demand for oil is projected to increase due to higher global consumption, boosting the long-term outlook. Federal and state government employment remains an important backbone of the local economy. Portions of the public employment sector are likely to face a difficult year as payrolls are expected to expand slowly with the decline in government spending due to high inflation. The report notes strengths for Oklahoma City's economy include diversity among a set of non-energy drivers, the low-cost structure, and the high concentration of prime-age workers. Moody's states that exposure to a weak energy sector and few high-tech jobs present weaknesses to the economy.

The largest employers within the Oklahoma City AA are Tinker Air Force Base, University of Oklahoma – Norman, and Integris Health. Devon Energy, a Fortune 500 company, OGE Energy Corp, Chesapeake Energy, SandRidge Energy, and Continental Resources are all headquartered within Oklahoma City. Other large corporate companies located in Oklahoma City include Paycom, Hobby Lobby, Sonic Corp, and Love's Travel Stops.
The unemployment rate increased from 2.9 percent in 2019 to 6.2 percent in 2020 amid the COVID-19 pandemic, before dropping down to 3.8 percent in 2021. Oklahoma City saw little population growth during the evaluation period, with an average growth rate of 1 percent. According to Moody's Analytics, the median household income has increased from \$59,400 to \$61,800 during the evaluation period, with personal income growth averaging 7 percent per year.

#### Housing

Housing affordability in the Oklahoma City AA varies among counties. The Census' five-year (2017-2021) ACS statistics estimates an affordability ratio for Canadian, Cleveland, and Oklahoma Counties at 2.3 times, 2.6 times, and 2.8 times, respectively, compared to the State of Oklahoma at 2.6 times. The U.S average is higher at 3.5 times. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Oklahoma County and Cleveland County's homeownership rates of 59.3 percent and 64.3 percent, respectively, are lower than both the State of Oklahoma and the national rates at 66.1 percent and 64.6 percent, respectively. Canadian County, at 75.6 percent, outpaces both the state and national averages. Median gross rent levels for all three Counties are higher than the State of Oklahoma, but below the national level.

#### **Community Contacts**

Examiners utilized six existing community contacts to assess the community credit needs and opportunities for financial institutions in the Oklahoma City AA. These contacts include: two individuals that work within different local chambers of commerce; two individuals that work in economic development organizations that exclusively serve LMI individuals; an Executive Director within the Farm Service Agency; and an individual who works within the administration of a local city government office. The contacts noted that the AA economy has stabilized post-pandemic, with varying levels of growth among different economic sectors. All contacts stated that the AA is highly competitive among banking institutions. Effective community outreach is vital to all banks to remain competitive. Most institutions are proactive in the community, and work to make their presence known. Lending opportunities are quickly seized by area banks, with few AA-lending voids. There is still a large need for affordable housing, and many lenders have taken the opportunity to provide financial guidance to LMI individuals and many first-time borrowers. Contacts noted that there is still a need for additional financial literacy educational opportunities for both individuals and small business owners. Many banks are active in trying to facilitate education to individuals and small business owners. One contact noted that many bank's in the area seek feedback in trying to improve their connection to the local community, and are proactive in looking for opportunities to better serve community needs.

#### Scope of Evaluation in Oklahoma

INTRUST maintains deposit operations in only the Oklahoma City AA in the State of Oklahoma. As such, the Oklahoma City AA received a full-scope review. The AA housed 15 percent of total bank branches, held 5 percent of total bank deposits, and generated 5.7 percent of the total number of loans analyzed inside all AAs. Given the relatively low volume of deposits and loans, performance in the State of Oklahoma has minimal impact on the overall CRA performance rating.

The Lending Test analysis placed slightly more weight on small business lending than home mortgage lending based on the number and dollar volume of loans granted for each product within the AA. During the evaluation period, CRA reportable small business lending represented 73.4 percent of the number,

and 49.6 percent of the total dollar volume of reportable lending within the AA. The bank's home mortgage lending represented approximately 24.8 percent of the number, and 32.4 percent of the dollar volume of total reportable lending within the AA.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

#### LENDING TEST

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

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

Based on a full-scope review, the bank's performance in the Oklahoma City AA is good.

