

LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Public Disclosure

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Community Reinvestment Act Performance Evaluation

UMB Bank, National Association
Charter Number: 23920

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NOTE: 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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General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the CRA performance of **UMB Bank, National Association** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **May 22, 2000**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

Community Development (CD) - Affordable 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.

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.

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

Geography - A census tract or a block numbering area 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 applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

Home Mortgage Loans - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwellings loans, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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, branch distribution).

Low-Income - Income levels that are less than 50 percent of the median family income.

Median Family Income (MFI) - The median income determined by the United States 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 Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80 percent and less than 120 percent of the MFI.

Moderate-Income - Income levels that are at least 50 percent and less than 80 percent of the MFI.

Small Business Loans - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

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

Upper-Income - Income levels that are 120 percent or more of the MFI.

Overall CRA Rating

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

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

Performance Levels	UMB Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		
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:

- < UMB achieved good lending test performance in all of its rated areas, including the Kansas City MSA, the St. Louis MSA, the State of Missouri, the State of Kansas and the State of Illinois.
- < UMB provided an excellent level of investments in its Kansas City MSA, which weighed heavily in the overall rating assigned. Performance in all other rated areas ranged from good in the St. Louis MSA and the States of Missouri and Kansas to adequate in the State of Illinois.
- < UMB's service delivery systems provide reasonable access to geographies and individuals of different income levels, including Low- and Moderate-Income (LMI) areas and individuals. UMB's largest markets, Kansas City and St. Louis, weighed most heavily in this conclusion. Branch distribution in LMI areas for these assessment areas (AAs) was lower than demographics, but deemed adequate. The bank provided a relatively high level of community development services in these areas, but this did not outweigh the underrepresentation of branches in LMI areas.

Description of Institution

UMB Bank, National Association (UMB) is a \$6 billion interstate financial institution headquartered in Kansas City, Missouri. UMB is a wholly owned subsidiary and serves as the lead bank of UMB Financial Corporation (UMBFC), Kansas City, Missouri, an \$8 billion regional, multi-bank holding company. UMBFC owns five commercial banks and one credit card bank with locations in the six midwestern states of Missouri, Kansas, Illinois, Colorado, Oklahoma and Nebraska. In September 1999, UMBFC merged several of its state- and national-chartered affiliate banks in Missouri into UMB. In March 2000, UMBFC consolidated its two Oklahoma banking affiliates into UMB.

For the majority of this evaluation period, UMB operated 125 banking offices throughout 18 AAs in three states--Missouri, Kansas and Illinois. The AAs consisted of two multistate metropolitan areas--Kansas City and St. Louis; seven other MSAs--Joplin, Columbia, Springfield and St. Joseph in Missouri and Topeka, Lawrence and Wichita in Kansas; and nine other nonMSA areas in Missouri, Kansas and Illinois. Refer to Appendix A for additional detail on the nonMSA areas. Approximately 82 percent of the bank's deposits and 56 percent of loan originations, by number (including consumer loans), were attributed to locations in the metropolitan areas of Kansas City and St. Louis.

UMB is a full-service banking institution, offering various retail and commercial banking services. The bank's primary business focus is middle-market businesses, personal trust and correspondent banking services. As of March 31, 2000, UMB's loan portfolio consisted of: 59 percent commercial and commercial real estate loans; 27 percent loans to individuals; 4 percent residential real estate; 3 percent loans to financial institutions and 7 percent other loans. Net loans represented 56 percent of total deposits and 42 percent of the bank's asset base. Tier 1 capital totaled \$518 million.

UMB has the financial capacity to assist in meeting its communities' credit needs. UMBFC recapitalized its Community Development Corporation (UMBCDC) during this evaluation period, providing a vehicle for funding home improvement loans to LMI individuals and in LMI areas. UMB presented this information for consideration under the Investment Test. There are no known legal or financial constraints that could impede its CRA efforts. The OCC assigned a CRA rating of "Satisfactory" during the bank's prior CRA evaluation dated November 17, 1997.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated UMB's CRA performance using the Large Bank Tests in the revised CRA regulation. Our analysis included CRA activities since the prior CRA examination dated November 17, 1997. For the Lending Test, we analyzed the bank's reported HMDA, small business, small farm and community development lending data for calendar years' 1998 and 1999. Also, at the bank's option, we considered consumer loan data, which the bank collected for the same time period.

Market comparisons for HMDA, business and farm lending are based on 1998 peer data. This was the most recent data available at the time of the evaluation. Peer data for consumer loans is not available.

We gave refinance loans little weight in our overall assessment of home mortgage lending activity. This is not a primary product for the bank. Nor is it an identified credit need in any of the full-scope AAs. In addition, it is not unusual to have weaker performance for this loan type as it is primarily used to decrease a borrower's cost of credit. Many settlement costs associated with a loan refinancing do not vary based on loan amount. Therefore, it generally takes longer to recoup these costs (through interest savings) on smaller dollar loans. LMI sectors likely have a higher proportion of small dollar loans given the direct correlation between income and debt service ability.

For consumer loans, we weighted borrower distribution more heavily than geographic distribution. Geographic distribution is less meaningful since the bank relies heavily on indirect distribution channels (primarily automobile dealers) to generate these loans. Also, consumer loans generally are not considered a credit product with a stabilizing impact on LMI areas, nor are consumer loans consistently identified as a credit need in the bank's AAs.

For the Investment and Service Tests, we evaluated equity investments and donations; retail services, including branch distribution and accessibility; and community development services. The bank provided information regarding qualified investments UMB's affiliates made that benefited UMB's AAs. These affiliates are detailed in Appendix A.

Data Integrity

We found the bank's reported HMDA, small business, small farm and consumer lending data accurate. We verified the accuracy of this loan data by reviewing a sample of the loans originated during this evaluation period. For community development loans, qualified investments and community development services,

we verified whether the items the bank submitted for CRA consideration met the community development definition in the CRA regulation. We found this information generally reliable.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, we selected an assessment area (AA) within that state for a full-scope review. Refer to the AScope section under each State Rating for details regarding how the areas were selected. Every multistate metropolitan area where UMB has branches in more than one state received a full-scope review.

Ratings

The bank's overall rating is a blend of the multistate metropolitan area rating(s) and state ratings. We weighted the bank's CRA performance in the Kansas City multistate metropolitan AA most heavily since it constitutes 66 percent of the bank's total deposit base, 31 percent of the number of loan originations (including consumer loans) during this evaluation period, and is the bank's headquarters. The state of Missouri, followed by the St. Louis multistate metropolitan AA, received the next highest weightings. The state of Missouri represented 34 percent of the bank's loan originations and 15 percent of total bank deposits, while the St. Louis AA represented 24 percent of loan originations and 16 percent of deposits. The state of Kansas and Illinois received the least weight in our analysis. Kansas represented only ten percent of loan originations and three percent of deposits. Illinois represents less than one-half of one percent of the bank's loan originations and only 0.2 percent of the bank's total deposits.

The multistate metropolitan area rating(s) and state ratings are based primarily on those areas that received full-scope reviews. Refer to the AScope section under each State Rating for details regarding how the areas were weighted in arriving at the overall state rating.

We did not assign a rating for the State of Oklahoma due to the recent merger, March 2000, of these affiliate banks into UMB. There was not sufficient data to form a conclusion regarding the bank's CRA performance in this state. UMBFC acquired one of the banks in November 1999 and state regulators examined the other affiliate in September 1999. Both banks received Satisfactory CRA ratings at their most recent evaluations.

Inside/Outside Ratio

For the geographic distribution analysis under the Lending Test, we performed an inside/outside ratio analysis at the bank level. A substantial majority of bank loans, by number, are inside its AAs - 92 percent of home mortgage loans, 93

percent of business loans, 89 percent of farm loans and 85 percent of consumer loans. We viewed this Lending Test characteristic positively in our assessment of lending performance.

Other Loan Data

In addition to UMB's collected consumer loan data, the bank made two loans totaling \$12 million to a military lending organization to fund consumer loans to active and retired military personnel throughout the United States. A substantial majority of those using this service are enlisted personnel who, based on military pay scales, are considered LMI. This activity benefits LMI individuals in the broader statewide areas, including the bank's AAs. We considered this information positively in our analysis of the bank's efforts to facilitate consumer loans to LMI individuals.

Fair Lending Review

The OCC performed an analysis of 1998 and 1999 HMDA, small business and small farm lending data, public comments, and consumer complaint information according to the OCC's risk-based fair lending approach. The analysis of this data revealed no basis for the OCC to conduct a comprehensive fair lending examination in connection with the CRA evaluation this year. The OCC performed the most recent comprehensive fair lending examination in 1997, in conjunction with the prior CRA evaluation. UMB has adequate fair lending policies and procedures in place and periodically provides training to prevent discriminatory practices from occurring.

Multistate Metropolitan Area Rating

CRA Rating for the Kansas City, MO-KS MSA #3760: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- < UMB's lending activity reflects adequate responsiveness to credit needs overall. Home improvement lending was particularly strong. The bank originated the most reported home improvement loans of all lenders in this AA in 1998. Community development lending contributed positively to the bank's overall lending performance in this AA.
- < UMB achieved a good distribution of loans to borrowers of different income levels, including LMI borrowers. Performance was strongest in consumer and home mortgage lending.
- < UMB achieved a good geographic distribution of loans, including LMI areas. Performance was strongest in home mortgage and business lending.
- < UMB and its affiliates showed excellent responsiveness to community development needs with \$39 million in qualified equity investments and donations. These investments helped meet primary community development needs in the AA. Investments show leadership in developing innovative affordable home improvement loan programs through an established CDC. A majority of the investments provided continued support of a complex TIF redevelopment plan that the bank initiated during the last evaluation period.
- < UMB's branch distribution provides reasonable access to geographies and individuals of different income levels, including LMI areas and individuals. Bank personnel provided a relatively high level of community development services during this evaluation period.

Description of Institution's Operations in the Kansas City MSA

UMB operates 46 branches and 242 ATMs in its Kansas City AA. This represents 37 percent of the bank's total branches and 51 percent of the bank's ATMs. The Kansas City AA accounts for 66 percent of the bank's total deposits and 31 percent of the total number of loan originations, including consumer loans. Forty-seven percent of all deposits in this AA are attributed to UMB and three other interstate financial institutions. Each accounts for between 11 and 12 percent of

the total deposits.

We performed 4 community contacts and reviewed eleven other recent contacts the OCC and other regulators made. These contacts included affordable housing organizations; economic development and business associations; government officials and community groups. Contacts cited the following credit needs: business loans, including venture capital and start-up loans targeted to minority business-owners; low-income loan programs; home improvement loans; and financial education. Refer to the Kansas City MSA Market Profile in Appendix C for detailed demographics and other performance context information.

LENDING TEST

UMB's performance under the Lending Test in the Kansas City AA is rated High Satisfactory.

- < We gave the most weight to small business loans, followed by consumer loans and home mortgage loans. These loans respectively accounted for 48 percent, 36 percent and 12 percent of the dollar volume of loan originations over the evaluation period. We considered the dollar volumes more meaningful than the numbers of loans in determining the weighting. The large number of consumer loans the bank generates would disproportionately skew the weight given to the bank's consumer lending.
- < For home mortgage lending, we gave the most weight to home improvement loans. This product accounts for 73 percent of home mortgage loans (by number) over the evaluation period and is also an identified credit need. We gave refinance loans little weight in our overall assessment of home mortgage lending as previously discussed under the overall Scope of the Evaluation. Market share analysis for home purchase and refinance loans is not meaningful given the bank generated less than one percent of the market's loans in these categories.
- < For consumer loans, we weighted borrower distribution more heavily than geographic distribution since the bank relies heavily on indirect distribution channels to generate these loans. Also, consumer loans generally are not considered a credit product with a stabilizing impact on LMI areas.
- < Our analysis does not include farm lending, as it is not a major bank product. Farm loans account for less than one percent of bank loans by dollar, and only two percent by number (excluding consumer loans), over the evaluation period. In addition, farm lending is not an identified credit need in this AA. The Kansas City MSA is primarily an urban area with little agricultural land.

Lending Activity

Lending levels reflected adequate responsiveness to credit needs in relation to the bank's sizeable deposit base and the healthy economic conditions in this MSA. Refer to Table 1 in Appendix D for data used to evaluate the bank's lending activity.

UMB was a leader in home improvement lending. Seventy-three percent of the bank's reported home mortgage loans were for home improvement. In 1998, UMB ranked first of 167 lenders, originating 22 percent of all reported home improvement loans in the Kansas City MSA. This ranking was consistent with UMB's deposit rank in the MSA.

The bank's business loan market share is not as strong, but still reasonable given the significant competition in this market. In 1998, UMB originated 9 percent of all reported business loans in the Kansas City MSA, ranking fourth of 123 lenders.

Home purchase and refinance loans are not primary products for UMB. In addition, competition for these products is strong. In 1998, UMB ranked 51st of all lenders reporting home purchase loans and 40th of all lenders reporting refinance loans in the MSA.

Distribution of Loans by Income Level of the Geography

UMB's distribution of loans, including lending in LMI geographies, was good overall. UMB achieved its strongest penetration of LMI areas through its small business lending. Penetration of LMI areas through home mortgage loans was also good. However, consumer loan penetration of LMI areas was poor. Refer to Tables 2-5 and 14 in Appendix D for data used to evaluate the geographic distribution of the bank's home mortgage, small business and consumer loans.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans was good.

The geographic distribution of home improvement loans was excellent. The percentage of loans in low-income tracts exceeded the percentage of owner-occupied housing in these tracts. UMB's market share in low-income tracts equaled its overall market share for home improvement loans. This performance was particularly notable in light of the low level of owner-occupied housing in low-income tracts. The percentage of loans in moderate-income tracts was near the percentage of owner-occupied housing in these tracts. UMB's market share in moderate-income tracts was slightly less than its overall market share.

The geographic distribution of home purchase loans was not as strong, but still adequate. The low level of owner-occupied housing in low-income tracts limits opportunities to generate real estate loans in those geographies. The percentage of loans in moderate-income tracts was somewhat less than the percentage of owner-occupied housing in moderate-income tracts.

The geographic distribution of refinance loans was poor. The percentage of loans in LMI tracts was significantly less than the percentage of owner-occupied housing in these tracts.

Small Loans to Businesses

The geographic distribution of small business loans was excellent. The percentage of loans in both LMI tracts exceeded the percentage of businesses in these tracts. UMB's market shares in both LMI tracts also exceeded its overall business loan market share.

Consumer Loans

The geographic distribution of consumer loans was poor. The percentage of loans in both LMI tracts was significantly less than the percentage of households in these tracts. Based on bank prepared data, approximately 42 percent of consumer loan originations resulted from indirect lending channels in this AA.

Lending Gap Analysis

Our geographic distribution analysis included a review for any lending gaps in the Kansas City AA, particularly in LMI areas. We did not identify any unexplained conspicuous gaps.

Inside/Outside Ratio

We calculated this ratio at the bank level. A substantial majority of bank loans originated in its AAs. Refer to the Scope of the Evaluation section for additional detail.

Distribution of Loans by Income Level of the Borrower

UMB's distribution of loans by borrower income level showed good penetration. The bank achieved its strongest penetration to LMI borrowers with its home mortgage loans. Consumer loan penetration to LMI borrowers was also good, while the distribution of loans to small businesses was adequate. Refer to Tables 7-10 and 14 in Appendix D for data used to evaluate the borrower distribution of the bank's loan products.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans was excellent.

Home mortgage loan penetration to moderate-income borrowers was excellent for all products. The percentage of home purchase, home improvement and refinance loans exceeded the percentage of families that are moderate-income. For home improvement loans, UMB's market share to moderate-income borrowers was consistent with its overall market share.

