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Comptroller of the Currency  
Administrator of National Banks

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**PUBLIC DISCLOSURE**

**September 10, 1997**

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

**INTRUST Bank, National Association  
Charter Number 2782  
105 North Main  
Wichita, Kansas 67202**

**Supervisory Agency: Office of the Comptroller of the Currency  
Midwestern District  
2345 Grand Boulevard, Suite 700  
Kansas City, Missouri 64108**

**NOTE:** This evaluation is not, nor should it 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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## Community Reinvestment Act Performance Evaluation

INTRUST Bank, National Association, Wichita, Kansas

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### GLOSSARY OF TERMS AND COMMON ABBREVIATIONS

The following terms and abbreviations are used throughout this Performance Evaluation.

**Assessment Area (AA)** - The geographic area which an institution selects as the community within which its regulator will assess the institution's record of CRA performance. Generally, an urban assessment area will not extend beyond the boundaries of a MSA. A rural assessment area may contain one or more neighboring counties.

**Block Numbering Area (BNA) or Census Tract (CT)** - Small, locally defined statistical areas within a MSA. These areas are determined by the United States Census Bureau in an attempt to group homogeneous populations. A CT has defined boundaries per ten-year census and an average population of 4,000.

**Community Development Purpose** - A community development purpose is defined per 12 C.F.R. 25.12(h) as affordable housing (including multi-family rental housing) for low- and moderate-income (LMI) individuals; community services targeted to LMI individuals; activities that promote economic development by financing businesses or farms that meet size eligibility standards of 13 C.F.R. 121.802(a)(2) or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize LMI geographies.

**Community Reinvestment Act (CRA)** - A statute that requires federal regulators to evaluate a financial institution's lending performance in light of the credit needs in the institution's local community. (This is a generic description of the bank's requirements and not a legal explanation of the requirements contained in 12 U.S.C. 2901, as amended, and 12 C.F.R. 25, as amended.)

**Home Mortgage Disclosure Act (HMDA)** - A statute that requires certain mortgage lenders that do business or have banking offices in MSAs to file annual summary reports of their lending activity. The reports include such data as the race, gender, and the income of the applicant(s), the amount of loan requested and its disposition (e.g made, turned down, withdrawn). The types of loan applications reported include governmentally-guaranteed home purchase and home improvement loans, conventional home purchase loans, home improvement loans, refinancing of home purchase and home improvement loans and loans for the purchase of multi-family (5 or more units) dwellings. (This is a generic description of the bank's requirements and not a legal explanation of the requirements contained in 12 U.S.C. 2801, as amended, and 12 C.F.R. 203, as amended.)

**Income Levels** - These relate to individuals, families, the CTs in an MSA or BNAs in nonMSA areas.

**Low** = An income level that is less than 50 percent of the median income.

**Moderate** = An income level that is at least 50 percent and less than 80 percent of the median income.

**LMI** = An income level that is less than 80 percent of the median income.

**Middle** = An income level that is at least 80 percent and less than 120 percent of the median income.

**Upper** = An income level that is 120 percent or more of the median income.

**Median Family Income** - The median family income for a specific MSA as determined by the United States Census Bureau. The Department of Housing and Urban Development updates this figure annually using an estimated inflation factor.

**INTRUST Financial Corporation.** = IFC. IFC is the parent company of INTRUST.

**INTRUST Bank, National Association, Wichita, Kansas** = INTRUST.

**Metropolitan Statistical Area (MSA)** - An area containing a city with a population of at least 50 thousand or an urbanized area with a population of at least 50 thousand and a total metropolitan population of at least 100 thousand. Generally, MSAs consist of one or more whole counties that have a high degree of interaction.

**Small Business or Small Farm** - A business or farm that has \$1 million or less in gross annual revenues.

**Small Loan to a Business or Farm** - A loan of \$1 million or less to a business of any size or a loan of \$500 thousand or less to a farm of any size.

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**General Information**

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of **INTRUST Bank, National Association, Wichita, Kansas (INTRUST)** prepared by the **Office of the Comptroller of the Currency**, the institution's supervisory agency, as of **September 10, 1997**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include visits to some, but not necessarily all, of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

**Institution's CRA Rating:** This institution is rated **"Satisfactory."**

The following table indicates the performance level of **INTRUST** with respect to the lending, investment and service tests.

Performance Levels	INTRUST Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory		X	X
Needs To Improve			
Substantial Noncompliance			

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

## DESCRIPTION OF INSTITUTION

INTRUST is a \$1.6 billion financial institution headquartered in Wichita, Kansas. It is a wholly-owned subsidiary of INTRUST Financial Corporation (IFC), a \$1.7 billion holding company. In the third quarter of 1995, IFC acquired First National Bank, Ottawa, Kansas and merged it into INTRUST. In 1996, INTRUST merged its affiliated mortgage company into the bank. INTRUST offers a full range of commercial and industrial, real estate, and consumer credit products.

INTRUST has three assessment areas (AAs), all within the state of Kansas. They are: the entire Wichita MSA (#9040), Johnson County of the Kansas City, MO-KS MSA (#3760) and Franklin County. Further details of the bank's AAs are discussed later in this evaluation. The following table shows the percentage of the bank's loans and deposits attributed to each AA based on information the bank provided as of June 30, 1997. As shown below, over 90 percent of the bank's loans and deposits are attributed to the Wichita MSA. In all of its AAs, INTRUST faces strong competition from other financial institutions and mortgage companies.

Assessment Area	Total Loans (in millions)	% of Total Loans	Total Deposits (in millions)	% of Total Deposits
Wichita MSA	\$1,103	91%	\$1,225	92%
Johnson County	\$94	8%	\$67	5%
Franklin County	\$14	1%	\$40	3%
Total	\$1,211	100%	\$1,332	100%

INTRUST has the financial capacity to assist in meeting its communities' credit needs. There are no known legal or financial constraints which could impede its efforts. The OCC assigned a CRA rating of "Satisfactory Record of Meeting Credit Needs" during the last CRA evaluation ending June 29, 1995. As of March 31, 1997, INTRUST had a return on average assets of 1.2 percent. The bank's net loan-to-deposit ratio on that date was 84 percent. The loan portfolio consisted of the following types of credit: 49 percent commercial and commercial real estate; 22 percent consumer loans; 12 percent credit cards; 10 percent 1-4 family residential; 3 percent agricultural; 2 percent construction and development and 2 percent other loans.