#### **Lending Activity**

Lending levels reflect good responsiveness to AA credit needs. The bank has six branches in Oklahoma. Small business loans were greater by both number and dollar volume during the evaluation period. Based on these lending volumes, small business loans received more weight in our analysis.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Oklahoma City AA	127	376	5	4	512	100	100

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Lo	ans*						
Assagement Area	Home	Small	Small	Community		%State	%State
Assessment Area	Mortgage	Business	Farm	Development	Total	Loans	Deposits
Oklahoma City AA	29,077	44,453	1,116	15,048	89,694	100	100

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

As of June 30, 2021, the Oklahoma City AA had 67 financial institutions, which included branches of national and regional banks, and local community banks. The bank ranked 24<sup>th</sup> in deposits with a market share of 0.7 percent, putting INTRUST in the 64<sup>th</sup> percentile among depository institutions within the AA. The five largest depository institutions include Midfirst Bank, JPMorgan Chase Bank, N.A., BOKF, N.A., Bank of America, N.A., and BancFirst with a combined market share of 64.5 percent. Midfirst comprises the majority of deposits at 26.61 percent.

In 2021, there were 153 small business lenders within the AA. The bank ranked 32<sup>nd</sup> in the highly competitive environment with a market share of 0.36 percent by number, putting INTRUST in the 79<sup>th</sup> percentile. The top five institutions for small business lending were American Express National Bank, JPMorgan Chase Bank, N.A., BancFirst, Arvest Bank, and Capital One Bank (USA), N.A., with a combined market share of 51.7 percent. The individual market shares among the five leaders ranged from 5.5 percent to 15.7 percent.

In 2021, there were 523 mortgage lenders within the AA. The bank ranked 175<sup>th</sup> with a market share of 0.04 percent by number, putting INTRUST in the 67<sup>th</sup> percentile. This market is highly competitive and consists of lenders ranging from large banks, mortgage companies, and smaller community banks. The top five home mortgage originators/purchasers were U.S. Bank, N.A., Rocket Mortgage, Cornerstone Home Lending, Inc., First United Bank and Trust Co., and Wells Fargo Bank, N.A., with a combined market share of 23.19 percent. The individual market shares among the five leaders ranged from 3.4 percent to 7.1 percent.

The bank's small business and home mortgage market shares and rankings are lower than the bank's deposit market share and ranking. Still, a more accurate depiction of INTRUST's lending performance relative to competition can be determined by comparing the bank's percentile ranking within its respective markets. The bank's small business lending performance exceeded its deposit base relative to the level and nature of competition for small business lending, with INTRUST being in the 64<sup>th</sup> percentile for deposits compared to its position in the 79<sup>th</sup> percentile for small business lending. INTRUST's home mortgage lending performance also exceeded its deposit base relative to the level and nature of competition for home mortgage lending, with the bank in the 64<sup>th</sup> percentile for deposits compared to its position.

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

The bank exhibits an excellent geographic distribution of loans in its AA.

#### Home Mortgage Loans

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

During the evaluation period, INTRUST exhibited good geographic distribution of home mortgage loans originated and purchased in both low- and moderate-income tracts within the Oklahoma City AA.

The bank exhibited good geographic distribution with 2.4 percent of home mortgage loans originated or purchased in low-income tracts within the AA. This was below the demographic data, which showed 3.9 percent of owner-occupied housing units within the AA were located in low-income tracts; however, the geographic distribution exceeded the aggregate lending data, which showed 2.0 percent of home mortgage loans were originated or purchased in low-income tracts within the AA.

The bank exhibited good geographic distribution with 15.7 percent of home mortgage loans originated or purchased in moderate-income tracts within the AA. This was below the demographic data, which showed 19.3 percent of owner-occupied housing units within the AA were located in moderate-income tracts; however, the geographic distribution exceeded the aggregate lending data, which showed 13.0 percent of home mortgage loans were originated or purchased in moderate-income tracts within the AA.

#### Small Loans to Businesses

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

During the evaluation period, INTRUST exhibited an excellent geographic distribution of loans to small businesses throughout the AA.

