



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

January 31, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Stride Bank, National Association
Charter Number 12044

324 West Broadway
Enid, OK 73701

Office of the Comptroller of the Currency

8282 South Memorial Drive, Suite 300
Tulsa, OK 74133

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 **Satisfactory**.

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on the performance of the state of Oklahoma and is satisfactory. As discussed in the Scope of Evaluation section, the bank's business model and strategy were considered heavily when arriving at the overall test rating.
- The penetration of loans to individuals and businesses of different income levels is reasonable and meets the standard for satisfactory performance.
- The geographic distribution of loans reflects reasonable dispersion throughout the Oklahoma assessment areas (AAs) and meets the standard for satisfactory performance.
- The Community Development (CD) Test rating is based on the performance of the state of Oklahoma rating area, which is Satisfactory.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit ratio (LTD) is more than reasonable.

Stride Bank's quarterly average LTD ratio for the period January 1, 2019, through December 31, 2021, averaged 78.5 percent and exceeds LTD ratios of similarly sized institutions. Stride Bank's LTD ratio had an average high ratio of 96.6 percent in the third quarter 2019. We compared the bank's LTD ratio to two similarly situated banks (peer group banks) located in Bixby and Oklahoma City, OK ranging in total asset sizes of \$1.6 billion to \$2.0 billion. The peer group bank's average LTD ratio was 70.1 percent with a high average ratio of 79.0 percent and a low average ratio of 61.2 percent.

Lending in Assessment Area

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

The bank originated or purchased 56 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.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
Oklahoma	858	54.6	714	45.4	1,572	192,988	50.7	187,916	49.3	380,904
Utah	0	0.0	0	100.0	0	0	0.0	0.00	100.0	0
Total Home Mortgage	858	54.6	714	45.4	1,572	192,988	50.7	187,916	49.3	380,904
Small Business										
Oklahoma										
Enid, OK MSA	20	100	0	0.00	20	2,987	100	0	0.00	2,987
OK Non MSA	20	95.2	1	4.8	21	3,459	62.8	2,052	37.2	5,511
Oklahoma City MSA	20	95.2	1	4.8	21	14,260	99.4	75	0.6	14,335
Total Oklahoma	60	96.8	2	3.2	62	20,706	90.7	2,127	9.3	22,833
Utah	0	0.00	0	100.0	0	0	0.00	0	100.0	0
Total Small Business	60	96.8	2	3.2	62	20,706	90.7	2,127	9.3	22,833
Total Loans	918	56.2	716	43.8	1,634	213,694	52.9	190,043	47.1	403,737
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

Stride Bank, National Association (Stride or bank) is a single-state financial institution headquartered in Enid, Oklahoma, which is located in north-central Oklahoma. The bank is a subsidiary of Central Service Corporation, a three-entity holding company headquartered in Enid, Oklahoma. Subsidiaries of the holding company include Stride (wholly owned), CSC Capital Corp (wholly owned/inactive), and Central Service Capital Trust I (an unconsolidated subsidiary established to issue trust preferred securities). Stride also has three wholly owned subsidiaries, including CSC Insurance Agency, Central Registration Co. of Enid, and CSC Enid Properties. Activities in the bank subsidiaries were not considered in the evaluation.

As of December 31, 2021, Stride reported total assets of \$2.2 billion, loans of \$1.5 billion (63.6 percent of total assets), and tier 1 capital of \$150.5 million. The bank's loan portfolio consists of 51.7 percent in consumer loans, 18.1 percent in non-farm loans, 13.9 percent in commercial loans, 5.7 percent in 1-4 family loans, and 10.6 percent in other loans. The large percentage of consumer loans consists of Stride Bank's prepaid card relationship with a Fintech vendor.

Stride Bank has five AAs, four are located within the state of Oklahoma and one in the state of Utah. The State of Oklahoma AAs include the Enid Metropolitan Statistical Area (MSA), the Tulsa MSA, the Oklahoma City MSA and the Oklahoma Non-MSA (OK Non-MSA). The State of Utah AA consists of the Salt Lake City MSA.

The bank operates eight full-service banking centers within the State of Oklahoma; the main bank and two branches are located in the Enid MSA, five branches in the Oklahoma Non-MSA, one branch in the Oklahoma City MSA, and one branch in the Tulsa MSA. All branches, except the Tulsa branch, offer drive-in banking. There is one branch located in Salt Lake City, Utah. Bank lobby hours are provided Monday through Friday at all locations, with three locations offering extended hours on Fridays or Saturdays. In addition to the branches, Stride also operates 17 automated teller machines (ATMs).

During the evaluation period, there were three branch openings and two bank closings. In the state of Oklahoma, there were two branch openings and two branch closings. Both Oklahoma branch openings were in Oklahoma City with one branch closing in Oklahoma City and one branch closing in Enid. In the state of Utah, there was one branch opening in November 2019.

