



Comptroller of the Currency
Administrator of National Banks

Midwestern District Office
2345 Grand Boulevard, Suite 700
Kansas City, Missouri 64108

PUBLIC DISCLOSURE

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

October 30, 1996

**Commerce Bank, N. A.
Charter Number 11010
150 North Main
Wichita, Kansas 67202**

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

GENERAL INFORMATION

This document is an evaluation of the Community Reinvestment Act (CRA) performance of Commerce Bank, N. A., Wichita, Kansas, prepared by the Office of the Comptroller of the Currency (OCC), the institution's supervisory agency.

The evaluation represents the OCC's current assessment and rating of the institution's CRA performance based on an examination conducted as of October 30, 1996. It does not reflect any CRA-related activities that may have been initiated or discontinued by the institution after the completion of the examination.

The purpose of the Community Reinvestment Act of 1977 (12 U.S.C. 2901), as amended, is to encourage each financial institution to help meet the credit needs of the communities in which it operates. The Act requires that in connection with its examination of a financial institution, each federal financial supervisory agency shall (1) assess the institution's record of helping to meet the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operations of the institution, and (2) take that record of performance into account when deciding whether to approve an application of the institution for a deposit facility.

The Financial Institutions Reform, Recovery and Enforcement Act of 1989, Pub. L. No. 101-73, amended the CRA to require the Agencies to make public certain portions of their CRA performance assessments of financial institutions.

Basis for the Rating

The assessment of the institution's record takes into account its financial capacity and size, legal impediments and local economic conditions and demographics, including the competitive environment in which it operates. Assessing the CRA performance is a process that does not rely on absolute standards. Institutions are not required to adopt specific activities, nor to offer specific types or amounts of credit. Each institution has considerable flexibility in determining how it can best help to meet the credit needs of its entire community. In that light, evaluations are based on a review of 12 assessment factors, which are grouped together under 5 performance categories, as detailed in the following section of this evaluation.

GLOSSARY OF TERMS AND COMMON ABBREVIATIONS

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

Metropolitan Statistical Area (MSA) - Area consisting of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Census Tract (CT) - Small, locally defined statistical areas within a MSA. These areas are determined by the United States Census Bureau in an attempt to group homogeneous populations. A CT has defined boundaries per 10-year census and an average population of 4,000.

Median Family Income - The median income determined by the United States Census Bureau. This figure is based on estimations developed by the Department of Housing and Urban Development and is updated annually.

Low- and Moderate-Income (LMI) - Income levels which are less than 80% of the median family income.

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

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

Commerce Bancshares, Inc. (CBI) - CBI is the parent company of Commerce Bank, N.A., Wichita, Kansas.

Commerce Mortgage Company, Inc. (CMC) - CMC is a mortgage company that is a wholly-owned subsidiary of CBI.

Commerce Bank, N.A. (Commerce)

ASSIGNMENT OF RATING

Identification of Ratings

In connection with the assessment of each insured depository institution's CRA performance, a rating is assigned from the following groups:

Outstanding record of meeting community credit needs.

An institution in this group has an outstanding record of, and is a leader in, ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Satisfactory record of meeting community credit needs.

An institution in this group has a satisfactory record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Needs to improve record of meeting community credit needs.

An institution in this group needs to improve its overall record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Substantial noncompliance record of meeting community credit needs.

An institution in this group has a substantially deficient record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

DISCUSSION OF INSTITUTION'S PERFORMANCE

Institution's Rating:

Based on the findings presented below, this institution is rated: **“Satisfactory Record of Meeting Community Credit Needs.”** The evaluation period covers April 22, 1993 to October 30, 1996.

The purpose of CRA is to ensure that financial institutions help meet the credit needs of their local communities. We rated this institution's CRA record as Satisfactory because:

- Commerce extended reasonable volumes of home, small business and consumer loans. A significant portion of these loans was made within the bank's delineated communities.
- Commerce's loans are reasonably distributed to borrowers and geographies of different income levels.
- Commerce demonstrates leadership and actively participates in ongoing community development activities which benefit its delineated communities.