## SCOPE OF EXAMINATION

We evaluated INTRUST's CRA performance in its three AAs using the FFIEC Interagency Large Bank CRA Examination Procedures. This evaluation covers the time period from the last CRA evaluation, June 29, 1995, to the date of this evaluation. We reviewed HMDA and small business loan products for all AAs. We reviewed small farm loan products for the Wichita MSA and Franklin County AA only, where most of the bank's farm loans originate. Together these products comprise approximately 62 percent, by dollar volume, of the bank's total loan portfolio.

We analyzed HMDA-reportable loans for calendar year 1996 through May 31, 1997. We considered the bank's 1995 HMDA-reportable loans for the Wichita MSA to evaluate the bank's performance relative to other lenders

in this market, since the bank is a significant HMDA lender in this MSA.

This evaluation covers calendar year 1996 for small business and small farm loans, since it was the first year such data was required to be collected and reported under the revised CRA regulation. We evaluated INTRUST's lending to small businesses and small farms using a combination of the loan data the bank collected and samples of small business and small farm originations in 1996. We found the bank's reported data significantly under reported and unreliable for the assessment areas outside the Wichita MSA.

To analyze the bank's lending to small businesses and small farms in the Johnson County and Franklin County AAs, we selected samples from loans the bank originated during 1996 for these product types. We selected 56 business loans for Johnson County which represented approximately 46 percent, by number, and 48 percent, by dollar volume, of new business loans originated in 1996 based on bank estimates. For Franklin County, we selected 126 loans which represented approximately 50 percent, by number, and 65 percent, by dollar volume, of new business and farm loan originations for 1996 based on bank estimates.

For the Wichita MSA, based on a sample of 142 loans, we found the bank reported approximately 75 percent of the small business and small farm loans which the bank originated in 1996. We relied on this data to determine the bank's lending performance within the Wichita MSA since the reported numbers constituted a majority of the lending activity in that AA.

We are required by the new CRA regulation to present conclusions for the performance tests which provide the basis for the bank's overall CRA rating. We are also required to present facts and data which support our conclusions for each of the performance tests, separately for each MSA where INTRUST has at least one branch. If the bank's defined AA does not include the entire MSA, we must also discuss the bank's performance in the portion of the MSA defined as the bank's AA, i.e. Johnson County of the Kansas City MSA. If the bank has branches in nonMSA areas of the state, we also must provide conclusions, facts and data for those areas that we examined. Refer to the **MSA** and **NonMSA** sections for the detailed descriptions of the bank's AAs.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

We rate INTRUST's CRA performance "Satisfactory" because:

- INTRUST's HMDA and small business lending showed good responsiveness to the credit needs of its assessment areas, particularly in the Wichita MSA.
- The geographic distribution of the bank's HMDA and small business loans showed good penetration throughout its assessment areas, including LMI CTs.
- INTRUST's HMDA and small business loans reflected good penetration to borrowers of different income levels and businesses of different revenue sizes.
- INTRUST made an adequate level of qualified community development investments and grants; however,

none were made in its Johnson County or Franklin County AAs.

- INTRUST's service delivery systems are reasonably accessible throughout its AAs and the bank provides a high level of community development services in the Wichita MSA.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

We gave the most weight to the bank's lending performance in the Wichita MSA since over 90 percent of the bank's loans are attributed to this MSA. The conclusions regarding the performance tests are largely based on the bank's performance in the Wichita MSA and the facts and data supporting the conclusions primarily relate to the Wichita MSA unless otherwise indicated.

### **LENDING TEST**

INTRUST's lending levels reflect good responsiveness to its AAs' credit needs. The following discussion provides conclusions regarding the bank's lending performance for HMDA, small business and small farm loans.

#### ***HMDA Activity:***

INTRUST originates a substantial portion of its HMDA loans within its defined AAs. For 1996, the bank originated, 93 percent by number and 89 percent by dollar volume, within its AAs. For year-to-date 1997, the bank originated 92 percent by number and 94 percent by dollar volume within its AAs.

HMDA lending levels reflect good responsiveness to AA credit needs, particularly in the Wichita MSA. Based on 1995 aggregate HMDA loans for all lenders in the Wichita MSA, INTRUST and its affiliated mortgage company generated the second highest number of HMDA loans, with eight percent of the total market's HMDA loans. The lender with the highest number of HMDA loans originated ten percent of the market's HMDA loans. In 1996, INTRUST continued to originate a high volume of HMDA loans, exceeding 1995 totals by over 600 loans. Aggregate HMDA data for the market is not yet available for 1996. The following table details the number and dollar volume of INTRUST's HMDA loans for the Wichita MSA.

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**Wichita MSA**

LOAN TYPE	1995		1996		1997 (through May 31)	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000)
Home Purchase	305	19,027	369	22,653	96	6,491
Refinance	172	10,429	345	16,013	80	3,880
Home Improvement	558	5,289	941	12,480	279	2,664
Multi Family	1	224	1	6	0	0
<b>Totals</b>	<b>1,036</b>	<b>34,969</b>	<b>1,656</b>	<b>51,152</b>	<b>455</b>	<b>13,035</b>

INTRUST also generated a reasonable number of HMDA loans in its Johnson County and Franklin County AAs based on the resources the bank has dedicated to these markets. Refer to the **MSA** and **NonMSA** sections for further details.

***Geographic Distribution of HMDA Loans:***

INTRUST's geographic distribution of HMDA loans shows good penetration in the Wichita MSA. We did not evaluate the geographic distribution of HMDA loans in the Johnson County or Franklin County AAs since there are no LMI CTs/BNAs or clearly defined LMI areas within these AAs. The percentage of INTRUST's HMDA loans originated in low-, moderate-, middle-, and upper-income geographies is consistent with the percentage of owner-occupied units in these geographies when looking at total HMDA originations for 1995, 1996 and year-to-date 1997. The percentage of owner-occupied housing gives some indication of the potential opportunities for making housing-related loans in CTs of different income levels.

The following table shows the geographic distribution of INTRUST's HMDA lending. It shows the number of HMDA loans and the percentage of total HMDA loans originated in low-, moderate-, middle- and upper-income CTs and the related percentage of owner-occupied housing in these CTs. We chose to use the number of loans rather than the dollars extended to more clearly show the number of individuals who have benefitted from INTRUST's HMDA lending.