Regarding the state of Oklahoma branch openings and closings, one branch opening, and one branch closing were located in unknown census tracts (CT). The newly opened branch is located in a middle-income CT and the branch closing was located in a moderate-income CT. The closed branch was located in a moderate-income CT; however, the bank's main office is within three miles of the closed branch and is also located in a moderate-income CT.

In the state of Utah, the one opened branch is located in a moderate-income CT.

The bank operates 17 ATM locations, three of which accept deposits and are included in the current AAs. Each banking location except Mooreland, OK has an ATM, with an additional 12 ATMs in the Enid, OK area and one additional ATM in Blackwell, OK. Locations of the bank's branches are listed below in the following chart:

Stride Bank, National Association Branch Locations		
Location	Address	City/State
Main Bank (Broadway)	324 West Broadway	Enid, OK
Willow	2219 W Willow	Enid, OK
Woodward Branch	2730 Williams Ave	Woodward, OK
Mooreland Branch	127 South Main	Mooreland, OK
Blackwell Branch	102 North Main	Blackwell, OK
Bartlesville Branch	1415 S E Washington Blvd	Bartlesville OK
Oklahoma City	1225 N Broadway Ave, Suite 201	Oklahoma City, OK
Tulsa Branch	8811 S Yale Ave, Suite 101	Tulsa, OK
Salt Lake City Branch	30 E 300 South, Suite 300	Salt Lake City, UT

Although headquartered in Enid, OK, most of the senior staff operates out of the Tulsa, OK branch. The bank has operations in seven cities in Oklahoma which include: Enid (main office), Bartlesville, Blackwell, Mooreland, Tulsa, Woodward, and Oklahoma City. Both the Enid market and the non-MSA markets in Woodward, Kay, and Washington counties are focused on a mix of commercial and agricultural lending. The bank has one branch location in Salt Lake City, UT.

The bank has several lending programs focused primarily on small businesses. These small business programs include the U.S. Department of Housing and Urban Development Multifamily Accelerated Processing Lending Program, and their heavy equipment lending and healthcare lending programs. Other program offers include Small Business Administration (SBA) 7(a) and SBA 504 loan programs.

Stride Bank, NA offers a full range of retail and commercial deposit and loan products at all locations. The bank also has a Wealth Management (including Trust) Department in the main bank in Enid, OK but serves all customers at all bank locations. The bank also offers free internet banking and free bill-pay products. Treasury management services and remote deposit capture (RDC) are available for qualifying business customers, and mobile RDC is available for mobile banking users. Stride also has an extensive prepaid card line of business.

The bank is strategically segregated into two separate business units. The first business unit is the traditional bank consisting of local deposits and conventional loans. Loans are generated in local markets, but lenders have numerous contacts in outside markets. The bank has credit concentrations in commercial real estate, cattle, transportation (tractor/trailers), and hotels. The other business unit is the prepaid/debit card program consisting of nontraditional deposits and loans. Stride Bank offers debit cards, prepaid cards, and secured credit cards for various customers, including Fintechs.

The majority of Stride Bank's card program deposits and transaction income is derived from a significant Fintech partnership, which resulted in asset growth in 2020 and 2021. Growth from this Fintech partnership in 2020 and 2021 was significant due to the COVID-19 pandemic and the increase in online banking.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs. Stride is involved in and provides support to meet the community's financial needs. The bank received an overall rating of "Satisfactory" at the last CRA evaluation dated January 7, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation (PE) assesses the bank's performance under the Intermediate Small Bank CRA procedures, which includes the Lending Test and the CD Test. The Lending Test evaluates the bank's record of meeting the credit needs of the bank's AAs through its lending activities. The CD Test evaluates the bank's responsiveness to CD needs in its AAs through qualified CD lending, investments and donations, and services. The evaluation period for the Lending and CD Tests is January 1, 2019, through December 31, 2021.

The OCC compared bank loan data for all applicable years in the state rating area to: demographic data using the U.S. Census American Community Survey (ACS); Federal Deposit Institution Corporation (FDIC) deposit market share; Federal Financial Institutions Examination Council (FFIEC) adjusted median family incomes; 2019 Dun and Bradstreet small business demographic data; 2019 peer mortgage loan data reported under the Home Mortgage Disclosure Act (HMDA) and 2019 peer small business data reported under CRA.

For purposes of this evaluation, at least 20 originated and purchased loans within an AA during the evaluation period are needed for a meaningful analysis. Based on the volume of lending activity and dollar amount, mortgage and small business loans made to businesses are the bank's primary lending products. The bank did not originate or purchase a sufficient volume of multifamily loans or small farm loans in an AA to perform a meaningful analysis. In our evaluation of the Lending Test, we considered and concluded upon mortgage loans (includes home purchase, home refinance, and home improvement loans) reported on the bank's HMDA loan application register in aggregate. For small business loans, a

random loan sample was selected using the bank's internal reports of loans originated and renewed during the evaluation period. The random sample of 62 loans totaling \$23 million was used for the lending test analysis. Multifamily loans meeting the CD definition were considered as part of the evaluation of CD lending. Performance Tables O, P, Q, and R in Appendix D include data covered by the analysis period of 2019 through 2021.