REASONABLENESS OF COMMUNITY DELINEATION

Commerce's delineated communities are reasonable and do not arbitrarily exclude any LMI CTs or block numbering areas (BNAs). The three separate delineations include areas surrounding branch locations and contain a majority of the bank's retail deposits and lending volume.

COMMUNITY PROFILES

Following are brief descriptions of the three areas which have been designated as the bank's delineated communities. Commerce's market share of deposits is based on aggregate bank deposit information for other competing financial institutions in each defined market as reported in June 30, 1995 Consolidated Reports of Condition.

Wichita Metropolitan Statistical Area (MSA) Market

The Wichita delineated community, located within the Wichita, Kansas MSA #9040, includes most of Sedgwick and Butler Counties. It includes the cities of Wichita, Derby and El Dorado. Based on 1990 census data, the population of this area was approximately 381,000. There are 94 CTs within the bank's defined area. The CTs are, by income level, 11% low-, 24% moderate-, 47% middle-, and 18% upper-income CTs. The 1996 HUD MSA median family income for the Wichita MSA is \$44,500.

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The local economy is stable. Unemployment is low at 3%. Major industries include aircraft manufacturing, health care, financial services, education, retail trade establishments and government. There are four large aircraft manufacturers. Boeing Aircraft is the largest employer with 15,000 employees. Seventy-three percent of the bank's deposits are from the Wichita market. Commerce has the fifth largest deposit market share in the three-city area at 8%.

NonMSA Markets - Reno County and Cowley County

The Reno and Cowley County markets are not located in an MSA. The economies of these markets are stable. Unemployment is approximately 2%. The 1996 HUD nonMSA median family income for these areas is \$34,300.

Reno County

The Reno County delineated community includes the City of Hutchinson. Located in the northwest quadrant of the county, the area contains 13 CTs. The CTs are, by income level, 23% moderate-, 31% middle-, and 38% upper-income. There are no low-income CTs, however, one CT (8%) does not report any income. Based on 1990 census data, the population for the area was approximately 47,000. Major Hutchinson employers include a salt mine, a junior college, the Kansas State Reformatory and Hutchinson Hospital. Sixteen percent of the bank's total deposits are from the Reno County market. Commerce has the third largest deposit market share in Hutchinson at 16%.

Cowley County

The Cowley County delineated community includes the cities of Winfield and Arkansas City. Located in the western half of the county, the area contains nine BNAs, none of which are LMI. The BNAs are, by income level, 67% middle- and 33% upper-income. Based on 1990 census data, the population for the area was approximately 31,000. Major employers for the area include General Electric, Rubbermaid, Crayola, and Cowley County Community College. Eleven percent of the bank's total deposits are from the Cowley County market. Commerce has the third largest deposit market share in this area at 18%.

BANK PROFILE

Commerce is a subsidiary of CBI, a multi-bank holding company based in Kansas City, Missouri. CBI formally acquired the bank on April 17, 1995. Prior to the acquisition, the bank was known as Union National Bank and owned by Union Bancshares, Inc. In August 1995, CBI merged Commerce Bank, El Dorado, Kansas into Commerce Bank, N.A., Wichita, Kansas.

Commerce is a full-service financial institution providing both commercial and retail lending. As of June 30, 1996, the bank had approximately \$756 million in total assets. The bank's loan-to-deposit ratio was 60%, with a loan mix of 43% consumer; 37% real estate (including 27% 1-4 family residential); 19% commercial; and 1% other. A large portion of the 1-4 family

residential real estate loans outstanding results from prior bank mergers and acquisitions. The lending activity by Commerce's affiliate, CMC, within the bank's delineated communities, is included in the HMDA-reportable loan totals presented in this evaluation. CMC originates the majority of the home purchase and refinance loans.

I. ASCERTAINMENT OF COMMUNITY CREDIT NEEDS

Assessment Factor A - Activities conducted by the institution to ascertain the credit needs of its community, including the extent of the institution's efforts to communicate with members of its community regarding the credit services being provided by the institution.

Commerce regularly conducts activities to determine community credit needs and maintains ongoing relationships with a variety of community representatives.