**Wichita MSA: All HMDA Originations:**

Income Level of CT	% of Owner-Occupied Housing	1995		1996		1997 (through May 31)	
		# of Loans	% of Loans	# of Loans	% of Loans	# of Loans	% of Loans
Low	3%	34	3%	43	3%	9	2%
Moderate	14%	128	13%	209	13%	49	11%
Middle	61%	644	62%	950	57%	267	59%
Upper	22%	230	22%	454	27%	130	28%
<b>Total</b>	<b>100%</b>	<b>1,036</b>	<b>100%</b>	<b>1,656</b>	<b>100%</b>	<b>455</b>	<b>100%</b>

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Based on 1995 aggregate HMDA data for all lenders in the Wichita MSA, INTRUST originated the highest number of HMDA loans in low-income CTs (17 percent of the total market) and the second highest number of HMDA loans in moderate-income CTs (10 percent of the total market). INTRUST's strongest performance in LMI CTs is attributed to its home purchase and home improvement lending. The bank's affordable home loan product enhanced the bank's HMDA lending in LMI CTs. Refer to the **Flexible Program** section of this evaluation for further details. In 1996, the bank maintained the percentage of total HMDA loans in LMI geographies.

**Distribution by Borrower Income Level (HMDA):**

INTRUST's HMDA lending shows good penetration among borrowers of different income levels. In 1995, based on aggregate HMDA data of all lenders in the Wichita MSA, INTRUST ranked second in total HMDA loans to low-income individuals and third in HMDA loans to moderate-income individuals which reflects the market's responsiveness to the bank's affordable home purchase loan product. INTRUST was also the market leader in home improvement loans to LMI individuals. The bank made 27 percent of the MSA's low-income and 21 percent of the MSA's moderate-income home improvement loans.

The following table shows the distribution of the bank's HMDA lending to borrowers of different income levels within the Wichita MSA. As a comparison, the table also shows the percentage of families at each income level within the MSA based on 1990 U.S. Census Data. It also shows the percentage of "households" at or below poverty income level. This offers some explanation for the difference between the percentage of families in the assessment area which are designated low-income and the bank's lending to borrower's at the low-income level. There is no data available on the percentage of "families" at poverty.

**Wichita MSA: All HMDA Originations:**

Income Level of Borrower	% of Total Families in AA	1995		1996		1997 (through May 31)	
		# of Loans	% of Loans	# of Loans	% of Loans	# of Loans	% of Loans
Low**	17%	134	13%	191	11%	35	8%
Moderate	19%	222	21%	328	20%	94	21%
Middle	24%	290	28%	446	27%	115	25%
Upper	40%	383	37%	677	41%	207	45%
NA	NA	7	1%	14	1%	4	1%
Total	100%	1,036	100%	1,656	100%	455	100%

\*\* Percentage of households at or below poverty=10%.

There has been a slight decrease in the percentage of HMDA loans made to LMI borrowers. However, INTRUST's 1996 HMDA lending continues to compare favorably with the percentage of families at each income level after considering the percentage at or below poverty.

The distribution of HMDA lending to borrowers of different income levels in the Johnson County and Franklin County AAs is reasonable. Refer to the **MSA** and **NonMSA** sections for details of borrower distribution for the

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bank's HMDA lending in the Johnson County and Franklin County AAs.

***Small Business Lending Activity:***

INTRUST showed good responsiveness to the credit needs of its AAs through its origination of small business and small farm loans. INTRUST actively participates in Small Business Administration (SBA) loan programs and was identified as the top SBA lender in Wichita and south central Kansas for the fiscal year ended September 30, 1996. The bank has increased its SBA participation from \$3.8 million in 1994 to \$5.9 million in 1996. The following table shows the number and dollar volume of small business and small farm loans and the portion which INTRUST made within its three assessment areas in 1996. These results are based on the bank's reported loan data for the Wichita MSA and samples of loans for other AAs. Refer to the **Scope of Examination** for details on samples.

1996	Small Business				Small Farm			
	Wichita MSA	#	%	\$ (000's)	%	#	%	\$ (000's)
In	2,749	94%	298,186	92%	87	76%	3,675	55%
Out	164	6%	24,402	8%	27	24%	2,971	45%
Total	2,913	100%	322,588	100%	114	100%	6,646	100%
Johnson County AA	#	%	\$ (000's)	%	#	%	\$ (000's)	%
In	29	52%	1,893	49%	NA	NA	NA	NA
Out	27	48%	1,948	51%	NA	NA	NA	NA
Total	56	100%	3,841	100%	NA	NA	NA	NA
Franklin County AA	#	%	\$ (000's)	%	#	%	\$ (000's)	%
In	47	100%	1,147	100%	74	95%	690	95%
Out	0	0%	0	0%	4	5%	37	5%
Total	47	100%	1,147	100%	78	100%	727	100%

Based on the loans reported and our samples, INTRUST made a significant portion of its small business loans within the Wichita MSA and the Franklin County AA. For the Johnson County AA, the portion of small business loans outside the AA was high; however, many of these loans (20 by number) are located within nearby Missouri portions of the Kansas City MSA. Considering this factor, approximately 88 percent, by number, and 85 percent, by dollar volume, of the loans in our sample originated within the Kansas City, MO-KS MSA.

INTRUST also made a reasonable percentage of its small farm loans within its AAs. Although the percentage of small farm loans outside the Wichita MSA is significant, many of these loans originated in the rural areas just outside of the Wichita MSA.

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**Geographic Distribution of Small Business Loans:**

INTRUST's lending to small businesses in CTs of different income levels showed good penetration. The bank's lending to small businesses with revenues of \$1 million or less is comparable to the demographics of the Wichita MSA. The following table illustrates the geographic distribution of INTRUST's lending to businesses with revenues of \$1 million or less in the Wichita MSA. For comparison, the percentage of businesses with revenues of \$1 million or less is shown. This information is based on 1995 data from Dun and Bradstreet.

**Wichita MSA: Businesses with Revenues of \$1 Million or Less**

Income Level of CT	% of Businesses with Rev < or = \$1 million	# of Loans	% of Loans	\$ Volume of Loans in 000's	% Volume of Loans in 000's
Low	8%	119	7%	8,800	7%
Moderate	25%	406	23%	32,898	25%
Middle	49%	688	39%	37,036	28%
Upper	18%	559	31%	53,544	40%
Total	100%	1,772	100%	132,278	100%

A geographic distribution analysis was not meaningful for the Johnson County and Franklin County AAs since there are no LMI CTs in these AAs.

**Distribution by Borrower Characteristics (Small Business):**

INTRUST's lending among businesses of different revenue sizes showed adequate penetration. The following table shows the bank's lending to businesses with revenues of different sizes. The percentage of businesses with revenues of \$1 million or less and over \$1 million within the MSA is shown to demonstrate the possible small business opportunities available within the bank's AA. This information is based on 1995 data from Dun and Bradstreet.