Loan penetration to low-income borrowers was excellent for home improvement and home purchase products. The percentage of loans to low-income borrowers was less than the percentage of low-income families. However, this was considered strong performance given the percentage of families living below the poverty level (7 percent). Families below the poverty level have annual incomes less than \$16,260. At this income level, it would be difficult to afford a home at the MSA's median value of \$67,517. Loan penetration to low-income borrowers was weaker for refinance loans. However, it was considered adequate given the percentage of families living below the poverty level. The bank's market share of home improvement loans to low-income borrowers was only slightly less than its overall market share.

Small Loans to Businesses

The distribution of loans to businesses of different sizes was adequate. UMB made 39 percent of its reported business loans to entities with gross annual revenues of \$1 million or less (i.e. small businesses). The bank's percentage of loans to businesses with revenues of \$1 million or less was somewhat less than demographics and the performance of other lenders. In aggregate, other lenders made 55 percent of their 1998 reported business loans to small businesses. UMB's small business loan market share was also slightly less than its overall market share of reported business loans.

Consumer Loans

The overall borrower distribution of consumer loans was good. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income households. Performance was not as strong in the low-income sector, but was still good considering the percentage of households below the poverty level (10 percent).

Community Development Lending

UMB originated a good level of community development loans (CD loans) in the Kansas City AA given its size, lending capacity and opportunities. We gave the bank's CD lending positive consideration in this MSA. CD loans accounted for three percent of bank loans, by dollar volume, over the evaluation period. Refer to Table 1 in Appendix D for data used to evaluate the bank's level of CD lending.

CD loans met identified credit needs. Specifically, CD loans provided financing to businesses located in targeted redevelopment areas and to organizations that provide social services to LMI individuals. Other CD loans showed participation in affordable housing programs targeted to LMI families and geographies. UMB originated 15 qualified CD loans totaling \$17 million within the Kansas City AA. In addition, UMB originated other loans with a community development purpose. These included financing affordable housing for LMI borrowers and financing businesses that provide services to LMI individuals or geographies. These loans are included in the loan volume for HMDA and small business loans for the Lending Test.

Projects that highlight UMB's CD lending and benefited the Kansas City AA during this evaluation period included:

- < \$11.7 million in construction and bridge loans to facilitate the relocation of a service center of a national firm to a moderate-income area targeted for redevelopment. This business provides 200 full-time and 600 seasonal jobs for mainly LMI employees from the surrounding areas.
- < A \$2 million unsecured line of credit to a worldwide humanitarian organization that serves needy children and families. This organization has two project locations in the United States, including Kansas City. Projects emphasize the health and educational well being of individual children. In Kansas City, this organization provides day care and after-school care, medical care and medicine, dental treatment, developmental screenings and speech therapy.
- < A \$1 million loan to an organization that distributes funding to social service agencies and nonprofit organizations that primarily serve LMI individuals.
- < A \$145 thousand participation loan to a nonprofit organization to finance the construction of four new single-family homes located in a low-income area of the Kansas City, Kansas enhanced enterprise community. This organization was formed to address neighborhood revitalization in the Wyandotte County community, a predominately LMI area. UMB is the lead bank in this project with another local financial institution.
- < Three loans totaling \$121 thousand to two nonprofit organizations that provide community development services in LMI areas. These services include:

childcare to low-income and homeless families, emergency shelter, transitional living, food and substance abuse counseling.

- < A \$78 thousand loan to a nonprofit ministry to purchase a 10-unit apartment building used for transitional housing for homeless families.

Product Innovation and Flexibility

UMB offers a limited number of programs that use flexible or innovative lending practices targeted to assist LMI individuals or geographies. These programs help meet identified credit needs by providing low cost loans for small businesses in targeted communities and homebuyer assistance to LMI individuals.

Missouri First Linked Deposit Program: One of the nation's most utilized linked deposit loan programs administered by the Office of the Missouri State Treasurer. Under the program, below market rate deposits of state funds are deposited in the lending institution allowing eligible borrowers to obtain low-interest loans from the institution. Savings to the borrower are generally 25-30 percent of their interest costs. The program promotes Missouri's economic growth and gives priority to businesses located in enterprise zones and economically depressed areas and to projects that provide a positive impact on neighborhood stability. Priority is also given to individuals who target areas with affordable housing needs. This program is available in all of the AA's in the state of Missouri.

Missouri Housing Development Commission (MHDC) Down Payment Assistance Program: LMI first time homebuyers may qualify for five percent of the purchase price of a home under this down payment assistance program. The assistance is in the form of a zero-interest "soft second" loan. MHDC requires at least a \$20 repayment per month and homebuyers have up to 30 years to repay the assistance loan. Homebuyers are required to make a minimum personal investment of \$750 for down payment or closing costs. Borrower's income may not exceed 80 percent of the area median income. Homes may be located anywhere in Missouri excluding Columbia, Independence, Kansas City, St. Joseph, St. Louis City and County, and Springfield.

INVESTMENT TEST

The bank's performance under the Investment Test in the Kansas City AA is rated Outstanding. Refer to Table 12 in Appendix D for data used to evaluate the bank's level of qualified investments in the Kansas City AA.

UMB and its affiliates provided an excellent level of qualified investments and demonstrated continued commitment to support community development initiatives in its AA. UMB funded \$39 million in qualified investments attributed to this AA. Ninety-five percent of these dollars completed the funding of a project initiated during the last evaluation period. The project helped revitalize and stabilize a blighted area targeted for redevelopment. One investment reflects leadership and creativity in supporting an affordable home improvement initiative. Two bond issues showed innovativeness and complexity by developing a new

vehicle to aid in completing the financing package more efficiently. There are no investments outstanding from prior evaluation periods.

Per community contacts and the consolidated plans for the City and the Enhanced Enterprise Community, the Kansas City AA has many community development needs and opportunities. These include affordable housing for LMI, home-rehabilitation loan programs, small business development, revitalization/stabilization of LMI areas, and financial support for organizations that provide services to LMI individuals. UMB's investments address most of these primary community development needs, including home-rehabilitation programs, revitalization or stabilization of LMI areas, and financial support for organizations that provide services to LMI individuals.

Descriptions of UMB and its affiliates qualified investment activities follow.

UMBFC funded the remaining \$36.9 million of a \$43.8 million project to complete its redevelopment efforts for a portion of downtown Kansas City, Missouri. UMBFC initiated the bank technology and operations center project during the last evaluation period in response to a TIF Commission's public request for proposals to redevelop a blighted area. In addition to retaining jobs, the project also compliments other city plans to redevelop the central business district of Kansas City, Missouri.

UMB's Investment Banking Department underwrote and its affiliate banks purchased \$652 thousand of \$15.2 million in certificates of participation to provide financing for a predominately LMI school district in Kansas City, Kansas. The proceeds will facilitate refinancing, constructing, and rehabilitating school facilities that primarily serve LMI families. The school bond issue entailed a complex type of financing that used certificates of participation backed by revenues through a lease purchase agreement.

UMB purchased \$590 thousand of \$2.94 million in bonds to help finance building improvements for the Junior College District (comprised of four Junior Colleges) in Kansas City, Missouri. Over 55 percent of the total student population at these colleges are LMI individuals. UMB's Investment Banking Department underwrote the bonds. This represented an innovative and complex activity as the bank set up a separate subsidiary, UMB Building Corporation, to facilitate the underwriting. The Building Corporation is a 501(c)(3) nonprofit organization that helped support a leaseback agreement, which expedited the bond issuance process. This project required outside legal assistance.

UMBFC provided \$1 million to UMB Community Development Corporation (UMBCDC). The funds reactivated this CDC with a goal of implementing affordable home improvement loan programs targeting LMI areas or LMI individuals in the

bank's AAs. This investment is allocated among all UMBFC's subsidiary banks. The allocation to UMB is \$820 thousand, of which \$262 thousand is allocated to the Kansas City AA. The remainder of the \$820 thousand investment is allocated to the other UMB AAs. Allocation amounts are primarily based on the percentage of deposits per AA. The investment is innovative and complex. Most CDCs do not focus on home improvement loan products. The investment is also complex based on the level of expertise needed to work with several diverse groups in developing tailored home improvement programs for the various AA markets. This loan program is eligible for partnerships with other organizations to allow for attractive financing programs using interest rate subsidies. To date, no loans have been made under this program. The bank continues to finalize details before implementation.

UMB purchased \$50 thousand of a \$5 million revenue bond to help construct a new building for a Junior College in Kansas City, Kansas. Over 52 percent of the total student population are LMI individuals.

UMB also provided \$559 thousand in grants and donations to qualified community development organizations. The majority of these dollars assisted organizations that provide services for LMI individuals, such as housing, food, health care, and social services.

SERVICE TEST

UMB's performance under the Service Test in the Kansas City AA is rated Low Satisfactory.

UMB's branch delivery systems are reasonably accessible to geographies and individuals of different income levels in the Kansas City AA. Refer to Table 13 of Appendix D for data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings. UMB also provided a relatively high level of community development services that benefited its AA. Branch distribution received the most weight in rating the bank's performance under the Service Test.

Retail Banking Services

UMB's percentage of branches in low-income CTs is slightly less than the percentage of population in those CTs. The bank's percentage of branches in moderate-income CTs is much lower than the percentage of population residing in moderate-income CTs. UMB has several branches in middle- or upper-income CTs that are adjacent to LMI CTs. The bank also has two branches in CTs with no income level designation in the central business district of Kansas City, a

predominantly LMI area. The proximity of these branches helps provide reasonable access for residents of those adjacent LMI CTs.

UMB's ATM distribution of ATMs in low-income CTs approximates the percentage of population in those CTs. The percentage of ATMs in moderate-income CTs is much lower than the percentage of population in those CTs. The bank has over 40 ATMs in middle- and upper-income tracts or tracts with no income designation that are adjacent to LMI areas. These ATMs help provide reasonable access to these services.

During our evaluation period UMB opened four and closed two branches. None of the new branches are in LMI areas. One of the branch closures occurred in a moderate-income CT. This closing did not impact the accessibility of services to LMI areas as this branch had only a nominal volume of customers.

Banking hours vary at the different branches, but not in a manner that inconveniences portions of the AA. Most branches offer extended banking hours during the week and on Saturday. Hours maintained at branches in LMI areas are comparable to those in other areas. Seventy-seven percent of the bank's ATMs offer 24-hour services. Those with restricted hours or access operate during normal business hours. A few ATMs have limited hours because of security reasons.

All banking services are offered at the branches. Although only a few of the branches have in-house lenders, individuals can apply for credit at any branch location. In addition, loan officers will meet with customers by appointment at any location. Only ATMs located at bank branches accept deposits.

UMB also offers other alternative delivery systems such as 24-hour account information via telephone, telephone bill payment services and PC online banking. However, the bank does not have information available to determine if these services are an effective alternative for providing banking services to LMI individuals or geographies. These services received no weight in determining the bank's overall performance.

Community Development Services

UMB provided a relatively high level of community development services in the Kansas City AA. UMB bank staff provided their financial expertise to over 70 organizations that promote community development initiatives in the Kansas City AA. Over half of the organizations provide community services for LMI individuals, a critical need in this AA. Other services helped further economic development efforts; revitalization and stabilization of LMI areas; and affordable housing initiatives. Bank personnel regularly served on Boards of Directors and loan

committees, assisted with fund raising and financial planning, and provided financial education to individuals and small business owners.

Several bank officers and employees provided financial expertise to 41 community organizations that primarily provide needed services to the LMI. Services provided by these organizations included: healthcare; youth programs; family counseling; food and clothing; job training; no interest car loans; financial planning; and tax preparation. Bank personnel served in several capacities, including Board members, fundraising and loan committee members, assisting with fundraising efforts; and providing financial and budget education.

UMB employees used their financial expertise and acumen for business lending to assist 16 organizations that promote economic development by financing small businesses or small farms. A bank officer served as Chairman of the SBA's Access to Capital Committee, which strives to find ways to increase capital access for small businesses. Other officers and employees served as Board members, committee members, financial counselors and instructors for these organizations.

Bank officers and employees furnished their financial expertise to seven affordable housing organizations, serving as officers, Board members and Chairpersons. These organizations develop housing strategies and affordable homeownership opportunities in the greater Kansas City area for LMI individuals.

UMB officers and employees also assisted with the area's revitalization and stabilization of LMI areas through their participation in seven organizations that focus on these activities. This participation included: serving as Treasurer, Board members, and advisory directors; and reviewing funding proposals.

UMB offers accounts that are beneficial to primarily LMI individuals. UMB participates in Kansas' VISION Program and Missouri's QUEST Program, which enables recipients of Aid to Families with Dependent Children to withdraw benefit payments by debit card at the bank's ATMs. UMB also offers Electronic Transfer Accounts (ETA). These accounts support the government's initiative to improve access to financial services and encourage LMI individuals to establish accounts to receive their payments from the federal government. UMB also offers low-cost checking accounts for individuals and small businesses.

Multistate Metropolitan Area Rating

CRA Rating for the St. Louis MO-IL MSA #7040: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- < UMB's lending activity reflects good responsiveness to credit needs. The bank achieved its strongest performance via home improvement lending. The bank ranked second among all lenders of home improvement loans in 1998. Community development lending contributed positively to the bank's overall lending performance.
- < UMB achieved a good distribution of loans to borrowers of different income levels. Performance was strongest in home mortgage lending, followed by small business lending.
- < UMB achieved an adequate geographic distribution of loans, including penetration of LMI areas. The bank's small business lending showed the strongest penetration of these areas among all loan types.
- < UMB and its affiliate, UMBFC, showed good responsiveness to community development needs with \$4.2 million in qualified equity investments and donations. These investments assisted in meeting primary community development needs in the AA and demonstrated some leadership in assisting with community development initiatives.
- < UMB's branch distribution provides reasonable access to geographies and individuals of different income levels, including LMI areas and individuals. The bank provided a relatively high level of community development services, including initiatives to address affordable housing home loan programs.

Description of Institution's Operations in the St. Louis MSA

UMB operated 29 branches and 145 ATMs in its St. Louis AA, which represented 23 percent and 30 percent of the bank's total branches and ATMs, respectively. The St. Louis AA accounted for 16 percent of the bank's total deposits and 24 percent of total loan originations, by number, including consumer loans. UMB ranked sixth among deposit-taking financial institutions, with two percent of all deposits in this AA. Two large interstate financial institutions account for 43 percent of all deposits in this AA.

We reviewed 10 recent community contacts the OCC and other regulators performed in this AA. These contacts encompassed affordable housing and economic development organizations; local government officials and community organizations. These contacts cited the following credit needs: small business loans and risk capital for small businesses; general consumer loans and consumer loans with flexible terms; homebuyer education, including budgeting, and home repair and maintenance. Refer to the St. Louis MSA Market Profile in Appendix C for detailed demographics and other performance context information.

LENDING TEST

UMB's performance under the Lending Test in the St. Louis AA is rated High Satisfactory.

- < We weighted consumer loans most heavily, followed by business loans and home mortgage loans. These loans respectively account for 55 percent, 27 percent and 15 percent of bank loans by dollar volume over the evaluation period.
- < In our analysis of home mortgage lending, we gave the most weight to home improvement loans. This product accounts for 86 percent of home mortgage loans (by number) over the evaluation period. We gave refinance loans little weight in our overall assessment of home mortgage lending as previously discussed under the overall Scope of the Evaluation. Market share analysis for home purchase and refinance loans was not meaningful since the bank originated less than one percent of the market's loans in these product types.
- < For consumer loans, we weighted borrower distribution more heavily than geographic distribution since the bank relies heavily on indirect distribution channels to generate these loans. Also, consumer loans generally are not considered a credit product with a stabilizing impact on LMI areas.
- < Our analysis does not include farm lending. UMB made no farm loans during the evaluation period. The St. Louis MSA is primarily an urban area and farm lending is not an identified credit need in this AA.

Lending Activity

Lending levels reflected good responsiveness to credit needs in relation to the bank's deposit base and healthy economic conditions in this MSA. Refer to Table 1 in Appendix D for data used to evaluate the bank's lending activity.