Management pursues ongoing contacts with a number of groups and organizations that enable the bank to assess the community's credit needs. Contacts include public officials; neighborhood organizations; and community groups involved in affordable housing, small business and community development. In addition, bank officers regularly contact customers and non-customers to discuss credit needs through an officer call program.

Through the bank's ascertainment efforts, management identified credit-related needs in its communities. Examiners confirmed these needs through community outreach. They include affordable home loan products with flexible underwriting and small business loans.

Commerce and CMC's credit products are reasonably suited to meet these needs. Management regularly reviews its loan products to ensure they meet the credit needs of the community. Loan products offered are discussed in Assessment Factors I and J. In addition, Commerce participates in several public and private loan partnerships. See Assessment Factor H for details.

In response to needs, Commerce and CMC developed loan programs to better serve the needs of LMI individuals. For example, they implemented the Commerce Home Partnership Program (CHPP), which targets LMI individuals living in LMI areas. The program includes flexible underwriting, such as low down payment requirements and higher debt ratio allowances, as well as grant funds for closing costs. Response to this product has been limited. Refer to Assessment Factor J for details.

Assessment Factor C - The extent of participation by the institution's board of directors in formulating the institution's policies and reviewing its performance with respect to the purposes of the Community Reinvestment Act.

The Board and management provides adequate oversight of the CRA process.

The Board established a Community Affairs Committee to oversee the bank's CRA program. The committee includes senior bank management (some of whom serve on the insider Board of Directors) and outside advisory directors. Through the committee, the Board is able to monitor the bank's CRA performance and provide guidance on the CRA program.

Commerce's senior management and bank officers are personally involved in activities and groups designed to develop, improve and enhance the local community. They demonstrate their involvement through membership in numerous community organizations.

II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED

Assessment Factor B - The extent of the institution's marketing and special credit-related programs to make members of the community aware of the credit services offered by the institution.

Commerce's marketing program is reasonably suited to make members of all segments of the community aware of credit services the bank offers.

Commerce uses various methods to inform the community of its products and services. Regional advertising, implemented through CBI's corporate marketing staff, focuses on broad based general media activities including television, radio and major community newspapers. On a local level, the bank occasionally uses newspapers to advertise special credit products targeted to specific segments of the community, including LMI borrowers and LMI areas. Commerce uses direct mailings and an officer call program to inform existing and potential customers of products and services. Commerce also used a door-to-door canvassing program to inform residents of LMI neighborhoods about the bank's CHPP.

Commerce provides direct and indirect technical assistance to individuals and groups in understanding and applying for credit. Bank employees regularly participate in seminars that emphasize educating prospective LMI homeowners.

Assessment Factor I - The institution's origination of residential mortgage loans, housing rehabilitation loans, home improvement loans, and small business or small farm loans within its community, or the purchase of such loans originated in its community.

Commerce demonstrated responsiveness to area credit needs through its origination of housing, small business and consumer loans.

Commerce originates a significant volume of its loans within its delineated communities. For year-to-date 1996, the bank originated 85% of the total number of its HMDA-reportable loans within the delineated communities. For small business loans originated year-to-date 1996, 89% were within the bank's delineated communities. For consumer loans originated between March 1, 1996 and May 31, 1996, 73% were within the delineated communities.

Commerce/CMC originated a reasonable volume of its HMDA-reportable loans within the Wichita MSA market. The volume of home purchase and refinancing originations declined from 1994 to 1995; however, this is consistent with most financial institutions in the market.

The following table shows Commerce/CMC's volume of HMDA-reportable loan originations within the Wichita MSA market. It outlines the number of loans by loan type, the bank's market share percentage for each product type and the bank's ranking among all HMDA lenders in the market (excluding mortgage companies not associated with local banks or savings and loan associations). HMDA information for nonMSA markets is not available, because lenders were not required to geocode home loan information in nonMSA areas prior to 1996.

Loan Type	1994*			1995			1996**
	Number of Loans	Market Share Percent	Market Share Rank	Number of Loans	Market Share Percent	Market Share Rank	Number of Loans
Conventional Home Purchase	91	1.97%	8th	64	1.52%	9th	29
Home Improvement	84	3.41%	8th	98	4.84%	6th	34
Refinancing	79	2.38%	7th	42	2.99%	9th	44

* 1994 HMDA originations also include loans of Union National Bank; Commerce Bank, El Dorado; and CMC.

