



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

UMB National Bank Of America
Charter Number: 4945

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Salina, KS 67402

Office of the Comptroller of the Currency

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

Table of Contents

OVERALL CRA RATING	2
DEFINITIONS AND COMMON ABBREVIATIONS	3
DESCRIPTION OF INSTITUTION	6
SCOPE OF THE EVALUATION	7
FAIR LENDING REVIEW	8
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	9
LENDING TEST	9
INVESTMENT TEST	15
SERVICE TEST	16
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS	B-1
APPENDIX C: TABLES OF PERFORMANCE DATA	C-1

Overall CRA Rating

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

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

Performance Levels	UMB National Bank of America Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	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 National Bank of America’s (UMBNBA) responsiveness to community credit needs is adequate. A substantial majority of the bank’s loans (84 percent) are within its designated assessment areas. The distribution of loans by borrower income level demonstrates good performance in small business, small farm, and consumer lending. The geographic distribution of loans is adequate given there are no low- and only four moderate-income tracts in the full-scope assessment areas.
- UMBNBA provided a good level of qualified community development investments. Qualified investments assisted in economic revitalization efforts and provided needed support to charitable organizations that provide community and social services targeted to low- and moderate-income individuals.
- UMBNBA’s delivery systems are accessible to geographies and individuals of different income levels. Bank personnel provided a high level of community development services by providing their financial expertise and assistance to organizations that primarily benefit low- and moderate-income individuals or promote economic development.

Definitions and Common Abbreviations

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

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

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

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

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

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet 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.

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also

include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract 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 area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

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

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

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

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

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

Metropolitan Area (MA): Any primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

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

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

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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

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

Description of Institution

UMB National Bank of America (UMBNBA) is a \$558 million intrastate financial institution headquartered in Salina, Kansas. UMBNBA is subsidiary of UMB Financial Corporation (UMBFC), a \$8 billion interstate holding company headquartered in Kansas City, Missouri. In addition to UMBNBA, UMBFC owns and operates four other banks, one credit card bank, and one trust company, with 165 locations throughout Missouri, Kansas, Illinois, Oklahoma, Nebraska, and Colorado. No mergers or acquisitions occurred during the evaluation period.

UMBNBA is a full-service bank offering a wide array of loan products. The bank's primary lending focus is commercial loans, followed by agricultural loans. The following financial information is reported as of March 31, 2002: The loan portfolio totaled \$128 million and was comprised of the following: 34 percent commercial and commercial real estate, 22 percent agricultural, 20 percent consumer, 18 percent residential real estate, and 6 percent other. Net loans represented 23 percent of the bank's total assets and the loan-to-deposit ratio was 40 percent. Lower loan demand in some markets and deposits purchased in prior periods adversely impact this ratio. Public funds of \$74 million were not included in this computation, as they are not considered part of the bank's core business. Tier 1 capital was \$67 million.

UMBNBA operates 23 branches in Kansas. Thirteen branches are full-service offices located in north central Kansas. These offices serve the bank's assessment areas of Salina/Abilene (Saline and Dickinson Counties); Russell/Great Bend (Barton, Russell, and Stafford Counties); Concordia (Cloud County); and Manhattan (Riley and Pottawatomie Counties). Ten branches are located within an existing affiliate branch facility. Assessment areas for these branches consist of one census tract each. These branches, located in the Kansas communities of Kansas City, Overland Park, Olathe, Merriam, Lawrence, Ft. Scott, Wichita, Atchison, and Topeka accept only public funds deposits. State of Kansas statutes restrict public funds to banks chartered and headquartered in Kansas. The branches do not originate any loans. Public fund deposits received by these locations are reported under the main branch in Salina but, as previously mentioned, are not considered part of the bank's core business since they are short-term in nature and managed by the parent company, UMBFC.

UMBNBA has the financial capacity to assist in meeting the credit needs of its assessment areas. There are no legal or financial constraints that impede the bank's CRA efforts. UMBNBA received a "Satisfactory" rating on its last CRA evaluation dated July 26, 1999.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the lending test, including community development loans, is January 1, 1999 through December 31, 2001. Products reviewed in the lending test include home mortgage, small business, small farm, and consumer loans. We used 2000 peer lending data, the most recent data available, for home mortgage, small business, and small farms to compare UMBNBA's lending performance to other reporting lenders in the assessment areas (AAs). Since the collection of consumer loan data is optional, there is no information available to compare this product with other lender's performance.

The evaluation period for the investment and the service tests is July 27, 1999 through July 22, 2002. At the bank's request, we considered qualified investments made, and services provided, by affiliates.

We used deposit information, reported to the Federal Deposit Insurance Corporation annually, to determine the bank's deposit market share and market presence within its AAs. The most recent deposit information available is as of June 30, 2001.

Data Integrity

To assess the accuracy of the data, we conducted an independent test of data for home mortgage, small business, small farm, and consumer loan products. We identified a material error in the home mortgage data for calendar year 2001 involving the inaccurate geocoding of loans. We also identified duplicate loan records in 14 percent of the reported home mortgage data. The bank corrected and re-filed its home mortgage loan data and we validated its accuracy. We determined the loan data to be substantially accurate and it is used without exception in this evaluation.

We reviewed 100 percent of the bank's community development loans, investments, and services. Only those activities that qualified are presented and considered in this evaluation.

Selection of Areas for Full-Scope Review

We selected the Salina/Abilene and Russell/Great Bend AAs for full-scope review. These two AAs contain the highest level of deposits and loans and are representative of the markets in which the bank operates. The bank's headquarters is located in the Salina/Abilene AA. We performed limited-scope reviews in the Concordia and Manhattan AAs. We did not identify any significant performance differences in these AAs to warrant expanding our review.

For the ten AAs with locations inside affiliate branches, we determined if CRA performance was consistent with the bank's overall performance. Since UMBNBA does not have any CRA activity attributed to these AAs, we determined performance was inconsistent with the overall bank performance. However, given the business strategy for these locations, this does not impact the bank's overall performance. Additionally, the bank's Kansas City affiliate offers full

banking services in these locations. UMBNBA does not compete for business in these locations. No further analysis of these AAs is contained in the Performance Evaluation.

