



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

January 10, 2011

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

UMB National Bank of America
Charter Number: 4945

100 South Santa Fe
Salina, KS 67401

Office of the Comptroller of the Currency

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

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Overall CRA Rating

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

The following table indicates the performance level of UMB National Bank of America (UMB) with respect to the Lending, Investment, and Service Tests:

Performance Levels	UMB National Bank of America Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The borrower distribution of small loans to businesses and farms is excellent. The distribution of home mortgage loans is adequate.
- The geographic distribution of loans is adequate.
- The level of community development lending is excellent, which had a positive impact on the lending test rating. The bank originated loans totaling \$50 million in its AAs during the evaluation period.
- The level of qualified investments is excellent. Performance in the full-scope AA is good. Investments made in the State of Kansas, with the potential to benefit the bank’s AA, had a positive impact on the Investment Test rating.
- Service delivery systems provide reasonable accessibility to geographies and individuals of different income levels in its AAs.

Definitions and Common Abbreviations

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

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

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

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

Community Development: 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

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

Full 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 do 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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan area.

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

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

Tier One 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.

Description of Institution

UMB National Bank of America (UMB) is an \$839 million intrastate financial institution headquartered in Salina, Kansas. UMB is a wholly owned subsidiary of UMB Financial Corporation (UMBFC), a \$11 billion regional, multi-bank holding company headquartered in Kansas City, Missouri. UMBFC owns and operates four full-service national banks with 128 locations throughout Missouri, Kansas, Illinois, Oklahoma, Nebraska, Colorado, and Arizona. Subsidiaries of UMBFC and the lead bank, UMB Bank, N.A., include brokerage and insurance companies, registered investment advisors for proprietary mutual funds, and an investment services group based in Milwaukee, Wisconsin.

UMB is a full-service banking institution offering a wide range of products and services. The bank operates eight branches and seven automated teller machines (ATM) in its assessment areas (AA). One of the ATMs accepts deposits.

UMB's primary lending focus is agricultural loans followed by commercial loans. Net loans represent 26 percent of total assets and 55 percent of total deposits as of December 31, 2010. The loan portfolio (by dollar volume) is comprised of 39 percent agricultural/farmland, 36 percent commercial and commercial real estate, 21 percent residential real estate, and 3 percent consumer loans. Other miscellaneous loans represent 1 percent of the loan portfolio. Tier 1 capital is \$51 million.

There are no legal or financial constraints that impede the bank's ability to help meet the credit needs in its AAs. The bank received a rating of "Satisfactory" during its last CRA examination dated June 19, 2006. Affiliate activities are included in our analysis of the bank's Investment Test performance.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test, excluding community development (CD) loans, is January 1, 2006 to December 31, 2009. This evaluation period includes every full calendar year of the bank's available loan data since the ending date of the evaluation period of the last CRA examination. Products reviewed in the lending test include home mortgage loans, small loans to businesses, and small loans to farms.

For CD loans, the Investment Test and Service Test, the evaluation period is from June 7, 2006 to January 10, 2011. The Investment Test included a review of investments and donations originated in the bank's AAs that meet the definition of CD investments. At the bank's request, we considered qualified investments made by its affiliates. The Service Test included a review of retail and CD services provided in the bank's AAs.

The bank adequately addressed the community development needs in its AA. Therefore, consideration is given to CD activities that were made at the broader statewide area that includes the bank's AA but has no potential to benefit its AA. These activities are discussed under CD Lending and the Investment Test, and are also shown on Tables 1 and 14. Activities are also discussed under Community Development Services.

During the evaluation period, the economy suffered due to a severe recession. As a result, business activity slowed considerably. Loan demand declined. The loss of jobs in the bank's rural markets had a large impact on loan and investment opportunities.

Data Integrity

We verified the accuracy of 2006-2009 data for Home Mortgage Disclosure Act (HMDA) reportable loans, small loans to businesses and small loans to farms. As a result of our initial review, we required the bank to correct HMDA data errors. Subsequently, we performed a follow-up review and found data to be accurate and reliable. We evaluated CD loan, investment, and service information during the examination.

Selection of Areas for Full-Scope Review

We performed a full-scope review in the bank's non-metropolitan AAs. These assessment areas represent 86 percent of loan activity and 81 percent of deposit activity. We performed limited scope procedures for the Manhattan MA AA. Refer to appendix A for more information.

