

CRA RATINGS OF MASSACHUSETTS BANKS, CREDIT UNIONS, AND LICENSED MORTGAGE LENDERS IN 2016

MAHA's Twenty-Sixth Annual Report on How Well
Lenders and Regulators Are Meeting Their Obligations
Under the Community Reinvestment Act

Prepared for the

Massachusetts Affordable Housing Alliance

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INTRODUCTION AND SUMMARY OF MAJOR FINDINGS

Since 1990, state and federal bank regulators have been required to make public their ratings of the performance of individual banks in serving the credit needs of local communities, in accordance with the provisions of the federal Community Reinvestment Act (CRA) and its Massachusetts counterpart. And since 1991, the Massachusetts Affordable Housing Alliance (MAHA) has issued annual reports offering a comprehensive listing and analysis of all CRA ratings of Massachusetts banks and credit unions. This is the twenty-sixth report in this annual series. Since 2011 these reports have also included information on the CRA-like ratings of licensed mortgage lenders issued by the state's Division of Banks in accordance with its CRA for Mortgage Lenders regulation.

As defined for this report, there were 153 "Massachusetts banks" as of December 31, 2016. This includes not only 131 banks that have headquarters in the state, but also 22 banks based elsewhere that have one or more branch offices in Massachusetts.¹ **Table A-1 provides a listing of the 153 Massachusetts banks and their current CRA ratings.** (The 27 federally-chartered banks and the twelve banks chartered by other states receive ratings only from their federal regulators; the 114 Massachusetts state-chartered banks receive ratings from both Massachusetts and federal regulators.)^{2 3}

Banks that operate in more than one state receive separate federal CRA ratings for each state as well as an overall CRA rating; for such banks, this report uses the CRA rating for their Massachusetts operations rather than the overall rating.⁴ **Table A-2 provides information on the 41 banks that have branches both inside and outside of Massachusetts;** these banks are shown in italics in Table A-1.

Table A-3 provides a listing of the current CRA ratings of the state's 68 state-chartered credit unions. (Federally-chartered credit unions are not covered by CRA.) **Table A-4 provides a listing of all current CRA ratings of currently-licensed mortgage lenders.**

Tables 1-8 present information about the distribution of the most recent CRA ratings of banks, credit unions, and licensed mortgage lenders as of year-end 2016; about the distribution of CRA ratings awarded during the calendar year 2016 and during earlier years; and about the number and distribution of CRA ratings awarded annually by each of the federal bank regulators and by the state's Division of Banks. Some of the notable findings contained in those tables may be summarized as follows:

¹ This report's definition of "Massachusetts Banks" excludes trust companies that specialize in serving investors; these banks do not offer retail banking services and most of them have no deposits in their Massachusetts branches.

² In recent years, CRA ratings of state-chartered banks have almost always been the result of a joint examination by the state and the FDIC (resulting in a single performance evaluation with both agencies' names on the cover) or of a concurrent examination by the state and the Fed (resulting in separate performance evaluations with the same exam date on the covers). The two ratings resulting from these joint or concurrent exams have always been the same during the last four years except in those relatively few cases where the state rating has been "High Satisfactory," a rating not available to federal regulators who have given these banks a rating of "Satisfactory."

³ Although the twelve banks chartered by other states that have Massachusetts branches are subject to oversight by the state's Division of Banks for their in-state activities, the Division has not awarded any CRA ratings or public performance evaluations to any of these banks. The other ten out-of-state banks with branches here are federally-chartered and therefore not subject to state CRA oversight.

⁴ To be more precise, banks with branches in more than one state receive not only an overall CRA rating, but also (1) a separate rating for each multistate metropolitan statistical area (MMSA) within which they have branches and (2) a separate rating for each state (the "state" rating excludes any part of the state covered by a MMSA rating). Since most of the Massachusetts activity of Bank of America, Citizens, People's United, and Santander is within multistate MSAs (e.g., the Boston MA-NH MSA), their "Massachusetts" CRA ratings are based on evaluation of only a small portion of their activity within the state. Therefore, their ratings in this report are those for these multistate MSAs.

- **Of the 50 CRA ratings awarded to Massachusetts banks during 2016, only five (10.0%) were “Outstanding.”** Although this is a modest increase from the share of “Outstanding” ratings in 2015, it is far below the share in the 2011-2013 period, when more than 20% of all ratings were “Outstanding,” and even further below the 2005-2007 period, when over 30% of all ratings were “Outstanding.” It is notable that all five of the “Outstanding” ratings were among the seven total ratings awarded by the OCC; not a single “Outstanding” rating was awarded by the FDIC, the Fed, or the state. For federal regulators, the “Outstanding” share was 16.7% (5 of 30 ratings); for the state, the “Outstanding” share was 0.0% (0 of 20). (See Tables 1 and 2.)
- When each bank is classified by its most recent CRA rating, **17.9% of all banks had a most recent rating of “Outstanding” at year-end 2016, continuing a three-year downward trend from 22.2% in 2013, and the lowest share of “Outstanding” ratings since 1994.** Another 9.9% of banks had a most recent rating of “High Satisfactory,” and 67.5% of banks had a most recent rating of “Satisfactory.” Seven banks (4.6%) had a most recent rating of “Needs to Improve,” down from eight one year earlier, but much higher than the average of only one from 2009 through 2012. Five of these seven are out-of-state banks given low ratings by their federal regulators for their performance in Massachusetts. **Two Massachusetts-based banks had most recent CRA ratings of “Needs to Improve” – OneUnited Bank and Sage Bank.** (See Table 3.)
- **Eight of the state’s ten biggest banks were rated “Outstanding” in their most recent CRA exams; Citizens Bank (#3) and First Republic Bank (#8) have most recent ratings of “Satisfactory.”** The eight among the current top ten that have ratings of “Outstanding” are, in rank order: State Street, Bank of America, Santander, TD Bank, Eastern, Rockland Trust, BNY Mellon, and Boston Private.⁵ Banks are ranked by total in-state deposits as reported by the FDIC for mid-2016.⁶ (See Table A-1 for ratings of all individual banks.)
- When banks are classified, for each regulator, in terms of the year in which they most recently received a CRA rating, the data reveal that **over one-half (52.3%) of Massachusetts banks have received at least one CRA rating (federal and/or state) within the past two years and that only one bank has not received any CRA rating within the last five years.** Nevertheless, it is notable that the total number CRA ratings awarded in 2016 (50 ratings) was much lower than in recent years (the average number of total ratings per year during the 2012-2015 period was 88).⁷ (See Table 4 and Table 1.)
- For the third consecutive year, only two credit unions – Jeanne D-Arc CU in Lowell and Workers’ CU in Fitchburg – had “Outstanding” ratings (2.7% of the 68 current state-chartered credit unions),

⁵ On the basis of a joint examination by its two regulators, Boston Private Bank received an overall rating of “High Satisfactory” from the state and of “Satisfactory” from the FDIC, but a rating of “Outstanding” for Massachusetts.

⁶ The Bank of New York Mellon (New York City) had \$13.1B of deposits in Massachusetts and ranked seventh on the FDIC’s list. However, this bank is a wholesale bank whose CRA “assessment area” lies entirely within metropolitan New York and it is thus not counted as a Massachusetts bank for purposes of this report. BNY Mellon, an affiliated bank with headquarters in Pittsburgh, is counted as a Massachusetts bank.