Ratings

The bank's overall rating is based on those areas that received full-scope reviews. We gave more weight to performance in the Salina/Abilene AA since the largest portion of the bank's loans and deposits are attributed to this AA.

By product type, we gave the most weight to small business lending in the Salina/Abilene AA, and to farm lending in the Russell/Great Bend AA. Consumer lending performance was given more weight in the Salina/Abilene AA. Home mortgage lending received little weight in the analysis, as the bank is not a significant home mortgage lender.

Other

We conducted three community contacts during this evaluation; two in the Salina/Abilene AA and one in the Russell/Great Bend AA. Community contacts identified small business and agricultural-related lending, as primary credit needs. Refer to the **Market Profiles** section in Appendix B of this report for a complete discussion of community contact information.

Fair Lending Review

An analysis of the most recent public comments, consumer complaint information, HMDA, small business, and small farm lending data was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed in July 1999.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Salina/Abilene and Russell/Great Bend AAs is adequate.

Lending Activity

Refer to Tables 1 Lending Volume, and 1a Other Products, in Appendix C for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect an adequate responsiveness in relation to area credit needs and the bank's deposit market share. Business and agricultural loans are essential to the local economy and were identified by community contacts, as primary credit needs. Consumer lending represents the largest volume of loans originated during the evaluation period. Home mortgage lending is not a major focus for the bank. Lending market share data is presented in the analysis; however, it has only limited use. The majority of institutions in the full-scope AAs are not subject to data collection and reporting requirements.

In the Salina/Abilene AA, the bank originated 2,543 loans during the evaluation period. Consumer loans represent the primary loan product by number in this AA, followed by small loans to businesses and small loans to farms. Lending in this AA represents 37 percent of the bank's reported loans. UMBNBA ranked first among 17 financial institutions with 19 percent of the deposit market share as of June 30, 2001. Based on the 2000 Small Business Peer Data, UMBNBA ranked third in market share for small business and small farm loans with 11 percent and 17 percent of the market respectively. For home mortgage loan products the bank's strongest market share performance is in home improvement loans ranking fourth among all reporting lenders with a market share of 6 percent. The bank did not capture a significant share for either home purchase or home refinance loans, both with less than 1 percent of the market. Only nine of the seventeen institutions in the AA are required to collect and report lending data.

In the Russell/Great Bend AA, the bank originated 1,695 loans during the evaluation period. In this AA, consumer loans also represents the primary loan product by number, followed by small loans to farms and small loans to businesses. Lending in this AA represents 32 percent of the bank's reported loans. UMBNBA ranked third among 19 financial institutions with 11 percent of the deposit market share as of June 30, 2001. Based on the 2000 Small Business Peer Data, the bank ranked second in market share for small loans to business and first in market share for small loans to farms with approximately 15 percent and 37 percent of the market respectively. Home improvement lending activity achieved the strongest market share among home mortgage products ranking third among all reporting lenders with 11 percent of the market. The market share for home purchase is 2 percent and for home refinance loans is

less than 1 percent. Only five of the nineteen institutions in the AA are required to collect and report lending data.

Refer to the ***Scope of Evaluation*** section of this report for a complete description of how we weighted the areas in arriving at the overall Lending Test conclusion.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans is adequate. For small loans to businesses and small loans to farms, the geographic distribution of loans is good. For consumer loans, the distribution is poor, and for home mortgage loans, distribution is adequate.

Geographic distribution did not carry substantial weight in the Lending Test analysis. There are no low-income tracts in either of the full-scope AAs, three moderate-income tracts in the Salina/Abilene AA, and one moderate-income tract in the Russell/Great Bend AA. Conclusions for the geographic distribution are primarily based on performance in the Salina/Abilene AA.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans is adequate given the limited number of moderate-income tracts and owner-occupied housing in the AAs and the limited volume of home mortgage loan originations during the evaluation period.

Home mortgage lending activity is strongest in the Russell/Great Bend AA where the performance for all product types is excellent and exceeds area demographics. Performance is weaker in the Salina/Abilene AA. Home purchase and home refinance lending performance is poor and is significantly lower than demographics; home improvement lending is good and exceeds demographics.

UMBNA's market share performance is strongest in home improvement lending in both AAs. In the Salina/Abilene AA, the bank ranked fourth in overall market share and third in market share for lending in moderate-income areas. In the Russell/Great Bend AA, the bank ranked third in overall market share and first in market share for lending in the moderate-income area. In both AAs, market shares in the moderate-income areas exceed the bank's overall market shares. UMBNA did not capture a significant overall market share for home purchase and home refinance loans and did not penetrate the moderate-income geographies in either AA for home refinance loans or in the Russell/Great Bend AA, for home purchase loans.

We did not perform an analysis of multifamily loans. Due to the limited number of originations, an analysis of this product type would not be meaningful.

Small Loans to Businesses

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is good. UMBNBA's performance is excellent in the Russell/Great Bend AA where the percentage of loans in the moderate-income area significantly exceeds area demographics. In the Salina/Abilene AA, performance is good although less than demographics.

UMBNBA ranked third in overall market share in the Salina/Abilene AA and second in the Russell/Great Bend AA. In both AAs, the bank's market share in moderate-income areas exceeds its overall market share.

Small Loans to Farms

Refer to Table 7 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

UMBNBA's geographic distribution of small loans to farms is good. In the Russell/Great Bend AA, the distribution of small loans to farms is excellent, significantly exceeding the percentage of farms in the moderate-income tract. Although performance in the Salina/Abilene AA is substantially below area demographics, performance is considered adequate given the limited opportunities to make loans of these types in this AA. All of the moderate-income tracts are located within the city limits of Salina and there are only a limited number of farms operating in these tracts. Additionally, the 2000 market share data shows only eight loans originated in the moderate-income tracts for this AA.