UMB's home improvement lending was particularly responsive. In 1998, UMB

originated 14 percent of all reported home improvement loans in the St. Louis MSA, ranking second among 188 lenders. This ranking was higher than the bank's deposit rank of seventh in the MSA. Home purchase and refinance loans are not primary products for UMB and competition for these products is strong in this market. In 1998, UMB originated less than one percent of both home purchase loans, ranking 102nd, and refinance loans, ranking 85th.

The bank's business loan market share was not as strong, but still reasonable given the strong competition in this market. In 1998, UMB originated three percent of all reported business loans in the St. Louis MSA, ranking twelfth of 126 lenders.

Distribution of Loans by Income Level of the Geography

UMB's distribution of loans, including lending in LMI geographies, was adequate overall. The bank achieved its strongest penetration of LMI geographies with its small business loans, which was good. Home mortgage loan penetration of LMI geographies was adequate. The bank showed its weakest penetration of LMI geographies through its consumer loans. Refer to Tables 2-4 and 14 in Appendix D for data used to evaluate the geographic distribution of the bank's lending data.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans was adequate.

For home improvement loans, the geographic distribution was adequate. The percentage of loans in low-income tracts and moderate-income tracts was somewhat less than the percentage of owner-occupied housing in these tracts. Bank market share in LMI tracts was also somewhat less than its overall home improvement market share.

The geographic distribution of home purchase and refinance products was poor. The percentage of home purchase loans and refinance loans in low-income tracts is significantly less than the percentage of owner-occupied housing in these tracts. The percentage of home purchase loans and refinance loans in moderate-income tracts is also significantly less than demographic comparisons.

Small Loans to Businesses

The geographic distribution of business loans was good, particularly in moderate-income tracts. The percentage of loans in moderate-income tracts substantially met the percentage of businesses in moderate-income tracts. The percentage of loans in low-income tracts was somewhat less than demographics. UMB's market share in moderate tracts was equal to its overall business loan market share.

UMB's market share in low-income tracts approximated the overall business loan market share.

Consumer Loans

The geographic distribution of consumer loans was poor. The percentage of loans in both low-income and moderate-income tracts was significantly less than the percentage of households in those tracts. Based on bank prepared data, approximately 71 percent of consumer loan originations resulted from indirect lending channels in this AA.

Lending Gap Analysis

Our geographic distribution analysis included a review for any lending gaps in the St. Louis AA, particularly in LMI areas. We did not identify any unexplained gaps.

Inside/Outside Ratio

A substantial majority of bank loans were inside its AAs. Refer to the Scope of the Evaluation section for additional detail.

Distribution of Loans by Income Level of the Borrower

UMB's distribution of loans by borrower income level showed good penetration. The bank achieved the strongest penetration to LMI borrowers through its home mortgage loans. Penetration to businesses of different sizes was also good. Penetration to LMI borrowers was the weakest in the bank's consumer loans, but was considered adequate. Refer to Tables 7-10 and 14 in Appendix D for data used to evaluate borrower loan distribution.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans was excellent.

Distribution to moderate-income borrowers was excellent. The percentage of loans to moderate-income borrowers exceeded the percentage of families that are moderate-income for home purchase and home improvement loans and nearly met the demographic for refinance loans. For home improvement loans, UMB's moderate-income market share approximated its overall market share.

Distribution to low-income borrowers was good for home improvement and home purchase products. The percentage of loans to low-income borrowers was somewhat less than demographics, but this was strong performance considering the percentage of families living below the poverty level (8 percent). Families below the poverty level have annual incomes less than \$15,600. At this income level, it can be difficult to afford a home at the MSA's median value of \$75,985. The bank's low-income market share for home improvement loans was only

slightly less than its overall market share.

For refinance loans, distribution to low-income borrowers was poor. The percentage of refinance loans to low-income borrowers was six percent. This was much less than percentage of low-income families, even considering the percentage of families below the poverty level (8 percent).

Small Loans to Businesses

The distribution of loans to businesses of different sizes is good. UMB made 60 percent of its reported business loans to entities with gross annual revenues of \$1 million or less (i.e. small businesses). The bank's percentage of loans to businesses with revenues of \$1 million or less substantially met the percentage of businesses in the AA with revenues of \$1 million or less. UMB's performance was also better than the performance of other lenders. In aggregate, other lenders made 55 percent of their 1998 reported business loans in this AA to small businesses. UMB's small business market share was consistent with its overall market share of reported business loans.

Consumer Loans

The borrower distribution of consumer loans was adequate. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income households. Performance in the low-income sector was poor, even considering the percentage of households below the poverty level (11 percent). The percentage of loans to low-income borrowers was significantly less than the percentage of low-income households.

Community Development Lending

UMB originated an excellent level of community development loans (CD loans) in the St. Louis AA given its size, lending capacity and opportunities for participation. We gave the bank's CD lending positive consideration in this MSA. CD loans account for three percent of bank loans by dollar volume over the evaluation period.

Refer to Table 1 in Appendix D for data used to evaluate the bank's level of CD lending.

CD loans met identified credit needs by providing financing to small businesses located in empowerment zones and through participation in affordable housing programs targeted to LMI individuals and geographies. UMB originated 18 qualified CD loans totaling \$13 million within the St. Louis AA. Three of the 18 loans, totaling \$358 thousand, represent the refinancing of existing notes for community development projects already in progress. Additionally, the bank has 14 CD loans

outstanding totaling \$954 thousand for the construction of 14 single family homes for LMI individuals, located in moderate-income census tracts. UMB also originated other loans with a community development purpose. These loans are included in the loan volume for HMDA and small business loans for the Lending Test.

Projects that highlight UMB's CD lending in the St. Louis AA during this evaluation period include:

- < Four loans totaling \$7.9 million to four businesses located in LMI areas designated as empowerment zones targeted for redevelopment. Two of these businesses are also located in areas designated by the Small Business Administration as HUBZones. A HUBZone is a historically underutilized business zone which is generally an area of low income and high unemployment. Three of these loans financed the ongoing operations of the businesses and the remaining loan financed new construction and the expansion of the business. These businesses primarily employ LMI workers.
- < Two loans totaling \$3.9 million through the Federal Home Loan Bank of Topeka's Community Investment Program (CIP). The proceeds of the advances will be used to provide financing for the construction of office space and a warehouse. This project qualifies for CIP funding because more than 51 percent of the employees in the project have incomes less than 80 percent of the area median income for the St. Louis MSA.
- < Five loans totaling \$271 thousand to four organizations for the purpose of affordable housing rehabilitation. These loans resulted in the development of six housing units for LMI individuals.

Product Innovation and Flexibility

UMB offers several programs that use flexible or innovative underwriting targeted to assist LMI individuals or geographies. Most of these programs relate to home improvement and home purchase lending. The bank funded loans or made commitments to lend under the following home improvement loan programs: the Catholic Commission on Housing Home Improvement Program, St. Louis County Home Improvement Program, Ferguson Home Improvement Program and the Neighborhood Housing Services Home Safety Partnership. These programs generally offer below market interest rates, with further subsidies of interest rates through community funding sources.

UMB also uses state mortgage assistance programs targeted toward LMI first time homebuyers. These programs help make home purchase loans more affordable. These programs include: the MHDC Revenue Bond program which provides below market interest rates and a 4 percent grant for downpayment and closing costs; the MHDC Mortgage Credit Certificate program which increases a borrower's

disposable income through a 25 percent federal income tax credit on mortgage interest paid or \$2,000; and the Illinois Bond Assist Program which provides below market interest rates and cash grants to help with downpayments, closing costs or points. Refer also to the Kansas City MSA for detailed information about the Missouri First Linked Deposit Program.

INVESTMENT TEST

The bank's performance under the Investment Test in the St. Louis AA is rated High Satisfactory. Refer to Table 12 in Appendix D for data used to evaluate the bank's level of qualified investments in the St. Louis AA.

UMB and its affiliate provided a significant level of qualified investments by funding \$4.2 million in qualified investments attributed to this AA. Over 90 percent of these dollars result from a bond issue UMB underwrote. The bank used its expertise in this bond underwriting initiative and showed leadership and creativity taking action to develop affordable home improvement programs its AAs. Investments addressed primary community development needs, including rehabilitation of housing and financial support for community development organizations through donations and grants. There are no investments outstanding from prior evaluation periods.

Per community contacts and consolidated plans for the City, County and the Enterprise Community, the St. Louis AA has many community development needs and opportunities. They include economic development, affordable housing, rehabilitation programs, revitalization or stabilization of LMI areas, and financial support for community development organizations that assist small businesses and provide jobs and/or services for LMI individuals. UMB focused its investments in developing a home improvement program and providing financial support for entities that primarily serve LMI individuals in its AA.

UMB's Investment Banking Department underwrote and the bank financed a \$3.68 million lease/purchase bond to provide financing for a community college that primarily serves LMI individuals in Belleville, IL. The purpose of the investment was to finance a new integrated management information system.

For the St. Louis AA, the bank allocated \$125 thousand of UMBFC's \$1 million investment in UMBCDC. This investment has the potential to benefit this AA through affordable home improvement programs targeting LMI areas or LMI individuals. This investment is considered both innovative and complex. Refer to the Investment Test for the Kansas City AA for additional information.

UMB also provided \$385 thousand in grants and donations to qualified community development organizations. The majority of these dollars assisted organizations that provide services for LMI individuals, including housing, food, health care and social services.

SERVICE TEST

UMB's performance under the Service Test in the St. Louis AA is rated Low Satisfactory.

UMB's branch delivery systems are reasonably accessible to geographies and individuals of different income levels in the St. Louis AA. Refer to Table 13 of Appendix D for data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings. UMB also provided a relatively high level of community development services that benefited its AA. Branch distribution received the most weight in rating the bank's performance under the Service Test.

Retail Banking Services

The percentage of branches and ATMs in moderate-income CTs is much lower than the percentage of population residing in moderate-income CTs. Three of the bank's 29 branches and 12 of its 145 ATMs are located in moderate-income CTs. The bank does not have any branches in low-income CTs and has only three ATMs in low-income CTs. However, UMB does have ten branches located adjacent to LMI areas. These include one branch in St. Louis City, the predominant LMI area on the Missouri-side of the MSA; six in St. Louis County; and three in Madison and St. Clair Counties in Illinois. The bank also has 50 ATMs in middle- or upper-income CTs that are adjacent to LMI CTs. These branches and ATMs help provide reasonable access for residents of the LMI CTs.

Since the last examination, UMB opened ten branches, including one in a moderate-income CT in St. Louis County. UMB did not close any branches in this AA.

Banking hours vary by branch location, but not in a way that inconveniences portions of the AA. Hours maintained at branches in LMI areas are comparable to those in other areas. Most branches offer extended banking hours during the week and on Saturday. ATMs at bank branches and ATM facilities in two shopping malls and a retail store accept deposits. Over 80 percent of the AA's 145 ATMs offer 24-hour availability. Hours are restricted at other ATMs due to the business hours of the retail business where they are located. All banking services are offered at the branches. Refer to the Service Test comment for the Kansas City AA for details.

Community Development Services

UMB provided a relatively high level of community development services during this evaluation period. Bank officers and employees lent their financial expertise to over 40 community organizations engaged in affordable housing initiatives; economic development; redevelopment of LMI areas and services for primarily LMI

individuals.

These activities helped address some critical community development needs in this AA. In particular, bank personnel demonstrated leadership and creativity in tackling the need for home improvement loans in LMI areas and for LMI individuals.

UMB personnel regularly work with municipal and community organizations to design subsidized home improvement loan products that target LMI individuals and areas.

UMB officers and employees provided their financial expertise to four organizations that primarily focus on affordable housing needs for LMI. Employees served as treasurer, members of the Boards or committee members to assist these organizations with their initiatives. A significant example of UMB's involvement in affordable housing initiatives in this AA follows:

- < UMB was the sole bank represented on a task force for the local chapter of a national affordable housing organization seeking to obtain funding for addressing fire safety and prevention issues and reduce fire losses in the inner city. UMB officers assisted with the application for funding and chaired the loan committee that developed an affordable home improvement loan product for eligible applicants. This example took advantage of the bank's considerable expertise in home improvement lending. A bank officer also serves as the underwriter for these loans.

UMB assisted 18 organizations that primarily focus on economic development and revitalization and stabilization efforts. Bank officers and employees regularly provide financial expertise as Board or committee members of these organizations; assist with fund raising efforts; and provide education for small business owners.

UMB employees were also actively involved in 19 organizations that provide needed services for LMI individuals. Services include: family counseling; welfare to work programs; healthcare; financial education; housing and temporary shelter.

Bank officers and employees often assist with fundraising; provide education on budgeting and financial matters; and use their financial expertise serving as Board or committee members.

UMB also offers banking services that primarily benefit LMI individuals. UMB offers ETA accounts and its ATMs are programmed to allow Missouri and Illinois' welfare recipients access to their benefits electronically. Refer to the Service Test for the Kansas City AA for further details on these programs and other products that primarily benefit LMI.

State Rating

CRA Rating for Missouri¹:	<u>Satisfactory</u>
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>High Satisfactory</u>
The Service Test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

- < UMB's lending activity reflects good responsiveness to credit needs in the state of Missouri.
- < UMB achieved a good distribution of loans to borrowers of different income levels in Missouri. For the Joplin MSA, performance was particularly strong in business and home mortgage lending.
- < UMB achieved an adequate geographic distribution of loans in Missouri. For the Joplin MSA, performance was strongest in home mortgage lending.
- < Lending test performance in the limited-scope AAs did not detract from the bank's full-scope assessments.
- < UMB and its affiliate, UMBFC, showed good responsiveness to community development needs in the state of Missouri, providing \$8.4 million in qualified investments and donations. This includes a portion of UMBFC's investment in its recapitalized CDC that has the potential to benefit Missouri AAs by providing home improvement loan programs benefiting LMI areas or individuals.
- < UMB's branch distribution provides reasonable accessibility to geographies and individuals of different income levels, including LMI areas and individuals. The bank provided an adequate level of community development services in its Joplin MSA.

Description of Institution's Operations in Missouri

UMB has ten AAs in the State of Missouri, excluding the Missouri portion of the Kansas City and St. Louis MSAs, which are rated separately as required by the CRA regulation. Four of the Missouri AAs are metropolitan areas (Joplin, Columbia, Springfield and St. Joseph) and six are nonMSA areas (Central Missouri,

¹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Monett, Northeast Missouri, North Central Missouri, Jefferson City and Northwest Missouri). Missouri operations account for 39 (31 percent) of UMB branches and 76 (16 percent) of its ATMs. Fifteen percent of total bank deposits, by dollar volume, and 36 percent of the bank's reported loans, by number, during this evaluation period, are also attributable to these AAs.

The State of Missouri constitutes 87 percent of the bank's reported farm loans, 36 percent of its business loans, 33 percent of its consumer loans and 16 percent of its home mortgage loans. UMB's primary credit product in Missouri is consumer loans. This loan product represents 83 percent, by dollar volume, of all bank loans extended in its Missouri AAs.

UMB accounts for four percent of all deposits and ranks fourth of all FDIC-insured financial institutions operating in its Missouri AAs. This excludes the Missouri portion of the Kansas City and St. Louis MSAs. Major competitors include Firststar, Commerce Bank and Bank of America which held deposit market shares of 13 percent, 8 percent and 6 percent, respectively.

Refer to the Market Profiles for the State of Missouri in Appendix C for detailed demographics and other performance context information related to the AA(s) receiving full-scope reviews.