Ratings

The bank's overall rating is based primarily on those areas that received full-scope reviews.

The Lending Test is more heavily weighted than the Investment and Service Test. Within the Lending Test, ratings were primarily based on the bank's performance regarding small loans to farms, followed by small loans to businesses. In the full-scope AA, small loans to farms and small loans to businesses represent 59 percent and 30 percent, respectively, of the total

number of reported loans during the evaluation period. Minimal weight is given to home mortgage lending since it is not a major focus for the bank and represents less than 11 percent of reported loans in the full-scope AA.

Other

We contacted a local nonprofit agency that assists various local organizations in the full-scope AA. Our contact identified affordable housing as the primary need in the community.

Fair Lending or Other Illegal Credit Practices Review

“We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "Outstanding". Based on full-scope reviews, the bank's performance in the combined non-MA AA is excellent.

Lending Activity

Refer to Tables 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect excellent responsiveness in relation to area credit needs and the bank's deposit market share. UMB has a deposit market share of 11 percent, which ranks second in the combined non-MA AA. Our analysis is based on 2009 peer data.

Small farm and small business loan activity is excellent. For small farm loans, the bank's overall market share is 43 percent (#1 ranking). For small business loans, the overall market share is 8 percent (#2 ranking).

The bank's market share for home mortgage loan activity is not significant. Overall market share for home purchase, home improvement, and refinance loans is less than three percent. Mortgage lending is not a major focus for UMB and is very limited. Competition is strong. There are over 90 institutions operating in the AA, including large nationwide banks and mortgage companies.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is adequate.

Geographic distribution did not carry substantial weight in our analysis. There are no low-income geographies and only three moderate income tracts in the AA. One tract is located in a downtown business area. Another tract is located in a low lying area of mostly marsh land used for hunting and fishing. The third moderate-income tract is more than 20 miles from the closest UMB branch.

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is adequate. Home refinance loans received the most weight in our analysis, followed by home purchase loans. Home refinance, home purchase, and home improvement loans represent 55 percent, 27 percent, and 18

percent of the total number of mortgage loans, respectively. The bank did not originate any multifamily loans during the evaluation period in the full-scope AA.

Performance in moderate-income tracts is adequate. The distribution of refinance is poor and UMB did not originate any home purchase loans in these tracts. The distribution of home improvement loans is adequate. The percentage of bank loans is 5.36 percent compared to demographics of 6.9 percent. Performance is considered adequate based on the following mitigating factors. There are very limited lending opportunities in these geographies based on performance context issues noted above. Only seven percent of owner-occupied housing is within these tracts. Mortgage lending is not a major focus for the bank.

Small Loans to Businesses

Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Performance in moderate-income tracts is adequate. The distribution of small loans to businesses is well below demographics. However, performance is considered adequate considering the following mitigating factors. There are very limited lending opportunities in these geographies as only seven percent of small businesses are located in these tracts. As noted above, two of the three moderate tracts consists of mostly marsh land and is more than 20 miles from the nearest UMB branch.

Small Loans to Farms

Refer to Table 7 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Performance in moderate-income tracts is adequate. The distribution of small loans to farms is well below demographics. However, performance is adequate considering the following mitigating factors. Opportunities are very limited in these tracts based on performance context issues noted above. Based on 2009 peer data, a total of only 13 loans were made in moderate-income tracts. In addition, less than 3 percent of farms are located in these areas.

Lending Gap Analysis

Our geographic distribution analysis included a review for lending gaps, particularly in low- and moderate-income areas. We did not identify any unexplained conspicuous gaps in the combined non-MA AA.

Inside/Outside Ratio

We performed this analysis at the bank level based on UMB originations and purchases. UMB originated a majority of its loans within its AAs: 70 percent by number and 68 percent by dollar volume. The impact on the analysis of the geographic distribution of lending is neutral.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans is excellent.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to borrowers of different income levels is adequate. Seven percent of families are below the poverty level.

Lending performance to moderate-income borrowers is good. The distribution of refinance and home purchase loans is near to demographics. The market share of home purchase loans exceeds the overall market share. Home improvement loan performance exceeds demographics.

Performance to low-income borrowers is poor. Given the percent of families below poverty, the distribution of refinance loans is well below demographics. The distribution of home purchase loans is below demographics and the distribution of home improvement loans exceeds demographics.