⁷ Table 4 and the discussion in this paragraph provide one indication of the timeliness with which regulators are awarding CRA ratings. Ideally, the performance of each regulator would be compared to its own stated policy on the frequency of CRA examinations and ratings. However, this would be a complex task, beyond the scope of the present report. Complexity results from (1) the fact that mandated examination frequency depends on the asset size of the bank and on the bank’s previous rating (for the Fed and the FDIC, it also depends on the bank’s “Compliance Rating,” which is not public) and (2) the fact that the policies of the three federal regulators differ significantly among themselves, and from the policies of the DoB. The Division of Banks’ policy is in its Regulatory Bulletin 1.3-105. The Federal Reserve’s policy is contained in its Consumer Affairs Letters (CA 13-20). The FDIC’s policy is in Section II-11.1 of its Compliance Examination Manual. The OCC’s policy can be found by a Google search for “How often does the OCC conduct a CRA examination?”

while seven more (10.3%) have ratings of “High Satisfactory.” Only one credit union has a rating of “Needs to Improve.” **Nineteen credit union ratings were awarded in 2016; this is the first time since 2008 that the number of annual ratings was at the level needed to provide a rating to each credit union “at least once every 48 months,” as specified in state policy.**⁸ As of year-end 2016, only six credit unions (8.8% of the total) had not received a CRA rating based on an exam dated within the last five years; this a major improvement from 17 credit unions (23.9% of the total) at year-end 2015 and 32 credit unions (42.1% of the total) at year-end 2014. (Tables 5, 6, and A-3.)

- Ten licensed mortgage lenders (LMLs) received CRA for Mortgage Lenders ratings during 2016; one of these ratings was “High Satisfactory,” seven were “Satisfactory,” and two were “Needs to Improve.” **Of the 59 currently-licensed LMLs that have ever received CRA for Mortgage Lender ratings, three have a current rating of “High Satisfactory,” 49 have a current rating of “Satisfactory,” six have a current rating of “Needs to Improve” and one has a current rating of “Substantial Noncompliance.”** (Tables 7 & 8; Table A-4 provides selected information for each of these 59 lenders.⁹)
- **The Division of Banks is far from compliance with its stated policy of examining each licensed mortgage lender (LML) “at least once every 48 months.”**¹⁰ **Of the 91 currently-licensed LMLs that were qualified for coverage under the state’s CRA for Mortgage Lenders regulation by reporting 50 or more Massachusetts loans in 2015 HMDA data, only 37 (40.7%) have received a CRA rating within the last four years.** Sixteen additional lenders (17.6% of the total) received ratings in 2012 or earlier, and 38 lenders (41.8%) have never received a CRA rating.¹¹ **Although maintaining compliance with its stated policy would require approximately twenty ratings per year¹², the Division awarded only ten ratings in 2016, and a total of only fifty ratings during the past five years.** (See Table 7.)
- **Among the 38 currently-licensed CRA-eligible LMLs that have never received a rating are three of the top six, as ranked by total number of 2015 Massachusetts loans: Quicken (ranked #2), Residential Mortgage (#4), and Fairway Independent Mortgage (#6);** each of these three lenders has been continuously covered by CRA for Mortgage Lenders for at least seven years. On the other hand, 17 of the 38 never-rated lenders became newly covered by CRA for Mortgage Lenders on the basis of their 2015 lending.

⁸ The quotation is from the Division of Banks’ Regulatory Bulletin 1.3-105.

⁹ In addition to the 59 lenders included in the body of Table A-4, the notes to that table identify the sixteen not-currently-licensed lenders that have received CRA for Mortgage Lender ratings and the three currently-licensed lenders whose exams resulted in consent orders rather than ratings.

¹⁰ This policy is in the Division’s Regulatory Bulletin 1.3-105, Section II.A and is repeated in its most recent “Quarterly Schedules for MLCI Examinations.” An exception to this policy is that LMLs with ratings of “Outstanding” or “High Satisfactory” will have their next CRA examination begin “no sooner than 60 months following the prior Division CRA examination.”

¹¹ These numbers are based on a review of the current licensing status (as of early January 2017) of each lender that reported fifty or more Massachusetts loans in the 2015 HMDA LAR data and of every other lender that has ever received a CRA for Mortgage Lenders rating. The 59 current ratings noted in the text include six ratings of currently-licensed lenders that did not make 50 or more Massachusetts loans in 2015. Table 7 includes ratings awarded in previous years to LMLs that are no longer licensed in the state, but Tables 8 and A-4 include only LMLs licensed as of January 2017.

¹² “Approximately” is used because the list of CRA-eligible LMLs continually varies. LMLs join the list by becoming newly licensed by the state and/or by increasing their number of Massachusetts loans above the threshold of fifty. LMLs leave the list by giving up their licenses and/or by reducing their number of Massachusetts loans below the threshold. The number of currently-licensed CRA-eligible lenders was 79 at year-end 2015 and 91 at year-end 2016.

For Additional Information:

- A great deal of information on the CRA (Community Reinvestment Act) in general, and on the CRA evaluation/examination/rating system in particular, is readily available on the web sites of the state's Division of Banks (www.state.ma.us/dob) and of the federal bank regulators: the Federal Deposit Insurance Corporation (www.fdic.gov); the Office of the Comptroller of the Currency (www.occ.treas.gov); and the Federal Reserve (www.federalreserve.gov).
- The web sites of each of the three federal regulators (given just above), provide searchable databases of all of the CRA ratings that they have ever provided. For example, these databases can be searched by state, by year, and/or by bank name. The lists of banks/ratings that result from these searches provide links to the individual *Performance Evaluations*, which can then be read on-line, downloaded, or printed out.
- The website of the Massachusetts Division of Banks (given just above) provides two lists of current CRA ratings, also with links to individual *Performance Evaluations*. One list is of CRA ratings of banks and credit unions. The second list is of ratings of licensed mortgage lenders under the state's CRA for Mortgage Lenders regulation.
- The Federal Reserve's National Information Center offers an "Institution Search" function that can provide up-to-date information on the status and history of any individual bank, past or present. (www.ffiec.gov/nicpubweb/nicweb/NicHome.aspx).

TABLE 1
TOTAL CRA RATINGS GIVEN TO MASSACHUSETTS BANKS & PERCENT
THAT WERE "OUTSTANDING" OR BELOW "SATISFACTORY" -- 1991-2016

Year	Number of Ratings			% Outstanding			% Below Satisfactory*		
	Federal	Mass.	Total	Federal	Mass.	Total	Federal	Mass.	Total
1991	56	54	110	5.4%	3.7%	4.5%	17.9%	20.4%	19.1%
1992	88	109	197	10.2%	12.8%	11.7%	19.3%	18.3%	18.8%
1993	97	55	152	15.5%	12.7%	14.5%	8.2%	7.3%	7.9%
1994	137	38	175	10.2%	23.7%	13.1%	7.3%	2.6%	6.3%
1995	120	119	239	24.2%	24.4%	24.3%	3.3%	0.8%	2.1%
1996	106	98	204	32.1%	34.7%	33.3%	1.0%	1.0%	1.0%
1997	88	71	159	28.4%	29.6%	28.9%	1.1%	0.0%	0.6%
1998	82	77	159	25.6%	24.7%	25.2%	0.0%	0.0%	0.0%
1999	83	78	161	16.9%	25.6%	21.1%	2.4%	0.0%	1.2%
2000	48	50	98	29.2%	20.0%	24.5%	0.0%	0.0%	0.0%
2001	39	38	77	15.4%	15.8%	15.6%	2.6%	2.6%	2.6%
2002	46	37	83	15.2%	21.6%	18.1%	0.0%	0.0%	0.0%
2003	55	23	78	18.2%	34.8%	23.1%	0.0%	0.0%	0.0%
2004	69	30	99	24.6%	26.7%	25.3%	0.0%	0.0%	0.0%
2005	53	41	94	35.8%	26.8%	31.9%	1.9%	0.0%	1.1%
2006	40	32	72	40.0%	28.1%	34.7%	0.0%	0.0%	0.0%
2007	35	19	54	40.0%	26.3%	35.2%	5.7%	0.0%	3.7%
2008	57	37	94	17.5%	13.5%	16.0%	0.0%	0.0%	0.0%
2009	50	25	75	12.0%	12.0%	12.0%	2.0%	0.0%	1.3%
2010	44	26	70	18.2%	15.4%	17.1%	2.3%	0.0%	1.4%
2011	32	34	66	21.9%	20.6%	21.2%	3.1%	2.9%	1.5%
2012	56	44	100	21.4%	18.2%	20.0%	1.8%	0.0%	1.0%
2013	41	25	66	29.3%	16.0%	24.2%	5.1%	0.0%	3.1%
2014	54	39	93	16.7%	10.3%	14.0%	7.4%	5.1%	6.5%
2015	50	38	88	8.0%	5.3%	6.8%	4.0%	0.0%	2.3%
2016	30	20	50	16.7%	0.0%	10.0%	0.0%	0.0%	0.0%

* Since 1993, all ratings below "Satisfactory" have been "Needs to Improve."