In evaluating the bank's lending performance, we determined the bank's primary loan products which were identified by volume of the loans originated within each AA and dollar amount. For home mortgage loans reported on the bank's Consolidated Report of Condition and Income, we used the entire HMDA loan application registers.

Bank and deposit data as of June 30, 2021, is based on information from the FDIC. The distribution of bank branches is compared to 2015 U.S. Census ACS population estimates.

Qualifying activities performed in response to the significant impact of the COVID-19 pandemic across the United States are addressed in this evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has a location, one or more of the AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA 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 AA. These combined AAs may be evaluated as full- or limited-scope.

Refer to the Scope section under each State Rating 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.

Ratings

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

Refer to the Scope section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

The state of Oklahoma rating area carried the greatest weight in the conclusions because it represented the bank's most significant market in terms of deposit concentration, branch distribution, and reportable loans. As of June 30, 2021, deposits in these rating areas comprised 98.3 percent of the bank's total deposits. Additionally, 90.9 percent of the bank's branches and 99.9 percent of mortgage and small business loan originations were generated in this state.

Generally, equal emphasis is given to the geographic distribution of loans and lending by borrower income level. Greater weight was generally given to performance compared to aggregate lenders than to performance relative to demographic factors in lending, unless other performance context factors indicate greater consideration should be given to demographics or aggregate performance. The analysis included both the number and dollar volume of lending. The analysis of lending, except for CD loans, emphasized the number of loans rather than the dollar volume because it is a better indicator of the number of businesses or individuals served.

Discriminatory or Other Illegal Credit Practices Review

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

State Rating

State of Oklahoma

CRA rating for the State of Oklahoma: Satisfactory

The Lending Test is rated: Satisfactory
The CD Test is rated: Satisfactory

The major factors that support this rating include:

- Distribution of Loans by Income Level of the Geography - The bank exhibits reasonable geographic distribution of loans in the state.
- Distribution of Loans by Income Level of the Borrower - The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.
- The CD Test rating is based on a satisfactory level of CD loans, qualified investments, and donations.
- The bank did not receive any CRA-related complaints during the evaluation period.

Description of Institution's Operations in the State of Oklahoma

The bank has designated four AAs in Oklahoma, which includes the Enid MSA, Oklahoma MSA, Tulsa MSA, and the OK Non-MSA.

The Enid MSA consists of the entire Garfield County. The Oklahoma City MSA consists of 294 contiguous CTs of the total 332 in Canadian, Cleveland, and Oklahoma counties. The Tulsa MSA consists of 116 contiguous CTs out of the total 175 in Tulsa County. The OK Non-MSA consists of three contiguous CTs of the 11 CTs in Kay, Washington, and Woodward counties, all of which were combined for analysis purposes.

According to the June 30, 2021, FDIC deposit market share report in the state of Oklahoma, the bank has \$1.7 billion in deposits with a deposit share of 1.4 percent making it the 12th deposit holder out of 209 banks in the state.

Enid MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Enid MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	25.0	50.0	25.0	0.0
Population by Geography	62,192	0.0	30.4	44.2	25.4	0.0
Housing Units by Geography	26,856	0.0	30.1	43.0	26.9	0.0

Owner-Occupied Units by Geography	15,938	0.0	26.6	40.3	33.2	0.0
Occupied Rental Units by Geography	7,999	0.0	33.0	49.7	17.2	0.0
Vacant Units by Geography	2,919	0.0	41.3	39.4	19.3	0.0
Businesses by Geography	4,557	0.0	31.5	41.2	27.3	0.0
Farms by Geography	282	0.0	18.8	42.6	38.7	0.0
Family Distribution by Income Level	16,911	19.0	19.9	22.3	38.8	0.0
Household Distribution by Income Level	23,937	21.8	17.0	20.1	41.2	0.0
Median Family Income MSA - 21420 Enid, OK MSA		\$57,419	Median Housing Value			\$97,211
			Median Gross Rent			\$746
			Families Below Poverty Level			9.9%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 12 CTs, of which there are no low-income and three are moderate-income.

According to the June 30, 2021, FDIC deposit market share report in the AA, the bank has \$1.6 billion in deposits with a deposit share of 58.5 percent making it the first in deposit holder out of 14 banks.

Community Contacts

The OCC made two community contacts in the AA, which included an economic development organization focused on development in low- and moderate-income (LMI) areas. Community contacts indicated that the following are identified needs within the bank's AA:

- Home mortgages in LMI areas,
- Small loans to small businesses, and
- Financing for small farms and agricultural loans.

Housing Characteristics

The AA has a reasonable cost housing area which allows access to affordable home ownership among LMI borrowers.