UMBNBA ranked first in overall market share and in market share of the moderate-income tract of the Russell/Great Bend AA. Performance in the moderate-income tract is slightly higher than its overall market share. The bank ranked third in overall market share in the Salina/Abilene AA, but did not achieve any penetration in the moderate-income tracts.

Consumer Loans

Refer to Table 13 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans is poor. UMBNBA's performance is strongest in the Russell/Great Bend AA where the distribution of consumer loans is good and slightly higher than the percentage of households in the moderate-income tract. Performance in the Salina/Abilene AA is poor. The distribution of consumer loans in the moderate-income tracts is well below the percentage of households located in those tracts.

Lending Gap Analysis

Our geographic distribution analysis included a review for any unexplained lending gaps in the AAs, particularly in the moderate-income tracts. We performed this analysis using maps and reports showing the bank's lending in each tract. Our analysis found UMBNBA achieved penetration in all moderate-income tracts in both AAs. We did not identify any conspicuous gaps of underserved geographies within the AAs.

Inside/Outside Ratio

For the geographic distribution analysis under the Lending Test, we performed an inside/outside ratio analysis at the bank level. A majority of the bank's loans, 84 percent by number, were within the bank's AAs. By product type, 92 percent of home mortgage loans, 92 percent of business loans, 87 percent of farm loans, and 80 percent of consumer loans were within the bank's AAs. We viewed this as a positive characteristic in our assessment of lending performance.

Distribution of Loans by Income Level of the Borrower

The distribution of loans by income level is good. For small loans to farms, borrower distribution is excellent. The distribution of small loans to businesses and consumer loans is good. Borrower distribution of home mortgage loans is adequate

Home Mortgage Loans

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

The distribution of home mortgage loans by income level is adequate. Lending opportunities to low- and moderate-income borrowers are limited due to a shortage of affordable housing stock coupled with a family poverty rate in both AAs of approximately 9 percent, which hampers the ability of low-income borrowers to qualify for home mortgage loans.

For home purchase loans, performance is excellent in the Russell/Great Bend AA where the bank exceeded demographics in loans to moderate-income borrowers and was near to demographics in loans to low-income borrowers. In the Salina/Abilene AA, the distribution of home purchase loans to low-income borrowers is adequate, considering the area poverty rate, and poor to moderate-income borrowers. UMBNBA did not capture a significant portion of the market share for home purchase loans. In both AAs, the bank ranked ninth in overall market share. In the Russell/Great Bend AA, market share to both low- and moderate-income borrowers exceeds the bank's overall market share. In the Salina/Abilene AA, market share to low-income borrowers is slightly better than the overall market share, and to moderate-income borrowers is much lower than the overall market share.

The distribution of home improvement loans is adequate in both AAs. Although penetration to low- and moderate-income borrowers in both AAs is less than demographics, performance is considered adequate given the areas poverty levels. Market share performance is strongest in the Russell/Great Bend AA where the bank ranked third overall. In the Salina/Abilene AA, the bank ranked fourth. Market share to moderate-income borrowers in both AAs is somewhat lower than the bank's overall market share. UMBNBA did not achieve any market share to low-income borrowers.

The distribution of home refinance loans is adequate in both AAs. In the Salina/Abilene AA, the bank exceeded demographics in loans to moderate-income borrowers, and although penetration to low-income borrowers is below demographics, performance is considered adequate given the costs associated with home refinance loan products and a 9 percent poverty rate in this AA. In the Russell/Great Bend AA, the percentage of loans to moderate-

income borrowers is significantly higher than demographics; however, the bank did not originate any loans to low-income borrowers. UMBNBA ranked 22nd in overall home refinance lending in the Salina/Abilene AA. Market share for lending to low- and moderate-income borrowers was higher than the bank's overall market share. In the Russell/Great Bend AA, the bank ranked fortieth in overall home refinance lending. Market share lending to moderate-income borrowers is higher than the overall market share; the bank did not achieve any market share to low-income borrowers.

Small Loans to Businesses

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

UMBNBA's distribution of loans to businesses of different sizes is good in both AAs. In the Salina/Abilene AA, the percentage of loans to businesses with revenues of \$1 million or less is lower than the percentage of businesses with revenues of \$1 million or less in the AA. The bank originated 77 percent of its loans in amounts of \$100,000 or less with an average loan size of \$102,000. In the Russell/Great Bend AA, the percentage of loans to business with revenues of \$1 million or less is slightly higher than area demographics. Approximately 94 percent of the bank's loans in this AA originated in amounts of less than \$100,000 with an average loan size of \$47,000.

UMBNBA ranked third in overall market share in the Salina/Abilene AA and second in the Russell/Great Bend AA. In both AAs, the bank's market share of loans to businesses with revenues \$1 million or less exceeded its overall market share.

Small Loans to Farms

Refer to Table 12 in the Appendix C for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes is excellent in both AAs. In the Salina/Abilene AA, the percentage of small loans to farms with revenues of \$1 million or less is slightly higher than percentage of farms with revenues of \$1 million or less in the AA. UMBNBA originated 87 percent of its loans in amounts of \$100,000 or less with an average loan size of \$60,000. In the Russell/Great Bend AA, performance approximates area demographics. The bank originated 95 percent of the small loans to farms in amounts of \$100,00 or less with an average loan size of \$25,000.

UMBNBA ranked third in overall market share in the Salina/Abilene AA and first in the Russell/Great Bend AA. In both AAs, the bank's market share of loans to farms with revenues of \$1 million or less exceeds its overall market share.

Consumer Loans

Refer to Table 13 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans by borrower income level is good. The percentage of loans to moderate-income borrowers exceeds demographics in both AAs. In the Russell/Great Bend AA, loans to low-income borrowers are slightly lower than demographics and in the Salina/Abilene AA, significantly lower than demographics. Performance, however, is still considered good given a household poverty rate of 13 percent in the Russell/Great Bend AA and 12 percent in the Salina/Abilene AA.

Community Development Lending

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

Community development lending had a positive impact on the Lending Test conclusions for the Salina/Abilene AA. Although the loans were not complex or innovative they did promote activities that had a positive impact on the AA.