** Data through June 28, 1996. Aggregate HMDA market share information is not available for 1996.

Commerce originated 166 small business loans for \$17,656,000 and 14 small farm loans totaling \$252,000 from January 1, 1996 to June 21, 1996. Over 90% of the small business loans, by number and volume, and 100% of the small farm loans were originated in the Wichita market. Prior to 1996, banks were not required to track small business or small farm loans by revenues of the business/farm. Instead, outstanding small loans to businesses and farms were reported, by loan size, in the June 30th Consolidated Report of Condition. According to June 30, 1996 information for outstanding loans, Commerce had 1,456 small loans to businesses totaling

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\$51,873,000 and 172 small loans to farms for \$4,742,000. Eighty-eight percent of these loans were originated for amounts less than \$100,000.

The bank originated a large number of consumer loans during the evaluation period. For 1994, Commerce made 14,237 loans for \$154 million. For 1995, the bank made 15,190 loans totaling \$155 million. Through September 10, 1996, the bank originated 8,267 loans for \$84 million. These numbers include loans originated outside of the delineated communities and reflect loan originations that are still outstanding. Information was not available for the volume of loans made during this time period that have been paid in full.

Assessment Factor J - The institution's participation in governmentally-insured, guaranteed or subsidized loan programs for housing, small businesses, or small farms.

Commerce's loan activity in governmentally-insured loan programs for small businesses and housing has been limited during this evaluation period. However, in 1996, the bank has shown a significant increase in its Small Business Administration lending. CMC has also made several housing loans under a government loan program it began offering in 1996.

Commerce is a Certified Small Business Administration (SBA) lender, participating in the SBA 504, 7A, and Low Doc loan programs. During this evaluation period, Commerce originated 20 SBA loans for \$3,996,000. Bank participation in SBA lending increased significantly in 1996 as ten of the above loans, totaling \$1,830,000, were originated in 1996. In addition, the bank generated an additional four SBA loans for \$153,000 which have not yet been funded. The 1996 data is included in the small business loan numbers listed in Assessment Factor I.

In 1996, CMC began offering Federal National Mortgage Association (FNMA) Community Lending programs in the bank's markets. This included using FNMA 97% Home Purchase Program guidelines for the CHPP product. CMC has originated 15 loans under this program for \$830,000. CMC recently added grant funds for closing costs to the program. To date, no grants have been extended.

Commerce, through CMC, offers Federal Housing Authority (FHA) and Veteran's Administration (VA) housing loans; however, participation in these programs is limited. In 1994, the bank originated 36 FHA/VA home purchase loans for \$1,728,000. In 1995, the volume dropped to three loans for \$163,000. In 1996, CMC has not originated any FHA/VA home purchase loans in the bank's defined markets.

Commerce began offering Farmers Home Administration (FmHA) loans in 1996; however, they have not yet originated any loans under this program.

III. GEOGRAPHIC DISTRIBUTION AND RECORD OF OPENING AND CLOSING OFFICES

Assessment Factor E - The geographic distribution of the institution's credit extensions, credit applications, and credit denials.

Commerce shows a reasonable distribution of loans throughout its delineated communities, including LMI areas and to LMI borrowers.

In 1994 and 1995, in the Wichita market, Commerce/CMC originated a higher percentage of its total HMDA loans in LMI CTs and to LMI borrowers than the aggregate percentage extended by all HMDA reporters. Commerce/CMC originated 14% and 20% of its total HMDA loans in LMI CTs, in 1994 and 1995, respectively, compared to the aggregate market which originated 12% and 14%. Commerce/CMC originated 32% and 38% of its total HMDA loans to LMI borrowers, in 1994 and 1995, respectively, compared to the aggregate market, which originated 30% and 32%. Based on the number of HMDA loans originated in LMI CTs and to LMI borrowers in 1995, Commerce/CMC ranked tenth for each segment among all HMDA lenders in the Wichita market (excluding mortgage companies not associated with local banks or savings and loan associations).