The 2021 FFIEC adjusted median family income (AMFI) in the AA is \$69,300. According to Realtor.com data, the median housing value in the AA is \$167,000 and \$149,900 in 2019 and 2021, respectively, reflecting a 10.2 percent decrease.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for a down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$34,650 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$161,366 mortgage with a payment of \$866 per month. A moderate-income borrower making \$55,440 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$258,186 mortgage with a payment of \$1,386 per month. This illustrates that LMI borrowers would not be challenged to qualify for a mortgage loan in the AA.

Oklahoma City MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Oklahoma City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	295	8.8	31.5	32.2	24.4	3.1
Population by Geography	996,458	7.5	27.5	33.9	30.8	0.3
Housing Units by Geography	423,825	7.4	29.7	34.0	28.5	0.4
Owner-Occupied Units by Geography	229,035	4.3	21.6	36.3	37.7	0.1
Occupied Rental Units by Geography	151,885	10.7	39.1	31.9	17.6	0.7
Vacant Units by Geography	42,905	12.4	39.6	28.9	18.4	0.7
Businesses by Geography	107,000	4.8	22.3	32.7	36.6	3.7
Farms by Geography	2,381	4.6	21.1	30.1	42.9	1.2
Family Distribution by Income Level	239,821	21.9	17.2	20.2	40.7	0.0
Household Distribution by Income Level	380,920	24.0	16.9	17.9	41.2	0.0
Median Family Income MSA - 36420 Oklahoma City, OK MSA		\$64,058	Median Housing Value			\$139,565
			Median Gross Rent			\$811
			Families Below Poverty Level			11.9%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 295 CTs, of which 26 are low-income and 93 are moderate-income.

According to the June 30, 2021, FDIC deposit market share report in the AA, the bank has \$3.5 million in deposits with a deposit share of less than zero percent making it the 66th deposit holder out of 67.

Community Contacts

The OCC made two community contacts in the AA, which included a nonprofit organization focused on neighborhood revitalization and economic development in LMI areas. Community contacts indicated that the following are identified needs within the bank's AA:

- Home mortgages to LMI individuals and families,
- Mortgage down payment and closing cost assistance programs, and
- Small loans to small businesses.

Housing Characteristics

The housing market in the AA is challenged as demand exceeds housing supply, and prices continue to trend upwards. Rentals have also not been affordable for LMI families. The lack of affordable housing supply has increased rental costs, thereby making it difficult for LMI families to purchase homes in the AA.

The AA is a high cost housing area, limiting access to affordable home ownership among LMI borrowers.

The 2021 FFIEC adjusted median family income (AMFI) in the AA is \$73,100. According to Realtor.com data, the median housing value in the AA is \$234,900 and \$279,500 in 2019 and 2021, respectively, reflecting an 18.9 percent increase.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for a down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$36,550 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$170,215 mortgage with a payment of \$914 per month. A moderate-income borrower making \$58,480 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$272,344 mortgage with a payment of \$1,462 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

OK Non MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: OK Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	4.8	14.3	42.9	38.1	0.0
Population by Geography	85,377	2.4	10.1	45.4	42.2	0.0
Housing Units by Geography	38,761	2.5	9.9	46.3	41.3	0.0
Owner-Occupied Units by Geography	24,118	1.5	8.9	45.2	44.5	0.0
Occupied Rental Units by Geography	9,396	3.7	10.8	49.0	36.5	0.0
Vacant Units by Geography	5,247	5.3	12.6	47.0	35.1	0.0
Businesses by Geography	6,121	2.5	4.6	50.1	42.8	0.0
Farms by Geography	350	0.6	5.4	58.9	35.1	0.0
Family Distribution by Income Level	22,525	17.8	16.0	17.8	48.4	0.0
Household Distribution by Income Level	33,514	19.5	15.4	15.8	49.3	0.0
Median Family Income Non-MSAs - OK		\$51,491	Median Housing Value			\$100,983
			Median Gross Rent			\$672
			Families Below Poverty Level			11.2%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 80 CTs, of which one is low-income and three are moderate-income.

According to the June 30, 2021, FDIC deposit market share report in the AA, the bank has \$131.6 million in deposits with a deposit share of 4.1 percent making it the eighth deposit holder out of 21 banks.

Community Contacts

The OCC made three community contacts in the AA, which consisted of nonprofit organizations focused on neighborhood revitalization and economic development in LMI areas. Community contacts indicated that the following are identified needs within the bank's AA:

- Affordable housing in LMI areas,
- Home mortgages in LMI areas, and
- Small loans to small businesses.

Housing Characteristics

The AA has a reasonable cost housing area, which allows access to affordable home ownership among low-income borrowers.