- UMBNBA originated a \$990,000 construction loan to renovate and expand the facilities for a non-profit organization in a moderate-income tract. The bank then acted as the lead bank for the permanent financing loan of \$890,000. UMBNBA's portion of the permanent financing loan was \$148,000 with five other area banks participating in the remainder. This loan aided the revitalization efforts in a moderate-income tract in the City of Salina.
- The bank originated or renewed five loans totaling \$95,000 to a non-profit organization to construct new homes and remodel older homes to provide affordable housing for low- and moderate-income families in the City of Salina.
- The bank originated a \$20,000 working capital loan to an organization that provides community development services to at-risk low- and moderate-income youths in the Salina/Abilene AA.

Product Innovation and Flexibility

UMBNBA participated in two government guaranteed programs that are directed towards small businesses and small farms.

- The bank originated seven loans totaling \$413,000 under the Small Business Administration guaranteed business loan program. This government program is designed to promote small business formation and growth.
- The bank originated nine loans totaling \$819,000 under the Farmers Home guaranteed loan program. These loans are for farm ownership and farm operating purposes. The government program targets beginning farmers and ranchers.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Concordia AA and Manhattan AA is not inconsistent with the bank's overall "Low Satisfactory" performance under the lending test. Refer to Tables 1 through 13 in Appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Salina/Abilene AA is adequate and in the Russell/Great Bend AA is excellent. Refer to Table 14 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

UMBNBA's level of qualified investments demonstrates good responsiveness given the limited opportunities in its AAs. Community contact and performance context research confirmed that there are few opportunities for qualified investments in the bank's AAs or in a broader statewide or regional area. Many of the opportunities to participate in qualified investment activities are in the form of grants and donations to organizations within the AAs.

In the Salina/Abilene AA, the bank made 27 qualified investments totaling \$163,000 during the current evaluation period. UMBNBA also continues to hold one investments totaling \$123,000 from a prior evaluation period. In the Russell/Great Bend AA, the bank made 12 qualified investments totaling \$1.5 million.

- UMBFC provided \$1 million to the UMB Community Development Corporation (CDC). The funds reactivated this CDC with a goal of implementing affordable home improvement loan programs targeting low- and moderate-income individuals or areas. This investment is allocated among all UMBFC's subsidiary banks. The allocation to UMBNBA is \$90,000, of which \$52,000 is allocated to the Salina/Abilene AA and \$20 thousand to the Russell/Great Bend AA. The remaining \$18,000 is split equally between the Concordia and Manhattan AAs. Allocation amounts are primarily based on the percentage of deposits per AA. The investment is innovative and complex, as 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 various AA markets. This loan program is eligible for partnership 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.
- In the Russell/Great Bend AA, an affiliate bank underwrote and purchased a \$1.5 million investment in City of Russell general obligation bonds. The bonds were issued to develop certain street and other infrastructure improvements in connection with the construction of an ethanol plant located in a redevelopment district within the city. The construction of the ethanol plant resulted in 61 new jobs. The bonds were held for a

brief time period and were immediately sold to private investors. Refer to the **Service Test** for additional information regarding the underwriting of this investment.

- In the Salina/Abilene AA, the banks continues to hold a \$123,000 investment in a regional venture capital group that helps finance and develop small businesses in a statewide area, including the bank's AA. Included in this group's portfolio is an investment in a company locally based in Salina, Kansas.
- UMBNBA contributed \$111,000 to 26 charitable organizations in the Salina/Abilene AA and \$19,000 to 10 charitable organizations in the Russell/Great Bend AA. These organizations assist with small business development, economic revitalization efforts, financial literacy programs, and community and social services targeted to low- and moderate-income individuals.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Concordia AA is not inconsistent with the bank's overall "high satisfactory" performance under the investment test. In the Manhattan AA, performance is weaker than the bank's overall "high satisfactory" performance. Performance is considered weaker because the level of qualified investments is substantially lower in this AA. However, given the limited opportunities to participate in community development activities, performance in this AA did not adversely impact the bank's rating under the lending test. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Salina/Abilene and the Russell/Great Bend AAs is good. Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Retail Banking Services

UMBNBA's delivery systems are accessible to geographies and individuals of different income levels throughout the AA. In the Salina/Abilene AA, the bank operates three offices. One office is located in a moderate- income tract, one in a middle-income tract, and one in upper-income tracts. There are no low- and three moderate-income tracts in the AA. The bank has not opened or closed any offices in the AA during the evaluation period. Approximately 21 percent of the AA's population resides in moderate-, 44 percent reside in middle-, and 35 percent reside in upper-income tracts. Geographic distribution of low- and moderate-income families in the AA shows 18 percent in moderate-, 45 percent in middle-, and 37 percent in upper-income tracts.

UMBNBA operates five offices in the Russell/Great Bend AA. Four offices are located in a middle-income tract and one office is located in an upper-income tract. There is no low- and one moderate-income tract in this AA; no offices were opened or closed during the evaluation period. Four percent of the AA population resides in the moderate-, 88 percent in the middle-, and 8 percent in the upper-income tracts. Geographic distribution of low- and moderate-income families in the AA approximates the population distribution.

Business hours and services offered are reasonable and do not vary in a way that inconveniences the AAs. In the Salina/Abilene AA, all offices are open five days a week with additional Saturday hours at one Salina office. The office in the upper-income tract does not have a full-time loan officer on staff. Branch personnel accept loan applications that are forwarded to the main bank for processing. Drive-up service is available six days a week at all three locations. All offices in the AA are willing to make special arrangements to meet with customers in the evening or by appointment.

Offices in the Abilene/Great Bend AA are open five days a week with extended lobby hours on Friday at the Russell, Luray, and Hudson offices. One Great Bend location offers Saturday lobby hours until twelve pm. Drive-up service is available five days a week at three of the offices. Saturday drive-up hours are offered at both of the Great Bend offices. An internal analysis determined there was no demand for Saturday hours in the Luray, Russell, and Hudson markets. Management periodically evaluates this decision; to date there has been no adverse community response. The branch located in the Great Bend upper-income tract does not have a full-time loan officer on staff. Branch personnel accept loan applications that are forwarded to the main office in Great Bend for processing. All offices in the AA are also willing to make special arrangements to meet with customers in the evening or by appointment.