**TABLE 2
CRA RATINGS OF MASSACHUSETTS BANKS
BY REGULATOR AND RATING, 1993-2016**

	OCC				OTS or Fed*				FDIC				MASS				
	Out	Sat	NI	All	Out	Sat	NI	All	Out	Sat	NI	All	Out	HSat	Sat	NI	All
A. Numbers of Ratings																	
1993	2	12	0	14	0	12	2	14	13	50	6	69	7	*	44	4	55
1994	0	8	0	8	1	10	1	12	13	95	9	117	9	*	28	1	38
1995	1	6	0	7	0	9	1	10	28	72	3	103	29	*	89	1	119
1996	1	6	0	7	4	8	0	12	29	57	1	87	34	*	63	1	98
1997	2	6	0	8	1	5	1	7	22	51	0	73	21	5	45	0	71
1998	0	2	0	2	3	6	0	9	18	53	0	71	19	19	39	0	77
1999	2	2	0	4	2	6	0	8	10	59	2	71	20	15	43	0	78
2000	0	1	0	1	0	1	0	1	14	32	0	46	10	6	34	0	50
2001	0	1	0	1	1	5	0	6	5	26	1	32	6	14	17	1	38
2002	0	1	0	1	0	3	0	3	7	35	0	42	8	10	19	0	37
2003	0	2	0	2	0	3	0	3	8	40	0	48	8	7	8	0	23
2004	0	3	0	3	2	5	0	7	14	44	0	58	8	5	17	0	30
2005	0	4	0	4	3	3	0	6	15	26	1	42	7	4	30	0	41
2006	0	2	0	2	3	2	0	5	12	20	0	32	9	4	19	0	32
2007	2	1	0	3	3	4	0	7	9	14	2	25	5	5	9	0	19
2008	1	2	0	3	1	5	0	6	8	38	0	46	4	10	23	0	37
2009	1	5	0	6	1	4	0	5	3	33	1	37	3	6	16	0	25
2010	0	3	0	3	4	6	1	11	4	24	0	28	4	5	17	0	26
2011	1	1	0	2	2	2	0	4	4	21	0	25	7	8	18	1	34
2012	3	5	0	8	2	4	0	6	7	34	1	42	8	8	28	0	44
2013	8	3	0	11	2	3	1	6	2	21	1	24	4	3	18	0	25
2014	4	4	1	9	1	7	0	8	4	30	3	37	4	6	27	2	39
2015	0	6	1	7	2	8	1	11	2	30	0	32	2	9	27	0	38
2016	5	2	0	7	0	3	0	3	0	20	0	20	0	1	19	0	20
B. Percentage Distribution of Ratings by Each Regulator in Each Year																	
1993	14%	86%	0%		0%	86%	14%		19%	72%	9%		13%	0%	80%	7%	
1994	0%	100%	0%		8%	83%	8%		11%	81%	8%		24%	0%	74%	3%	
1995	14%	86%	0%		0%	90%	10%		27%	70%	3%		24%	0%	75%	1%	
1996	14%	86%	0%		33%	67%	0%		33%	66%	1%		35%	0%	64%	1%	
1997	25%	75%	0%		14%	71%	14%		30%	70%	0%		30%	7%	63%	0%	
1998	0%	100%	0%		33%	67%	0%		25%	75%	0%		25%	25%	51%	0%	
1999	50%	50%	0%		25%	75%	0%		14%	83%	3%		26%	19%	55%	0%	
2000	0%	100%	0%		0%	100%	0%		30%	70%	0%		20%	12%	68%	0%	
2001	0%	100%	0%		17%	83%	0%		16%	81%	3%		16%	37%	45%	3%	
2002	0%	100%	0%		0%	100%	0%		17%	83%	0%		22%	27%	51%	0%	
2003	0%	100%	0%		0%	100%	0%		17%	83%	0%		35%	30%	35%	0%	
2004	0%	100%	0%		29%	71%	0%		24%	76%	0%		27%	17%	57%	0%	
2005	0%	100%	0%		50%	50%	0%		36%	62%	2%		17%	10%	73%	0%	
2006	0%	100%	0%		60%	40%	0%		38%	63%	0%		28%	13%	59%	0%	
2007	67%	33%	0%		43%	57%	0%		36%	56%	8%		26%	26%	47%	0%	
2008	33%	67%	0%		17%	83%	0%		17%	83%	0%		11%	27%	62%	0%	
2009	17%	83%	0%		20%	80%	0%		8%	89%	3%		12%	24%	64%	0%	
2010	0%	100%	0%		36%	55%	9%		14%	86%	0%		15%	19%	65%	0%	
2011	50%	50%	0%		50%	50%	0%		16%	84%	0%		21%	24%	53%	3%	
2012	38%	63%	0%		33%	67%	0%		17%	81%	2%		18%	18%	64%	0%	
2013	73%	27%	0%		33%	50%	17%		8%	88%	4%		16%	12%	72%	0%	
2014	44%	44%	11%		13%	88%	0%		11%	81%	8%		10%	15%	69%	5%	
2015	0%	86%	14%		18%	73%	9%		6%	94%	0%		5%	24%	71%	0%	
2016	71%	29%	0%		0%	100%	0%		0%	100%	0%		0%	5%	95%	0%	

Notes: The rating of "High Satisfactory" became available to Mass. regulators -- but not to federal regulators -- in mid-1997. No Massachusetts bank has received a rating of "Substantial NonCompliance" since 1992.

* Ratings shown through 2010 are those of the OTS, which also gave one rating ("Sat") in 2011 before merging into OCC. Ratings shown for 2011 and later are those of the Fed, which gave between 0 and 2 ratings per year before 2011.

**TABLE 3
DISTRIBUTION OF MOST RECENT CRA RATINGS OF MASSACHUSETTS BANKS
BY NUMBER OF RANKINGS AND PERCENT, YEAR-END 1993-2016**

Date	1993	1995	1997	1999	2001	2003	2005	2007	2009	2011	2012	2013	2014	2015	2016
Active Banks	286	257	245	228	220	210	194	185	176	165	159	169	166	159	153
Rated Banks	262	257	243	227	219	207	194	182	173	164	159	167	165	158	151
"Outstanding"	32	57	70	57	47	44	51	57	41	32	31	37	36	32	27
"High Satisfactory" #	n/a	n/a	5	21	21	17	6	11	20	24	21	19	18	18	15
"Satisfactory"	198	196	168	147	150	146	136	112	112	106	106	108	105	100	102
Below "Satisfactory"	32	4	0	2	1	0	1	2	0	2	1	3	6	8	7
% "Outstanding"	12.2%	22.2%	28.8%	25.1%	21.5%	21.3%	26.3%	31.3%	23.7%	19.5%	19.5%	22.2%	21.8%	20.3%	17.9%
% "High Satisfactory" #	n/a	n/a	2.1%	9.3%	9.6%	8.2%	3.1%	6.0%	11.6%	14.6%	13.2%	11.4%	10.9%	11.4%	9.9%
% "Satisfactory"	75.6%	76.3%	69.1%	64.8%	68.5%	70.5%	70.1%	61.5%	64.7%	64.6%	66.7%	64.7%	63.6%	63.3%	67.5%
% Below "Satisfactory"	12.2%	1.6%	0.0%	0.9%	0.5%	0.0%	0.5%	1.1%	0.0%	1.2%	0.6%	1.8%	3.6%	5.1%	4.6%

Note: For increased legibility, the columns for even-numbered years before 2012 are not shown in this table. In 1994, the % "Outstanding" was 14.8%.

The rating of "High Satisfactory," first awarded in mid-1997, is available only from Mass. All 15 of the 18 banks with a 2016 most recent rating of "High Satisfactory" had federal ratings of "Satisfactory" -- all except one of these from concurrent state/federal exams.