The bank exhibited excellent geographic distribution with 11.7 percent of loans to small businesses originated or purchased in low-income tracts within the AA. INTRUST significantly exceeded the demographic data, which showed 4.7 percent of businesses were in low-income tracts within the AA, and the aggregate lending data, which showed 4.7 percent of loans to small businesses were originated or purchased in low-income tracts within the AA.

INTRUST exhibited excellent geographic distribution with 28.2 percent of loans to small businesses originated or purchased in moderate-income tracts within the AA. The bank significantly exceeded the demographic data, which showed 21.5 percent of businesses were in moderate-income tracts within the AA, and the aggregate lending data, which showed 19.9 percent of loans to small businesses were originated or purchased in moderate-income tracts within the AA.

#### Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of the bank's home mortgage and small business loans during the evaluation period. The analysis did not identify any unexplained conspicuous gaps.

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

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

#### Home Mortgage Loans

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

INTRUST exhibited good distribution of home mortgage loans to low- and moderate-income borrowers within the Oklahoma City AA.

The distribution of home mortgage loans to low-income borrowers is good. INTRUST originated 11.8 percent of home mortgage loans to low-income borrowers within the AA. Lending distribution was lower than the demographic data, which identified 21.5 percent of families within the AA as low-income; however, the bank exceeded the aggregate lending data, which indicated 4.7 percent of home mortgage loans within the AA were originated to low-income borrowers.

The distribution of home mortgage loans to moderate-income borrowers is good. The bank originated 15 percent of home mortgage loans to moderate-income families within the AA. Lending distribution was lower than the demographic data, which identified 17.3 percent of families within the AA as moderate-income; however, the bank exceeded the aggregate lending data, which indicated 14.2 percent of home mortgage loans within the AA were originated to moderate-income borrowers.

#### Small Loans to Businesses

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

During the evaluation period, INTRUST exhibited an adequate distribution of loans to businesses with revenues less than or equal to \$1 million within the AA.

The bank originated 46.0 percent of commercial loans to small businesses with revenues less than or equal to \$1 million within the AA. This is significantly lower than the demographic data, which showed 90.2 percent of businesses within the AA had revenues equal to or less than \$1 million. The bank's lending distribution exceeded the aggregate data, which showed 40.7 percent of commercial loans to small businesses were to businesses with revenues less than or equal to \$1 million; however, it is also worth noting that 34.0% of the bank's commercial loans were made to businesses with no available revenue information.

#### **Community Development Lending**

The institution is a leader in making CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period, the bank originated four CD loans, totaling \$15 million within the AA. INTRUST's CD lending supported revitalization and stabilization through job retention in a low-income tract, economic development benefiting LMI employees, and community services serving LMI individuals and families. The bank's CD lending also created affordable housing for LMI individuals.

#### **Product Innovation and Flexibility**

In addition to the institution's innovative and/or flexible lending practices noted in the Overall CRA Rating section of this performance evaluation, INTRUST originated loans in response to the COVID-19 pandemic through the SBA's PPP. These loans made to small businesses impacted by the pandemic in 2020 and 2021, helped to support and retain LMI jobs. The bank originated 239 PPP loans within the Oklahoma City AA, totaling \$17.5 million. PPP loans accounted for 64 percent of the bank's small business loans by number within the AA.

#### **INVESTMENT TEST**

The bank's performance under the Investment Test in Oklahoma is rated High Satisfactory.

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

Based on a full-scope review, the bank's performance in the Oklahoma AA is good. The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits good responsiveness to credit and community economic development needs. The institution makes significant use of innovative and/or complex investments to support CD initiatives.

Qualified Investments	5									
	Pric	or Period*	Cu	rrent Period		Г	otal		U	Jnfunded
Assessment Area									Com	nmitments**
	#	\$(000's)	#	\$(000's)	#	% of Total	\$(000's)	% of	#	\$(000's)
						#		Total \$		
Oklahoma City AA	1	95	17	7,868	18	85.7	7,963	99.6	0	0
Oklahoma Statewide	0	0	3	30	3	14.3	30	0.4	0	0

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

During the evaluation period, INTRUST made \$8 million in total qualifying investments and donations in the Oklahoma City AA. The bank made over \$7.9 million in investments that supported affordable housing, and \$41,328 in donations to organizations that provide community services to LMI individuals. We also considered qualified investments that benefited the broader statewide or regional areas that include the bank's AAs. INTRUST made \$29,694 in total qualifying donations in the broader statewide region to organizations that provide community services to LMI individuals.