Scope of Evaluation in Missouri

We performed a full-scope review of the Joplin MSA. For the State of Missouri, the Joplin MSA represented 14 percent of the bank's deposits and 15 percent of loan originations. Of the metropolitan AAs in Missouri, Joplin had one of the highest percentages of the bank's total deposits at a little over two percent and the most loan originations at five percent. No one AA in Missouri represents more than three percent of total bank deposits or more than seven percent of the total number of reported loans. Of the 15 FDIC-insured depository institutions in the Joplin MSA, UMB ranks sixth, with five percent of the area's total deposits. The Joplin MSA also contains five branches and eight ATMs, which represent four percent and two percent of total bank facilities, respectively.

Other AAs received limited scope reviews. We combined data for all nonMSA AAs in Missouri that received limited scope reviews. Refer to Appendix A for further information regarding the nonMSA AAs. The combined information is presented in the Tables in Appendix D.

State ratings are primarily based on performance in the area(s) receiving full-scope reviews. However, since the limited-scope AAs represent a substantial portion of the bank's lending, investment and service activities, the performance in these AAs impacted the final ratings assigned to the State of Missouri.

During the examination, we conducted three community contacts in the Joplin MSA. The contacts included a housing authority, an economic development organization and a local business owner. Contacts cited a need for affordable housing programs and small business loans (start-up financing, in particular).

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Missouri is rated High Satisfactory. Based on our full-scope review, bank performance in the Joplin MSA is good.

- < We weighted consumer loans most heavily, followed by business loans, home mortgage and farm loans. Consumer loans account for 79 percent of bank loans, by dollar volume, in the Joplin MSA over the evaluation period. For the other loan types, small business, home mortgage and small farm, these loans respectively account for 43 percent, 32 percent and 25 percent of bank loans in the Joplin MSA.
- < For home mortgage loans, we weighted home improvement and home purchase loans similarly. These products account for 37 percent and 35 percent of the number of home mortgage loans in the Joplin MSA over the evaluation period. We gave refinance loans little weight in our overall assessment of home mortgage lending as previously discussed under the bank's overall Scope of the Evaluation.
- < For consumer loans, we weighted borrower distribution more heavily than geographic distribution since the bank relies heavily on indirect distribution channels to generate these loans. Also, consumer loans generally are not considered a credit product with a stabilizing impact on LMI areas.

Lending Activity

Lending levels reflect good responsiveness to credit needs in relation to the bank's small deposit base and healthy economic conditions in the Joplin MSA. Refer to Table 1 in Appendix D for data used to evaluate the bank's lending activity.

The bank's business and farm loan market shares are consistent with, or better than, its deposit market rank and market share among banks subject to CRA data collection. Although UMB ranks sixth in deposit market share among the fifteen FDIC-insured financial institutions with branches in this AA, it ranks fourth among

CRA data reporters. In 1998, UMB originated 12 percent of all reported business loans in the Joplin MSA, ranking fourth of 42 lenders. UMB originated 44 percent of all reported farm loans in the Joplin MSA, ranking first of 14 lenders.

For home improvement lending, UMB ranked fifth, which was slightly better than its deposit market rank of sixth. Since the Joplin area is in an MSA, all banks in this AA are subject to reporting home mortgage loans. Home purchase and refinance loans are not primary products for UMB and competition for these products is strong. In 1998, UMB originated less than two percent of the Joplin MSA's home purchase (ranked 17th) and refinance loans (ranked 22nd).

Distribution of Loans by Income Level of the Geography

UMB's distribution of loans, including lending in moderate-income geographies, was adequate overall. There are no low-income geographies in this AA. UMB achieved its strongest penetration of moderate-income areas through its home mortgage loans which was excellent. Penetration of moderate-income areas through consumer and farm loans was adequate. The bank's weakest penetration of moderate-income geographies occurred with its small business loans, although penetration did improve in 1999. Refer to Tables 2-6 and 14 in Appendix D for data used to evaluate the geographic distribution of the bank's home mortgage, small business and consumer loans.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans, including moderate-income areas, was excellent.

The geographic distribution of home improvement and home purchase loans was excellent. The percentage of home improvement loans in moderate-income tracts was near the percentage of owner-occupied housing in these tracts. The percentage of home purchase loans in moderate-income tracts exceeded this demographic. In addition, UMB's market share in moderate-income tracts exceeded its overall market share for both products.

The geographic distribution of refinance loans was very poor. UMB did not make any refinance loans in moderate-income tracts during the evaluation period.

Small Loans to Businesses

The geographic distribution of business loans was poor, though UMB did improve both the number and percentage of business loans it originated in moderate-income geographies in 1999 compared to 1998. The percentage of loans in moderate-

income tracts was significantly less than the percentage of businesses in moderate-income tracts. UMB's market share in moderate-income tracts was also significantly below its overall business loan market share.

Small Loans to Farms

The geographic distribution of farm loans was adequate even though UMB did not make any farm loans in moderate-income tracts over the evaluation period. There are few farms located in these tracts, which limits opportunities to make loans. Other lenders, in aggregate, reported only three farm loans in these tracts in 1998.

Consumer Loans

The geographic distribution of consumer loans was adequate. The percentage of loans in moderate-income tracts was somewhat less than the percentage of households in those tracts. Based on bank prepared data, 49 percent of consumer loan originations resulted from indirect lending channels.

Lending Gap Analysis

Our geographic distribution analysis included a review for any lending gaps in the Joplin MSA, particularly in moderate-income areas. We did not identify any unexplained gaps.

Inside/Outside Ratio

A substantial majority of bank loans were inside its AAs. Refer to the Scope of the Evaluation section for additional detail.

Distribution of Loans by Income Level of the Borrower

UMB's distribution of loans by borrower income was good overall. The bank achieved its strongest penetration with its home mortgage and small business loans, which both were excellent. Consumer loan distribution was good and distribution to farms of different sizes was adequate. Refer to Tables 7-11 and 14 for data used to evaluate the borrower distribution of the bank's loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans was excellent.

Loan penetration to moderate-income borrowers was excellent. The percentage of loans to moderate-income borrowers exceeded the percent of moderate-income families for all home mortgage loan types, i.e. home improvement, home purchase and refinance loans. For home improvement loans, UMB's moderate-income market share exceeded its overall market share. For home purchase loans, UMB's moderate-income market share was consistent with its overall loan market share. For refinance loans, UMB had less than one percent market share.

market share of home improvement loans to low-income borrowers was less than its overall market share, but few loans separate the lender with the highest market share and the lender with the lowest. For home purchase loans, the bank's low-income market share was consistent with its overall market share. For refinance loans, the bank's market share was less than one percent.

Small Loans to Businesses

The distribution of loans to businesses of different sizes was excellent. UMB made 72 percent of its reported business loans to entities with gross annual revenues of \$1 million or less (i.e. small businesses). Bank performance substantially met the percentage of businesses in the AA with revenues of \$1 million or less, and was consistent with other lenders. UMB's small business market share was also very near its overall market share of reported business loans.

Small Loans to Farms

The distribution of loans to farms of different sizes was adequate. UMB made 69 percent of its reported farm loans to entities with gross annual revenues of \$1 million or less (i.e. small farms). Bank performance was less than demographics, i.e. the percentage of farms in the AA with revenues of \$1 million or less, and the performance of other lenders. In aggregate, other lenders made 91 percent of their 1998 reported farm loans in this AA to small businesses. UMB's small farm market share was also somewhat less than its overall farm loan market share.

Consumer Loans

The overall borrower distribution of consumer loans was good. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of households that were moderate-income. Performance is not as strong in the low-income sector with the percentage of loans to low-income borrowers somewhat less than the percentage of low-income households. However, performance was still good considering the percentage of households below the poverty level (16 percent).

Community Development Lending

UMB did not originate any community development loans in the Joplin MSA.

Product Innovation and Flexibility

UMB offers a limited number of programs that use flexible or innovative underwriting targeted to assist LMI individuals or geographies. Refer to the Kansas City AA for detailed information about the Missouri First Linked Deposit Program and the MDHC Down Payment Assistance Program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's Lending Test performance in the Columbia MSA and the nonMSA areas is not inconsistent with the bank's overall High Satisfactory Lending Test rating in Missouri. In the Springfield MSA and St. Joseph MSA, bank performance was weaker than overall performance in the state, but still adequate. Refer to the Tables 1-11 and 14 in Appendix D for data that support these conclusions.

Weaker performance in the Springfield and St. Joseph MSAs was primarily attributable to weaker distributions in consumer loans. Performance differences between the full- and limited scope AAs did not change the overall Lending Test rating in the State of Missouri. These markets represented only 27 percent of UMB's deposits, and 19 percent of UMB's loans, in Missouri.

INVESTMENT TEST

The bank's performance under the Investment Test in Missouri is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Joplin MSA is adequate. However, the bank's performance in limited scope AAs had a positive impact on the overall rating for the state of Missouri. The limited scope AAs represent 86 percent of the bank's deposits, 85 percent of loan originations and 99 percent of the qualified investment dollars.

Conclusions for Areas Receiving Full-Scope Reviews

UMB and its affiliate, UMBFC, showed adequate responsiveness to community development needs in the Joplin MSA, providing \$57 thousand in qualified investments and donations. Investments address community development needs, including affordable home improvement programs and community services for LMI individuals. Refer to Table 12 in Appendix D for data used to evaluate the bank's level of qualified investments.

For the Joplin MSA, the bank allocated \$42 thousand of UMBFC's funded \$1 million investment in UMBCDC. This investment has the potential to benefit this AA through affordable home improvement programs targeting LMI areas and/or LMI individuals. This investment is considered both innovative and complex. Refer to the Investment Test for the Kansas City AA for additional information.

Per community contacts and the consolidated plan for the city of Joplin, there are limited opportunities for direct investment in the AA. Information in the plan addressed housing needs that included rehabilitation initiatives. No other community development needs were identified. The UMBCDC investment will help address home improvement needs in the AA.

Investment dollars also included \$15 thousand in grants and donations to qualified community development organizations.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Columbia MSA and Combined nonMSA Missouri AAs is not inconsistent with the bank's overall performance under the Investment Test in Missouri. Performance in these AAs had a positive impact on the rating for Missouri, increasing it to High Satisfactory. These AAs accounted for 98 percent of the investment dollars in Missouri. The primary reason for the stronger performance in the Combined nonMSA Missouri AA is due to a significant \$8 million investment in a revenue bond that primarily benefits LMI individuals in the AA and the broader regional area.

The stronger performance in the Columbia MSA is due to a prior period investment in a local CDC that is still outstanding.

In the St. Joseph and Springfield MSAs, the bank's performance was weaker than the bank's overall performance in the state, but similar to performance in the full-scope Joplin MSA. Since these two AAs represented only one percent of the investment dollars, 27 percent of the bank's deposits and 19 percent of loan originations in Missouri, it did not impact the overall rating for Missouri. Refer to Table 12 in Appendix D for data that support these conclusions.

SERVICE TEST

UMB's performance under the Service Test in Missouri is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Joplin MSA is good. However, the bank's performance in the limited scope AAs of Springfield and the combined nonMSA Missouri, which represent 69 percent of the Missouri branches,

had an adverse impact on the overall rating for Missouri. Branch distribution compared less favorably to demographics in these areas, thus impacting the overall Service Test rating for Missouri. Refer to Table 13 in Appendix D for data used to evaluate the distribution of the bank's branch delivery system.

Conclusions for Areas Receiving Full-Scope Reviews

The bank's service-delivery systems are accessible to geographies and individuals of different income levels in the Joplin MSA. Refer to Table 13 of Appendix D for data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings. In addition, UMB provided an adequate level of community development services in this AA.

Retail Banking Services

UMB's percentage of branches in moderate-income CTs exceeds the percentage of population residing in these CTs. One of the bank's five branches is located in a moderate-income CT. While the bank does not have any ATMs in moderate-income CTs, five ATMs are in middle- or upper-income CTs adjacent to moderate-income CTs. Three of these ATMs are deposit taking and have 24-hour availability. These ATMs somewhat increase the accessibility of basic banking services to LMI areas and individuals. This AA does not have any low-income CTs.

The bank has not opened or closed any branches since the last examination.

Branch hours, which include Saturday hours for drive-through facilities, are similar for all locations, including the branch in the moderate-income CT. Eight of the eleven ATMs offer 24-hour availability. All banking services are offered at the branches. Please refer to the Service Test comment for the Kansas City AA for details.

Community Development Services

UMB provided an adequate level of community development services in its Joplin MSA. Bank officers and employees lent their financial expertise and provided technical assistance to five organizations that primarily provide services for LMI individuals. These organizations provided support to assist underprivileged youth; to counsel and care for women affected by domestic violence and substance abuse, or to provide employment opportunities for disabled individuals. Bank employees assisted in fundraising efforts, were officers of the organizations or served as Treasurer or on the Finance Committee.

Refer to the Service Test for the Kansas City AA for details on other services that primarily benefit LMI, including ETA accounts and ATM programming that allows welfare recipients access to their benefits electronically.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the combined Missouri nonMSA AAs was not inconsistent with the bank's overall rating of Low Satisfactory in Missouri. In the Columbia MSA and St Joseph MSA, the bank's performance was stronger than the bank's overall performance in the state. Branch distribution compared favorably to the percentage of population in LMI areas which was similar to performance in the full-scope Joplin MSA. In the Springfield MSA, the bank's performance was weaker than the bank's overall performance, since the bank has no branches in LMI geographies while 23 percent of the population in the AA resides in LMI geographies.

The stronger performance in the Joplin, Columbia and St. Joseph AAs did not outweigh the performance of other limited scope AAs, resulting in the overall rating of Low Satisfactory. The evaluation in limited scope AAs included only the distribution of branches by income level of geography and the bank's record of opening and closing branches. Refer to Table 13 in Appendix D for data that support these conclusions.

State Rating

CRA Rating for Kansas²:	<u>Satisfactory</u>
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>High Satisfactory</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- < UMB's lending activity reflects adequate responsiveness to credit needs in Kansas.
- < The distribution of loans to borrowers of different income levels was good. For the Topeka AA, the bank achieved its strongest performance in consumer and home mortgage lending.
- < Geographic distribution of loans, including lending in LMI areas, was also good. For the Topeka AA, performance was notable in business and home mortgage lending.
- < Lending test performance in the limited-scope AAs did not detract from the bank's full-scope assessment.
- < UMB and its affiliate, UMBFC, showed good responsiveness to community development needs in the state of Kansas, providing \$165 thousand in qualified investments and donations. This includes a portion of UMBFC's investment in its recapitalized CDC that has the potential to benefit this AA through home improvement loan programs benefiting LMI areas or individuals.
- < UMB's branch distribution is accessible to geographies and individuals of different income levels, including LMI areas and individuals. The bank provided an adequate level of community development services in its Topeka AA.

Description of Institution=s Operations in Kansas

UMB has five AAs in the State of Kansas, excluding the Kansas portion of the Kansas City MSA. Three AAs are metropolitan areas (Topeka, Wichita, and Lawrence) and two are nonMSA areas (Atchison and Fort Scott). Kansas

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution=s performance in that area.

operations account for 10 branches (eight percent) and 15 ATMs (three percent). Three percent of total bank deposits, by dollar volume, and ten percent of the bank's loan originations, by number, are also attributable to these AAs.

Seven percent of UMB's farm loans, five percent of its business loans and four percent of the bank's home mortgage loans originated in UMB's Kansas AAs. UMB's primary credit product in Kansas is consumer loans. This loan product represents 68 percent, by dollar volume, of all bank loans extended in its Kansas AAs.

UMB has only one percent market share of deposits of all FDIC insured financial institutions operating in its Kansas AAs, excluding the Kansas portion of the Kansas City MSA). Financial institutions with the highest deposit market shares include Capital Federal Savings Bank, Bank of America and Intrust Bank, with deposit market shares of 19 percent, 14 percent, and 13 percent, respectively.

Refer to the Market Profiles for the State of Kansas in Appendix C for detailed demographics and other performance context information related to the AA(s) receiving full-scope reviews.