Small Loans to Businesses

Refer to Table 11 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Lending performance to businesses of different sizes is excellent. The distribution of loans to businesses with revenues of \$1 million or less exceeds demographics. The market share of these loans also exceeds the overall market share.

Small Loans to Farms

Refer to Table 12 in the appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Lending performance to farms of different sizes is excellent. The distribution of loans to farms with revenues of \$1 million or less substantially meets demographics. The market share for these loans exceeds the overall market share.

Community Development Lending

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development (CD) lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

The level of CD lending is excellent, which had a positive impact on the Lending Test rating.

During the evaluation period, UMB originated 11 loans totaling \$50 million in the combined non-MA AA. These loans promoted economic development by financing businesses that meet

the size eligibility standards. They also helped support permanent job creation and/or retention for low- and moderate-income (LMI) individuals. Approximately \$28 million included working capital loans to a corporation where over 80 percent of employees are LMI. Another \$6 million was to an economic development corporation for the expansion of a local business that primarily employs and will create additional jobs for LMI individuals. This loan was unique as it was made to a 501c corporation owned by the Salina Chamber of Commerce to acquire and construct the building.

UMB adequately addressed CD needs in its AA. Therefore, we also gave positive consideration for a \$1 million loan made in the broader statewide area that has no potential to benefit the AA. The loan promotes economic development by financing a business that meets the size eligibility standards. The business is located in the state of Kansas and helped support permanent job retention for LMI individuals.

Product Innovation and Flexibility

UMB did not provide information on innovative or flexible product offerings targeted to low- and moderate-income individuals or geographies. The impact on the Lending Test rating is neutral.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Manhattan MA AA is not inconsistent with the bank's overall "Outstanding" performance under the lending test.

Refer to Tables 1 through 13 in appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "Outstanding". Qualified investment opportunities are limited.

Based on full-scope reviews, the bank's performance in the combined non-MA AA is good. Qualified investments totaling \$562 thousand helped provide affordable housing, which is identified as a primary need. In addition, we gave consideration to statewide investments, which had a positive impact on the Lending Test rating.

Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

UMB had 56 qualified investments and donations in the combined non-MA AA totaling \$1.8 million. This includes \$1.6 million made during the current period. Approximately 36 percent of current period investments helped provide affordable housing, which is a primary credit need in the community. Current period investments include \$1.2 million made by the bank's

affiliate, Kansas City Financial Corporation, which holds the investment portfolio. No other affiliate has claimed these investments.

We also gave consideration to statewide investments with the potential to benefit the AA totaling \$2.5 million. This includes \$1.5 million made during the current period. These funds represent investments in the Kansas Equity Fund. This Fund utilizes corporate investment and available tax incentives to stimulate the development of affordable housing units.

UMB adequately addressed CD needs in its AA. Therefore, consideration is given to an investment made at the broader statewide area that has no potential benefit to the AA. The bank's investment in the Kansas Development Finance Authority Beginning Farmer Loan Program totals \$246 thousand, of which \$120 thousand is in the current period.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Manhattan MA AA is weaker than the bank's overall "Outstanding" performance under the investment test. Qualified investments and donations total \$236 thousand. Performance is adequate. Approximately 19 percent of deposits and 14 percent of loans are in this AA. The impact on the Investment Test rating is neutral.

Refer to Table 14 in appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the combined non-MA AA is adequate.

Retail Banking Services

Refer to Table 15 in appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

UMB branches are reasonably accessible to geographies and individuals of different income levels in its AA. There are six branches located in the combined non-MA AA. None are in moderate-income tracts where only seven percent of the population resides. There are no low-income geographies in this AA. Also, there were no branch openings or closings during the evaluation period. UMB has four ATMs in the AA; one is deposit-taking.

Banking hours are reasonable. Drive-up facilities are located at four of the six locations. There are no material differences in the availability of products and services among branch locations.

Community Development Services

The level of CD services provided by bank employees is adequate. Services were provided to 12 different organizations. A majority of these services provided community services to LMI families. For example, day care, assistance with utility payments, food, and scholarships.

ATMs accept cards issued by the State under the Temporary Aid to Needy Families Program. These cards are provided to recipients who have not arranged for direct deposit of the funds.

UMB adequately addressed CD needs in its AA. Therefore, consideration is given to a CD Service made at the broader statewide area that has no potential benefit to the AA. This organization provides services to LMI individuals in northwest Kansas counties.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Manhattan MA AA is stronger than the bank's overall "Low Satisfactory" performance under the Service Test. Two branches are in this AA; one (50 percent) is located in a moderate-income tract where 21 percent of the population resides. The impact on the Service Test rating is neutral.