#### **SERVICE TEST**

The bank's performance under the Service Test in Oklahoma is rated High Satisfactory.

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

Based on a full-scope review, the bank's performance in the Oklahoma City AA is good.

#### **Retail Banking Services**

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of E	Branch Delivery	System									
	Deposits		Bran	ches					Popu	lation	
	% of Rated	# of	% of Rated	es by	% c	of Popula	ation wi	thin			
	Area	BANK	Area Branches	es (%)	Each Geography						
Assessment	Deposits in	Branches	in AA								
Area	AA			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Oklahoma City	100.0	6	100.0	16.7	33.3	50.0	0.0	7.0	25.2	37.7	29.9

INTRUST operates six branches in the Oklahoma City AA. The bank also has six cash-dispensing ATMs, with one at each branch location. INTRUST's distribution of branches in both low- and moderate-income tracts exceeds the distribution of the population living in these tracts, 7.0 percent and

25.2 percent, respectively. INTRUST added Allpoint ATM network in May 2020 to provide more surcharge-free ATM access to our customers. The bank has 6 ATMs within the OKC AA. In addition to the institution's ATMs, INTRUST added the Allpoint ATM network in May 2020 to provide more surcharge-free ATM access to their customers. The Oklahoma City AA has 100 Allpoint ATMs, including 27 within LMI census tracts.

Distribution of Bran	ch Openings/Closin	igs										
		Branch Openi	ngs/Closi	ings								
Assessment Area	# of Branch Openings# of Branch ClosingsNet change in Location of Branches (+ or - )											
			Low	Mod	Mid	Upp						
Oklahoma City AA	0	0	0	0	0	0						

The bank did not open or close any branches within the AA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. INTRUST offers a wide range of loan and deposit products, including overdraft protection, safe deposit boxes, mortgage loans, and a variety of consumer, commercial, agri-business, and small business loans. INTRUST's hours of operation are uniform with the AA: Monday through Friday from 9:00 a.m. to 5:00 p.m. Standard drive-up hours are Monday through Friday from 8:00 a.m. to 6:00 p.m. and Saturday from 9:00 a.m. to 12:00 p.m.

INTRUST compliments its traditional service delivery methods with alternative delivery systems, including free online and mobile banking to all customers. From January 1, 2019, through December 31, 2021, INTRUST had 196 active mobile banking users in LMI branch zip codes within the AA. INTRUST also cashes government checks for all customers.

#### **Community Development Services**

The institution provides a relatively high level of CD services.

INTRUST provided a relatively high-level of CD services within the AA. During the evaluation period, five employees provided 613 hours of CD services to four qualified CD organizations benefitting the Oklahoma City AA. All CD services were through organizations that provide community services to LMI individuals. Examples of service hours include the following:

- Serving as a board member to an organization that provides community services to single mothers.
- Serving as a board member to a local community organization that works on revitalization in Oklahoma City that includes low- and moderate-income tracts.

## **Appendix A: Scope of Examination**

The following table identifies the time-period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term "full-scope," and those that received a less comprehensive review, designated by the term "limited-scope".

Time Period Reviewed:	January 1, 2019, to Decem	ber 31, 2021
Bank Products Reviewed:	Home mortgage and small	business loans
	Community development le	oans, qualified investments, community development
	services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
		None
List of Assessment Areas and Typ	e of Examination	
<b>Rating and Assessment Areas</b>	Type of Exam	Other Information
State of Kansas		
Wichita AA	Full-Scope	Sedgwick, Butler, and Harvey Counties
Manhattan AA	Full-Scope	Geary and Riley Counties
Kansas City AA	Limited-Scope	Johnson County
Lawrence AA	Limited-Scope	Douglas County
Topeka AA	Limited-Scope	Shawnee County
State of Arkansas		
Benton County AA	Full-Scope	Benton County
State of Oklahoma		
Oklahoma City AA	Full-Scope	Canadian, Cleveland, and Oklahoma Counties