Scope of Evaluation in Kansas

We performed a full-scope review of the Topeka AA. The Topeka AA is representative of the Kansas markets. In the State of Kansas, Topeka represented 44 percent of UMB's deposits and 28 percent of loan originations. Of UMB's Kansas metropolitan AAs, Topeka had the largest percentage of total bank deposits, \$58 million or one percent, and the most loan originations at three percent. No one AA in Kansas represents more than one percent of total bank deposit volume or more than three percent of total loan originations. The Topeka AA was also home to four of the ten branch facilities and 8 of the 15 ATMs in Kansas. However, this represented only three percent of total bank branches and two percent of total ATMs.

Other AAs received limited scope reviews. We combined data for all nonMSA AAs in Kansas that received limited scope reviews. Refer to Appendix A for further information regarding the nonMSA AAs. The combined information is presented in the Tables in Appendix D.

State ratings are primarily based on performance in the area(s) receiving full-scope reviews. However, since limited scope AAs represent a substantial portion of the bank's lending, investment and service activities, the performance in these AAs impacted the final ratings assigned to the State of Kansas.

During the examination, we conducted two community contacts in the Topeka AA.

The contacts included an economic development organization and a grassroots community group. Contacts cited needs for small business loans, affordable housing programs and financial education.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

UMB's Lending Test performance in Kansas is rated High Satisfactory. Based on our full-scope review, bank performance in the Topeka MSA area is good.

- < We weighted consumer loans most heavily, followed by business loans, home mortgage and farm loans. Consumer loans account for 64 percent of bank loans, by dollar volume, in the Topeka AA over the evaluation period. For the other loan types, small business and home mortgage, these loans respectively account for 29 percent and 7 percent of bank loans over the evaluation period.
- < For home mortgage loans, we weighted home improvement loans most heavily. This product accounts for 51 percent of home mortgage loans (by number) over the evaluation period. Our analysis of home mortgage lending in the Topeka AA does not include home purchase loans. Home purchase lending is not a primary bank product. UMB reported only eight home purchase loans in this market over the evaluation period. We gave refinance loans little weight in our overall assessment of home mortgage lending as previously discussed under the bank's overall Scope of the Evaluation. Market share analysis for refinance loans was not meaningful since the bank generated less than one percent of the market's loans in this category.
- < For consumer loans, we weighted borrower distribution more heavily than geographic distribution since the bank relies heavily on indirect distribution channels to generate these loans. Also, consumer loans generally are not considered a credit product with a stabilizing impact on LMI areas.
- < Our analysis in the Topeka AA does not include farm lending. UMB reported only one farm loan in this market over the evaluation period. The Topeka MSA is primarily an urban area and farm lending is not an identified credit need in this AA.

Lending Activity

Lending levels reflected adequate responsiveness to credit needs in relation to the bank's deposit base and healthy economic conditions in the Topeka MSA. Refer to Table 1 in Appendix D for data used to evaluate the bank's lending activity.

The bank's home improvement loan market share was consistent with its deposit market share. In 1998, UMB originated four percent of all reported home improvement loans, ranking eighth of 39 lenders. Of all FDIC-insured financial institutions operating in this AA, UMB ranked ninth in deposit market share.

Responsiveness to business credit needs is not as strong. In 1998, UMB originated three percent of all reported business loans in the Topeka AA, ranking eighth of 31 lenders. Among CRA data reporters, the bank ranks fourth in deposit market share.

Home refinance lending is not a primary product for UMB. In 1998, UMB originated less than one percent refinance loans, ranking 34th of 143 lenders.

Distribution of Loans by Income Level of the Geography

UMB's distribution of loans, including lending in LMI geographies, was good overall. The bank achieved good penetration of LMI geographies with its home mortgage loans, particularly with its home improvement loans. Small business loan distribution was also good. Consumer loan distribution in LMI geographies was weaker, but still adequate. Refer to Tables 2-5 and 14 in Appendix D for data used to evaluate the borrower distribution of the bank's loans.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans in the Topeka AA was good.

The geographic distribution of home improvement loans was excellent. The percentage of home improvement loans in moderate-income tracts exceeded the percentage of owner-occupied housing in these tracts. In addition, UMB's market share in moderate-income tracts exceeded its overall home improvement loan market share.

The geographic distribution of refinance loans was poor. The percentage of refinance loans in moderate-income tracts was significantly less than the percentage of owner-occupied housing in these tracts.

UMB did not make any home mortgage loans in low-income tracts over the evaluation period, but this was reasonable. The two low-income tracts in the Topeka AA have a high rental rate (60 percent), and high poverty rate (37 percent), which limits lending opportunities. Other lenders, in aggregate, reported only eight home purchase, six home improvement loans and eleven refinance loans in these tracts in 1998.

Small Loans to Businesses

The overall geographic distribution of business loans was good.

Performance in moderate-income tracts was excellent. The percentage of loans in moderate-income tracts was very near the demographic (i.e. the percent of businesses in moderate-income tracts). UMB's market share in moderate-income tracts was equal to its overall business loan market share.

Geographic distribution of business loans in low-income tracts was poor. The percentage of loans in low-income tracts was significantly less than the percentage of businesses in low-income tracts. In addition, UMB's market share in low-income tracts was less than its overall business loan market share.

Consumer Loans

The overall geographic distribution of consumer loans was adequate.

Consumer loan distribution in moderate-income tracts was adequate, but poor in low-income tracts. The percentage of loans in moderate-income tracts was somewhat less than the percentage of households in those tracts. The percentage of loans in low-income tracts was significantly less than the percentage of households in low-income tracts. Based on bank prepared data, 62 percent of consumer loan originations resulted from indirect lending channels in this AA.

Lending Gap Analysis

Our geographic distribution analysis included a review for any lending gaps in the Topeka AA, particularly in LMI areas. We did not identify any unexplained gaps.

Inside/Outside Ratio

A substantial majority of bank loans are inside its AAs. Refer to the Scope of the Evaluation section for additional detail

Distribution of Loans by Income Level of the Borrower

UMB's distribution of loans by borrower income level was good. The bank achieved its best penetration with its home mortgage and consumer loans which were both good. Penetration to businesses of different sizes was less strong, but adequate. Refer to Tables 7-10 and 14 in Appendix D for data used to evaluate the borrower distribution of the bank's loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans was good.

Borrower distribution of home improvement loans was excellent. The percentage of home improvement loans to LMI borrowers exceeded or was near the percentage of LMI families. UMB's market share to low-income borrowers exceeded and its market share to moderate-income borrowers equaled its overall home improvement loan market share.

Borrower distribution of refinance loans was poor. The percentage of refinance loans to low-income and moderate-income borrowers was significantly less than the percentage of LMI families, even considering the percentage of families below the poverty level (7 percent).

Small Loans to Businesses

The distribution of loans to businesses of different sizes was adequate. UMB made 58 percent of its reported business loans to entities with gross annual revenues of \$1 million or less, i.e. small businesses. This percentage is somewhat less than the percentage of businesses in the AA with revenues of \$1 million or less and the performance of other lenders. In aggregate, other lenders made 72 percent of their 1998 reported business loans in this AA to small businesses. UMB's small business market share was consistent with its overall business loan market share.

Consumer Loans

The overall borrower distribution of consumer loans was good. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income households. Performance was not as strong in the low-income sector, but still good considering the percentage of households below the poverty level (10 percent). The percentage of loans to low-income borrowers was less than the percentage of low-income households.

Community Development Lending

UMB originated a limited number of community development loans in the Topeka AA. Two community development loans totaling \$7 thousand met an identified credit need of affordable housing by providing financing to a nonprofit organization that develops, finances and manages low-income single family homes.

Product Innovation and Flexibility

UMB did not have any specific flexible or innovative loan program to LMI individuals or geographies in the State of Kansas during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's Lending Test performance in the nonMSA areas was not inconsistent with the bank's overall High Satisfactory Lending Test rating in Kansas. In the Lawrence MSA and Wichita MSA, bank performance was weaker than overall performance in the state, but still adequate.

Borrower distributions for consumer loans and geographic distributions for all loan products in the Lawrence MSA and for business loans in the Wichita MSA contributed to the weaker performance. Performance differences between full- and limited-scope AAs did not change the overall Lending Test rating for the State of Kansas. These markets represent only seven percent of UMB's deposits, and 40 percent of UMB's loan originations, in Kansas. Refer to Tables 1-11 and 14 in Appendix D for data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Kansas is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Topeka AA was adequate. Bank performance in limited scope AAs, which represented 73 percent of the investments in the State of Kansas, had a positive impact on this rating for Kansas.

Conclusions for Areas Receiving Full-Scope Reviews

UMB and its affiliate, UMBFC, showed adequate responsiveness to community development investment needs in the Topeka AA, providing \$44 thousand in qualified investments and donations. Investments address community development needs, including affordable home improvement programs and community services for LMI individuals. Refer to Table 12 in Appendix D for data used to evaluate the bank's level of qualified investments.

For the Topeka AA, the bank allocated \$28 thousand of UMBFC's \$1 million investment in UMBCDC. This investment has the potential to benefit this AA through affordable home improvement programs targeting LMI areas and/or LMI individuals. This investment is considered both innovative and complex and has the potential to benefit this AA. Refer to the Investment Test for the Kansas City AA for additional information.

Per community contacts and the consolidated plan for the city of Topeka, there are limited opportunities for direct investment in the AA. Information in the plan addressed housing needs that included rehabilitation initiatives. No other community development investment needs were identified. The UMBCDC investment will help address home improvement needs in the AA. This investment

is previously described in the Kansas City AA Investment Test.

Investment dollars also included \$16 thousand in grants and donations to qualified community development organizations.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Lawrence, Wichita and combined nonMSA Kansas AAs was stronger than the bank's performance in the full-scope Topeka AA. This had a positive impact on the overall rating for the Investment Test in Kansas. Performance was considered stronger due to a higher dollar level of investments relative to the bank's capacity and resources attributed to these areas. The limited scope AAs represented 56 percent of the bank's deposits, 72 percent of loan originations and 73 percent of the qualified investment dollars. Refer to Table 12 in Appendix D for data that support these conclusions.

SERVICE TEST

UMB's performance under the Service Test in Kansas is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Topeka MSA was good.

Conclusions for Areas Receiving Full-Scope Reviews

The bank's service-delivery systems are readily accessible to geographies and individuals of different income levels in the Topeka AA. UMB provided an adequate level of community development services that benefited the Topeka AA. Refer to Table 13 in Appendix D for data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Retail Banking Services

UMB's branch facilities and ATMs are well represented in moderate-income CTs. Three of the bank's four facilities, which include deposit-taking ATMs, are located in moderate-income CTs. This percentage of branches as well as the percentage of ATMs in moderate-income CTs greatly exceeds the percentage of population residing in these CTs. While the bank does not have any branches in low-income CTs, two of its branches are located adjacent to these CTs. In addition, UMB has one ATM in a low-income CT that provides cash-dispensing services at a grocery store.

The bank has not opened or closed any branches in this AA since the last examination.

Branch hours, which include extended hours during the week and Saturday hours, are identical for all branches. All banking services are offered at the branches. See the Service Test comment for the Kansas City AA for details regarding these services. Five of eight ATMs in this AA are available 24 hours a day. Access to other ATMs is limited to the hours of operation for the businesses where they are located, including grocery stores and convenience stores. Only ATMs located at bank branches accept deposits.

Community Development Services

UMB provided an adequate level of community development services in the Topeka AA during this evaluation. Bank employees lent their financial expertise to seven community organizations in several capacities. This included: serving as members of the Boards of Directors; serving as Treasurer; assisting with fundraising efforts; and sharing budgeting and financial advice. These organizations provided needed services to LMI individuals, including temporary shelter, affordable housing, advice and counsel for welfare recipients, and education to small business owners.

Refer to the Service Test for the Kansas City AA for details on other services that primarily benefit LMI individuals, i.e. ETA accounts and ATM programming that allows welfare recipients access to their benefits electronically.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Wichita MSA was not inconsistent with the bank's overall rating of High Satisfactory in Kansas. For the Lawrence MSA and the combined Kansas nonMSA AA, bank performance was weaker than the overall performance for the state. The bank has no branch representation in the LMI areas of these AAs where 23 percent and 18 percent of the population resides, respectively. This weaker performance did not outweigh the performance in the full-scope Topeka AA and limited scope Wichita MSA, since these AAs represented 60 percent of the bank's branches in Kansas. The evaluation in limited scope AAs included only the distribution of branches by income level of geography and the bank's record of opening and closing branches. Refer to Table 13 in Appendix D for data that support these conclusions.

State Rating

CRA Rating for Illinois³:	<u>Satisfactory</u>
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>Low Satisfactory</u>
The Service Test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

- < UMB's lending activity reflects adequate responsiveness to credit needs in Illinois.
- < The bank's distribution of loans to borrowers of different income levels was excellent, particularly with consumer loans. Geographic distribution of loans was also adequate.
- < UMB and its affiliate, UMBFC, showed adequate responsiveness to community development needs in Illinois, providing \$4.5 thousand in qualified investments and donations. This includes a portion of UMBFC's investment in its recapitalized CDC that has the potential to benefit this AA by providing home improvement loan programs benefiting LMI individuals.
- < UMB's lone branch provides reasonable access to geographies and individuals of different income levels, including the AA's moderate-income areas. UMB also provided an adequate level of community development services.

Description of Institution=s Operations in Illinois

UMB has one nonMSA AA and one branch in the State of Illinois. The Morrisonville AA comprises less than one percent of bank branches, deposits and reported loans.

UMB's primary credit product in Illinois is consumer loans. This loan type represented 82 percent of bank loan originations in Illinois. Less than one percent of the bank's farm, business or home mortgage loans originated in the Illinois AA.

UMB has the second smallest deposit market share, with less than one percent, of 26 FDIC-insured financial institutions operating in the Morrisonville AA.

³ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution=s performance in that area.

Competitors in the AA include Firststar, Bank & Trust Company and First National Bank in Taylorville with deposit market shares of 10 percent, nine percent and eight percent, respectively. Thirteen other competitors have between three and seven percent deposit market shares within this AA.

Refer to the Market Profile for the State of Illinois in Appendix C for detailed demographics and other performance context information related to the Morrisonville AA.

Scope of Evaluation in Illinois

We performed a full-scope review of the Morrisonville AA. The Morrisonville AA is UMB's only AA in the State of Illinois. State of Illinois ratings are based entirely on bank performance in the Morrisonville AA. Refer to the table in Appendix A for more information.

During the examination, we conducted one community contact with a local government representative. The contact cited a need for agricultural and auto loans.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

UMB's Lending Test performance in Illinois is rated High Satisfactory. Based on our full-scope review, bank performance in the Morrisonville AA is good.

- < We weighted consumer loans most heavily, followed by farm loans and business loans. Consumer loans accounted for 77 percent of the dollar volume of loans in the Morrisonville AA over the evaluation period. Farm, business and home mortgage loans, by dollar volume, accounted for twelve percent, six percent, and five percent, respectively.
- < For consumer loans, we weighted borrower distribution more heavily than geographic distribution since the bank relies heavily on indirect distribution channels to generate these loans. Also, consumer loans generally are not considered a credit product with a stabilizing impact on LMI areas.
- < Our analysis in the Morrisonville AA does not include home mortgage lending. Home mortgage lending is not a primary bank product. UMB reported only five home mortgage loans in this market over the evaluation period.

Lending Activity

Lending levels reflect adequate responsiveness to credit needs in relation to the bank's capacity in the Morrisonville AA. Refer to Table 1 of Appendix D for data used to evaluate the bank's lending activity.

The bank's farm loan market share was better than its deposit market share among CRA data reporters. In 1998, UMB originated nine percent of all reported farm loans in the Morrisonville AA, ranking second of seven lenders. Only 7 of the twenty six FDIC-insured financial institutions operating in this AA reported farm loans. UMB ranked fifth in deposit market share among these reporters.