The 2021 FFIEC adjusted median family income (AMFI) in the AA is \$58,100. According to Realtor.com data, the median housing value in the AA is \$125,725 and \$139,953 in 2019 and 2021, respectively, reflecting a 11.3 percent decrease.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for a down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$29,050 per year (or less than 50 percent of the 2021 FFIEC AMFI in the AA) could afford a \$135,287 mortgage with a payment of \$726 per month. A moderate-income borrower making \$46,480 per year (or less than 80 percent of the 2021 FFIEC AMFI in the AA) could afford a \$216,459 mortgage with a payment of \$1,162 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Scope of Evaluation in the State of Oklahoma

For the state of Oklahoma, we completed full-scope reviews on the Enid MSA, Oklahoma City MSA, and Oklahoma Non-MSA. Ratings are based primarily on results of the full-scope areas. The Enid MSA and Oklahoma Non-MSA were chosen for full-scope reviews based on the number of branch locations, represented 97.1 percent of state deposits and 57.0 percent of state mortgage and small business loan originations. The Oklahoma City MSA was chosen for review as it has not been previously reviewed and represents 29.3 percent of state mortgage and small business loan originations.

In the Enid MSA, there are no low-income geographies in the bank's AA. For the analysis of distribution of loans to geographies with different income levels, consideration was given to the bank's performance in moderate-income geographies.

In performing the analysis of CD loan and qualified investments, competition in the AA is high, with large interstate, regional, and community banks competing for qualified CD activities in the state.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF OKLAHOMA

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full- and limited-scope reviews, the bank's lending performance in the state of Oklahoma is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table O in the state of 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.

Enid MSA

The geographic distribution of home mortgage loans reflects a good distribution.

The percentage of home mortgage loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units and exceeds the aggregate percentage of all reporting lenders.

Oklahoma City MSA

The geographic distribution of home mortgage loans reflects adequate distribution.

The percentage of home mortgage loans originated or purchased in low-income geographies is significantly below the percentage of owner-occupied housing units and below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units and exceeds the aggregate percentage of all reporting lenders.

OK Non-MSA

The geographic distribution of home mortgage loans reflects an adequate distribution.

The percentage of home mortgage loans originated or purchased in low-income geographies exceeds the percentage of owner-occupied housing units and the aggregate percentage of all reporting lenders. The bank did not originate or purchase loans in moderate-income geographies.

Small Loans to Businesses

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

Enid OK MSA

There are no low-income CTs located within Garfield County (Enid, OK MSA).

The geographic distribution of small business loans to businesses reflects excellent distribution. For moderate-income geographies, the bank's lending exceeds both the percent of small businesses located in moderate-income geographies and the aggregate lending to small businesses in moderate-income geographies.

Oklahoma City MSA

The geographic distribution of small business loans to businesses reflects good distribution. For low-income geographies, the bank's lending exceeds both the percent of small businesses located in low-income geographies and the aggregate lending to small businesses in low-income geographies. For moderate-income geographies, the bank's lending was somewhat lower than both the percent of small businesses located in moderate-income geographies and the aggregate lending to small businesses in moderate-income geographies.

Oklahoma Non-MSA

The geographic distribution of small business loans to businesses reflects adequate distribution considering CT changes. In year 2020, CT changes resulted in no low-income CTs within the counties of Kay, Washington, and Woodward.

For low-income geographies, the bank's lending was lower than both the percent of small businesses located in low-income geographies and the aggregate lending to small businesses in low-income geographies. For moderate-income geographies, the bank's lending was lower than both the percent of small businesses located in moderate-income geographies and the aggregate lending to small businesses in moderate-income geographies. Considering the percentage of businesses located in low-and moderate-income geographies, this is considered adequate performance.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of 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.

Enid MSA

The distribution of home mortgage loans among individuals of different income levels is adequate.

The high cost of housing limits opportunities for LMI borrowers and the negative impact on economic conditions caused by the pandemic in 2020 may have limited opportunities for lending. These contexts are considered in the analysis.

The percentage of home mortgage loans originated or purchased to low-income borrowers is below the percentage of families in the AA. In moderate-income geographies, the percentage of home mortgage loans originated or purchased is significantly below the percentage of families in the AA.

The percentage of home mortgage loans originated or purchased to low-income borrowers exceeds the aggregate percentage of all reporting lenders. In moderate-income geographies, the percentage of home mortgage loans originated or purchased is significantly below the aggregate percentage of all reporting lenders.

Oklahoma City MSA

The distribution of home mortgage loans among individuals of different income levels is good.

The high cost of housing limits opportunities for LMI borrowers and the negative impact on economic conditions caused by the pandemic in 2020 may have limited opportunities for lending. These contexts are considered in the analysis.

The percentage of home mortgage loans originated or purchased to low-income borrowers is below the percentage of families in the AA. In moderate-income geographies, the percentage of home mortgage loans originated or purchased exceeded the percentage of families in the AA.

The percentage of home mortgage loans originated or purchased to LMI borrowers exceeds the aggregate percentage of all reporting lenders.

OK Non-MSA

The distribution of home mortgage loans among individuals of different income levels is good.