Refer to Table 15 in appendix C for the facts and data that support these conclusions.

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 metropolitan and nonmetropolitan areas 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	Lending Test (excludes CD Loans): 1/1/2006 to 12/31/2009 Investment and Service Tests and CD Loans: 6/7/2006 to 1/10/2011	
Financial Institution	Products Reviewed	
UMB National Bank of America (UMB) Salina, Kansas	Home Mortgage, Small Business, Small Farm, and Community Development Loan Data; Qualified Investments; Retail and Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Kansas City Financial Corporation	Subsidiary of UMB Bank, National Association	Qualified Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Manhattan, KS #31740	Limited-Scope	
Combined non-MA AAs	Full-Scope	Saline, Dickinson, Russell, Barton, and Stafford Counties

Appendix B: Market Profiles for Full-Scope Areas

Combined non-MA AA

Demographic Information for Full-Scope Area: Combined non-MA AA (Saline, Dickinson, Russell, Barton, and Stafford Counties)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	30	0.00	10.00	76.67	13.33	0.00
Population by Geography	113,305	0.00	7.14	77.94	14.92	0.00
Owner-Occupied Housing by Geography	32,892	0.00	6.90	76.41	16.69	0.00
Business by Geography	11,365	0.00	6.85	80.27	12.87	0.00
Farms by Geography	1,169	0.00	2.65	86.91	10.44	0.00
Family Distribution by Income Level	30,727	16.54	19.04	25.73	38.70	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	10,931	0.00	11.55	81.24	7.21	0.00
Median Family Income		41,490	Median Housing Value		67,339	
HUD Adjusted Median Family Income for 2009		52,100	Unemployment Rate		5.26%	
Households Below Poverty Level		10.05%	(2009)			

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2009 HUD updated MFI

The Combined non-MA AA consists of the following counties in central Kansas: Saline, Dickinson, Russell, Barton, and Stafford. For analysis purposes, we combined two of the bank's defined AAs: (1) Saline and Dickinson counties, and (2) Russell, Barton, and Stafford counties. These AAs comply with the regulation and do not arbitrarily exclude any LMI areas. The bank's primary business focus is agricultural lending. There are three moderate-income, 23 middle-income, and four upper-income tracts in the AA.

The local economy is experiencing declining trends. The unemployment rate is below both the state and national average for 2009. Competition is strong with approximately 30 institutions in the AA competing for deposit market share.

UMB has six full-service branches and four ATMs in the AA. Major industries include services, retail trade, and agriculture. Affordable housing is the primary community credit need. Opportunities to participate in CD activities are limited.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As ___12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm.

Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table 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 households within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: KANSAS				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009						
Assessment Area :	% of Rated Area Loans (#) in MA/AA [*]	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans ^{**}		Total Reported Loans		% of Rated Area Deposits in MA/AA ^{***}
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Combined non-MA AAs	85.74	310	22,271	879	70,672	1,733	126,857	11	49,535	2,933	269,335	81.00
Limited Review:												
Manhattan	14.26	92	16,441	278	20,416	110	6,410	8	17,750	488	61,017	19.00
Statewide with no potential benefit to the AA								1	1,150			

^{*} Loan Data as of December 31, 2009. Rated area refers to either state or multi-state MA rating area.

^{**} The evaluation period for Community Development Loans is from June 07, 2006 to January 10, 2011.

^{***} Deposit Data as of June 30, 2010. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: KANSAS					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Combined non-MA AAs	83	79.81	0.00	0.00	6.90	0.00	76.41	96.39	16.69	3.61	1.54	0.00	0.00	2.00	0.36	
Limited Review:																
Manhattan	21	20.19	0.00	0.00	5.65	23.81	67.24	66.67	27.12	9.52	0.34	0.00	2.22	0.31	0.00	

* Based on 2009 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: KANSAS								Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Combined non-MA AAs	56	76.71	0.00	0.00	6.90	5.36	76.41	94.64	16.69	0.00	1.94	0.00	0.00	2.79	0.00
Limited Review:															
Manhattan	17	23.29	0.00	0.00	5.65	5.88	67.24	52.94	27.12	41.18	0.87	0.00	0.00	1.31	0.00