Deposit services and loan product information can be obtained at each branch or through the bank's Internet site. Product and service availability does not vary among the bank's AAs. UMBNBA offers three types of free, no minimum balance checking account products; one product is available to all customers, the other is targeted to students, and the third is a "Youth Savings" program. The student checking account is free provided there no more than 20 checks written. The bank also offers three other types of free checking account products with varying minimum balance requirements. One product is focused on customers with investments; another is a money market sweep account; and, the third is available to all customers. Fees charged are the same in the different markets and AAs. In the Salina banking offices, employees fluent in Spanish are available to assist the communities growing Hispanic population.

The locations of bank ATMs in both AAs are reasonably accessible to individuals of different income levels. UMBNBA operates three ATMs in the Salina/Abilene AA; two branches have 24-hour ATMS that accept deposits. The bank operates an additional ATM that has 24-hour access but does not accept deposits. ATMS in this AA are located as follows: 33 percent in moderate-, 33 percent in middle-, and 33 percent in upper-income tracts. A deposit taking ATMs is located in the moderate-income tract.

In the Russell/Great Bend AA, the bank operates two ATMs located at branch offices in middle-income tracts. Both ATMs have 24-hour access and accept deposits.

The bank also offers a STAR (Services to Assist Retirement) program. A bank representative will visit the customer at home and assist them with their financial needs, or they will provide transportation to the bank. The program is offered on an as-needed basis.

Other alternative delivery systems include a 24-hour telephone service, Internet banking, and the Vision EBT Card. The telephone banking service allows customers to access account balances, review checks cleared and loan information, and transfer funds between accounts. The Internet banking service offers similar features; in addition, it accepts online loan applications and processes bill payment requests. The EBT program is an ATM card issued by the State Aid to Families with Dependent Children. The program allows recipients of government benefits to access their funds through an ATM. The State issues these cards to recipients who have not arranged for direct deposit of their funds. UMBNBA has accepted the card since 1997.

The telephone service and Internet banking, as alternate delivery systems, did not influence service test performance. The bank could not demonstrate the impact of these systems in low- and moderate-income geographies or the use of these systems by low- and moderate-income individuals.

Community Development Services

UMBNBA provided a relatively high level of community development services in both the Salina/Abilene and Russell/Great Bend AAs. Bank officers participate in a variety of organizations that primarily benefit low- and moderate-income individuals or promote economic development. In the Salina/Abilene AA, 10 officers provided their financial expertise to 15 different community development organizations. In the Russell/Great Bend AA, four officers provided expertise to seven organizations. Bank officer's activities included involvement with economic development corporations that finance small business activities, financial education seminars, housing authorities, credit counseling services, and charitable organizations serving low- and moderate-income individuals and families.

The Investment Banking division of an affiliate bank provided its financial expertise to the City of Russell by underwriting \$1.5 million in tax-exempt general obligation bonds. These bonds are for financing the costs of certain street and other infrastructure improvements in connection with the construction of an ethanol plant located in a redevelopment district in the City of Russell. Refer to the *Investment Test* for further information about the bond issuance.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Concordia and Manhattan AAs is not inconsistent with the bank's overall "High Satisfactory" performance under the Service Test.

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 non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (includes CD Loans): 01/01/1999 to 12/31/2001 Investment and Service Tests: 07/27/1999 to 07/22/2002	
Financial Institution	Products Reviewed	
UMB National Bank of America (UMBNA) Salina, Kansas	<ul style="list-style-type: none"> • Home Mortgage, Small Business, Small Farm, Consumer, and Community Development Loans; • Qualified Investments; • Retail and Community Development Services 	
Affiliate(s)	Affiliate Relationship	Products Reviewed
UMB Financial Corporation (UMBFC)	Holding Company	<ul style="list-style-type: none"> • Qualified Investments
UMB Bank, n.a. (UMB)	Subsidiary of UMBFC	<ul style="list-style-type: none"> • Qualified Investments and Community Development Services
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Salina/Abilene Russell/Great Bend Concordia Manhattan	Full-Scope Full-Scope Limited-Scope Limited-Scope	

Appendix B: Market Profiles for Full-Scope Areas

Table of Contents

Market Profiles for Areas Receiving Full-Scope Reviews

Salina/Abilene	B-2
Russell/Great Bend	B-3

Salina/Abilene

Demographic Information for Full Scope Area: Salina/Abilene						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	18	n/a	16.67	50.00	33.33	0.00
Population by Geography	68,259	n/a	20.73	44.31	34.96	0.00
Owner-Occupied Housing by Geography	18,760	n/a	15.45	45.52	39.03	0.00
Business by Geography	3,709	n/a	36.78	34.48	28.74	0.00
Farms by Geography	508	n/a	6.10	54.72	39.17	0.00
Family Distribution by Income Level	18,975	15.37	17.71	23.96	42.96	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	6,277	n/a	29.78	49.48	20.74	0.00
Median Family Income		\$28,067	Median Housing Value		\$42,146	
HUD Adjusted Median Family Income for 2002		\$44,200	Unemployment Rate (June 2002)		3.01%	
Households Below Poverty Level		12.31%				

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 US Census, 2002 HUD updated MFI, and Bureau of Labor Statistics

The Salina/Abilene AA is located in north central Kansas and consists of Saline and Dickinson counties. There are no low- and three moderate-income tracts in this AA. All of the moderate-income tracts are located in the City of Salina. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

UMBNA operates three bank offices and three ATMs in the AA. Two offices are located in Salina, the third in Abilene. In this AA, the primary business focus is commercial lending, although by number, consumer loans represents the largest volume of lending activity. The bank's deposit base in this AA is 40 percent. Lending in the AA represents 37 percent of the bank's reported loans. The bank ranked first in deposit market share, as of June 30, 2001, with 19 percent of the area deposits. A total of 16 other financial institutions operate 33 banking offices in the AA. Primary competitors include Capital Federal Savings Bank, Sunflower Bank N.A., and Security Savings Bank.

