



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

DIVISION OF  
CORPORATION FINANCE

January 22, 2020

Brian Walker  
Chief Accounting Officer  
UMB Financial Corporation  
1010 Grand Boulevard  
Kansas City, Missouri 64106

**Re: UMB Financial Corporation**  
**Form 10-K**  
**Filed March 1, 2019**  
**File No. 001-38481**

Dear Mr. Walker:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance  
Office of Finance