# **Appendix B: Summary of MMSA and State Ratings**

	RATINGS INT	<b>FRUST Bank</b> , Nation	nal Association	
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Multistate Rating
INTRUST Bank, N.A.	Outstanding	Outstanding	Outstanding	Outstanding
State:				
Kansas	Outstanding	Outstanding	Outstanding	Outstanding
Arkansas	Needs to Improve	Outstanding	Low Satisfactory	Satisfactory
Oklahoma	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

## **Appendix C: Definitions and Common Abbreviations**

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

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

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

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

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

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

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an Appendix C-2

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

**MMSA** (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

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

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

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

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

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

### **Content of Standardized Tables**

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

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

- Table O.Assessment Area Distribution of Home Mortgage Loans by Income Category of the<br/>Geography Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the<br/>percentage distribution of owner-occupied housing units throughout those geographies. The<br/>table also presents aggregate peer data for the years the data is available.
- Table P.Assessment Area Distribution of Home Mortgage Loans by Income Category of the<br/>Borrower Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the<br/>percentage distribution of families by income level in each MMSA/assessment area. The<br/>table also presents aggregate peer data for the years the data is available.
- **Table Q.** Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.
- Table R.Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue<br/>- Compares the percentage distribution of the number of small loans (loans less than or<br/>equal to \$1 million) originated and purchased by the bank to businesses with revenues of<br/>\$1 million or less to: 1) the percentage distribution of businesses with revenues of greater<br/>than \$1 million; and, 2) the percentage distribution of businesses for which revenues are<br/>not available. The table also presents aggregate peer small business data for the years the<br/>data is available.
- Table S.Assessment Area Distribution of Loans to Farms by Income Category of the<br/>Geography The percentage distribution of the number of small loans (less than or equal<br/>to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T.Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -<br/>Compares the percentage distribution of the number of small loans (loans less than or equal<br/>to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1<br/>million or less to: 1) the percentage distribution of farms with revenues of greater than \$1<br/>million; and 2) the percentage distribution of farms for which revenues are not available.<br/>The table also presents aggregate peer small farm data for the years the data is available.
- Table U.Assessment Area Distribution of Consumer Loans by Income Category of the<br/>Geography Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the<br/>percentage distribution of households in those geographies.
- Table V.Assessment Area Distribution of Consumer Loans by Income Category of the<br/>Borrower Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the<br/>percentage distribution of households by income level in each MMSA/assessment area.

NOTE: The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

#### KANSAS

Table O:	: Asse	essment	Area	a Distr	ibution	of H	ome Mo	ortgage	Loans	by Inco	me Cat	egory	of the	Geogra	phy			201	19-2021
	Tota	l Home Mo	ortgage	Loans	Low-	Income	Tracts	Moder	ate-Incon	ne Tracts	Middle	-Incom	e Tracts	Upper-	Income	e Tracts	Not Av	ailable Tracts	-Income
Assessment Area:	#	\$	% of Total	Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate
Full Scope	:																		
Wichita AA	2,284	355,871	87.6	28,060	4.7	2.3	2.6	17.4	11.4	13.4	34.7	33.3	32.7	43.1	53.1	51.3	0.0	0.0	0.0
Manhattan AA	89	15,925	3.4	4,255	0.0	0.0	0.0	20.5	46.1	18.3	38.9	23.6	36.8	40.1	29.2	44.3	0.4	1.1	0.6
Limited So	cope:																		
Kansas City AA	145	21,740	5.6	41,135	0.3	0.0	0.2	4.5	0.7	3.8	31.3	24.1	28.1	63.9	75.2	67.9	0.0	0.0	0.0
Lawrence AA	75	22,574	2.9	5,043	1.3	0.0	2.1	25.4	22.7	24.3	36.9	29.3	34.1	36.3	48.0	39.5	0.0	0.0	0.0
Topeka AA	15	2,172	0.6	7,049	4.6	6.7	2.1	15.3	13.3	10.7	39.1	46.7	39.4	41.0	33.3	47.9	0.0	0.0	0.0
Total	2,608	418,282	100.0	85,542	2.6	2.0	1.2	12.7	12.3	9.4	34.2	32.4	31.3	50.5	53.2	58.0	0.0	0.0	0.0
Source: 2015 Due to roundi INTRUST BA	ing, total	's may not e	equal 10	0.0%			Aggregate L	Data, "" de	ata not ava	iilable.									