As shown in the following table, INTRUST made a majority of its small business loans to firms with revenues of \$1 million or less. The bank made 64 percent of its small business loans to firms with revenues of \$1 million or less. This is lower than the percentage of businesses in the Wichita MSA which report revenues of this size, i.e. 72 percent. Further analysis, based on a sample of 142 loans, showed that INTRUST made 50 percent of its loans to businesses with revenues of \$150 thousand or less.

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**Wichita MSA: Business Loans by Revenue Size of Business**

Revenue Size in 000's	% of Businesses in MSA	# of Loans	% of Loans	\$ Volume of Loans in 000's	% Volume of Loans in 000's
= or < \$1 million	72%	1,772	64%	132,278	44%
> \$1 million	11%	826	30%	149,065	50%
Unknown Revenues	17%	153	6%	16,894	6%
Total	100%	2,751	100%	298,237	100%

Loan size also generally correlates to the size of the business. The following table shows the size of loans the bank made to businesses of different revenue sizes. As shown, INTRUST made a majority (53 percent) of its loans to businesses with revenues of \$1 million or less in amounts of \$100 thousand or less.

**Wichita MSA: Business Loans by Loan Size**

Loan Size (in 000's)	Rev < or = \$1 million		Rev > \$1 million		Rev Not Available		Loan Totals	
	#	%	#	%	#	%	#	%
<=\$100	1,451	53%	459	17%	110	4%	2,020	73%
>\$100 and <=\$250	205	7%	194	7%	22	1%	421	15%
>\$250 and <\$1,000	113	4%	169	6%	20	1%	302	11%
>\$1,000	3	<1%	4	<1%	1	<1%	8	<1%
Total	1,772	64%	826	30%	153	6%	2,751	100%

The distribution of small business loans to firms with different revenue sizes for the Johnson County and Franklin County AAs is presented in the **MSA** and **NonMSA** sections of this evaluation.

***Small Farm Lending Activity:***

INTRUST originated an adequate number of small farm loans in its Wichita MSA and Franklin County assessment areas considering farm loans are not a primary business focus. Farm loans comprise only three percent of the bank's loan mix.

***Geographic Distribution of Small Farm Loans:***

The geographic distribution of small farm loans is adequate considering the bank's small number of farm loans. We considered only the distribution in the Wichita MSA since Franklin County has only middle-income BNAs. The following table shows the distribution of farm loans to farms with revenues of \$1 million or less in CTs of different income levels. It also shows the percentage of farms with revenues of \$1 million or less which are located in CTs of different income levels within the Wichita MSA per 1995 Dun and Bradstreet information. The percentage of farm loans originated in LMI CTs is lower than the comparable demographics.

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**Wichita MSA: Farms with Revenues of \$1 Million or Less**

Income Level of CT	% of Farms with Rev < or = \$1 million	# of Loans	% of Loans	\$ Volume of Loans in 000's	% Volume of Loans in 000's
Low	2%	1	1%	30	1%
Moderate	8%	0	0%	0	0%
Middle	71%	65	92%	1,997	91%
Upper	19%	5	7%	172	8%
Total	100%	71	100%	2,199	100%

***Distribution by Borrower Characteristics (Small Farms):***

The bank showed good penetration among farms of different revenue sizes in the Wichita MSA. Ninety percent, by number, and 65 percent, by dollar volume, of the bank's farm loans were made to farms with revenues of \$1 million or less. The following table shows the percentage of loans, by number and dollar volume, that the bank made to farms of different revenue sizes.

**Wichita MSA: Farm Loans by Revenue Size of Farm**

Revenue Size in 000's	% of Farms in MSA	# of Loans	% of Loans	\$ Volume of Loans in 000's	% Volume of Loans in 000's
= or < \$1 million	96%	71	90%	2,199	65%
> \$1 million	2%	6	8%	635	19%
Unknown Revenues	2%	2	2%	551	16%
Total	100%	79	100%	3,385	100%

In addition, loan size generally correlates to the size of the farm. This is demonstrated through the following table which shows that 96 percent of the farm loans that INTRUST made to farms with revenues of \$1 million or less were made in amounts of \$100 thousand or less.

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**Wichita MSA: Farm Loans by Loan Size**

Loan Size (in 000's)	Rev < or = \$1 million		Rev > \$1 million		Rev Not Available		Loan Totals	
	#	%	#	%	#	%	#	%
<=\$100	68	96%	2	33%	1	50%	71	90%
>\$100 and <=\$250	3	4%	4	67%	0	0%	7	9%
>\$250 and <\$1,000	0	0%	0	0%	1	50%	1	1%
>\$1,000	0	0%	0	0%	0	0%	0	0%
Total	71	100%	6	100%	2	100%	79	100%

INTRUST also showed good penetration among farms of different revenue sizes in the Franklin County AA. Refer to the **NonMSA** section for details.

**Community Development Lending:**

INTRUST funded a relatively high level of community development loans. A community development loan must meet the definition in the revised CRA regulation which states that such loan must have as its **primary** purpose community development. Community development loans specifically exclude loans which have been reported as HMDA or small business loans, except for multi-family rental housing loans which can be reported under both categories.

During the evaluation period, INTRUST made ten qualified community development loans in its AAs totaling \$4,532,661. Eight loans representing 96 percent of the total community development loan dollars, \$4,372,161, benefitted the Wichita MSA. The remaining two loans benefitted the bank's Franklin County AA. Following are details of the community development loans the bank made in the Wichita MSA.

- \$3,249,661 of a \$15 million cooperative effort among 14 financial institutions to construct a new hotel in downtown Wichita. This project is revitalizing a LMI area and will provide many jobs for LMI individuals.
- \$400 thousand to purchase and rehabilitate a formerly vacant 48-unit apartment complex in a LMI area which serves primarily LMI families.
- \$427 thousand to construct a job training center for welfare recipients to provide them the opportunity to get off welfare.
- \$295,500 (five loans total) to three nonprofit affordable housing organizations to purchase multi-family or construct single-family housing for the benefit of LMI families.

Details regarding the two loans for the Franklin County AA are contained in the **NonMSA** section of this evaluation.

***Flexible Programs:***

INTRUST offers flexible home purchase loan programs which benefit LMI home buyers. Loans originated under these programs are included in the HMDA originations presented in this evaluation.