The bank's business loan market share was consistent with its deposit market share among CRA data reporters. UMB originated five percent of all 1998 reported business loans in the Morrisonville AA, ranking fifth of 24 lenders.

Distribution of Loans by Income Level of the Geography

UMB's distribution of loans, including lending in the two moderate-income tracts in this AA, was adequate for all loan product types. Refer to Tables 2-6 and 14 for data used to evaluate the geographic distribution of the bank's reported loans.

Small Loans to Businesses

UMB's geographic distribution of business loans was considered adequate even though UMB did not originate any business loans in moderate-income geographies. UMB's branch is not near to the AA's two moderate-income geographies. These two tracts are located 15 miles north and 23 miles east of UMB's branch location. In addition, there are many competing financial institutions located closer to these geographies.

Small Loans to Farms

UMB's geographic distribution of farm loans was also considered adequate even though UMB did not originate any farm loans in moderate-income geographies. As previously mentioned, UMB's branch is not near these areas.

Consumer Loans

The geographic distribution of consumer loans was adequate. UMB made three percent of its consumer loans in moderate-income areas. While bank performance was less than the percentage of households in those areas, it was reasonable given these geographies' distance from a UMB office and their proximity to competing financial institutions. Also, based on bank prepared data, 43 percent of consumer loan originations resulted from indirect lending channels in this AA.

Lending Gap Analysis

Our geographic distribution analysis included a review for any lending gaps in the Morrisonville AA, particularly in moderate-income areas. We did not identify any unexplained gaps.

Inside/Outside Ratio

A substantial majority of bank loans are inside its AAs. Refer to the Scope of the Evaluation section for additional detail.

Distribution of Loans by Income Level of the Borrower

UMB's distribution of loans by borrower income level was excellent. The bank achieved its strongest penetration with consumer loans to LMI borrowers, which was excellent. UMB's penetration to smaller business and farms (those with revenues of \$1 million or less) was also good

Small Loans to Businesses

The distribution of loans to businesses of different sizes was good. UMB made 61 percent of its reported business loans to entities with gross annual revenues of \$1 million or less (i.e. small businesses). This percentage substantially met the percentage of businesses in the AA that have revenues of \$1 million or less, but was less than the percentage achieved by other lenders. In aggregate, other lenders made 76 percent of their 1998 reported business loans in this AA to small businesses. UMB's small business market share approximated its overall business loan market share.

Small Loans to Farms

The distribution of loans to farms of different sizes is good. UMB made 81 percent of its reported farm loans to entities with gross annual revenues of \$1 million or less (i.e. small farms). This percentage substantially met the percentage of farms in the AA with revenues of \$1 million or less, but was less than the percentage achieved by other lenders. In aggregate, other lenders made 91 percent of their 1998 reported farm loans in this AA to small farms. UMB's small farm market share exceeded its overall farm loan market share.

Consumer Loans

The borrower distribution of consumer loans was excellent. The percentage of loans to moderate-income borrowers far exceeded the percentage of moderate-income households. Performance was not as strong in the low-income sector, but it was still good considering the percentage of households below the poverty level (13 percent). The percentage of loans to low-income borrowers was slightly less than the percentage of low-income households.

Community Development Lending

UMB did not originate any community development loans in the Morrisonville AA.

Product Innovation and Flexibility

UMB did not have any specific flexible or innovative loan program to LMI individuals or geographies in the State of Illinois during the evaluation period.

INVESTMENT TEST

The bank's performance under the Investment Test in Illinois is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Morrisonville AA was adequate. Refer to Table 12 in Appendix D for data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

UMB and its affiliate, UMBFC, showed adequate responsiveness to community development needs in the State of Illinois, providing \$4.5 thousand in qualified investments and donations. Investments primarily address affordable home improvement community development needs.

For the Morrisonville AA, the bank allocated \$4.5 thousand of UMBFC's \$1 million investment in UMBCDC. This investment has the potential to benefit this AA with affordable home improvement programs targeting LMI areas and/or LMI individuals. This investment was considered both innovative and complex. Refer to the Investment Test for the Kansas City AA for additional information. UMB also made five small donations to organizations that provide needed services for primarily LMI during this evaluation period.

Per community contacts, there are very limited opportunities for direct investment in the AA. A primary need is home remodeling loans. No specific community development needs were identified. The UMBCDC investment will help address home improvement needs in the AA.

Conclusions for Area Receiving Limited-Scope Reviews - Not Applicable.

SERVICE TEST

UMB's performance under the Service Test in Illinois is rated Low Satisfactory. Based on a full-scope review of UMB's sole AA in Illinois, Morrisonville, performance was adequate.

Conclusions for Areas Receiving Full-Scope Reviews

The bank's service-delivery systems are reasonably accessible to geographies and individuals of different income levels in Illinois. UMB also provided an adequate level of community development services during this evaluation period. Refer to Table 13 of Appendix D for data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Retail Banking Services

The bank maintains one office and one ATM in this AA. Both are in a middle-income CT. The sole branch location is not near the moderate-income CTs, but several competing financial institutions serve these areas. Only nine percent of the AA's population resides in the two moderate-income CTs. The AA does not have any low-income areas.

The bank has not opened or closed any branches in this AA since the last examination.

UMB offers reasonable hours and services at its branch location. The branch maintains Saturday hours and extended hours for Friday afternoon. The deposit-taking ATM offers 24-hour service. All banking services are offered via the branch.

See the Service Test comment for the Kansas City AA for details regarding these services.

Community Development Services

UMB provided an adequate level of community development services considering the limited opportunities in this AA. During the evaluation period, an employee provided financial education to small business owners and LMI senior citizens. An employee also helped with fund-raising efforts for a local community organization that provides food services for the less fortunate. In addition, UMB provides two services that primarily benefit LMI individuals. UMB offers ETA accounts. And, the bank's ATMs are programmed to allow Illinois welfare recipients access to their benefits electronically. Refer to the Service Test for the Kansas City AA for further details on similar services.

Conclusions for Areas Receiving Limited-Scope Reviews - Not Applicable.

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 nonMSA areas that received comprehensive examination review (designated by the term AFull-Scope≡) and those that received a less comprehensive review (designated by the term ALimited-Scope≡).

Time Period Reviewed	Lending Test: (January 1, 1998 to December 31, 1999) Investment Test: (November 17, 1997 to May 22, 2000) Service Test: (November 17, 1997 to May 22, 2000)	
Financial Institution	Products Reviewed	
UMB Bank, National Association (UMB) Kansas City, Missouri	HMDA, Small Business, Small Farm and Consumer and Community Development Loan Data; Qualified Investments; Retail and Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
UMB National Bank of America, Salina, Kansas UMB Bank Colorado, N.A. UMB CDC	Subsidiary of UMBFC Subsidiary of UMBFC Subsidiary of UMBFC	Qualified Investments Qualified Investments Qualified Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Multistate MSA(s): Kansas City MO-KS MSA #3760 St. Louis MO-IL MSA #7040 Missouri: Joplin MSA #3710 Columbia MSA #1740 Springfield MSA #7920 St. Joseph MSA #7000 NonMSA MO Combined Kansas: Topeka MSA #8440 Lawrence MSA #4150 Wichita MSA #9040 NonMSA KS Combined Illinois: Morrisonville nonMSA AA	Full-scope Full-scope Full-scope Limited scope Limited scope Limited scope Limited scope Full-scope Limited scope Limited scope Limited scope Full-scope	Central Missouri; Monett; Northeast Missouri; North Central Missouri; Jefferson City; Northwest Missouri Atchison; Ft. Scott Not reviewed due to recent merger in

Oklahoma:	Not reviewed	March 2000.
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Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS UMB BANK, NATIONAL ASSOCIATION				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
UMB BANK, N.A.	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
KANSAS CITY MULTISTATE MSA	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
ST. LOUIS MULTISTATE MSA	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
STATE OF MISSOURI	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
STATE OF KANSAS	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
STATE OF ILLINOIS	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

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

Appendix C: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Kansas City Multistate Metropolitan Area	C-2
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State of Kansas - Topeka MSA.....	C-5
State of Illinois - Morrisonville AA.....	C-6

Kansas City, MO-KS MSA #3760

Demographic Information for Full-Scope Area: Kansas City, MO-KS MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	414	10%	23%	41%	23%	3%
Population by Geography	1,425,365	5%	18%	49%	28%	< 1%
Owner-Occupied Housing by Geography	359,880	3%	14%	52%	31%	0%
Businesses by Geography	57,971	5%	15%	45%	32%	3%
Farms by Geography	1,680	1%	9%	61%	29%	< 1%
Family Distribution by Income Level	384,171	18%	18%	25%	39%	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	137,617	9%	29%	49%	13%	NA
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$37,652 = \$54,200 = 10%	Median Housing Value Unemployment Rate (April 2000)				= \$67,517 = 2.71%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 1999 HUD updated MFI.

The Kansas City AA consists of six contiguous counties in the Kansas City MSA. These counties are: Cass, Clay, Jackson and Platte in Missouri; and Johnson and Wyandotte in Kansas. LMI CTs are predominately located in Jackson and Wyandotte Counties. The AA complies with regulatory guidelines and does not arbitrarily exclude any LMI areas.

Kansas City's economy is stable with a diverse employment base. Unemployment consistently runs well below the national average. Kansas City's largest industries are agribusiness, telecommunications, banking, engineering, transportation and manufacturing. The largest area employers are federal and state government, Hallmark Cards, Inc. and AT&T. Several major corporations are based in Kansas City, including Sprint Corporation, Hallmark Cards, Inc. Hoechst, Marion, Roussell, Inc. and Farmland Industries.

Kansas City's downtown areas have substantial blight and are in need or redevelopment. The City governments have actively sought ways to redevelop this area. In addition, a federally-approved Bi-State Empowerment Zone encompasses 19.6 square miles surrounding the Kansas City, Missouri and Kansas City, Kansas downtown area. The strategic plan for this area includes providing incentives to attract new businesses to the zone and to improve the lives of the low-income residents of this area through job opportunity and training.

Numerous commercial banks (including other interstate banks), savings institutions

and mortgage companies provide strong competition for banking services in the Kansas City AA. UMB held 12 percent of the deposits in this AA. Primary competitors include Bank of America, Firststar, and Commerce Bank which held deposit market shares of 12, 12 and 11 percent respectively.

St. Louis, MO-IL MSA #7040

Demographic Information for Full-Scope Area: St. Louis, MO-IL MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	435	13%	21%	44%	21%	1%
Population by Geography	2,286,591	7%	16%	48%	29%	< 1%
Owner-Occupied Housing by Geography	590,131	3%	13%	52%	32%	0%
Businesses by Geography	79,692	5%	12%	49%	34%	< 1%
Farms by Geography	2,632	1%	5%	68%	26%	< 1%
Family Distribution by Income Level	607,415	19%	18%	24%	39%	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	221,865	14%	24%	49%	13%	NA
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$37,995 = \$52,000 = 11%	Median Housing Value Unemployment Rate (April 2000)				= \$75,985 = 3.1%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 1999 HUD updated MFI.

The St. Louis AA consists of St. Louis City and five contiguous counties in the St. Louis MSA. These counties are: Jefferson, St. Charles and St. Louis in Missouri; and Madison and St. Clair in Illinois. The AA complies with regulatory guidelines and does not arbitrarily exclude any LMI areas.

St. Louis is located in eastern Missouri. The economy is good and the unemployment rate is below the national average. St. Louis' largest industries are aerospace, defense, food and beverage, automobile assembly, health services, education and chemical. St. Louis is headquarters for 20 fortune 1000 companies, including Anheuser-Busch Companies, Inc., Monsanto Company and Trans World Airlines, Inc.

A federally-approved Regional Empowerment Zone encompasses 15 CTs in St. Louis City which surrounds the downtown area. It also includes two CTs in St. Louis County. St. Louis' downtown area had undergone significant redevelopment to remove blight.

Numerous commercial banks (including other interstate banks), savings institutions and mortgage companies provide strong competition for banking services in the St. Louis AA. UMB ranked sixth in deposit market share (2 percent of the deposits) among financial institutions operating in the St. Louis AA. Primary competitors include Firststar, Bank of America and Union Planters which held deposit market shares of 28, 15, and 9 percent respectively.

State of Missouri Full-Scope Areas

Joplin MSA #3710

Demographic Information for Full-Scope Area: Joplin MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	32	0%	9%	75%	16%	NA
Population by Geography	134,910	0%	10%	74%	16%	NA
Owner-Occupied Housing by Geography	38,017	0%	8%	76%	16%	NA
Businesses by Geography	6,567	0%	20%	64%	16%	NA
Farms by Geography	427	0%	3%	93%	4%	NA
Family Distribution by Income Level	37,921	19%	19%	24%	38%	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	14,202	0%	14%	76%	10%	NA
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$26,192 = \$38,000 = 16%	Median Housing Value Unemployment Rate (April 2000)				= \$40,312 = 2.3%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 1999 HUD updated MFI.

The Joplin MSA consists of Jasper and Newton counties. The AA is contiguous and complies with regulatory guidelines. The AA does not arbitrarily exclude any LMI areas.

Joplin is located in the southwest corner of Missouri approximately five miles east of the Kansas state line and eight miles northeast of the Oklahoma state line. The economy is good and Joplin has enjoyed strong economic growth in the past decade. Major employers in the area include health care, transportation and manufacturing.

Numerous commercial banks (including other interstate banks) and savings institutions provide strong competition for banking services in the Joplin MSA. UMB ranked sixth in deposit market share (5 percent of deposits) among financial

institutions operating in the Joplin MSA. Three banks dominate the market with over 55 percent of the deposit share in the AA. Primary competitors include

Firststar, Southwest Missouri and Community Bank & Trust which held deposit market shares of 29, 15 and 12 percent respectively.

State of Kansas Full-Scope Areas

Topeka MSA #8440

Demographic Information for Full-Scope Area: Topeka MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	44	5%	27%	46%	20%	2%
Population by Geography	160,976	3%	24%	42%	31%	< 1%
Owner-Occupied Housing by Geography	42,450	2%	20%	45%	33%	0%
Businesses by Geography	6,509	12%	29%	33%	26%	< 1%
Farms by Geography	257	2%	11%	63%	24%	0%
Family Distribution by Income Level	43,025	18%	18%	26%	38%	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	15,465	5%	38%	40%	17%	NA
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$35,987 = \$51,200 = 10%	Median Housing Value Unemployment Rate (April 2000)				= \$55,484 = 3.1%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 1999 HUD updated MFI.

The Topeka AA consists of Shawnee County. The AA complies with the regulatory guidelines and does not arbitrarily exclude any LMI areas.

Topeka, located seventy miles west of Kansas City, is the state capital of Kansas and the Shawnee County seat. The local economy is supported by manufacturing, healthcare and retail services. Major employers include nine hospitals, state and local governments several large manufacturing firms.

With over 18 financial institutions located in Topeka, competition for deposit market share is strong. UMB ranked ninth in deposit market share (2 percent) among area financial institutions. Competition is provided by several large interstate banks including Capital Federal, Commerce Bank and Bank of America who held 41, 16, and 9 percent respectively.

State of Illinois Full-Scope Areas

Morrisonville AA

Demographic Information for Full-Scope Area: Morrisonville AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	18	0%	11%	89%	0%	NA
Population by Geography	65,146	0%	9%	91%	0%	NA
Owner-Occupied Housing by Geography	18,832	0%	8%	92%	0%	NA
Businesses by Geography	2,665	0%	7%	93%	0%	NA
Farms by Geography	900	0%	4%	96%	0%	NA
Family Distribution by Income Level	17,994	19%	18%	25%	38%	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	6,630	0%	13%	87%	0%	NA
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$29,694 = \$41,500 = 14%	Median Housing Value Unemployment Rate (April 2000)				= \$37,208 = 5.1%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 1999 HUD updated MFI.

The Morrisonville AA consists of Christian and Montgomery counties. The AA complies with regulatory guidelines and does not arbitrarily exclude any LMI areas.