**TABLE 4
YEAR OF MOST RECENT CRA RATINGS OF MASSACHUSETTS BANKS
BY REGULATOR AND OVERALL, AS OF DECEMBER 31, 2016**

Regulator	Banks 12/31/16	Last Rated in 2016		Last Rated in 2015		Last Rated in 2014		Last Rated in 2013		Last Rated in 2012		Not in Last 5 Years*	
		#	%	#	%	#	%	#	%	#	%	#	%
FED	31	3	9.7%	11	35.5%	9	29.0%	5	16.1%	3	9.7%	0	0.0%
OCC	27	7	25.9%	6	22.2%	7	25.9%	4	14.8%	2	7.4%	0	0.0%
FDIC	95	20	21.1%	31	32.6%	34	35.8%	5	5.3%	2	2.1%	1	1.1%
MASS	114	20	17.5%	37	32.5%	38	33.3%	7	6.1%	6	5.3%	4	3.5%
All Banks	153	31	20.3%	49	32.0%	49	32.0%	13	8.5%	7	4.6%	1	0.7%

* The final two columns do not include a few banks that are included the totals in the second column:

OCC: KeyBank's most recent exam was conducted before it acquired MA branches

FDIC: Farmington Bank's and Merchants Bank's most recent exams were conducted before they acquired MA branches.

MASS: Mutual Bank (2013) & Coastal Heritage Bank (2015) recently changed from federal to state charters.

**TABLE 5
DISTRIBUTION OF CRA RATINGS GIVEN TO MASS. CREDIT UNIONS
DURING EACH YEAR, 1991-2016**

Year	Number of Ratings Awarded					Distribution of Ratings During Year				
	Total	OUT	HI SAT	SAT	NI	OUT	HI SAT	SAT	NI	
1991	4	0	NA	3	1	0.0%	NA	75.0%	25.0%	
1992	24	0	NA	7	17	0.0%	NA	29.2%	70.8%	
1993	11	0	NA	9	2	0.0%	NA	81.8%	18.2%	
1994	72	1	NA	51	20	1.4%	NA	70.8%	27.8%	
1995	62	3	NA	48	11	4.8%	NA	77.4%	17.7%	
1996	65	2	NA	60	3	3.1%	NA	92.3%	4.6%	
1997	50	3	0	47	0	6.0%	0.0%	94.0%	0.0%	
1998	63	2	3	58	0	3.2%	4.8%	92.1%	0.0%	
1999	38	1	2	35	0	2.6%	5.3%	92.1%	0.0%	
2000	29	4	1	24	0	13.8%	3.4%	82.8%	0.0%	
2001	25	1	5	19	0	4.0%	20.0%	76.0%	0.0%	
2002	25	0	1	24	0	0.0%	4.0%	96.0%	0.0%	
2003	21	4	2	15	0	19.0%	9.5%	71.4%	0.0%	
2004	18	0	2	16	0	0.0%	11.1%	88.9%	0.0%	
2005	10	0	0	10	0	0.0%	0.0%	100.0%	0.0%	
2006	13	2	0	11	0	15.4%	0.0%	84.6%	0.0%	
2007	10	1	2	7	0	10.0%	20.0%	70.0%	0.0%	
2008	29	2	3	24	0	6.9%	10.3%	82.8%	0.0%	
2009	16	1	3	12	0	6.3%	18.8%	75.0%	0.0%	
2010	10	0	5	5	0	0.0%	50.0%	50.0%	0.0%	
2011	6	0	0	6	0	0.0%	0.0%	100.0%	0.0%	
2012	7	1	1	5	0	14.3%	14.3%	71.4%	0.0%	
2013	19	1	3	15	0	5.3%	15.8%	78.9%	0.0%	
2014	11	0	1	10	0	0.0%	9.1%	90.9%	0.0%	
2015	16	0	1	14	1	0.0%	6.3%	87.5%	6.3%	
2016	19	0	2	17	0	0.0%	10.5%	89.5%	0.0%	

Of of the state's 68 state-chartered credit unions, six have not received a CRA rating based on an exam dated within the last five years; one had its most recent rating based on an exam dated in 2007, two in 2010, and three in 2011. This is 9% of current CUs, down from 25% at year-end 2015 and 42% at year-end 2014.

**TABLE 6
DISTRIBUTION OF CURRENT CRA RATINGS OF MASSACHUSETTS CREDIT UNIONS
BY NUMBER OF RANKINGS AND PERCENT, YEAR-END 1993-2016**

Date	1993	1995	1997	1999	2001	2003	2005	2007	2009	2011	2012	2013	2014	2015	2016
Rated CUs	29	123	122	117	111	108	101	96	91	87	84	78	76	71	68
"Outstanding"	0	2	6	7	7	7	7	6	7	6	6	3	2	2	2
"High Satisfactory" #	n/a	n/a	0	6	8	10	10	10	12	14	14	15	14	11	7
"Satisfactory"	14	98	113	104	96	91	84	80	72	67	64	60	60	57	58
Below "Satisfactory"	15	23	3	0	0	0	0	0	0	0	0	0	0	1	1
% "Outstanding"	0.0%	1.6%	4.9%	6.0%	6.3%	6.5%	6.9%	6.3%	7.7%	6.9%	7.1%	3.8%	2.6%	2.8%	2.9%
% "High Satisfactory" #	n/a	n/a	0.0%	5.1%	7.2%	9.3%	9.9%	10.4%	13.2%	16.1%	16.7%	19.2%	18.4%	15.5%	10.3%
% "Satisfactory"	48.3%	79.7%	92.6%	88.9%	86.5%	84.3%	83.2%	83.3%	79.1%	77.0%	76.2%	76.9%	78.9%	80.3%	85.3%
% Below "Satisfactory"	51.7%	18.7%	2.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.4%	1.5%

Note: For increased legibility, the columns for even-numbered years between 1994 and 2010 are not shown in this table.

TABLE 7
RATINGS OF LICENSED MORTGAGE LENDERS AWARDED, 2009-2016

Year	Number of Ratings						Percent of Ratings				
	Total	Out	HS	Sat	NI	SNC	Out	HS	Sat	NI	SNC
2009*	6	0	0	5	0	1	0.0%	0.0%	83.3%	0.0%	16.7%
2010	14	0	1	12	1	0	0.0%	7.1%	85.7%	7.1%	0.0%
2011	16	0	0	15	1	0	0.0%	0.0%	93.8%	6.3%	0.0%
2012	5	0	0	4	1	0	0.0%	0.0%	80.0%	20.0%	0.0%
2013	8	0	0	7	1	0	0.0%	0.0%	87.5%	12.5%	0.0%
2014	9	0	0	7	1	1	0.0%	0.0%	77.8%	11.1%	11.1%
2015	18	0	1	12	5	0	0.0%	5.6%	66.7%	27.8%	0.0%
2016	10	0	1	7	2	0	0.0%	10.0%	70.0%	20.0%	0.0%
TOTAL	86	0	3	69	12	2	0.0%	3.5%	80.2%	14.0%	2.3%

* 2009 was a partial year -- October to December only.