The bank created its own affordable home loan program for LMI borrowers. The program provides conventional financing with as little as three percent down payment and no origination fees. Private mortgage insurance (PMI) is not required. INTRUST partners with two local housing organizations, Mennonite Housing Services and Community Housing Services of Wichita Sedgwick County, to provide home buyer counseling for prospective borrowers. Since July 1995, the bank has generated 72 loans under this program. The current outstanding balance of these loans is \$2.7 million.

INTRUST also participates in the City of Wichita's HOME Investment Partnership. The City provides funds for renovation, down payment, and closing costs. INTRUST funds the loans with no origination fees. Since September 1995, the bank has originated 29 loans under this program. The current outstanding balance on these loans is \$926 thousand.

## **INVESTMENT TEST**

INTRUST has made an adequate level of qualified community development investments and grants, all of which benefit the Wichita MSA. The bank and its affiliates, INTRUST Community Development Corporation (ICDC), INTRUST Financial Corporation (IFC) and INTRUST's Charitable Trust, have provided qualified investments and grants totaling \$1,970,678. These investments and donations provided financial support for affordable housing initiatives, including home buyer education; provided assistance to agencies and organizations which provide community services to LMI families and areas; provided small business education; and, assisted in furthering economic development and revitalization. Significant investments were:

- a \$100 thousand zero-interest deposit to provide start-up capital for a Community Development Financial Institution (CDFI) credit union serving a LMI area of Wichita.
- a \$50 thousand contribution over five years for the construction of a health and wellness center in the heart of northeast Wichita, which will serve predominately LMI families in this LMI area.
- \$659,426 purchase of tax credits and \$584,330 purchase of a bond by INTRUST's affiliates, IFC and ICDC, respectively, to complete the permanent financing of a LMI senior living center in the Wichita MSA.
- \$576,922 in grants and donations through the bank and its charitable trust for qualified community development purposes.

## SERVICE TEST

### Retail Banking Services:

INTRUST's delivery systems are reasonably accessible to the majority of the bank's AAs. The bank has 32 branches. Twenty-eight of the branches, including 10 in-store grocery locations and two branches in senior living centers, are located in the Wichita MSA. Complete bank services are available at all locations, with the exception of the two senior living center branches, which have restricted hours and services. The in-store branches offer extended hours on weekdays and Saturdays and a convenient way to combine grocery shopping with banking services. The bank also has 41 ATM locations, with 38 in the Wichita MSA.

The following table shows the branch distribution in the Wichita MSA by CTs of different income levels. The demographics of the MSA, including the percentage of CTs and population located within CTs of different income levels is also shown.

### **Wichita MSA: Branch Distribution**

Income Level of CT	% of CTs in MSA	% of Population	# of Branches	% of Branches
Low	9%	6%	0	0%
Moderate	21%	17%	3	11%
Middle	54%	57%	14	50%
Upper	16%	20%	11	39%
Total	100%	100%	28	100%

Six of the 38 ATMs located in the Wichita MSA, are in moderate-income areas (three in branches and three stand-alone).

Although the bank does not have any branches or ATMs in low-income CTs of the Wichita MSA, only 6% of the population resides in these CTs. Four of the bank's branches, including an in-store grocery branch are located in CTs contiguous to low-income CTs. In addition, bank personnel use alternative methods to effectively reach individuals living in low-income areas. INTRUST takes banking services out into the community by conducting financial and home ownership seminars at community centers in low-income areas. Officers deliver and collect loan applications at these functions. The bank's success in reaching this market segment is demonstrated by its HMDA performance in low-income geographies. In 1995, INTRUST was the market leader in lending in low-income geographies, making over 17 percent of the market's total HMDA loans which were originated in low-income geographies.

The three branches located outside of the Wichita MSA are all located in middle- and upper-income CTs consistent with the demographics of the AAs where they are located. Refer to the **MSA** and **NonMSA** sections for details.

INTRUST also offers automated 24-hour telephone banking and bill paying services. The bank's telephone banking is available with live interaction Monday through Saturday. The bank provides AT&T Language Line

Telephone Services, offering over-the-phone interpretation services for 140 languages.

***Community Development Services:***

INTRUST provides a high level of community development services. Community development services must have a primary purpose of community development and relate to the provision of financial services. The bank regularly provides services which meet this definition. INTRUST staff routinely provide technical assistance on financial matters to nonprofit and other community organizations serving LMI housing needs, small businesses and LMI individuals. Bank representatives serve on the Boards of Directors of several community organizations which focus on LMI and small business needs.

Following are examples of the community development services which INTRUST and its employees provided in the Wichita MSA. Bank personnel:

- conducted numerous home buying seminars for prospective LMI home buyers in partnership with a local community housing organization. Loan officers explained the application process and discussed down payment assistance programs.
- participated in small business seminars in conjunction with the SBA and the Wichita Minority Business Development Council to provide financial training for small business owners.
- provided financial expertise during the start-up phase for a new health and wellness center which will provide health care services for LMI individuals.
- were instrumental in creating a financing structure for a LMI elderly housing project through the use of tax credits, without which the center would not have been built.
- educated school age children, teens and civic organizations about credit, money management, and consumer responsibilities through the “How to do Your Banking” program.

Additionally, the bank provided personnel to assist a new CDFI credit union which serves a LMI area. Bank personnel provided financial expertise during the start-up phase and loan officers provided information on loan underwriting.

INTRUST provided an adequate level of community development services in its Johnson County and Franklin County AAs based on the more limited opportunities in these areas. Refer to the **MSA** and **NonMSA** sections of this evaluation for further details.

## **FAIR LENDING REVIEW**

We found no violations of the substantive provisions of the anti-discrimination laws and regulations.

## **METROPOLITAN STATISTICAL AREAS**

***Conclusions with Respect to Performance Tests in the Wichita, KS MSA #9040***

The conclusions regarding INTRUST's CRA performance in the Wichita MSA are the same as the overall conclusions for INTRUST. Since over 90% of the bank's loans are attributed to the Wichita MSA, the bank's performance in this AA weighed most heavily in the overall CRA rating. The facts and data supporting the conclusions for the Wichita MSA were presented as support for the overall conclusions earlier in this evaluation. Refer to the overall conclusions for details regarding the bank's CRA performance in the Wichita MSA under the lending, investment and service tests.

***Description of Institution's Operations in the Wichita, KS MSA #9040***

INTRUST operates 28 branches throughout the Wichita MSA. These include 13 traditional branches, 10 branches within grocery stores, three drive-up facilities apart from those attached to traditional branches and two branches at senior centers in Wichita. Three of the branches are located in moderate-income geographies with the remainder in middle- and upper-income geographies. The bank offers a full array of credit products and services in this MSA, but focuses on commercial and consumer loans, including indirect paper.