The percentage of home mortgage loans originated or purchased to low-income borrowers is well below the percentage of families in the AA. In moderate-income geographies, the percentage of home mortgage loans originated or purchased is near to the percentage of families in the AA.

The percentage of home mortgage loans originated or purchased to low-income borrowers exceeds the aggregate percentage of all reporting lenders. In moderate-income geographies, the percentage of home mortgage loans originated or purchased is near to the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the state of 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.

Enid OK MSA

During the evaluation period, the bank's distribution of small loans to businesses by revenue is excellent. The bank's percentage of loans to small businesses with revenues less than \$1 million was near to the proportion of small businesses and exceeds the aggregate distribution of loans to those businesses.

Oklahoma City MSA

During the evaluation period, the bank's distribution of small loans to businesses by revenue is good. The bank's percentage of loans to small businesses with revenues less than \$1 million was somewhat lower than the proportion of small businesses and exceeds the aggregate distribution of loans to those businesses.

Oklahoma Non-MSA

During the evaluation period, the bank's distribution of small loans to businesses by revenue is excellent. The bank's percentage of loans to small businesses with revenues less than \$1 million was near to the proportion of small businesses and exceeds the aggregate distribution of loans to those businesses.

Responses to Complaints

The bank did not receive any CRA-related complaints during the evaluation period.

Conclusions for Area Receiving Limited Scope Review

Based on limited-scope reviews, the bank's performance under the Lending Test in the Tulsa MSA is consistent with the bank's overall performance under the Lending Test in the full scope areas.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Oklahoma is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope and limited-scope reviews, the bank exhibits adequate responsiveness to CD needs in the state through CD loans and qualified investments, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs.

Number and Amount of Community Development Loans

The CD Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Enid MSA	4	36.4	5,261	19.1
Oklahoma City	3	27.3	8,852	32.2
Tulsa MSA	1	9.1	1,642	6.0
OK Non-MSA	3	27.3	11,752	42.7

Enid MSA

The bank made a reasonable level of CD loans in the AA. During the evaluation period, the bank originated four loans totaling \$5.2 million. The bank helped meet community credit needs by providing economic development. The volume of CD lending in this AA was equivalent to 3.9 percent of the allocated tier 1 capital. Of the CD loans, three totaled \$4.2 million which were part of the SBA Paycheck Protection Program through the national emergency disaster declaration to address the disruption in economic and financial activities as a result of the pandemic.

Oklahoma City MSA

The bank made a reasonable level of CD loans in the AA. During the evaluation period, the bank originated three loans totaling \$8.8 million. The bank helped meet community credit needs by supporting community services to LMI individuals and providing economic development. The volume of CD lending in this AA was equivalent to 3,003.2 percent of the allocated tier 1 capital.

OK Non-MSA

The bank made a reasonable level of CD loans in the AA. During the evaluation period, the bank originated one loan totaling \$11.8 million. The bank helped meet community credit needs by supporting revitalization and stabilization as part of a city plan, affordable housing, and economic development. The volume of CD lending in this AA was equivalent to 105.9 percent of allocated tier 1 capital.

Number and Amount of Qualified Investments

Refer to the Qualified Investments Table below for the information and data used to evaluate the bank's level of qualified CD investments. The table includes all CD investments and donations, including prior period investments that remain outstanding as of the examination date.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Enid MSA	0	0	94	425	94	32.0	425	46.5	0	0
Oklahoma City	0	0	25	64	25	8.5	64	7.0	0	0
Tulsa MSA	1	220	26	69	27	9.2	289	31.6	0	0
OK Non-MSA	0	0	148	136	148	50.3	136	14.9	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.

Enid MSA

The volume of investments made during the evaluation period in both AAs was excellent.

The bank's qualified investments totaled \$425,140, with current period investments of \$200,938 and qualified donations of \$224,202. Investments benefiting the AA during the evaluation period represented 0.3 percent of allocated tier 1 capital. Qualified investments provided community services to LMI individuals through a local school district bond. There were no prior period or unfunded commitments during the evaluation period.

The bank donated \$224,202 to 93 organizations in the AAs. A majority of the bank's investments helped organizations provide community services to LMI individuals.

Examples of the donations are:

- \$135,567 in various donations to a nonprofit organization which works with partners to advance the common good through a strategic focus on the building blocks in LMI communities. The organization supports programs which include education, financial stability, health, and basic needs.
- \$5,010 to an organization which supports predominantly LMI senior citizens. Many lack access to financial stability, have physical limitations, and without access to transportation. The many programs offered through the nonprofit are aimed to navigate everyday tasks that have become too difficult for seniors.
- \$1,600 to a nonprofit organization dedicated to empowering victims of domestic abuse. The organization provides intervention, prevention, education, and information to the public which includes a majority of LMI individuals and families

Oklahoma City MSA

The volume of investments made during the evaluation period in both AAs was adequate.