Table P:	Asses	ssment	Area	Distril	bution	of Ho	ome Mo	rtgage	Loan	s by Inc	come C	ategory	of the H	Borrow	er		-	201	19-2021
	Tota	al Home Mo	ortgage	Loans	Low-In	icome B	orrowers		derate-I Borrow		Middle	-Income Bo	orrowers	Upper-I	ncome I	Borrowers		vailable Borrow	-Income ers
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% 8ank Aggregate 1 Loans		% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full Scope	:				1														
Wichita AA	2,284	355,871	87.6	28,060	20.6	5.8	6.8	17.8	15.0	16.9	21.3	21.2	19.3	40.3	41.7	30.3	0.0	16.3	26.7
Manhattan AA	89	15,925	3.4	4,255	20.5	6.7	3.6	22.7	12.4	14.6	19.6	13.5	20.9	37.2	28.1	29.4	0.0	39.3	31.4
Limited Sc	cope:																		
Kansas City AA	145	21,740	5.6	41,135	12.0	6.9	3.8	13.6	9.7	13.1	19.0	22.8	20.0	55.3	53.1	47.1	0.0	7.6	16.0
Lawrence AA	75	22,574	2.9	5,043	19.1	6.7	7.1	19.6	13.3	18.9	20.6	24.0	21.6	40.7	34.7	37.7	0.0	21.3	14.8
Topeka AA	15	2,172	0.6	7,049	20.8	0.0	8.8	17.2	13.3	20.3	21.8	6.7	21.6	40.3	46.7	29.1	0.0	33.3	20.1
Total	2,608	418,282	100.0	85,542	17.3	5.9	5.4	16.5	14.6	15.4	20.4	21.0	20.0	45.9	41.7	38.7	0.0	16.9	20.5

Charter Number: 2782

Table Q: As	sessme	nt Area l	Distrib	oution o	of Loans	to Sn	nall B	Businesse	es by I	Incon	ne Categ	gory a	of the	Geogra	phy			2019-	2021
	Tota	al Loans to Sr	nall Busii	nesses	Low-Inc	come Tr	acts	Moderate-	Income	Tracts	Middle-Iı	ncome 7	Fracts	Upper-In	come T	racts	Not Avai T	lable-In `racts	come
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggre gate	% Businesses	Ronk Bonk Bonk Bonk	% Businesses	% Bank Loans	Aggre gate							
Full Scope:					1														<u>.</u>
Wichita AA	4,479	654,081	79.9	11,308	5.0	5.4	5.2	24.9	30.8	23.7	30.4	29.4	29.3	39.7	34.4	41.3	0.0	0.0	0.4
Manhattan AA	274	33,698	4.9	1,075	0.0	0.0	0.0	32.4	48.9	28.8	34.8	23.4	39.8	32.0	27.7	30.3	0.8	0.0	1.0
Limited Scope:																			
Kansas City AA	488	96,262	8.7	18,440	1.1	2.0	1.0	6.8	9.0	7.7	26.4	15.6	25.2	62.8	65.4	62.9	2.9	8.0	3.2
Lawrence AA	299	40,686	5.3	2,212	6.0	5.4	3.6	30.2	30.8	31.8	31.9	27.4	32.9	31.9	36.5	31.0	0.0	0.0	0.7
Topeka AA	63	18,101	1.1	2,417	15.4	27.0	10.5	17.8	28.6	18.0	40.1	33.3	42.0	26.6	11.1	28.9	0.0	0.0	0.5
Total	5,603	842,828	100.0	35,452	3.9	5.1	3.1	16.3	29.8	15.2	29.7	27.8	28.5	48.7	36.6	51.2	1.4	0.7	2.0