***Description of the Wichita, KS MSA (#9040):***

The Wichita MSA consists of Sedgwick, Butler and Harvey Counties in south central Kansas. It has 131 CTs which were designated 8 percent low-, 21 percent moderate-, 54 percent middle- and 16 percent upper-income per the 1990 U.S. Census. The MSA had a population of 485,270. By income level, families were designated as 18 percent low-, 18 percent moderate-, 26 percent middle- and 38 percent upper-income. Twelve percent of the population was over 65 and 10 percent of the households were below poverty level. The 1990 HUD MSA median family income for the Wichita MSA was \$35,931. In 1996 and 1997, the updated MSA median family income levels were \$44,500 and \$45,800, respectively.

Wichita is the largest city in the MSA with a population of approximately 300 thousand. It is known as the air capitol of the world, headquartering several general aviation manufacturers, including Boeing, Raytheon, Cessna and Learjet. Boeing is the largest local employer with over 15 thousand employees. The economy is good and unemployment is below the national average. The economy is diversified through the manufacturing, petroleum refining, wholesale and retail trade, services and agricultural industries.

Community contacts with government officials and community organizations indicate a need for affordable home loan products with flexible underwriting, down payment assistance, consumer and small business loans. The Northeast Wichita area is predominately LMI and a local Community Development Corporation is working to facilitate the development of low-income housing and economic development in this area.

**METROPOLITAN STATISTICAL AREAS**

***Conclusions with Respect to Performance Tests in the Kansas City, MO-KS MSA #3760 (Kansas side only)***

**Note:** We reviewed the bank's performance on only the Kansas side of the MSA since INTRUST does not have any branches on the Missouri side. References to the Kansas City MSA refer to the Kansas side only.

INTRUST's HMDA and small business lending levels in the Kansas City MSA, including its Johnson County AA, are reasonable considering the bank's resources dedicated to this AA. Distribution of HMDA loans to borrowers of different income levels and business loans among firms of different revenue sizes showed adequate penetration. The bank did not report any community development loans, qualified investments or grants for this AA, which is an area the bank can improve. Banking services are reasonably accessible to all parts of the AA. The bank provides an adequate level of community development services in this AA.

***Description of Institution's Operations in the Kansas City, MO-KS MSA #3760 (Kansas side only)***

INTRUST has three branches in Johnson County of the Kansas City MSA. One of the branches is in a middle-income geography and two in upper-income geographies. All branches are full-service. INTRUST's primary business focus in the Kansas City MSA is commercial and consumer lending, especially indirect paper.

***Description of the Kansas City, MO-KS MSA #3760 (Kansas side only)***

The Kansas City, MO-KS MSA is a multi-state MSA; however, the following description pertains only to the Kansas side of the MSA since INTRUST does not have any branches on the Missouri side. The Kansas side of the MSA has 171 CTs, which were designated 9 percent low-, 19 percent moderate-, 40 percent middle- and 29 percent upper-income. Three percent of the CTs (five CTs) did not have an income designation. The majority of the LMI CTs are concentrated in Wyandotte County, which is north of Johnson County. The population of the Kansas portion of the MSA was 604,884. By income level, families were designated as 15 percent low-, 17 percent moderate-, 24 percent middle- and 45 percent upper-income. Seven percent of the households were living below poverty. The 1990 HUD MSA median family income for the Kansas City MSA was \$37,652. In 1996 and 1997, the updated MSA median family income levels were \$47,700 and \$50,200, respectively.

***Johnson County AA ( a portion of the Kansas City, MO-KS MSA #3760)***

Johnson County is located on the Kansas side of the Kansas City, MO-KS MSA and is one of the fastest growing counties in Kansas. It has 75 CTs, which were designated 39 percent middle-income and 61 percent upper-income per the 1990 U.S. Census. The County had a population of 355,054. By income level, families were designated as 8 percent low-, 13 percent moderate-, 22 percent middle- and 57 percent upper- income. Only three percent of the households were living below poverty. The HUD median family income for the MSA is stated in the description of the Kansas City, MO-KS MSA above. The median family income for Johnson County exceeded 120 percent of the MSA median income in 1990. The average home value in Johnson County was \$110,806 in 1995 according to the Johnson County Economic Research Institute.

The economy is good and unemployment is low. Employment opportunities are diversified. The largest employers in Johnson County include Sprint Corporation, JC Penney, the Shawnee Mission School District and

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Black and Veach. Other large companies that employ over 1,000 individuals in the Kansas City MSA include Health Midwest and Hallmark Cards, Inc.

Contacts with government organization and economic development officials indicated that credit needs are being met through the local financial institutions. Small business and housing loans are the primary credit needs. They also indicated the demand for affordable housing has been minimal due in part to the demographics of the County.

***Lending Test******HMDA Activity:***

CRA performance based on HMDA data is substantially similar in the bank's defined AA and the MSA. INTRUST is not a significant HMDA lender in the Kansas City MSA and faces significant competition from other lenders including stand-alone mortgage companies for the business it does obtain.

INTRUST made a reasonable number and dollar volume of HMDA loans in the Kansas City MSA based on resources the bank has dedicated to this market and the strong competition from other financial institutions. Based on the 1996 HMDA data the bank provided, 92% of INTRUST's HMDA originations within the Kansas City MSA originated within Johnson County. The bank made only 12 loans in the MSA outside of Johnson County, which is not considered significant. For 1997, HMDA volumes were consistent for both the MSA and the bank's defined Johnson County AA. The following table shows the HMDA loan volumes which INTRUST originated in the Kansas City MSA.

**Kansas City MSA (Kansas side only)**

LOAN TYPE	1996		1997 (through May 31)	
	#	\$ (000)	#	\$ (000)
Home Purchase	17	985	8	542
Refinance	53	2,303	8	226
Home Improvement	74	1,625	13	317
Multi Family	0	0	0	0
<b>Totals</b>	<b>144</b>	<b>4,913</b>	<b>29</b>	<b>1,085</b>

***Geographic Distribution of HMDA Loans:***

The geographic distribution of INTRUST's HMDA lending in the Kansas City MSA is reasonable considering there are no low- and moderate-income CTs in the Johnson County portion of the MSA which is the bank's defined AA. All but two of the HMDA loans the bank originated in the Kansas City MSA were made in middle- or upper-income geographies which is consistent with the demographics of the Johnson County AA.