The bank's qualified investments totaled \$63,868, consisting primarily of qualified donations. Investments benefiting the AA during the evaluation period represented 21.7 percent of allocated tier 1 capital. There were no prior period or unfunded commitments during the evaluation period.

The bank donated to 25 organizations in the AAs. A majority of the bank's investments helped organizations provide community services to LMI individuals.

Examples of the donations are:

- \$30,000 to a nonprofit organization which serves to strengthen the resources to other nonprofits through training, consulting, advocacy, membership, networking, and awards.
- \$5,000 to a nonprofit organization which assists minorities and low income individuals to achieve social and economic equality. The services provided include workforce development, housing, financial literacy, family development, and social justice.
- \$7,017 to a nonprofit organization with a mission to connect people and resources to improve the well-being of those in the community including LMI individual and families.

OK Non-MSA

The volume of investments made during the evaluation period in both AAs was excellent.

The bank's qualified investments totaled \$355,414, with prior period investments of \$219,800 and qualified donations of \$135,615. Investments benefiting the AA during the evaluation represented 3.2 percent of allocated tier 1 capital. Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The prior period investment was to local school district bonds. There were no unfunded commitments during the evaluation period.

The bank donated to 148 organizations in the AAs. A majority of the bank's investments helped organizations provide community services to LMI individuals.

Examples of the donations are:

- \$14,495 to a nonprofit organization with a mission to connect people and resources to improve the well-being of those in the community including LMI individual and families.
- \$9,750 to a nonprofit organization in Washington County with a mission to enable young people in LMI communities to reach their full potential. The organization's programs are designed to drive positive outcomes for youth and reinforce necessary life skills.

Conclusion for Areas Receiving Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the Tulsa MSA is consistent with the bank's overall performance under the CD Test in the full scope areas.

State of Utah

CRA rating for the State of Utah: Satisfactory

The Lending Test is rated: Satisfactory

The CD Test is rated: Needs to Improve

The major factors that support this rating include:

- During the evaluation period, the bank did not originate or purchase a sufficient number of home mortgage, small business, or consumer loans in this AA to perform a meaningful analysis.
- The bank did not receive any CRA-related complaints during the evaluation period.
- Since the opening of the branch in November 2019, the COVID-19 pandemic precluded the bank from carrying out its strategic plans for this location.

Description of Institution's Operations in State of Utah

The bank designated one AA in the state of Utah, which is the Salt Lake City MSA. The Salt Lake City MSA consists of 14 contiguous CTs of the 223 in Salt Lake County, Utah.

The Salt Lake City MSA is a new AA since the last evaluation. The bank opened the branch in November 2019. The bank entered the market to support its prepaid card business and its own prepaid payroll card program and to originate an installment loan program through a Fintech partner located in Salt Lake City, Utah. The prepaid card business is national in scope.

According to the June 30, 2021, FDIC deposit market share report in the state of Utah, the bank has \$911,000 in deposits with a deposit share of less than zero percent making it the 57th deposit holder out of 57 banks in the state. The bank ranked 44th in total deposits out of 44 banks in the AA.

The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 12 CTs, of which there are three low-income and seven are moderate-income.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Salt Lake City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	21.4	50.0	21.4	7.1	0.0
Population by Geography	58,748	22.6	58.3	14.5	4.6	0.0
Housing Units by Geography	22,519	19.4	56.0	17.6	7.0	0.0
Owner-Occupied Units by Geography	9,387	16.1	57.2	21.2	5.5	0.0
Occupied Rental Units by Geography	10,986	23.8	56.5	12.1	7.5	0.0
Vacant Units by Geography	2,146	11.2	48.5	29.5	10.9	0.0
Businesses by Geography	7,873	5.7	34.0	56.9	3.4	0.0
Farms by Geography	106	14.2	46.2	39.6	0.0	0.0

Family Distribution by Income Level	11,921	41.7	20.6	18.4	19.3	0.0
Household Distribution by Income Level	20,373	38.8	21.9	17.4	21.9	0.0
Median Family Income MSA - 41620 Salt Lake City MSA		\$71,849	Median Housing Value			\$178,425
			Median Gross Rent			\$841
			Families Below Poverty Level			21.7%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in State of Utah

For the state of Utah, we completed a full-scope review of the Salt Lake City MSA using full-scope procedures because it is the only AA in the rating area. Therefore, ratings for the state of Utah are based on results of the full-scope area.

The bank did not originate or purchase a sufficient number of home mortgage loans, small business loans, or consumer loans in this AA to perform a meaningful analysis.

When evaluating the bank's performance under the CD Test, the bank's business model and strategy were considered due to the limited branch and ATM footprint within the state.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF UTAH

LENDING TEST

The bank's performance under the Lending Test in the state of Utah is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Utah is reasonable based on the COVID-19 pandemic that hampered the bank's strategic plan.