TABLE 8
CURRENT RATINGS OF CURRENTLY-LICENSED MORTGAGE LENDERS
YEAR-END, 2013-2016

Year	Number of Lenders with Rating						Percent of Ratings				
	Total	Out	HS	Sat	NI	SNC	Out	HS	Sat	NI	SNC
2013	41	0	1	36	4	0	0.0%	2.4%	87.8%	9.8%	0.0%
2014	47	0	1	41	4	1	0.0%	2.1%	87.2%	8.5%	2.1%
2015	53	0	2	45	5	1	0.0%	3.8%	84.9%	9.4%	1.9%
2016	59	0	3	49	6	1	0.0%	5.1%	83.1%	10.2%	1.7%

**TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2016 (page 1 of 4)**

Bank	City/Town	Mass Reg?	Mass Rating	Mass List	Mass ExamDate	Fed Reg	Fed Rating	Fed List	Fed ExamDate
Abington Bank	Abington	yes	SAT	Dec-13	08/26/13	Fed	SAT	Dec-13	08/26/13
Adams Community Bank	Adams	yes	SAT	Aug-15	04/13/15	FDIC	SAT	Sep-15	04/13/15
<i>Admirals Bank</i>	<i>Boston</i>	<i>no</i>				<i>OCC</i>	<i>SAT</i>	<i>Jun-14</i>	<i>03/17/14</i>
Athol SB	Athol	yes	SAT	Oct-14	07/07/14	FDIC	SAT	Dec-14	07/07/14
Avidia Bank	Hudson	yes	SAT	Sep-16	05/09/16	FDIC	SAT	Oct-16	05/09/16
Avon Coop Bank	Avon	yes	SAT	Jun-16	02/29/16	Fed	SAT	Jul-16	02/29/16
<i>Bank of America</i>	<i>Charlotte NC</i>	<i>no</i>				<i>OCC</i>	<i>OUT</i>	<i>Oct-14</i>	<i>12/31/11</i>
Bank of Canton	Canton	yes	SAT	Dec-14	08/11/14	FDIC	SAT	Jan-15	08/11/14
Bank of Easton	North Easton	yes	SAT	Apr-15	11/10/14	Fed	SAT	Mar-15	11/10/14
<i>Bank of New England</i>	<i>Salem NH</i>	<i>no</i>				<i>FDIC</i>	<i>SAT</i>	<i>Dec-16</i>	<i>08/01/16</i>
<i>BankFive*</i>	<i>Fall River</i>	<i>yes</i>	<i>HS</i>	<i>Sep-15</i>	<i>05/11/15</i>	<i>Fed</i>	<i>OUT</i>	<i>Sep-15</i>	<i>05/11/15</i>
BankGloucester	Gloucester	yes	HS	May-11	02/14/11	FDIC	SAT	Apr-14	10/15/13
Bay State SB	Worcester	yes	OUT	Jan-12	05/09/11	FDIC	OUT	Jun-15	10/21/14
<i>BayCoast Bank</i>	<i>Fall River</i>	<i>yes</i>	<i>HS</i>	<i>Sep-14</i>	<i>04/22/14</i>	<i>FDIC</i>	<i>SAT</i>	<i>Oct-14</i>	<i>04/22/14</i>
<i>Beal Bank USA</i>	<i>Las Vegas NV</i>	<i>no</i>				<i>FDIC</i>	<i>SAT</i>	<i>Oct-16</i>	<i>04/11/16</i>
Belmont SB	Belmont	yes	SAT	Jul-14	01/27/14	FDIC	SAT	Aug-14	01/27/14
<i>Berkshire Bank</i>	<i>Pittsfield</i>	<i>yes</i>	<i>SAT</i>	<i>Jul-15</i>	<i>01/20/15</i>	<i>FDIC</i>	<i>SAT</i>	<i>Jul-15</i>	<i>01/20/15</i>
Beverly Bank	Beverly	yes	SAT	Sep-15	04/06/15	FDIC	SAT	Sep-15	04/06/15
Blue Hills Bank	Boston	yes	SAT	Apr-16	09/28/15	FDIC	SAT	Apr-16	09/25/15
<i>BNY Mellon</i>	<i>Pittsburgh PA</i>	<i>no</i>				<i>OCC</i>	<i>OUT</i>	<i>Apr-16</i>	<i>08/26/13</i>
<i>Boston Private B&T</i>	<i>Boston</i>	<i>yes</i>	<i>OUT</i>	<i>Jun-15</i>	<i>10/14/14</i>	<i>FDIC</i>	<i>OUT</i>	<i>Jun-15</i>	<i>10/14/14</i>
Braintree Coop Bank	Braintree	yes	SAT	Feb-14	10/01/13	FDIC	SAT	Apr-14	10/01/13
Bridgewater SB	Raynham	yes	SAT	Jul-14	01/27/14	Fed	SAT	Jun-14	01/27/14
<i>Bristol County SB</i>	<i>Taunton</i>	<i>yes</i>	<i>HS</i>	<i>Oct-16</i>	<i>05/16/16</i>	<i>FDIC</i>	<i>SAT</i>	<i>Nov-16</i>	<i>05/16/16</i>
Brookline Bank	Brookline	yes	SAT	Aug-15	03/23/15	Fed	SAT	Jul-15	03/23/15
Cambridge SB	Cambridge	yes	OUT	Dec-14	06/23/14	FDIC	OUT	Dec-14	06/23/14
Cambridge Trust Co	Cambridge	yes	SAT	Sep-14	04/08/14	FDIC	SAT	Nov-14	04/08/14
Canton Coop Bank	Canton	yes	SAT	Jul-16	03/21/16	Fed	SAT	Jul-16	03/21/16
Cape Ann SB	Gloucester	yes	HS	Dec-15	08/24/15	FDIC	SAT	Dec-15	08/24/15
Cape Cod Coop Bank	Yarmouth Port	yes	SAT	Nov-14	06/02/14	FDIC	SAT	Dec-14	06/02/14
Cape Cod Five Cents SB	Harwich Port	yes	OUT	Aug-14	03/24/14	FDIC	OUT	Oct-14	03/24/14
<i>Cathay Bank</i>	<i>Los Angeles CA</i>	<i>no</i>				<i>FDIC</i>	<i>SAT</i>	<i>Aug-16</i>	<i>03/07/16</i>
Century B&T	Somerville	yes	HS	Jan-15	09/08/14	FDIC	SAT	Feb-15	09/08/14
Charles River Bank	Medway	yes	SAT	Feb-13	10/01/12	Fed	SAT	Jan-13	10/01/12
<i>Citizens Bank</i>	<i>Providence RI</i>	<i>no</i>				<i>OCC</i>	<i>SAT</i>	<i>May-14</i>	<i>12/31/12</i>
Clinton SB	Clinton	yes	SAT	Nov-16	01/19/16	FDIC	SAT	Dec-16	01/19/16
Coastal Heritage Bank* ^^	Scituate	yes	[state charter only since 2015]			FDIC	OUT	Dec-12	10/01/12
Colonial Coop Bank	Gardner	yes	SAT	Jan-16	10/19/15	FDIC	SAT	Jan-16	10/19/15
Colonial FSB	Quincy	no				OCC	OUT	Mar-13	12/26/12
Commerce B&T	Worcester	yes	SAT	Jan-15	05/30/14	FDIC	SAT	Jan-15	08/04/15
Commonwealth Coop Bank	Boston	yes	SAT	Jul-13	04/22/13	FDIC	SAT	Sep-13	04/22/13
Cooperative Bank, The	Boston	yes	SAT	Apr-14	12/30/13	FDIC	SAT	Jun-14	12/30/13
Country BfS	Ware	yes	SAT	Apr-16	11/16/15	FDIC	SAT	May-16	11/10/15
Dean Coop Bank	Franklin	yes	SAT	Sep-12	03/29/12	FDIC	SAT	Oct-12	03/29/12
Dedham Inst for Savings	Dedham	yes	SAT	Jun-15	01/21/15	FDIC	SAT	Jun-15	01/21/15

TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2016 (page 2 of 4)