Economic conditions in the AA are stable. The June 2002 area unemployment rate of 3.01 percent is lower than the state rate of 4.6 percent and national rate of 5.9 percent for the same time period. Salina is a regional center for agriculture, commerce, and health services. Major employers in the Salina area are Tony's Pizza, Great Plains Manufacturing, Exide Battery, Phillips Lighting, and Raytheon Aircraft. In Abilene, the major employer is Russell Stover Candies. The primary industry in Abilene is tourism. Abilene is home to the Dwight D. Eisenhower Presidential Library and Museum.

We performed two community contacts in this AA. Community contacts stated credit needs in this AA are small business financing, including business development and expansion, particularly in the downtown Salina area. Agricultural-related financing is also needed as the area remains strongly connected to the farming industry.

Russell/Great Bend

Demographic Information for Full Scope Area: Russell/Great Bend						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	13	n/a	7.69	84.62	7.69	0.00
Population by Geography	42,582	n/a	3.77	88.57	7.66	0.00
Owner-Occupied Housing by Geography	12,580	n/a	3.88	88.90	7.22	0.00
Business by Geography	2,660	n/a	2.59	90.53	6.88	0.00
Farms by Geography	613	n/a	6.53	91.68	1.79	0.00
Family Distribution by Income Level	12,074	17.76	20.18	24.08	37.99	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	4,580	n/a	5.24	90.02	4.74	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below Poverty Level		28,067 44,200 12.92%	Median Housing Value Unemployment Rate (June 2002)		34,305 3.23%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 US Census, 2002 HUD updated MFI, and Bureau of Labor Statistics

The Russell/Great Bend AA is located in the center of Kansas and is comprised of Barton, Russell, and Stafford counties. There is no low- and one moderate-income tract in the AA. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

UMBNA operates five bank offices and two ATMs in the AA. Two offices are located in Great Bend, and one each in the cities of Hudson, Luray, and Russell. In this AA, the primary business focus is agricultural lending, although by number, consumer loans represents the largest volume of lending activity. The bank's deposit base in this AA is 31 percent. Lending in the AA represents 32 percent of the bank's reported loans. The bank ranked third in deposit market share, as of June 30, 2001, with 11 percent of the area deposits. A total of 18 other financial institutions operate 28 banking offices in the AA. Primary competitors include Farmers Bank & Trust N.A., Sunflower Bank N.A., Commercial Federal Bank, and Bank of America.

Economic conditions in the AA are stable; however, recent drought-related conditions could adversely impact the agricultural industry. The economy is dependent on agriculture and many of the area industries are agricultural related. Major employers are local school districts, health care facilities, and local government. The June 2002 unemployment rate of 3.23 percent is lower than the state rate of 4.6 percent and national rate of 5.9 percent.

The City of Russell has experienced some economic gains with the construction of the ethanol plant, a CO-2 recovery plant, and a 54-room motel. The City was awarded a \$600,000 Community Development Block Grant for Housing Rehabilitation and Water Line replacement for 2001-2002. The City was also awarded a \$394,000 economic development grant from the United States Department of Commerce. The City's Neighborhood Revitalization Plan resulted in over \$200,000 in new building permits in 2001.

We performed one community contact in this AA. Our contact stated continued support of new commercial and residential construction is a primary banking need. Agricultural-related financing is also needed as the area remains strongly connected to the farming industry.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

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

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

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

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

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

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF KANSAS												
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001												
Assessment Area:	% of Rated Area Loans (#) in AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Reported Loans		% of Rated Area Deposits in AA**
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Salina/Abilene	36.68	165	7,840	426	41,885	416	20,703	8	1,253	1,015	71,681	39.86 ⁽¹⁾
Russell/Great Bend	32.02	110	1,907	282	9,221	494	12,933	0	0	886	24,061	30.89
Limited Review:												
Concordia	14.13	60	1,151	126	5,464	203	4,406	2	2,962	391	13,983	14.81
Manhattan	17.17	66	2,801	269	25,985	140	5,523	0	0	475	34,309	14.46

⁽¹⁾ Deposit Market Share includes only core deposits and excludes Public Funds attributed to the Salina branch.

* Loan Data as of December 31, 2001. Rated area refers to the State of Kansas rating area.

** Deposit Data as of June 30, 2001. Rated Area refers to the AAs in which the bank has at least one branch office.

Table 1a. Other Products

LENDING VOLUME		Geography: STATE OF KANSAS								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001				
Assessment Area:	% of Rated Area Loans (#) in AA	Total Optional Loans**		Home Equity**		Motor Vehicle**		Other Secured Consumer**		Other Unsecured Consumer**		Credit Card**		% of Rated Area Deposits in AA****
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:														
Salina/Abilene	41.63	1,528	22,754	47	2,039	1,222	17,413	154	1,698	105	1,604	0	0	39.86 ⁽¹⁾
Russell/Great Bend	22.04	809	9,727	24	752	469	5,377	195	1,249	121	2,349	0	0	30.89
Limited Review:														
Concordia	19.26	707	6,443	7	152	405	3,612	243	2,587	52	92	0	0	14.81
Manhattan	17.06	626	9,886	19	532	335	4,096	164	2,177	108	3,081	0	0	14.46

⁽¹⁾ Deposit Market Share includes only core deposits and excludes Public Funds attributed to the Salina branch.

* Loan Data as of December 31, 2001. Rated area refers to the State of Kansas rating area.