Due to the COVID-19 pandemic, the bank did not originate or purchase a sufficient number of home mortgage, small business, or consumer loans in this AA to perform a meaningful analysis.

Responses to Complaints

The bank did not receive any CRA-related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

There are no CD activities to evaluate, as the bank did not originate any CD activities during the evaluation period. As a result, bank's performance under the CD Test in the state of Utah is rated Needs to Improve.

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 MSA(s) and non-MSA(s) 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:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Home mortgage and small business CD loans, qualified investments	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Oklahoma		
Enid MSA	Full-scope	Garfield County
Oklahoma MSA	Full-scope	Counties of Canadian*, Cleveland*, and Oklahoma*
OK Non-MSA	Full-scope	Counties of Kay*, Washington, and Woodward.
Tulsa MSA	Limited-scope	Tulsa County*
State of Utah		
Salt Lake City MSA	Full-Scope	Salt Lake County*

* Partial County

Appendix B: Summary of State Ratings

Stride Bank Ratings			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank Rating
Stride Bank	Satisfactory	Satisfactory	Satisfactory
State:			
State of Oklahoma	Satisfactory	Satisfactory	Satisfactory
State of Utah	Satisfactory	Needs to Improve	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.

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/AA.

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.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower

distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus

adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

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

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

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 Loans to Businesses: 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.

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

State of Oklahoma

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Enid MSA	74	11,196	8.6	1,912	0.0	0.0	0.0	26.6	18.9	13.2	40.3	36.5	39.7	33.2	44.6	47.1	0.0	0.0	0.0		
OK Non-MSA	35	10,717	4.1	2,483	1.5	2.9	0.3	8.9	0.0	4.2	45.2	57.1	41.3	44.5	40.0	54.2	0.0	0.0	0.0		
Oklahoma City MSA	689	155,986	80.3	51,595	4.3	1.5	2.0	21.6	15.5	13.7	36.3	35.0	32.4	37.7	47.8	51.7	0.1	0.3	0.1		
Tulsa MSA	60	15,089	7.0	19,260	0.3	0.0	0.1	19.1	21.7	12.1	31.4	41.7	30.5	49.2	36.7	57.3	0.0	0.0	0.0		
Total	858	192,988	100.0	75,250	2.9	1.3	1.4	20.3	15.6	13.0	35.8	36.5	32.4	40.9	46.4	53.1	0.1	0.2	0.1		

Source: 2015 ACS Census; 01/01/2019 - 12/21/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2019-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Enid MSA	74	11,196	8.6	1,912	19.0	8.1	4.9	19.9	2.6	12.6	22.3	20.3	18.5	38.8	55.4	33.0	0.0	14.9	31.1		
OK Non-MSA	35	10,717	4.1	2,483	17.8	5.3	3.5	16.0	11.4	12.3	17.8	17.9	18.3	48.4	60.0	41.0	0.0	11.4	24.9		
Oklahoma City MSA	687	155,526	86.7	51,595	21.9	9.2	5.0	17.2	22.4	15.3	20.2	26.2	17.2	40.7	40.8	34.9	0.0	2.0	27.6		
Tulsa MSA	60	15,089	7.0	19,260	18.9	--	3.9	16.4	21.4	14.5	19.4	25.0	17.5	45.3	39.3	44.0	0.0	23.3	20.1		

Total	858	192,988	100.0	75,250	20.7	8.2	4.7	17.1	19.8	14.9	20.0	24.6	17.3	42.3	42.4	37.4	0.0	5.0	25.7
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Source: 2015 ACS Census; 01/01/2019 - 12/21/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-21**

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
Enid MSA	20	2,987	33	614	0.0	0.0	0.0	31.5	60.0	27.4	41.2	35.0	40.7	27.3	5.0	31.9	0.0	--	0.0
OK Non-MSA	20	3,459	33	1,549	2.5	0.0	3.7	4.6	0.0	6.3	50.1	50	51.4	42.8	50	38.7	0.0	--	0.0
Oklahoma City MSA	20	14,260	34	26,791	4.8	10.0	4.9	22.3	15.0	21.3	32.7	25.0	31.9	36.6	50.0	38.8	3.7	--	3.1
Total	60	20,706	100	39,827	3.6	--	4.0	21.3	--	20.4	33.5	--	33.4	39.4	--	40.2	2.3	--	2.1

Source: 2021 D&B Data; 01/01/2019 - 12/21/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Enid MSA 2021	20	2,987	100	614	82.9	80.0	33.9	5.0	20	12.2	--	
Non-MSA AA 2021	21	5,511	100	1,549	82.6	75.0	32.4	4.7	25.0	12.7	--	
Oklahoma City MSA 2021	21	14,334	100	26,791	87.8	65.0	28.8	4.0	35.0	8.3	--	
Total	62	22,833	100	39,827	87.2	--	30.0	4.3	--	8.5	--	
<i>Source: 2020 D&B Data; 01/01/2019 - 12/21/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												