A geographic distribution analysis of HMDA lending in the Johnson County AA, by itself, is not meaningful since there are no low- and moderate-income CTs in the County. The percentage of the MSA's owner-occupied

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housing in CTs of different income levels is presented to show the potential opportunities available in the MSA.

**Kansas City MSA (Kansas side only): All HMDA Originations**

Income Level of CT	% of Owner Occupied	1996		1997 (through May 31)	
		# of Loans	% of Loans	# of Loans	% of Loans
Low	2%	0	0%	0	0%
Moderate	13%	2	1%	0	0%
Middle	42%	40	28%	4	14%
Upper	43%	102	71%	25	86%
Total	100%	144	100%	29	100%

***Distribution by Borrower Income (HMDA):***

Distribution of HMDA loans shows adequate penetration among borrowers of different income levels given the bank's small volume of HMDA lending. The following table shows the borrower distribution for all HMDA loans. The percentage of families in the Kansas City MSA and the Johnson County AA are also shown to provide some insight into the potential opportunities in these areas. HMDA lending to low-income borrowers is consistently lower than the percentage of families at that income level in the MSA. However, for the Johnson County AA, the bank's 1996 HMDA distribution by borrower income is comparable to the percentage of families at LMI levels when adjusted for the percentage of poverty at the low-income level.

**Kansas City MSA (Kansas side only): All HMDA Originations**

Income Level of Borrower	% of Total Families in AA		1996		1997 (through May31)	
	MSA	AA	# of Loans	% of Loans	# of Loans	% of Loans
Low**	15%	8%	6	4%	1	3%
Moderate	16%	13%	24	17%	1	3%
Middle	24%	22%	22	15%	4	14%
Upper	45%	57%	91	63%	23	80%
NA	NA	NA	1	1%	0	0
Total	100%	100%	144	100%	29	100%

\*\* Percentage of households at or below poverty in Kansas City MSA=7%; Johnson County AA=3%.

***Small Business Lending Activity:***

INTRUST's small business lending levels reflect adequate responsiveness to small businesses' credit needs. The bank originated a majority of its business loans within the Johnson County AA. We relied on a sample of 56 business loans to evaluate the bank's lending to businesses of different sizes. There were no loans in our sample which the bank originated in the Kansas portion of the MSA that were not in Johnson County. Therefore, we

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used the demographics of the Johnson County AA when performing our analysis.

*Geographic Distribution of Small Business Loans:*

The geographic distribution of the small business loans is not meaningful since there are no LMI CTs in the bank's AA. Also, since none of the loans in our sample originated in the Kansas portion of the MSA outside of Johnson County, it was not meaningful to do further geographic distribution analysis of the MSA.

*Distribution by Borrower Characteristics (Small Business):*

INTRUST's lending to businesses reflects adequate penetration to businesses with revenues of different sizes. Based on our sample of 29 small business loans originated in the Johnson County AA, INTRUST made 58 percent to businesses with revenues of \$1 million or less which is lower than the demographics. Approximately 65 percent of the businesses in the Johnson County AA have revenues of \$1 million or less according to 1995 Dun and Bradstreet data.

**Johnson County AA: Business Loans by Revenue Size of Business**

Revenue Size in 000's	% of Businesses in AA	# of Loans	% of Loans	\$ Volume of Loans in 000's	% Volume of Loans in 000's
= or < \$1 million	65%	17	58%	485	26%
> \$1 million	14%	6	21%	1,255	66%
Unknown Revenues	21%	6	21%	153	8%
Total	100%	29	100%	1,893	100%

Based on further analysis of the sample of loans we reviewed, INTRUST made 47 percent of its small business loans to firms with revenues of \$150 thousand or less. INTRUST's lending to businesses of different sizes in the Kansas City MSA is substantially similar to the percentages in the above table. In addition, the bank's small business loans to firms with revenues of \$1 million or less show the correlation between loan size and business size. Ninety-four percent of loans to businesses with revenues of \$1 million or less were made in amounts of \$100 thousand or less.

*Community Development Lending:*

INTRUST did not report any qualified community development loans within the Kansas City MSA or its Johnson County AA. There are limited community development opportunities other than rehabilitation of homes in older neighborhoods and financing small businesses, both of which are captured under the bank's HMDA and small business loan data.

*Investment Test*

INTRUST did not report any qualified investments or grants, which meet the community development definition, specifically for the Kansas City MSA or its Johnson County AA.

*Service Test*

*Retail Services:*

INTRUST's three Johnson County branches are reasonably accessible to all portions of its defined AA. The branches are distributed among middle- and upper-income geographies which is consistent with the demographics of Johnson County. The bank offers full services from its two traditional branches and its in-store grocery branch. All branches offer Saturday banking hours. The in-store grocery branch offers extended hours Monday through Saturday. Telephone banking and AT & T Language Line Services are also available.

*Community Development Services:*

INTRUST provides an adequate level of community development services in its AA based on its size and resources there. Among the activities the bank participates in are:

- A bank officer is a member of the Johnson County Community College (JCCC) "Business Entrepreneurship Program Advisory Board". INTRUST is the only bank represented. Board members provide their expertise in overseeing the JCCC's Entrepreneurship Program which includes small business seminars and workshops where entrepreneurs can learn how to write a business plan and apply for a loan.
- A bank officer represents INTRUST in the Credit Associates of Greater Kansas City. This group presents credit awareness seminars to consumers, primarily targeting LMI areas and benefitting LMI individuals. The bank provides this organization free use of its facilities for meetings.
- A bank officer serves on the Shawnee Chamber of Commerce committee which conducts small business seminars to educate small business owners.

**NONMETROPOLITAN STATEWIDE AREAS**

***Conclusions with Respect to Performance Tests in the Franklin County Assessment Area***

INTRUST has one nonMSA AA, Franklin County, Kansas. INTRUST showed good responsiveness to the AA’s credit needs through the origination of small business and small farm loans. The bank’s lending in Franklin County showed good penetration to borrowers of different income levels for HMDA loans and businesses and farms of different revenue sizes. The bank did not report any qualified investments or grants for this AA, which is an area the bank can improve. Retail services are reasonably accessible to the AA and the bank provided an adequate level of community development services.

***Description of Institution’s Operations in the Franklin County Assessment Area***

INTRUST has one branch in the Franklin County AA, located in Ottawa, Kansas. The branch offers a full array of credit products, but primarily focuses on small business, small farm and retail credit needs.