Morrisonville is located in central Illinois approximately 76 miles northeast of St. Louis, Missouri. Christian and Montgomery counties are rural agricultural areas.

Unemployment in this area is higher than both the state and national rates. Wholesale and retail industries, services and agriculture make up the economic climate of this area. Major employers include the local school districts, city government and retail service organizations.

Twenty-six financial institutions (including other interstate banks) have a presence in this AA. UMB ranked 24th in deposit market share (< 1%) among area financial institutions. No one institution dominates this market. Firststar, Bank & Trust Company, and First National Bank in Taylorville held 10, 9 and 8 percent respectively.

Appendix D: Tables of Performance Data

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Content of Standardized Tables	D-2
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UMB Bank, N.A.	D-5

Content of Standardized Tables

A set of tables is provided for the bank. References to the Abank \cong 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: purchased loans are treated as originations/purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; 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 MSA/assessment area.

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/assessment area.
- 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 rank and 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 Refinance Loans** - See Table 2.
- Table 5. 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 rank and market share information based on the most recent aggregate market data available.
- Table 6. 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 rank and market share information based on the most recent aggregate market data available.

- Table 7. 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 MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** - See Table 7.
- Table 9. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 10. 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small business reporters in the bank=s AA to businesses with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 11. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank=s AA to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/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 have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.
- Table 13. 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 MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.
- Table 14. Geographic and Borrower Distribution of Consumer Loans** - 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 the population 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 MSA/assessment area.

Table 1. Lending Volume

LENDING VOLUME		Bank: UMB Bank, N.A.						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999				
MSA/Assessment Area:	% of Rated Area Deposits in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development		Total Reported Loans		% of Rated Area Loans(#) in MSA/AA**
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Multistate MSAs: (FS=Full Scope; LS=Limited Scope)												
FS-Kansas City MO-KS	100%	2,425	\$80,162	2,032	\$332,066	102	\$2,162	15	\$17,401	4,574	\$431,791	100%
FS-St. Louis MO-IL	100%	3,133	\$66,841	957	\$117,405	0	0	18	\$12,846	4,108	\$197,092	100%
State of Missouri:												
FS-Joplin MSA	14%	230	\$8,768	314	\$19,155	180	\$3,139	0	0	724	\$31,062	14%
LS-Columbia MSA	1%	37	\$861	24	\$474	12	\$84	0	0	73	\$1,419	1%
LS-Springfield MSA	11%	133	\$7,226	150	\$22,394	2	\$45	0	0	285	\$29,665	5%
LS-St. Joseph MSA	16%	207	\$5,289	227	\$14,184	122	\$1,331	0	0	556	\$20,804	11%
LS-NonMSA MO	58%	468	\$19,770	1,146	\$37,334	1,959	\$40,769	6	\$29	3,579	\$97,902	69%
State of Kansas:												
FS-Topeka MSA	44%	57	\$2,668	71	\$11,773	1	\$75	2	\$7	131	\$14,523	17%
LS-Lawrence MSA	3%	16	\$708	16	\$3,372	0	\$0	0	0	32	\$4,080	4%
LS-Wichita MSA	4%	15	\$944	56	\$7,154	0	\$0	0	0	71	\$8,098	9%
LS-NonMSA KS	49%	220	\$4,710	137	\$3,692	195	\$4,746	0	0	552	\$13,148	70%
State of Illinois:												
FS-Morrisonville AA	100%	5	\$207	28	\$245	37	\$463	0	0	70	\$915	100%

* Deposit data as of June 30, 1999.

**Percentage does not include consumer loans.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE				Bank: UMB BANK, N.A.				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999								
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% 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	#	% of Total**
Multistate MSAs: (FS=Full Scope; LS=Limited Scope)																
FS-Kansas City MO-KS	3%	< 1%	14%	10%	52%	49%	31%	41%	51	0.36	0.00	0.48	0.34	0.37	209	100%
FS-St. Louis MO-IL	3%	1%	13%	2%	52%	43%	32%	54%	102	0.13	0.00	0.05	0.08	0.20	129	100%
State of Missouri:																
FS-Joplin MSA	n/a	n/a	8%	10%	76%	73%	16%	17%	17	1.81	n/a	3.72	1.66	1.62	80	34%
LS-Columbia MSA	2%	0%	10%	0%	64%	100%	24%	0%	63	0.04	0.00	0.00	0.06	0.00	2	1%
LS-Springfield MSA	< 1%	0%	17%	4%	63%	78%	20%	18%	63	0.21	0.00	0.12	0.21	0.27	28	12%
LS-St. Joseph MSA	2%	0%	15%	9%	53%	65%	30%	26%	20	0.92	0.00	1.04	1.28	0.49	23	10%
LS-NonMSA MO	< 1%	0%	4%	1%	65%	79%	31%	20%	17	1.69	0.00	0.00	1.91	1.33	100	43%
State of Kansas:																
FS-Topeka MSA	2%	0%	20%	0%	45%	50%	33%	50%	55	0.07	0.00	0.00	0.08	0.08	8	17%
LS-Lawrence MSA	< 1%	0%	11%	0%	65%	33%	24%	67%	50	0.16	0.00	0.00	0.10	0.28	3	6%
LS-Wichita MSA	4%	0%	16%	0%	53%	0%	27%	100%	n/a	0.00	0.00	0.00	0.00	0.00	3	6%

LS-NonMSA KS	n/a	n/a	19%	21%	81%	79%	n/a	n/a	2	11.36	n/a	17.3 9	10.0 9	n/a	34	71%
State of Illinois:																
FS-Morrisonville AA	n/a	n/a	8%	0%	92%	100%	n/a	n/a	n/a	0.00	n/a	0.00	0.00	n/a	1	100%

(*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT				Bank: UMB BANK, N.A.				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999								
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans	
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Over-all	Low	Mod	Mid	Upp	#	% of Total**
Multistate MSAs: (FS=Full Scope; LS=Limited Scope)																
FS-Kansas City MO-KS	3%	4%	14%	13%	52%	52%	31%	31%	1	21.93	22.39	17.67	21.91	24.45	1,779	100%
FS-St. Louis MO-IL	3%	2%	13%	9%	52%	55%	32%	34%	2	14.23	8.16	9.12	14.76	16.46	2,707	100%
State of Missouri:																
FS-Joplin MSA	n/a	n/a	8%	7%	76%	86%	16%	7%	5	8.88	n/a	11.63	9.22	5.81	85	18%
LS-Columbia MSA	2%	3%	10%	14%	64%	60%	24%	23%	5	7.14	11.11	7.14	5.88	9.23	30	7%
LS-Springfield MSA	< 1%	0%	17%	10%	63%	70%	20%	20%	7	5.71	n/a	4.17	6.12	6.09	60	13%
LS-St. Joseph MSA	2%	1%	15%	17%	53%	56%	30%	26%	1	20.26	0.00	18.87	19.45	25.00	148	32%
LS-NonMSA MO	< 1%	0%	4%	1%	65%	93%	31%	6%	5	12.54	0.00	0.00	15.62	2.22	140	30%
State of Kansas:																
FS-Topeka MSA	2%	0%	20%	21%	45%	48%	33%	31%	8	4.39	0.00	4.58	5.04	3.64	29	20%
LS-Lawrence MSA	< 1%	0%	11%	0%	65%	50%	24%	50%	11	2.32	0.00	0.00	2.05	4.05	12	8%
LS-Wichita MSA	4%	0%	16%	30%	53%	50%	27%	20%	33	0.33	0.00	1.16	0.18	0.29	10	7%
LS-NonMSA KS	n/a	n/a	19%	9%	81%	91%	n/a	n/a	1	64.52	n/a	53.85	65.77	n/a	93	65%
State of Illinois:																
FS-Morrisonville AA	n/a	n/a	8%	0%	92%	100%	n/a	n/a	15	1.10	n/a	0.00	1.25	n/a	1	100%

(*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE					Bank: UMB BANK, N.A.				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999							
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans	
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Over-all	Low	Mod	Mid	Upp	#	% of Total**
Multistate MSAs: (FS=Full Scope; LS=Limited Scope)																
FS-Kansas City MO-KS	3%	1%	14%	6%	52%	53%	31%	40%	40	0.58	0.53	0.37	0.65	0.53	437	100%
FS-St. Louis MO-IL	3%	1%	13%	5%	52%	50%	32%	44%	85	0.21	0.30	0.10	0.21	0.22	297	100%
State of Missouri:																
FS-Joplin MSA	n/a	n/a	8%	0%	76%	81%	16%	19%	22	1.06	n/a	0.00	1.23	0.79	64	17%
LS-Columbia MSA	2%	0%	10%	0%	64%	100%	24%	0%	57	0.07	0.00	0.00	0.11	0.00	5	1%
LS-Springfield MSA	< 1%	0%	17%	9%	63%	53%	20%	38%	54	0.31	0.00	0.17	0.25	0.51	45	12%
LS-St. Joseph MSA	2%	0%	15%	28%	53%	42%	30%	30%	18	1.30	0.00	2.36	1.21	1.10	36	10%
LS-NonMSA MO	< 1%	0%	4%	0%	65%	78%	31%	22%	8	3.14	0.00	0.00	3.56	2.38	228	60%
State of Kansas:																
FS-Topeka MSA	2%	0%	20%	10%	45%	10%	33%	80%	34	0.47	0.00	0.28	0.15	0.80	20	17%
LS-Lawrence MSA	< 1%	0%	11%	0%	65%	0%	24%	100%	98	0.04	0.00	0.00	0.00	0.10	1	1%
LS-Wichita MSA	4%	0%	16%	0%	53%	0%	27%	100%	167	0.01	0.00	0.00	0.00	0.03	2	2%
LS-NonMSA KS	n/a	n/a	19%	12%	81%	88%	n/a	n/a	1	25.27	n/a	37.04	24.02	n/a	92	80%
State of Illinois:																
FS-Morrisonville AA	n/a	n/a	8%	0%	92%	100%	n/a	n/a	49	0.27	n/a	0.30	0.00	n/a	3	100%

(*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES					Bank: UMB BANK, N.A.				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999							
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Over-all	Low	Mod	Mid	Upp	#	% of Total**
Multistate MSAs: (FS=Full Scope; LS=Limited Scope)																
FS-Kansas City MO-KS	5%	7%	15%	18%	45%	41%	32%	27%	4	9.49	16.01	14.93	9.44	6.56	2,032	100%
FS-St. Louis MO-IL	5%	3%	12%	10%	49%	57%	34%	30%	12	2.72	2.40	3.22	3.04	2.18	957	100%
State of Missouri:																
FS-Joplin MSA	n/a	n/a	20%	6%	64%	89%	16%	5%	4	12.03	n/a	1.94	17.72	3.92	314	17%
LS-Columbia MSA	27%	0%	15%	0%	46%	79%	12%	21%	19	0.24	0.00	0.00	0.35	0.31	24	1%
LS-Springfield MSA	4%	1%	17%	18%	64%	56%	15%	25%	10	1.82	0.00	2.81	1.68	1.98	150	8%
LS-St. Joseph MSA	12%	14%	14%	20%	41%	39%	33%	27%	3	11.49	15.32	16.79	13.05	7.80	227	12%
LS-NonMSA MO	4%	< 1%	2%	< 1%	68%	77%	26%	22%	1	11.83	1.56	0.00	15.30	7.90	1,146	62%
State of Kansas:																
FS-Topeka MSA	12%	4%	29%	28%	33%	41%	26%	27%	8	3.18	0.64	3.37	3.90	2.15	71	25%
LS-Lawrence MSA	3%	0%	19%	0%	57%	50%	21%	50%	14	0.59	0.00	0.00	0.51	1.08	16	6%
LS-Wichita MSA	9%	13%	25%	7%	42%	55%	24%	25%	16	0.35	0.59	0.07	0.72	0.17	56	20%
LS-NonMSA KS	n/a	n/a	13%	16%	87%	84%	n/a	n/a	1	46.6	n/a	61.5	45.1	n/a	137	49%

										7		4	3			
State of Illinois:																
FS-Morrisonville AA	n/a	n/a	7%	0%	93%	100%	n/a	n/a	5	4.96	n/a	0.00	5.66	n/a	28	100%

(*) Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.

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

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS					Bank: UMB BANK, N.A.				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999							
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Multistate MSAs: (FS=Full Scope; LS=Limited Scope)																
FS-Kansas City MO-KS	1%	0%	10%	9%	60%	81%	29%	10%	1	23.40	n/a	23.81	32.75	5.75	102	100%
FS-St. Louis MO-IL	1%	n/a	5%	n/a	68%	n/a	26%	n/a	n/a	0.00	0.00	0.00	0.00	0.00	0	100%
State of Missouri:																
FS-Joplin MSA	n/a	n/a	3%	0%	93%	99%	4%	1%	1	43.71	n/a	0.00	45.42	20.00	180	8%
LS-Columbia MSA	4%	0%	4%	0%	80%	100%	12%	0%	6	3.18	0.00	0.00	3.76	0.00	12	1%
LS-Springfield MSA	< 1%	0%	13%	0%	79%	100%	8%	0%	n/a	0.00	0.00	0.00	0.00	0.00	2	< 1%
LS-St. Joseph MSA	1%	0%	3%	1%	69%	88%	27%	11%	3	18.46	0.00	33.33	22.34	8.25	122	5%
LS-NonMSA MO	< 1%	0%	2%	< 1%	77%	87%	21%	13%	1	30.70	n/a	4.76	34.53	26.58	1,959	86%
State of Kansas:																
FS-Topeka MSA	2%	0%	11%	0%	63%	0%	24%	100%	5	1.75	0.00	0.00	0.00	7.69	1	12%
LS-Lawrence MSA	0%	n/a	6%	n/a	77%	n/a	17%	n/a	n/a	0.00	n/a	0.00	0.00	0.00	0	0%
LS-Wichita MSA	2%	n/a	7%	n/a	61%	n/a	30%	n/a	n/a	0.00	0.00	0.00	0.00	0.00	0	0%
LS-NonMSA KS	n/a	n/a	15%	21%	85%	79%	n/a	n/a	1	96.15	n/a	90.91	97.92	n/a	195	99%

State of Illinois:																
FS-Morrisonville AA	n/a	n/a	4%	0%	96%	100%	n/a	n/a	2	9.23	n/a	0.00	9.68	n/a	37	100%

(*) Based on 1998 Aggregate Small Farm Data only. Market rank is for all income categories combined.

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

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE					Bank: UMB BANK, N.A.					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999						
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Purchase Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Over-all	Low	Mod	Mid	Upp	#	% of Total***
Multistate MSAs: (FS=Full Scope; LS=Limited Scope)																
FS-Kansas City MO-KS	18%	11%	18%	19%	25%	25%	39%	45%	51	0.36	0.17	0.25	0.27	0.57	209	100%
FS-St. Louis MO-IL	19%	8%	18%	21%	24%	23%	39%	48%	102	0.13	0.07	0.07	0.12	0.20	129	100%
State of Missouri:																
FS-Joplin MSA	19%	9%	19%	25%	24%	9%	38%	57%	17	1.81	1.98	1.60	0.84	2.68	80	34%
LS-Columbia MSA	19%	0%	19%	0%	23%	50%	39%	50%	63	0.04	0.00	0.00	0.14	0.00	2	1%
LS-Springfield MSA	18%	4%	19%	19%	24%	15%	39%	62%	63	0.21	0.15	0.17	0.06	0.38	28	12%
LS-St. Joseph MSA	21%	13%	17%	22%	23%	22%	39%	43%	20	0.92	1.75	1.12	0.50	0.94	23	10%
LS-NonMSA MO	16%	8%	16%	23%	22%	20%	46%	49%	17	1.69	1.51	1.19	1.51	2.04	100	43%
State of Kansas:																
FS-Topeka MSA	18%	0%	18%	25%	26%	38%	38%	37%	55	0.07	0.00	0.00	0.12	0.14	8	17%
LS-Lawrence MSA	20%	34%	16%	0%	25%	33%	39%	33%	50	0.16	0.60	0.00	0.21	0.12	3	6%
LS-Wichita MSA	18%	0%	18%	0%	25%	0%	39%	100%	n/a	0.00	0.00	0.00	0.00	0.00	3	6%
LS-NonMSA KS	22%	17%	19%	11%	26%	24%	33%	48%	2	11.36	11.11	7.14	7.89	17.02	34	71%
State of Illinois:																
FS-Morrisonville AA	19%	0%	18%	100%	25%	0%	38%	0%	n/a	0.00	0.00	0.00	0.00	0.00	1	100%

(*) As a percentage of loans with borrower income information available. No information was available for 3.39% of loans originated and purchased by the bank.