For the nonMSA markets, banks were not required to report geographic information for HMDA loans until 1996. Commerce/CMC's year-to-date HMDA information shows an acceptable geographic distribution for these areas. Also, for the Reno and Cowley County markets respectively, the bank originated 23% and 15% of total HMDA loans to LMI borrowers.

The following information is based on bank-generated reports of consumer loan activity from March 1, 1996 to May 31, 1996. In the Wichita market, 15% of all consumer loans the bank originated were in LMI CTs. Commerce's lending to LMI borrowers is significantly higher with 45% of all consumer loans made to LMI borrowers. In the Reno and Cowley County markets respectively, the bank originated 24% and 32% of its consumer loans to LMI borrowers. Demographics show 40% of the households in the Wichita market are LMI, while 37% of the households in the Reno and Cowley County markets are LMI. Information on consumer loan distribution by CT in the nonMSA areas was not available.

Commerce originated 31% of the number and 48% of the dollar amount of its small business loans in LMI CTs in the Wichita market for year-to-date 1996. An analysis of small business loan distribution in the nonMSA markets is not meaningful given the small number of LMI CTs in these areas and the small volume of small business loans generated in both markets.

Assessment Factor G - The institution's record of opening and closing offices and providing services at offices.

Commerce's offices provide reasonable access to banking services for all segments of its delineated communities.

Commerce has eighteen branches to serve its delineated communities. Fourteen branches are located within the Wichita MSA. Of these branches, four, or 28%, are located in LMI CTs. For the nonMSA communities, the bank has two branches in Hutchinson and one each in Arkansas City and Winfield. All nonMSA branches are in middle- or upper-income CTs which is consistent with the demographics of the nonMSA areas. The bank has not closed any branches since the last examination.

Banking services are reasonably accessible through most branch locations. Consumer and commercial loan services are available at all full-service branch locations. The bank has six mortgage loan originators who are available, by appointment, to assist home loan applicants at any branch location. Commerce has one agricultural lender who serves the entire defined community.

Bank personnel perform ongoing reviews of branch hours by monitoring traffic flows at branch locations. Branch hours are set accordingly to accommodate peak customer hours. The bank also offers a 24-hour Account Information Line through which customers can access account information on certain checking, savings and credit card accounts free of charge.

IV. DISCRIMINATION AND OTHER ILLEGAL CREDIT PRACTICES

Assessment Factor D - Any practices intended to discourage applications for types of credit set forth in the institution's CRA Statement(s).

We did not identify any practices intended to discourage individuals from applying for credit. Commerce solicited applications from all segments of its community, including LMI areas.

The Board and senior management developed formal policies and procedures supporting nondiscrimination in lending practices to help ensure individuals are not discouraged from applying for credit. In August 1996, CBI's audit department performed a comparative loan file analysis to ensure fair treatment of consumer automobile loan applicants. Commerce/CMC has a secondary review program which reviews all proposed denials of HMDA-reportable applications.

Assessment Factor F - Evidence of prohibited discriminatory or other illegal credit practices.

Our review did not detect any evidence of disparate treatment on the basis of gender. The bank is in compliance with the substantive provisions of antidiscrimination laws and regulations.

Based on the sample of credit files we reviewed, we did not find any evidence of differential treatment of loan applicants because of their gender. Underwriters provided a comparable level of assistance to applicants regardless of gender. Our comparative file analysis consisted of a sample of approved male and denied female automobile loan applicants which the bank received during the first three months of 1996.

V. COMMUNITY DEVELOPMENT

Assessment Factor H - The institution's participation, including investments, in local community development and redevelopment projects or programs.

Commerce actively participates in ongoing community development activities which benefit its delineated communities, especially the Wichita market. The bank's involvement includes providing leadership, technical expertise and financial support.