* Based on 2009 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: KANSAS				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Combined non-MA AAs	171	78.44	0.00	0.00	6.90	2.92	76.41	91.23	16.69	5.85	1.81	0.00	1.32	2.51	0.47	
Limited Review:																
Manhattan	47	21.56	0.00	0.00	5.65	12.77	67.24	48.94	27.12	38.30	0.46	0.00	0.91	0.41	0.50	

* Based on 2009 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: KANSAS					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Combined non-MA AAs	0	0.00	0.00	0.00	1.42	0.00	74.35	0.00	24.23	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Manhattan	7	100.00	0.00	0.00	24.85	28.57	51.31	71.43	23.84	0.00	9.52	0.00	20.00	7.69	0.00	

* Based on 2009 Peer Mortgage Data (USPR)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: KANSAS						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Combined non-MA AA	879	75.97	0.00	0.00	6.85	2.96	80.27	89.19	12.87	7.85	7.84	0.00	2.16	9.60	2.80
Limited Review:															
Manhattan	278	24.03	0.00	0.00	16.16	22.66	65.88	53.96	17.96	23.38	3.28	0.00	6.35	2.56	3.62

* Based on 2009 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2009).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: KANSAS						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009							
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Combined non-MA AAs	1,733	94.03	0.00	0.00	2.65	0.92	86.91	94.75	10.44	4.33	42.84	0.00	15.38	43.42	40.82
Limited Review:															
Manhattan	110	5.97	0.00	0.00	3.70	2.73	69.13	42.73	27.17	54.55	42.19	0.00	0.00	41.94	50.00

* Based on 2009 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: KANSAS						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Combined non-MA AAs	83	79.81	16.54	5.26	19.04	17.11	25.73	26.32	38.70	51.32	1.79	0.88	1.86	0.95	2.75
Limited Review:															
Manhattan	21	20.19	16.61	7.14	17.26	21.43	22.72	42.86	43.41	28.57	0.17	2.56	0.00	0.29	0.00

* Based on 2009 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 13.5% of loans originated and purchased by bank.

¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: KANSAS						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families ²	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Combined non-MA A	56	76.71	16.54	16.07	19.04	19.64	25.73	23.21	38.70	41.07	2.04	6.67	7.50	0.00	0.80
Limited Review:															
Manhattan	17	23.29	16.61	5.88	17.26	17.65	22.72	41.18	43.41	35.29	0.47	0.00	0.00	2.78	0.00

* Based on 2009 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: KANSAS						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families ³	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Combined non-MA A	171	78.44	16.54	2.52	19.04	16.98	25.73	20.75	38.70	59.75	2.06	0.00	1.60	1.93	2.56
Limited Review:															
Manhattan	47	21.56	16.61	9.68	17.26	16.13	22.72	41.94	43.41	32.26	0.36	1.33	0.00	0.68	0.25

* Based on 2009 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 12.8% of loans originated and purchased by bank.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: KANSAS			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Combined non-MA AAs	879	75.97	75.47	85.67	79.98	12.86	7.17	7.84	25.23
Limited Review:									
Manhattan	278	24.03	73.19	82.73	87.05	6.47	6.47	3.28	8.35

* Based on 2009 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2009).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.26% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: KANSAS			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Combined non-MA AAs	1,733	94.03	98.12	95.85	79.34	15.52	5.14	42.84	50.00
Limited Review:									
Manhattan	110	5.97	95.87	97.27	88.18	7.27	4.55	42.19	57.45

* Based on 2009 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2009).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 1.79% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: KANSAS				Evaluation Period: JUNE 7, 2006 TO JANUARY 10, 2011			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Combined non-MA AAs	2	119	54	1,640	56	1,759	37.10	0	0
Limited Review:									
Manhattan	0	0	6	236	6	236	4.98	0	0
Statewide with potential to benefit the AA	1	1,000	2	1,500	3	2,500	52.73	3	1,648
Statewide, no potential benefit to AA	3	126	1	120	4	246	5.19		

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: KANSAS		Evaluation Period: JUNE 7, 2006 TO JANUARY 10, 2011			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population								
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography								
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp					
Full Review:																						
Combined non-MA AAs	81.00	6	75.00	0.00	0.00	83.33	16.67	0	0	0	0	0	0	0.00	7.14	77.94	14.92					
Limited Review:																						
Manhattan	19.00	2	25.00	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	21.03	58.69	20.28					