** The evaluation period for Optional Product Line(s) is from January 01, 1999 to December 31, 2001.

**** Deposit Data as of June 30, 2001. Rated Area refers to the AAs in which the bank has at least one branch office.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF KANSAS				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001					Market Share (%) by Geography [*]				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans						
Full Review:																
Salina/Abilene	33	37.50	n/a	n/a	15.45	6.06	45.52	54.55	39.03	39.39	0.93	n/a	0.62	1.59	0.47	
Russell/Great Bend	24	27.27	n/a	n/a	3.88	4.17	88.90	95.83	7.22	0.00	2.44	n/a	0.00	2.96	0.00	
Limited Review:																
Concordia	15	17.05	n/a	n/a	n/a	n/a	100.00	100.00	n/a	n/a	3.39	n/a	n/a	3.39	n/a	
Manhattan	16	18.18	0.42	0.00	5.68	12.50	62.10	68.75	31.81	18.75	0.37	0.00	0.00	0.22	0.70	

^{*} Based on 2000 Peer Mortgage Data: Midwest Region.

^{**} Home purchase loans originated and purchased in the AA as a percentage of all home purchase loans originated and purchased in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF KANSAS						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001						
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Salina/Abilene	56	30.94	n/a	n/a	15.45	19.64	45.52	53.57	39.03	26.79	6.70	n/a	13.33	10.13	2.00
Russell/Great Bend	69	38.12	n/a	n/a	3.88	5.80	88.90	81.16	7.22	13.04	11.01	n/a	50.00	10.64	0.00
Limited Review:															
Concordia	32	17.68	n/a	n/a	n/a	n/a	100.00	100.00	n/a	n/a	37.50	n/a	n/a	37.50	n/a
Manhattan	24	13.26	0.42	0.00	5.68	0.00	62.10	79.17	31.81	20.83	4.72	0.00	0.00	7.25	1.82

* Based on 2000 Peer Mortgage Data: Midwest Region.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF KANSAS				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]					
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Salina/Abilene	73	57.94	n/a	n/a	15.45	2.74	45.52	75.34	39.03	21.92	0.84	n/a	0.00	2.12	0.00	
Russell/Great Bend	16	12.70	n/a	n/a	3.88	12.50	88.90	87.50	7.22	0.00	0.56	n/a	0.00	0.64	0.00	
Limited Review:																
Concordia	12	9.52	n/a	n/a	n/a	n/a	100.00	100.00	n/a	n/a	0.00	n/a	n/a	0.00	n/a	
Manhattan	25	19.84	0.42	0.00	5.68	4.00	62.10	64.00	31.81	32.00	0.60	0.00	0.00	0.58	0.76	

^{*} Based on 2000 Peer Mortgage Data: Midwest Region.

^{**} Home mortgage refinance loans originated and purchased in the AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF KANSAS						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001								
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]					
	#	% of Total ^{**}	% of MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	Overall	Low	Mod	Mid
Full Review:																
Salina/Abilene	3	50.00	n/a	n/a	44.21	0.00	18.47	66.67	37.32	33.33	33.33	n/a	0.00	50.00	0.00	
Russell/Great Bend	1	16.67	n/a	n/a	0.00	0.00	83.23	100.00	16.77	0.00	0.00	n/a	0.00	0.00	0.00	
Limited Review:																
Concordia	1	16.67	n/a	n/a	n/a	n/a	100.00	100.00	n/a	n/a	0.00	n/a	n/a	0.00	n/a	
Manhattan	1	16.67	10.84	0.00	30.85	100.00	27.03	0.00	31.28	0.00	0.00	0.00	0.00	0.00	0.00	

^{*} Based on 2000 Peer Mortgage Data: Midwest Region.

^{**} Multifamily loans originated and purchased in the AA as a percentage of all multifamily loans originated and purchased in the rated area.

^{***} Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: STATE OF KANSAS						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Salina/Abilene	426	38.62	n/a	n/a	36.78	30.52	34.48	28.64	28.74	40.85	11.15	n/a	12.76	7.25	15.65
Russell/Great Bend	282	25.57	n/a	n/a	2.59	7.80	90.53	86.17	6.88	6.03	14.74	n/a	33.33	15.46	14.04
Limited Review:															
Concordia	126	11.42	n/a	n/a	n/a	n/a	100.00	100.00	n/a	n/a	28.80	n/a	n/a	31.07	n/a
Manhattan	269	24.39	4.32	0.37	26.71	24.16	46.41	39.03	22.56	36.43	10.57	5.56	11.00	9.00	13.97

* Based on 2000 Peer Small Business Data: US&PR.

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

*** Source Data - Dun and Bradstreet (2001).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS				Geography: STATE OF KANSAS				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001								
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]					
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans	% of Farms ^{**}	% BANK Loans	% of Farms ^{**}	% BANK Loans	% of Farms ^{**}	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Salina/Abilene	416	33.20	n/a	n/a	6.10	0.96	54.72	76.92	39.17	22.12	16.62	n/a	0.00	18.84	11.87	
Russell/Great Bend	494	39.43	n/a	n/a	6.53	15.38	91.68	81.98	1.79	2.63	36.59	n/a	40.00	36.73	22.22	
Limited Review:																
Concordia	203	16.20	n/a	n/a	n/a	n/a	100.00	100.00	n/a	n/a	38.96	n/a	n/a	38.96	n/a	
Manhattan	140	11.17	2.80	0.00	4.58	2.86	62.85	38.57	29.77	58.57	53.41	0.00	0.00	39.47	68.09	

^{*} Based on 2000 Peer Small Business Data: US&PR.

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

^{***} Source Data - Dun and Bradstreet (2001).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: STATE OF KANSAS				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001									
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *					
	#	% of Total**	% Families **	% BANK Loans ****	% Families** *	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Salina/Abilene	33	37.50	15.37	6.06	17.71	9.09	23.96	30.30	42.96	54.55	1.01	1.79	0.48	1.38	0.87	
Russell/Great Bend	24	27.27	17.76	16.67	20.18	33.33	24.08	16.67	37.99	33.33	3.16	4.00	6.98	2.13	1.33	
Limited Review:																
Concordia	15	17.05	18.15	0.00	22.94	33.33	26.81	0.00	32.10	66.67	4.08	0.00	0.00	0.00	10.00	
Manhattan	16	18.18	16.84	12.50	19.93	18.75	21.97	31.25	41.26	37.50	0.51	4.00	0.00	0.63	0.32	

* Based on 2000 Peer Mortgage Data: Midwest Region.