(**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 31, 1999		Bank: UMB BANK, N.A.								Evaluation Period: JANUARY 1, 1998 TO DECEMBER						
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Improvement Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Over-all	Low	Mod	Mid	Upp	#	% of Total**
Multistate MSAs: (FS=Full Scope; LS=Limited Scope)																
FS-Kansas City MO-KS	18%	14%	18%	23%	25%	31%	39%	32%	1	21.93	17.21	20.94	24.75	23.18	1,779	100%
FS-St. Louis MO-IL	19%	10%	18%	21%	24%	31%	39%	38%	2	14.23	10.60	13.43	15.72	15.52	2,707	100%
State of Missouri:																
FS-Joplin MSA	19%	9%	19%	24%	24%	21%	38%	46%	5	8.88	2.90	10.57	7.64	11.17	85	18%
LS-Columbia MSA	19%	13%	19%	17%	23%	47%	39%	23%	5	7.14	7.69	6.82	10.81	3.95	30	7%
LS-Springfield MSA	18%	3%	19%	15%	24%	38%	39%	44%	7	5.71	1.03	4.22	7.78	7.17	60	13%
LS-St. Joseph MSA	21%	13%	17%	23%	23%	25%	39%	39%	1	20.26	20.63	21.26	17.14	22.00	148	32%
LS-NonMSA MO	16%	10%	16%	15%	22%	26%	46%	49%	5	12.54	11.48	14.66	10.30	13.19	140	30%
State of Kansas:																
FS-Topeka MSA	18%	21%	18%	17%	26%	34%	38%	28%	8	4.39	4.55	3.97	5.17	4.06	29	20%
LS-Lawrence MSA	20%	0%	16%	0%	25%	42%	39%	58%	11	2.32	0.00	0.00	1.45	4.27	12	8%
LS-Wichita MSA	18%	20%	18%	20%	25%	30%	39%	30%	33	0.33	0.49	0.24	0.31	0.35	10	7%
LS-NonMSA KS	22%	17%	19%	22%	26%	31%	33%	30%	1	64.52	70.00	57.69	58.54	67.74	93	65%
State of Illinois:																

FS-Morrisonville AA	19%	0%	18%	100%	25%	0%	38%	0%	15	1.10	0.00	0.00	10.0 0	0.00	1	100%
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(*) As a percentage of loans with borrower income information available. No information was available for 0.69% of loans originated and purchased by the bank.

(**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE					Bank: UMB BANK, N.A.					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999						
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Over-all	Low	Mod	Mid	Upp	#	% of Total***
Multistate MSAs: (FS=Full Scope; LS=Limited Scope)																
FS-Kansas City MO-KS	18%	9%	18%	20%	25%	27%	39%	44%	40	0.58	0.50	0.60	0.61	0.71	437	100%
FS-St. Louis MO-IL	19%	6%	18%	17%	24%	20%	39%	57%	85	0.21	0.11	0.19	0.17	0.30	297	100%
State of Missouri:																
FS-Joplin MSA	19%	6%	19%	22%	24%	26%	38%	46%	22	1.06	1.30	1.56	1.09	0.88	64	17%
LS-Columbia MSA	19%	0%	19%	20%	23%	20%	39%	60%	57	0.07	0.00	0.14	0.08	0.05	5	1%
LS-Springfield MSA	18%	2%	19%	20%	24%	18%	39%	60%	54	0.31	0.13	0.41	0.14	0.46	45	12%
LS-St. Joseph MSA	21%	0%	17%	14%	23%	19%	39%	67%	18	1.30	0.00	1.03	0.92	1.95	36	10%
LS-NonMSA MO	16%	5%	16%	12%	22%	22%	46%	61%	8	3.14	4.03	2.94	3.12	3.41	228	60%
State of Kansas:																
FS-Topeka MSA	18%	5%	18%	5%	26%	25%	38%	65%	34	0.47	0.38	0.00	0.60	0.72	20	17%
LS-Lawrence MSA	20%	0%	16%	0%	25%	0%	39%	100%	98	0.04	0.00	0.00	0.00	0.07	1	1%
LS-Wichita MSA	18%	0%	18%	0%	25%	0%	39%	100%	167	0.01	0.00	0.00	0.00	0.03	2	2%
LS-NonMSA KS	22%	17%	19%	10%	26%	35%	33%	38%	1	25.27	34.29	14.63	32.88	23.39	92	80%
State of Illinois:																
FS-Morrisonville AA	19%	0%	18%	50%	25%	0%	38%	50%	49	0.27	0.00	0.00	0.00	0.29	3	100%

(*) As a percentage of loans with borrower income information available. No information was available for 2.11% of loans originated and purchased by the bank.

(**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Bank: UMB BANK, N.A.				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999			
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Loans to Businesses	
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total*****
Multistate MSAs: (FS=Full Scope; LS=Limited Scope)										
FS-Kansas City MO-KS	68%	39%	55%	64%	16%	20%	9.49	6.64	2,032	100%
FS-St. Louis MO-IL	70%	60%	55%	73%	12%	15%	2.72	2.86	957	100%
State of Missouri:										
FS-Joplin MSA	75%	72%	72%	88%	4%	8%	12.03	10.52	314	17%
LS-Columbia MSA	72%	79%	78%	100%	0%	0%	0.24	0.18	24	1%
LS-Springfield MSA	72%	53%	68%	67%	14%	19%	1.82	1.20	150	8%
LS-St. Joseph MSA	71%	63%	74%	88%	5%	7%	11.49	10.01	227	12%
LS-NonMSA MO	74%	65%	73%	95%	3%	2%	11.83	11.08	1,146	62%
State of Kansas:										
FS-Topeka MSA	69%	58%	67%	66%	13%	21%	3.18	2.59	71	25%
LS-Lawrence MSA	73%	69%	58%	56%	19%	25%	0.59	0.58	16	6%
LS-Wichita MSA	69%	30%	54%	64%	20%	16%	0.35	0.24	56	20%
LS-NonMSA KS	74%	83%	63%	94%	4%	2%	46.67	53.61	137	49%
State of Illinois:										
FS-Morrisonville AA	75%	61%	76%	100%	0%	0%	4.96	4.10	28	100%

(*) Businesses with revenues of \$1 million or less as a percentage of all businesses.
 (**) 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 11.73% of small loans to businesses originated and purchased by the bank.
 (***) The market consists of all other Small Business reporters in the MSA/AA and is based on 1998 Aggregate Small Business Data only.
 (****) Based on 1998 Aggregate Small Business Data only.
 (*****) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Bank: UMB BANK, N.A.			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999				
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans	
	% of Farms*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total*****
Multistate MSAs: (FS=Full Scope; LS=Limited Scope)										
FS-Kansas City MO-KS	95%	84%	89%	96%	2%	2%	23.40	21.95	102	100%
FS-St. Louis MO-IL	95%	n/a	79%	n/a	n/a	n/a	0.00	0.00	0	100%
State of Missouri:										
FS-Joplin MSA	98%	69%	91%	98%	1%	1%	43.71	35.11	180	8%
LS-Columbia MSA	97%	100%	95%	100%	0%	0%	3.18	3.36	12	1%
LS-Springfield MSA	98%	50%	97%	100%	0%	0%	0.00	0.00	2	< 1%
LS-St. Joseph MSA	98%	89%	97%	99%	1%	0%	18.46	16.71	122	5%
LS-NonMSA MO	99%	89%	97%	97%	2%	1%	30.70	29.04	1,959	86%
State of Kansas:										
FS-Topeka MSA	94%	100%	95%	100%	0%	0%	1.75	1.85	1	1%
LS-Lawrence MSA	96%	n/a	87%	n/a	n/a	n/a	0.00	0.00	0	0%
LS-Wichita MSA	94%	n/a	65%	n/a	n/a	n/a	0.00	0.00	0	0%
LS-NonMSA KS	93%	82%	60%	98%	1%	1%	96.15	96.91	195	99%
State of Illinois:										
FS-Morrisonville AA	93%	81%	91%	100%	0%	0%	9.23	9.66	37	100%

(*) Farms with revenues of \$1 million or less as a percentage of all farms.

(**) 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 12.53% of small loans to farms originated and purchased by the bank.

(***) The market consists of all other Small Farm reporters in the MSA/AA and is based on 1998 Aggregate Small Farm Data only.

(****) Based on 1998 Aggregate Small Farm Data only. (*****) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated

area.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS		Bank: UMB BANK, N.A.				Evaluation Period: NOVEMBER 17, 1997 TO MAY 22, 2000				
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$=s	#	\$ (000's)	
Multistate MSAs: (FS=Full Scope; LS=Limited Scope)										
FS-Kansas City MO-KS	0	0	201	\$39,014	201	\$39,014	100%	0	0	
FS-St. Louis MO-IL	0	0	151	\$4,191	151	\$4,191	100%	0	0	
State of Missouri:										
FS-Joplin MSA	0	0	36	\$57	36	\$57	1%	0	0	
LS-Columbia MSA	1	\$5	1	\$9	2	\$14	< 1%	0	0	
LS-Springfield MSA	0	0	12	\$42	12	\$42	< 1%	0	0	
LS-St. Joseph MSA	0	0	9	\$49	9	\$49	1%	1	\$6	
LS-NonMSA MO	0	0	45	\$8,199	45	\$8,199	98%			
State of Kansas:										
FS-Topeka MSA	0	0	12	\$44	12	\$44	27%	0	0	
LS-Lawrence MSA	0	0	7	\$9	7	\$9	5%	0	0	
LS-Wichita MSA	0	0	10	\$7	10	\$7	4%	0	0	
LS-NonMSA KS	0	0	10	\$105	10	\$105	64%	0	0	
State of Illinois:										
FS-Morrisonville AA	0	0	6	\$5	6	\$5	100%	0	0	

(*) APrior Period Investments≡ means investments made in a previous evaluation period that are outstanding as of the examination date.

(**) AUnfunded Commitments≡ means legally binding investment commitments reported on the Report of Condition Schedule-L AOff Balance Sheet Items.≡

Table 13. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Bank: UMB BANK, N.A.				Evaluation Period: NOVEMBER 17, 1997 TO MAY 22, 2000			
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Multistate MSAs: (FS=Full Scope; LS=Limited Scope)																	
FS-Kansas City MO-KS*	100%	46	100%	2%	5%	63%	26%	2	4	0	-1	+2	+1	5%	18%	49%	28%
FS-St. Louis MO-IL	100%	29	100%	0%	10%	62%	28%	0	10	0	+1	+5	+4	7%	16%	48%	29%
State of Missouri:																	
FS-Joplin MSA	14%	5	13%	n/a	20%	60%	20%	0	0	0	0	0	0	n/a	10%	74%	16%
LS-Columbia MSA	1%	3	8%	34%	33%	0%	33%	0	0	0	0	0	0	14%	16%	53%	17%
LS-Springfield MSA	11%	7	18%	0%	0%	86%	14%	0	0	0	0	0	0	1%	23%	59%	17%
LS-St. Joseph MSA	16%	4	10%	0%	50%	25%	25%	0	0	0	0	0	0	4%	17%	50%	29%
LS-NonMSA MO	58%	20	51%	0%	0%	85%	15%	0	0	0	0	0	0	1%	3%	65%	31%
State of Kansas:																	
FS-Topeka MSA	44%	4	40%	0%	75%	0%	25%	0	0	0	0	0	0	3%	24%	42%	31%
LS-Lawrence MSA	3%	1	10%	0%	0%	0%	100%	0	0	0	0	0	0	6%	17%	57%	20%
LS-Wichita MSA	4%	2	20%	0%	50%	0%	50%	0	1	0	0	0	+1	7%	20%	49%	24%
LS-NonMSA KS	49%	3	30%	n/a	0%	100%	0%	0	0	0	0	0	0	n/a	18%	82%	0%
State of Illinois:																	
FS-Morrisonville AA	100%	1	100%	n/a	0%	100%	0%	0	0	0	0	0	0	n/a	9%	91%	0%

* Kansas City--2 branches, representing 4% of the AA's branches, are located in CTs with no income designation. Less than 1/10 of 1% of the population lives in CTs with no income designation.

Table 14. Geographic and Borrower Distribution of Consumer Loans

Geographic and Borrower Distribution: CONSUMER LOANS								Bank: UMB BANK, N.A.				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999						
MSA/Assessment Area:	Geographic Distribution								Borrower Distribution									
	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Total Consumer Loans	
	% of Hshlds*	% BANK Loans	% of Hshlds*	% BANK Loans	% of Hshlds*	% BANK Loans	% of Hshlds*	% BANK Loans	% of Hshlds	% BANK Loans	% of Hshlds	% BANK Loans	% of Hshlds	% BANK Loans	% of Hshlds	% BANK Loans	#	% of Total**
Multistate MSAs: (FS=Full Scope; LS=Limited Scope)																		
FS-Kansas City MO-KS	4%	1%	19%	7%	50%	50%	27%	42%	22%	16%	16%	22%	21%	24%	41%	38%	16,812	100%
FS-St. Louis MO-IL	7%	1%	16%	6%	50%	52%	27%	41%	23%	10%	16%	19%	20%	29%	41%	42%	12,462	100%
State of Missouri:																		
FS-Joplin MSA	n/a	n/a	12%	9%	72%	74%	16%	17%	24%	20%	16%	22%	19%	23%	41%	35%	2,823	15%
LS-Columbia MSA	9%	3%	19%	9%	54%	66%	18%	22%	25%	17%	15%	22%	18%	27%	42%	34%	717	4%
LS-Springfield MSA	1%	< 1%	22%	10%	60%	65%	17%	25%	24%	13%	16%	19%	20%	25%	40%	43%	1,760	9%
LS-St. Joseph MSA	4%	1%	18%	14%	50%	53%	28%	32%	25%	9%	15%	19%	19%	24%	41%	48%	1,799	10%
LS-NonMSA MO	1%	< 1%	3%	< 1%	66%	66%	30%	33%	21%	15%	15%	21%	18%	23%	46%	41%	11,424	62%
State of Kansas:																		
FS-Topeka MSA	3%	1%	25%	15%	42%	37%	30%	47%	22%	18%	17%	23%	22%	26%	39%	33%	1,642	30%
LS-Lawrence MSA	2%	< 1%	18%	8%	58%	60%	22%	32%	28%	11%	14%	18%	16%	25%	42%	46%	940	17%
LS-Wichita MSA	6%	2%	21%	9%	50%	44%	23%	45%	22%	7%	17%	18%	21%	28%	40%	47%	1,497	27%
LS-NonMSA KS	n/a	n/a	19%	22%	81%	78%	n/a	n/a	27%	22%	16%	22%	20%	25%	37%	31%	1,431	26%
State of Illinois:																		
FS-Morrisonville AA	n/a	n/a	9%	3%	91%	97%	n/a	n/a	24%	19%	16%	30%	19%	26%	41%	25%	317	100%

(*) The percentage of the households in the MSA/assessment area that resides in these geographies.

(**) Consumer loans originated and purchased in the MSA/AA as a percentage of all consumer loans originated and purchased in the rated area.