Table R: Assessme	nt Area Distr	ibution of	Loans to S	Small Bus	inesses by	Gross An	nual Reve	nues		, ,	2019-2021
		Fotal Loans to	Small Businesse	es	Businesses	with Revenue	s <= 1MM	Businesses wit 1M		Businesses wi Not Av	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full Scope:											
Wichita AA	4,479	654,081	79.9	11,308	83.3	46.2	50.3	5.6	30.9	11.2	22.9
Manhattan AA	274	33,698	4.9	1,075	80.1	59.5	42.6	4.4	23.0	15.6	17.5
Limited Scope:											
Kansas City AA	488	96,262	8.7	18,440	85.7	35.7	47.9	5.1	43.2	9.2	21.1
Lawrence AA	299	40,686	5.3	2,212	85.2	51.5	47.7	4.1	19.4	10.6	29.1
Topeka AA	63	18,101	1.1	2,417	79.9	28.6	45.6	6.1	54.0	14.0	17.5
Total	5,603	842,828	100.0	35,452	84.1	46.0	48.3	5.2	31.3	10.6	22.7

Due to rounding, totals may not equal 100.0%

#### **ARKANSAS and OKLAHOMA**

Table O: A	Cable O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography2019-2021															19-2021			
	Tot	al Home I	Aortgag	e Loans	Low-l	income '	Tracts	Moderat	te-Incon	ne Tracts	Middle	-Income	e Tracts	Upper-	Income	Tracts	Not Availa	ble-Inco	ome Tracts
Assessment Area:	#	\$		Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate	-		Aggregate
Benton County, AR	42	7,402	100.0	21,550	0.8	0.0	0.3	6.5	0.0	4.8	53.9	50.0	43.9	38.8	50.0	50.9	0.0	0.0	0.0
Oklahoma City AA	127	29,077	100.0	61,037	3.9	2.4	2.0	19.3	15.7	13.0	40.4	37.8	36.4	36.4	44.1	48.4	0.1	0.0	0.1
Due to rounding	ource: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "" data not available. ue to rounding, totals may not equal 100.0%																		

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total		% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Benton County, AR	42	7,402	100.0	21,550	17.4	2.4	4.9	17.1	9.5	12.7	21.1	7.1	17.4	44.3	66.7	43.1	0.0	14.3	21.9
Oklahoma City AA	127	29,077	100.0	61,037	21.5	11.8	4.7	17.3	15.0	14.2	20.3	22.0	17.3	40.9	33.1	32.7	0.0	18.1	31.2

Table Q: A	Asse	essmen	t Are	ea Dist	ribution	of L	oans to	Small B	usine	esses by	Income	Cate	egory of	the Geo	grap	hy		201	19-2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Benton County, AR		5,465	100.0	6,687	2.0	0.0	1.6	7.0	5.1	5.9	48.8	35.9	49.1	42.2	59.0	43.1	0.0	0.0	0.3
Oklahoma City AA	376	44,453	100.0	30,732	4.7	11.7	4.7	21.5	28.2	19.9	34.2	31.1	34.1	36.5	27.4	38.3	3.0	1.6	3.1
Source: 2021 D Due to rounding INTRUST BANI	, totai	ls may noi	equal 1	00.0%			CRA Aggrego	ate Data, "	" data n	ot available.			•						

						1M	IVI	Businesses with Revenues Not Available		
\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
5,465	100.0	6,687	83.8	48.7	42.9	4.0	38.5	12.2	12.8	
44,453	100.0	30,732	90.2	46.0	40.7	2.9	19.9	6.8	34.0	
2	44,453	44,453 100.0	5,465   100.0   6,687     44,453   100.0   30,732	5,465   100.0   6,687   83.8     44,453   100.0   30,732   90.2	5,465 100.0 6,687 83.8 48.7	5,465   100.0   6,687   83.8   48.7   42.9     44,453   100.0   30,732   90.2   46.0   40.7	5,465 100.0 6,687 83.8 48.7 42.9 4.0   44,453 100.0 30,732 90.2 46.0 40.7 2.9	5,465 100.0 6,687 83.8 48.7 42.9 4.0 38.5   44,453 100.0 30,732 90.2 46.0 40.7 2.9 19.9	5,465 100.0 6,687 83.8 48.7 42.9 4.0 38.5 12.2   44,453 100.0 30,732 90.2 46.0 40.7 2.9 19.9 6.8	