** As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by the bank.

*** Percentage of Families is based on the 1990 Census information.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: STATE OF KANSAS				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001					Market Share *				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families ***	% BANK Loans ****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Salina/Abilene	56	30.94	15.37	12.50	17.71	12.50	23.96	32.14	42.96	42.86	6.86	0.00	5.71	12.77	5.77	
Russell/Great Bend	69	38.12	17.76	10.14	20.18	17.39	24.08	26.09	37.99	46.38	11.43	0.00	11.11	3.85	19.15	
Limited Review:																
Concordia	32	17.68	18.15	6.67	22.94	16.67	26.81	46.67	32.10	30.00	40.00	50.00	20.00	20.00	100.00	
Manhattan	24	13.26	16.84	4.35	19.93	34.78	21.97	26.09	41.26	34.78	4.80	0.00	17.65	2.78	3.03	

* Based on 2000 Peer Mortgage Data: Midwest Region.

** As a percentage of loans with borrower income information available. No information was available for 1.66% of loans originated and purchased by the bank.

*** Percentage of Families is based on the 1990 Census information.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE				Geography: STATE OF KANSAS				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Salina/Abilene	73	57.94	15.37	8.33	17.71	25.00	23.96	23.61	42.96	43.06	0.96	2.86	2.04	0.68	0.41
Russell/Great Bend	16	12.70	17.76	0.00	20.18	31.25	24.08	18.75	37.99	50.00	0.64	0.00	2.86	0.00	0.00
Limited Review:															
Concordia	12	9.52	18.15	33.33	22.94	25.00	26.81	25.00	32.10	16.67	0.00	0.00	0.00	0.00	0.00
Manhattan	25	19.84	16.84	20.00	19.93	24.00	21.97	20.00	41.26	36.00	0.73	5.26	0.00	0.00	0.67

* Based on 2000 Peer Mortgage Data: Midwest Region.

** As a percentage of loans with borrower income information available. No information was available for 0.79% of loans originated and purchased by the bank.

*** Percentage of Families is based on the 1990 Census information.

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

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF KANSAS			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Salina/Abilene	426	38.62	87.89	71.36	77.46	11.50	11.03	11.15	13.48
Russell/Great Bend	282	25.57	90.49	93.26	93.62	3.55	2.84	14.74	21.60
Limited Review:									
Concordia	126	11.42	89.09	86.51	90.48	7.14	2.38	28.80	36.03
Manhattan	269	24.39	85.51	75.84	81.04	7.81	11.15	10.57	17.20

^{*} Based on 2000 Peer Small Business Data: US&PR.

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

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2001).

^{****} 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 1.72% of small loans to businesses originated and purchased by the bank.

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STATE OF KANSAS			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [*]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK ^{****} Loans	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Salina/Abilene	416	33.20	95.28	97.60	87.26	10.82	1.92	16.62	16.76
Russell/Great Bend	494	39.43	96.25	95.75	94.94	4.25	0.81	36.59	38.08
Limited Review:									
Concordia	203	16.20	97.62	97.04	96.06	3.45	0.49	38.96	39.33
Manhattan	140	11.17	92.88	97.14	90.00	9.29	0.71	53.41	58.75

^{*} Based on 2000 Peer Small Business Data: US&PR.

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

^{***} Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2001).

^{****} Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 1.60% of small loans to farms originated and purchased by the bank.

Table 13. Geographic and Borrower Distribution of Consumer Loans

Geographic and Borrower Distribution: CONSUMER LOANS										Geography: STATE OF KANSAS				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001					
Assessment Area:	Geographic Distribution										Borrower Distribution								
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	
Full Review:																			
Salina/Abilene	1528	41.63	n/a	n/a	22.60	13.35	43.82	50.00	33.58	36.65	20.06	8.34	15.84	18.24	19.17	26.72	44.93	47.85	
Russell/Great Bend	809	22.04	n/a	n/a	3.85	4.94	88.59	89.49	7.56	5.56	23.01	20.41	16.77	22.21	19.61	23.11	40.61	34.27	
Limited Review:																			
Concordia	707	19.26	n/a	n/a	n/a	n/a	100.00	100.00	n/a	n/a	24.71	18.82	18.75	29.24	22.84	26.59	33.71	25.35	
Manhattan	626	17.06	2.43	0.64	19.27	10.06	51.78	56.71	26.53	32.59	23.49	19.60	16.54	19.60	19.82	24.12	40.15	36.68	

* Consumer loans originated and purchased in the AA as a percentage of all consumer loans originated and purchased in the rated area.
 ** Percentage of Households is based on the 1990 Census Information.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF KANSAS				Evaluation Period: JULY 27, 1999 TO JULY 22, 2002			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Salina/Abilene	1	123	27	163	28	286	10%	0	0
Russell/Great Bend	0	0	12	1,500	12	1,500	51%	0	0
Limited Review:									
Concordia	0	0	9	1,080	8	1,080	37%	0	0
Manhattan	0	0	12	51	12	51	2%	0	0

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: STATE OF KANSAS				Evaluation Period: JULY 27, 1999 TO JULY 22, 2002					
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Salina/Abilene	39.86 ⁽¹⁾	3	23.08	n/a	33.33	33.33	33.33	0	0	0	0	0	0	n/a	20.73	44.31	34.96
Russell/Great Bend	30.89	5	38.46	n/a	0.00	80.00	20.00	0	0	0	0	0	0	n/a	3.77	88.57	7.66
Limited Review:																	
Concordia	14.81	3	15.38	n/a	n/a	100.00	n/a	0	0	0	0	0	0	n/a	n/a	100.00	n/a
Manhattan	14.46	2	23.08	0.00	50.00	0.00	50.00	0	0	0	0	0	0	5.34	24.62	45.05	24.99

(1) Deposit Market Share includes only core deposits and excludes Public Funds attributed to the Salina branch.