***Description of the Franklin County Assessment Area***

Franklin County is a nonMSA area located southwest of the Kansas City MSA. Ottawa is the largest city and the county seat of Franklin County. Franklin County has five BNAs, all of which were designated middle-income per the 1990 U.S. Census. The County had a population of 21,994. By income level, families were designated 17 percent low-, 16 percent moderate-, 25 percent middle- and 42 percent upper-income. Twelve percent of households were living below poverty and 16 percent of the population was over 65. The 1990 HUD median family income for the nonMSA portion of Kansas was \$28,068. For 1996 and 1997, the updated nonMSA median family income was \$34,300 and \$36,100, respectively. Community contacts indicated a need for affordable housing loans and small business loans.

***Lending Test***

***HMDA Activity:***

INTRUST made a reasonable number of HMDA loans in its Franklin County AA based on its size and resources in that AA. The following table shows the number and dollar volume of HMDA loans INTRUST reported in its Franklin County AA.

**Franklin County AA**

LOAN TYPE	1996		1997 (through May 31)	
	#	\$ (000)	#	\$ (000)
Home Purchase	5	70	4	139
Refinance	14	399	13	505
Home Improvement	22	256	11	148
Multi Family	0	0	0	0
<b>Totals</b>	<b>41</b>	<b>725</b>	<b>28</b>	<b>792</b>

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***Distribution by Borrower Income (HMDA):***

The distribution of HMDA loans by borrower income shows good penetration when considering the percentage of low-income households at poverty level. For 1996, the percentage of HMDA loans to low-, moderate-, middle- and upper-income borrowers is consistent with the percentage of families at these income levels after adjusting for households at the poverty level.

**Franklin County AA: All HMDA Originations**

Income Level of Borrower	% of Total Families in AA	1996		1997 (through May 31)	
		# of Loans	% of Loans	# of Loans	% of Loans
Low**	17%	2	5%	3	11%
Moderate	16%	7	17%	3	11%
Middle	25%	8	20%	7	25%
Upper	42%	24	58%	15	53%
NA	NA	0	0%	0	0%
Total	100%	41	100%	28	100%

\*\* Percentage of households at or below poverty=12%.

***Small Business and Small Farm Lending Activity:***

We relied on a sample of 47 business loans and 78 farm loans to evaluate the bank's lending to businesses and farms of different sizes.

INTRUST showed good responsiveness to the AA's credit needs through the origination of small business and small farm loans. Based on our sample, the bank made 100% of the small business loans and 95 percent of its small farm loans within its Franklin County AA. We used only the loans made within the AA for the distribution analysis which follows.

***Geographic Distribution of Small Business and Small Farm Loans:***

A geographic distribution of lending is not meaningful since all of the BNAs are middle-income and there are no distinct LMI areas within these BNAs.

***Distribution by Borrower Characteristics (Small Business):***

INTRUST showed good penetration of businesses of different revenue sizes. Eighty-three percent of the loans in our sample were made to businesses with revenues of \$1 million or less. This exceeds the percentage of businesses in the AA with revenues of \$1 million or less. The following table shows the distribution of the bank's small business and small farm loans based on the revenue size of the business or farm.

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**Franklin County AA: Business Loans by Revenue Size of Business**

Revenue Size in 000's	% of Businesses in AA	# of Loans	% of Loans	\$ Volume of Loans in 000's	% Volume of Loans in 000's
= or < \$1 million	77%	39	83%	637	56%
> \$1 million	9%	4	8.5%	500	43%
Unknown Revenues	4%	4	8.5%	10	1%
Total	100%	47	100%	1,147	100%

Based on further analysis of our sample, INTRUST made 41 percent of the loans to businesses with revenues of \$100 thousand or less. Also, the bank made 85 percent of the loans to businesses with revenues of \$1 million or less in amounts of \$25 thousand or less. This illustrates a correlation between loan size and the revenue size of businesses.

***Distribution by Borrower Characteristics (Small Farm):***

INTRUST showed good penetration among farms of different revenue sizes. Seventy-three percent of the loans in our sample were made to farms with revenues of \$1 million or less. This is lower than the percentage of farms in the AA with revenues of \$1 million or less; however, of the farms with known revenues, 100 percent were made to farms with revenues of \$1 million or less. The following tables show the distribution of the bank's small farm loans based on the revenue size of the farm.

**Franklin County AA: Farm Loans by Revenue Size of Farm**

Revenue Size in 000's	% of Farms in AA	# of Loans	% of Loans	\$ Volume of Loans in 000's	% Volume of Loans in 000's
= or < \$1 million	94%	54	73%	565	82%
> \$1 million	4%	0	0%	0	0%
Unknown Revenues	2%	20	27%	125	18%
Total	100%	74	100%	690	100%

Based on further analysis of our sample, 83 percent of the farm loans were made to farms with revenues of \$75 thousand or less. Also, 93 percent of the farm loans were made in amounts of \$25 thousand or less.

***Community Development Lending:***

INTRUST made an adequate level of community development loans based on the limited opportunities available in this AA. The bank originated or committed funds totaling \$160,500 during this evaluation period. These involved:

- A \$150 thousand commitment representing 25 percent of a \$600 thousand low-interest loan pool to be used for revitalizing and restoring downtown Ottawa.
- A \$10,500 loan to East Central Kansas Economic Opportunity Corporation (ECKAN) for an office site for

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this community action agency, which provides community services for low-income persons.

***Investment Test***

INTRUST did not report any qualified investments or grants, which meet the community development definition, specifically for the Franklin County AA.

***Service Test*****Retail Services:**

INTRUST's delivery systems are reasonably accessible to all portions of its AA. INTRUST has one branch which includes an ATM facility in Ottawa, Kansas. The branch provides complete services and extended hours on Friday as well as Saturday hours. Telephone banking services and AT&T Language Line Services are also available as described previously in this evaluation.

**Community Development Services:**

INTRUST provides an adequate level of community development services based on its resources.

- A bank officer led a successful effort, working with the Downtown Development Committee of the local Chamber of Commerce, to develop a low-interest loan pool for revitalizing and restoring downtown.
- A bank officer assisted a local affordable housing organization in its fund raising efforts.

**ADDITIONAL INFORMATION**

INTRUST has branches in two MSAs. HMDA data is available to the public by contacting the following organizations.

**Wichita, KS MSA #9040**

Wichita Public Library  
223 South Main Street  
Wichita, Kansas 67202  
Phone: (316) 262-0611

**Kansas City, MO-KS MSA #3760**

Mid-America Regional Council  
600 Broadway - 300 Rivergate Center  
Kansas City, Missouri 64105  
Phone: (816) 474-4240