Commerce has participated in several significant projects which contribute to economic development and revitalization and the availability of affordable housing to LMI individuals. Senior management actively supports community development activities, including forming partnerships with community organizations to facilitate projects. In Wichita, a community development officer represents the bank and helps identify community development needs. The following highlights Commerce's most significant community development activities:

- Commerce, in partnership with a local community housing organization, is leading efforts to revitalize a low-income neighborhood in Northeast Wichita. This project includes: building a 76-unit low-income elderly housing complex and senior citizens resource center; a retail center; and a Commerce branch facility. Commerce is providing up to \$5,900,000 in construction financing for the housing complex, resource center and retail center through direct loans and the purchase of taxable housing development bonds.
- Commerce provided \$2,092,000 financing for a community housing organization to purchase and renovate a 108-unit apartment building to house LMI individuals in a moderate-income neighborhood in the Wichita market. Commerce established a partnership with a local community housing organization to accomplish this project. Upon completion, Commerce provided \$1,157,000 in permanent financing and UBI Financial Services, Inc. (UBIFS), an affiliated community development corporation, took an equity position in the property

through the purchase of low-income housing tax credits.

- The bank extended \$2,042,000 in construction funds and permanent financing for a church located in a moderate-income neighborhood of Wichita to construct a new sanctuary and remodel the existing sanctuary for use as office space. The church operates a small health clinic that provides services to LMI individuals and a non-profit organization dedicated to revitalization of LMI neighborhoods in Northeast Wichita.
- Commerce extended several loans totaling \$1,120,000 to a Wichita community housing organization to fund operations as well as specific redevelopment projects.
- The bank invested in a community development financial institution (CDFI) through the purchase of a \$100,000 one-year, zero interest-rate certificate of deposit. The CDFI is located in a LMI area and was formed to serve LMI communities in Wichita.
- Commerce contributed funds, through its affiliated charitable foundation, Commerce Foundation, to a non-profit organization for converting a deteriorated parking lot in a low-income neighborhood of Wichita into a children's recreational area.

Commerce provides ongoing financial support and technical assistance to community and economic development organizations throughout its delineated communities. Bank personnel regularly provide first time home buyer and small business training in cooperation with local community organizations. They also regularly provide technical assistance for community organizations, small businesses and representatives of political subdivisions seeking government loans or grant funds.

Assessment Factor K - The institution's ability to meet various community credit needs based on its financial condition and size, legal impediments, local economic conditions and other factors.

Commerce's efforts to meet community credit needs are consistent with its size and resources.

Commerce has sufficient resources to help meet the credit needs of its community. The bank also has access to additional resources through its affiliates, including CBI, CMC, and UBIFS (which facilitates community development in LMI areas and acts as an equity investor). Commerce has demonstrated its willingness to support community growth and redevelopment through credit extensions and direct investment. There are no legal or other factors which limit the bank's efforts.

Assessment Factor L - Any other factors that, in the regulatory authority's judgment, reasonably bear upon the extent to which an institution is helping to meet the credit needs of its entire community.

Commerce regularly engages in other meaningful activities which facilitate meeting the credit needs of its delineated communities.

Commerce, directly and through its affiliates, makes regular donations to organizations that promote affordable housing, financial education or economic stabilization within the delineated communities. Examples include:

- Donating office equipment to a non-profit community organization working to improve the economic and general living conditions in LMI neighborhoods of Northeast Wichita.
- Contributing to a commission formed by the Governor of Kansas to develop state-wide strategies to ensure LMI individuals have access to affordable housing.
- Giving presentations on establishing credit and general banking services to local schools and universities.

ADDITIONAL INFORMATION

Examiners reviewed information bank management prepared and obtained additional information on community credit needs through four in-person community contacts. These included community groups and government officials that deal with housing, small business and economic development. Examiners also reviewed summaries of a number of community contacts made in the bank's delineated communities by other bank regulators.

Commerce is located in MSA #9040. Data on individual home mortgage lenders and aggregated data on home mortgage lending activity in the Wichita, Kansas MSA are publicly available at the following location:

Wichita State University
Ablah Library
1845 Fairmount
Wichita, Kansas 67260
(316) 689-3584

The Office of the Comptroller of the Currency is the regulatory agency responsible for the supervision of Commerce. Members of the public can contact this regulatory agency with questions, concerns, or issues. The address is:

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