Bank	City/Town	Mass Reg?	Mass Rating	Mass List	Mass ExamDate	Fed Reg	Fed Rating	Fed List	Fed ExamDate
Eagle Bank	Everett	yes	SAT	Mar-16	11/09/15	FDIC	SAT	Mar-16	11/09/15
East Boston SB	Boston	yes	SAT	Sep-14	04/07/14	FDIC	SAT	Oct-14	04/07/14
East Cambridge SB	Cambridge	yes	SAT	Mar-14	11/04/13	Fed	SAT	Mar-14	11/04/13
<i>East West Bank</i>	<i>Pasadena CA</i>	<i>no</i>				<i>Fed</i>	<i>NI</i>	<i>Jan-15</i>	<i>01/22/13</i>
<i>Eastern Bank</i>	<i>Boston</i>	<i>yes</i>	<i>OUT</i>	<i>May-15</i>	<i>09/15/14</i>	<i>FDIC</i>	<i>OUT</i>	<i>May-15</i>	<i>09/15/14</i>
<i>Easthampton SB</i>	<i>Easthampton</i>	<i>yes</i>	<i>HS</i>	<i>Aug-15</i>	<i>01/12/15</i>	<i>Fed</i>	<i>SAT</i>	<i>May-15</i>	<i>01/12/15</i>
Edgartown NB	Edgartown	no				OCC	OUT	Aug-14	05/12/14
<i>Enterprise B&T</i>	<i>Lowell</i>	<i>yes</i>	<i>HS</i>	<i>May-14</i>	<i>12/09/13</i>	<i>FDIC</i>	<i>SAT</i>	<i>Jun-14</i>	<i>12/09/13</i>
Equitable Bank*	Weymouth	yes	SAT	Jul-14	03/24/14	Fed	SAT	Aug-14	03/24/14
Everett Coop Bank	Everett	yes	SAT	May-16	02/01/16	FDIC	SAT	May-16	02/01/16
Family Federal Savings	Fitchburg	no				OCC	SAT	Oct-13	08/05/13
<i>Farmington Bank</i>	<i>Farmington Ct</i>	<i>no</i>				<i>FDIC</i>	<i>[no rating of MA performance]</i>		
Fidelity Coop Bank	Fitchburg	yes	SAT	Jan-16	09/28/15	FDIC	SAT	Feb-16	09/28/15
First Commons Bank	Newton	no				OCC	SAT	Aug-12	05/29/12
First Ipswich Bank	Ipswich	yes	SAT	Sep-15	03/23/15	Fed	SAT	Jul-15	03/23/15
<i>First Republic Bank</i>	<i>San Francisco</i>	<i>no</i>				<i>FDIC</i>	<i>SAT</i>	<i>Dec-15</i>	<i>06/15/15</i>
Florence SB	Florence	yes	HS	Apr-15	11/03/14	FDIC	SAT	Apr-15	11/03/14
Foxboro Federal Savings	Foxboro	no				OCC	SAT	Aug-13	06/07/13
<i>Georgetown Bank</i>	<i>Georgetown</i>	<i>no</i>				<i>OCC</i>	<i>SAT</i>	<i>May-15</i>	<i>02/20/15</i>
Greenfield Coop Bank^	Greenfield	yes	OUT	Aug-12	03/30/12	Fed	OUT	Oct-12	03/30/12
Greenfield SB	Greenfield	yes	SAT	Jul-15	02/24/15	FDIC	SAT	Jul-15	02/24/15
HarborOne Bank[CU until 7/2013]	Brockton	yes	HS	Feb-15	08/25/14	FDIC	SAT	Feb-15	08/25/14
<i>Haverhill Bank</i>	<i>Haverhill</i>	<i>yes</i>	<i>SAT</i>	<i>Aug-15</i>	<i>03/02/15</i>	<i>FDIC</i>	<i>SAT</i>	<i>Aug-15</i>	<i>03/02/15</i>
Hingham Inst for Savings	Hingham	yes	SAT	Feb-15	09/15/14	FDIC	SAT	May-15	09/15/14
Holbrook Coop Bank	Holbrook	yes	SAT	Oct-14	05/27/14	FDIC	SAT	Dec-14	06/27/14
Hometown Bank^	Oxford	yes	SAT	Oct-14	05/12/14	Fed	SAT	Nov-14	05/12/14
Inst for Savings	Newburyport	yes	SAT	Jun-15	12/29/14	FDIC	SAT	Jun-15	12/29/14
<i>KeyBank, NA</i>	<i>Cleveland OH</i>	<i>no</i>				<i>OCC</i>	<i>[no rating of MA performance]</i>		
Leader Bank	Arlington	no				OCC	SAT	Aug-16	04/18/16
Lee Bank	Lee	yes	SAT	Sep-14	04/07/14	FDIC	SAT	Oct-14	04/07/14
<i>Lowell Five Cent SB</i>	<i>Lowell</i>	<i>yes</i>	<i>SAT</i>	<i>Aug-15</i>	<i>02/23/15</i>	<i>FDIC</i>	<i>SAT</i>	<i>Aug-15</i>	<i>02/23/15</i>
Mansfield Coop Bank	Mansfield	yes	SAT	Jun-15	01/20/15	Fed	SAT	May-15	01/20/15
Marblehead Bank	Marblehead	yes	SAT	Oct-14	04/28/14	Fed	SAT	Aug-14	04/28/14
Marlborough SB	Marlborough	yes	SAT	Jul-13	02/15/13	FDIC	SAT	Aug-13	02/15/13
Martha's Vineyard SB^	Edgartown	yes	HS	Mar-14	10/21/13	Fed	SAT	May-14	10/21/13
Mechanics Coop Bank	Taunton	yes	HS	Dec-15	08/10/15	FDIC	SAT	Jan-16	08/10/15
Meetinghouse Bank	Boston	yes	SAT	Jul-15	03/09/15	FDIC	SAT	Jul-15	03/09/15
Melrose Coop Bank	Melrose	yes	SAT	Jul-15	02/23/15	FDIC	SAT	Jul-15	02/23/15
<i>Merchants Bank##</i>	<i>S. Burlington Vt</i>	<i>no</i>				<i>FDIC</i>	<i>SAT</i>	<i>Nov-13</i>	<i>05/29/13</i>
Methuen Coop Bank	Methuen	yes	SAT	Jan-14	08/26/13	FDIC	SAT	Mar-14	08/26/13
Middlesex Federal Savings	Somerville	no				OCC	SAT	Sep-15	06/22/15
Middlesex SB	Natick	yes	OUT	Feb-14	09/11/13	FDIC	OUT	Apr-14	09/11/13
<i>Milford Federal S&L</i>	<i>Milford</i>	<i>no</i>				<i>OCC</i>	<i>SAT</i>	<i>Aug-16</i>	<i>05/02/16</i>
Milford NB	Milford	no				OCC	OUT	Sep-16	07/25/16
Millbury NB	Millbury	no				OCC	SAT	Jan-15	10/20/14

**TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2016 (page 3 of 4)**

Bank	City/Town	Mass Reg?	Mass Rating	Mass List	Mass ExamDate	Fed Reg	Fed Rating	Fed List	Fed ExamDate
Millbury SB	Millbury	yes	SAT	Sep-10	06/07/10	FDIC	SAT	Apr-13	11/13/12
Monson SB	Monson	yes	SAT	Dec-16	09/12/16	FDIC	SAT	Nov-13	06/24/13
MountainOne Bank*	North Adams	yes	SAT	Nov-14	06/09/14	FDIC	SAT	Dec-14	06/09/14
Mutual Bank^	Whitman	yes	[state charter only since 2013]			Fed	OUT	Mar-13	10/29/12
MutualOne Bank	Framingham	yes	SAT	Nov-15	06/15/15	FDIC	SAT	Nov-15	06/15/15
National Grand Bank	Marblehead	no				OCC	SAT	Jul-15	04/27/15
<i>NBT Bank</i>	<i>Norwich NY</i>	<i>no</i>				<i>OCC</i>	<i>NI</i>	<i>Dec-14</i>	<i>03/17/14</i>
Needham Bank	Needham	yes	SAT	Jul-15	02/23/15	Fed	SAT	Jul-15	02/23/15
<i>Newburyport Five Cents SB</i>	<i>Newburyport</i>	<i>yes</i>	<i>SAT</i>	<i>Nov-15</i>	<i>07/13/15</i>	<i>FDIC</i>	<i>SAT</i>	<i>Dec-15</i>	<i>07/13/15</i>
North Brookfield SB	No.Brookfield	yes	SAT	Dec-14	08/11/14	Fed	SAT	Dec-14	08/11/14
North Cambridge Coop Bank	Cambridge	yes	SAT	Jun-16	02/29/16	FDIC	SAT	Jul-16	02/29/16
North Easton SB	North Easton	yes	SAT	Dec-14	08/25/14	FDIC	SAT	Jan-15	08/25/14
North Middlesex SB	Ayer	yes	SAT	Jun-15	01/20/15	FDIC	SAT	Jun-15	01/20/15
<i>North Shore Bank</i>	<i>Peabody</i>	<i>yes</i>	<i>SAT</i>	<i>Nov-16</i>	<i>07/05/16</i>	<i>FDIC</i>	<i>SAT</i>	<i>Dec-16</i>	<i>07/15/16</i>
<i>Northeast Community Bank</i>	<i>White Plains NY</i>	<i>no</i>				<i>FDIC</i>	<i>OUT</i>	<i>Nov-14</i>	<i>06/03/14</i>
Northern B&T	Woburn	yes	SAT	Jun-14	01/10/14	FDIC	SAT	Aug-14	01/10/14
<i>Northern Trust Co.</i>	<i>Chicago IL</i>	<i>no</i>				<i>Fed</i>	<i>NI</i>	<i>Oct-13</i>	<i>06/25/12</i>
Northmark Bank	N. Andover	yes	SAT	Oct-15	06/08/15	FDIC	SAT	Oct-15	06/08/15
Norwood Coop Bank	Norwood	yes	SAT	Apr-14	12/09/13	FDIC	SAT	Jun-14	12/09/13
<i>OneUnited Bank</i>	<i>Boston</i>	<i>yes</i>	<i>NI</i>	<i>Oct-14</i>	<i>11/05/13</i>	<i>FDIC</i>	<i>NI</i>	<i>Nov-14</i>	<i>11/05/13</i>
Patriot Community Bank	Woburn	yes	SAT	Sep-15	04/21/15	Fed	SAT	Aug-15	04/21/15
<i>Pentucket Bank</i>	<i>Haverhill</i>	<i>yes</i>	<i>SAT</i>	<i>Mar-16</i>	<i>10/26/15</i>	<i>FDIC</i>	<i>SAT</i>	<i>Mar-16</i>	<i>10/26/15</i>
<i>People's United Bank</i>	<i>Bridgeport CT</i>	<i>no</i>				<i>OCC</i>	<i>NI</i>	<i>Sep-15</i>	<i>07/15/13</i>
PeoplesBank	Holyoke	yes	SAT	Mar-16	05/04/15	FDIC	SAT	Apr-16	05/04/15
Pilgrim Bank	Cohasset	yes	SAT	Apr-11	02/16/10	FDIC	SAT	Jul-11	02/16/10
Pittsfield Coop Bank	Pittsfield	yes	HS	May-14	12/16/13	FDIC	SAT	Jun-14	12/16/13
<i>Provident Bank</i>	<i>Amesbury</i>	<i>yes</i>	<i>SAT</i>	<i>Jan-14</i>	<i>08/12/13</i>	<i>FDIC</i>	<i>SAT</i>	<i>Mar-14</i>	<i>08/12/13</i>
Radius Bank*	Boston	no				OCC	SAT	Jul-15	12/01/14
Randolph SB	Randolph	yes	SAT	Sep-14	04/21/14	FDIC	SAT	Oct-14	04/21/14
Reading Coop Bank	Reading	yes	SAT	Mar-14	09/17/13	Fed	SAT	Jan-14	09/16/13
Rockland Trust Co	Rockland	yes	OUT	Jul-14	02/10/14	FDIC	OUT	Sep-14	02/10/14
Rollstone B&T	Fitchburg	no				OCC	OUT	Dec-13	08/12/13
Sage Bank*	Lowell	yes	NI	Jul-14	03/18/14	FDIC	NI	Aug-14	03/18/14
<i>Salem Coop Bank</i>	<i>Salem NH</i>	<i>no</i>				<i>FDIC</i>	<i>SAT</i>	<i>Jan-14</i>	<i>06/26/13</i>
Salem Five Cents SB	Salem	yes	SAT	Jun-13	01/14/13	FDIC	SAT	Aug-13	01/14/13
<i>Salisbury B&T</i>	<i>Lakeville CT</i>	<i>no</i>				<i>FDIC</i>	<i>NI</i>	<i>May-14</i>	<i>10/28/13</i>
<i>Santander Bank*</i>	<i>Wilmington DE</i>	<i>no</i>				<i>OCC</i>	<i>OUT</i>	<i>Mar-12</i>	<i>09/28/10</i>
Savers Coop Bank	Southbridge	yes	HS	Oct-14	05/12/14	FDIC	SAT	Dec-14	05/12/14
Savings Bank, The	Wakefield	yes	SAT	Oct-16	07/18/16	FDIC	SAT	Nov-16	07/18/16
Seamen's Bank	Provincetown	yes	HS	Aug-15	04/13/15	FDIC	SAT	Aug-15	04/13/15
South Shore Bank	Weymouth	yes	SAT	Oct-12	04/09/12	Fed	SAT	Aug-12	04/09/12
Southbridge SB	Southbridge	yes	SAT	Jan-15	09/29/14	Fed	SAT	Jan-15	09/29/14
Spencer SB	Spencer	yes	HS	Aug-14	03/03/14	FDIC	SAT	Oct-14	03/03/14
State Street B&T	Boston	yes	OUT	Oct-13	01/14/13	Fed	OUT	Jul-15	02/17/15
StonehamBank	Stoneham	yes	SAT	Apr-16	12/07/15	FDIC	SAT	Apr-16	12/07/15

TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2016 (page 4 of 4)

Bank	City/Town	Mass Reg?	Mass Rating	Mass List	Mass ExamDate	Fed Reg	Fed Rating	Fed List	Fed ExamDate
Stoughton Coop Bank	Stoughton	yes	SAT	Oct-16	06/13/16	Fed	SAT	Oct-16	06/13/16
<i>TD Bank</i>	<i>Wilmington DE</i>	<i>no</i>				<i>OCC</i>	<i>OUT</i>	<i>Oct-16</i>	<i>12/31/13</i>
<i>TrustCo Bank</i>	<i>Schenectedy NY</i>	<i>no</i>				<i>OCC</i>	<i>SAT</i>	<i>Nov-14</i>	<i>08/05/13</i>
UniBank for Savings	Whitinsville	yes	SAT	Aug-15	12/15/14	FDIC	SAT	Aug-15	12/15/14
<i>United Bank</i>	<i>Rockville CT</i>	<i>no</i>				<i>FDIC</i>	<i>SAT</i>	<i>May-15</i>	<i>12/01/14</i>
Village Bank	Newton	yes	SAT	Aug-15	05/04/15	FDIC	SAT	Sep-15	05/04/15
Wakefield Coop Bank	Wakefield	yes	SAT	Dec-15	08/10/15	FDIC	SAT	Dec-15	08/10/15
Walpole Coop Bank	Walpole	yes	OUT	Mar-12	11/14/11	Fed	OUT	Mar-12	11/14/11
Washington SB	Lowell	yes	OUT	Jun-13	02/19/13	Fed	OUT	Jun-13	02/19/13
Watertown SB	Watertown	yes	OUT	Oct-12	06/04/12	Fed	OUT	Nov-14	07/07/14
<i>Webster Bank</i>	<i>Waterbury CT</i>	<i>no</i>				<i>OCC</i>	<i>OUT</i>	<i>Dec-14</i>	<i>06/02/14</i>
Webster Five Cents SB	Webster	yes	SAT	Jun-16	12/21/15	FDIC	SAT	Jun-16	12/21/15
Wellesley Bank	Wellesley	yes	SAT	Jul-14	02/24/14	FDIC	SAT	Sep-14	02/24/14
<i>Westfield Bank</i>	<i>Westfield</i>	<i>no</i>				<i>OCC</i>	<i>OUT</i>	<i>Dec-16</i>	<i>07/05/16</i>
Winchester Coop Bank	Winchester	yes	SAT	Oct-14	05/27/14	FDIC	SAT	Dec-14	05/27/14
Winchester SB	Winchester	yes	SAT	Apr-15	10/27/14	FDIC	SAT	Apr-14	10/27/14
Winter Hill Bank	Somerville	no				OCC	OUT	Sep-16	07/05/16
Wrentham Coop Bank	Wrentham	yes	SAT	Aug-11	05/02/11	FDIC	SAT	Jan-14	07/08/13

* indicates banks with potentially confusing recent names, including from name changes within the last four years:

BankFive is, officially, Fall River Five Cents SB and is listed under latter name by regulators

Coastal Heritage Bank, was until December 2015, Scituate FSB

Equitable Bank was, until July 2016, Weymouth Bank; Equitable Coop Bk was merged into it at time of name change.

MountainOne Bank was, until July 2013, Hoosac Bank

Radius Bank was, until September 2014, First Trade Union Savings Bank

Sage Bank was, until June 2013, Lowell Co-op Bank

Santander Bank was, until October 2013, Sovereign Bank

Italic type indicates the 41 banks with branches both inside and outside of Massachusetts.

See Table A-2 for more information on all banks with branches both inside and outside of Mass.

Merchants Bank acquired Nuvo B&T (Springfield) in December 2015; rating shown is for Nuvo.

^ indicates banks with Fed as current federal regulator, but most recent CRA ratings from former regulator -- FDIC or OCC.

^^ indicates one bank that now has FDIC as its federal regulator, but whose most recent rating is from the OCC

TABLE A-2
BANKS WITH BRANCHES BOTH INSIDE AND OUTSIDE OF MASSACHUSETTS
(Data as of June 30, 2016*)

Bank Name	Headquarters	Branches			Deposits (\$ millions)		
		Mass.	Other	Mass. %	Mass.	Other	Mass. %
A. Banks with Massachusetts Headquarters							
Admirals Bank	Boston	1	1	50.0%	175	194	47.4%
BankFive [^]	Fall River	12	1	92.3%	702	11	98.5%
BayCoast Bank	Fall River	17	1	94.4%	906	60	93.8%
Berkshire Bank	Pittsfield	38	57	40.0%	3,335	2,378	58.4%
Boston Private B&T	Boston	11	13	45.8%	3,854	1,862	67.4%
Bristol County SB	Taunton	16	1	94.1%	1,353	71	95.0%
Eastern Bank	Boston	90	6	93.8%	8,101	425	95.0%
Easthampton SB	Easthampton	10	5	66.7%	1,052	245	81.1%
Enterprise B&T	Lowell	17	6	73.9%	1,858	329	85.0%
<i>Gerogetown Bank</i>	<i>Georgetown</i>	<i>3</i>	<i>1</i>	<i>75.0%</i>	<i>228</i>	<i>8</i>	<i>96.6%</i>
Haverhill Bank	Haverhill	7	1	87.5%	309	8	97.5%
Lowell Five Cents SB	Lowell	15	1	93.8%	861	17	98.1%
Milford Federal S&L	Milford	3	1	75.0%	272	37	88.0%
Newburyport Five Cents SB	Newburyport	7	2	77.8%	450	47	90.5%
<i>North Shore Bank</i>	<i>Peabody</i>	<i>11</i>	<i>1</i>	<i>91.7%</i>	<i>595</i>	<i>24</i>	<i>96.1%</i>
OneUnited Bank	Boston	3	2	60.0%	26	343	7.0%
Pentucket Bank	Haverhill	4	2	66.7%	408	128	76.1%
Provident Bank	Amesbury	3	5	37.5%	393	216	64.5%
Westfield Bank	Westfield	12	2	85.7%	866	57	93.8%
Total, 19 Banks		280	109	72.0%	25,744	6,460	79.9%
B. Banks with Non-Massachusetts Headquarters							
Bank of America, NA	Charlotte NC	235	4,518	4.9%	68,180	1,136,306	5.7%
Bank of New England	Salem NH	3	6	33.3%	141	542	20.6%
Beal Bank, USA	Las Vegas NV	1	22	4.3%	123	3,204	3.7%
BNY Mellon, NA	Pittsburgh PA	1	38	2.6%	3,868	15,728	19.7%
Cathay Bank	Los Angeles CA	1	56	1.8%	58	10,095	0.6%
Citizens Bank NA	Providence RI	246	605	28.9%	31,356	46,356	40.3%
East West Bank	Pasadena CA	2	118	1.7%	326	26,838	1.2%
<i>Farmington Bank</i>	<i>Farmington CT</i>	<i>2</i>	<i>25</i>	<i>7.4%</i>	<i>99</i>	<i>1,989</i>	<i>4.7%</i>
First Republic Bank	San Francisco CA	4	68	5.6%	5,643	45,518	11.0%
KeyBank, NA*	Cleveland OH	9	1,356	0.7%	287	107,404	0.3%
Merchants Bank	S. Burlington VT	1	31	3.1%	93	1,361	6.4%
NBT Bank, NA	Norwich NY	6	151	3.8%	118	6,655	1.7%
Northeast Community Bank	White Plains NY	4	5	44.4%	154	324	32.2%
Northern Trust Co	Chicago IL	1	63	1.6%	84	41,355	0.2%
People's United Bank	Bridgeport CT	47	344	12.0%	3,559	25,547	12.2%
Salem Coop Bank	Salem NH	1	1	50.0%	55	212	20.6%
Salisbury B&T	Lakeville CT	3	10	23.1%	63	694	8.3%
Santander Bank	Wilmington DE	221	453	32.8%	18,278	39,923	31.4%
TD Bank, NA	Wilmington DE	144	1,143	11.2%	13,149	201,338	6.1%
TrustCo Bank	Glenville NY	4	141	2.8%	34	4,147	0.8%
United Bank	Rockville CT	21	32	39.6%	1,347	3,161	29.9%
Webster Bank, NA	Waterbury CT	36	139	20.6%	1,692	17,246	8.9%
Total, 22 Banks		993	9,325	9.6%	148,707	1,735,943	7.9%

* KeyBank entered MA in Oct. 2016 by absorbing First Niagara Bank; numbers shown are KeyBank plus First Niagara as of June 30.
Source: FDIC, Summary of Deposits data, as of June 30, 2016 (www.fdic.gov).

Also: This table ignores trust or investment banks with only branches that have no or minimal deposits. It also excludes Bank of New York Mellon, a wholesale bank whose CRA assessment area does not include any part of Massachusetts.

The three banks shown in *italics* were not in this table last year.

[^] BankFive's official name, used by the FDIC and the Fed, is Fall River Five Cents Savings Bank

TABLE A-3

CURRENT RATINGS OF MASSACHUSETTS STATE-CHARTERED CREDIT UNIONS, YEAR-END 2016

Credit Union Name	City/Town	Rating	ExamDate
Alden CU	Chicopee	SAT	08/15/16
<i>Align CU</i>	<i>Lowell</i>	<i>HS</i>	<i>02/29/12</i>
Allcom CU	Worcester	SAT	12/01/14
Alpha CU	Boston	SAT	10/05/15
Arrha CU	Springfield	SAT	08/03/15
<i>Athol Credit Union</i>	<i>Athol</i>	<i>HS</i>	<i>08/15/16</i>
Billerica Muni Empls CU	Billerica	SAT	04/06/15
Boston Firefighters CU	Boston	SAT	10/15/13
Bridgewater CU	Bridgewater	SAT	11/18/13
Brookline Municipal CU	Brookline	SAT	05/23/11
Brotherhood CU	Lynn	SAT	01/11/16
Cabot Boston CU	Boston	SAT	08/03/15
City of Boston CU	Boston	SAT	11/27/12
Comm. Utils Empls CU	Marion	SAT	10/05/07
<i>Community CU of Lynn</i>	<i>Lynn</i>	<i>HS</i>	<i>09/23/13</i>
Credit U of the Berkshires	Pittsfield	SAT	08/26/13
<i>Crescent CU</i>	<i>Brockton</i>	<i>HS</i>	<i>06/03/13</i>
Energy CU	Waltham	SAT	04/06/15
Everett CU	Everett	SAT	03/14/11
Fall River Muni CU	Fall River	SAT	10/13/15
First Priority CU	Boston	SAT	05/31/16
Freedom CU	Springfield	SAT	09/14/15
Gloucester Fire Dept CU	Gloucester	SAT	08/04/14
Gloucester Muni CU	Gloucester	SAT	09/08/15
Greater Springfield CU	Springfield	SAT	11/12/13
Harvard U Empls CU	Cambridge	SAT	07/23/12
Haverhill Fire Dept CU	Haverhill	SAT	05/21/13
<i>Holyoke CU</i>	<i>Holyoke</i>	<i>HS</i>	<i>07/07/14</i>
Holyoke Postal CU	Holyoke	SAT	02/10/16
Homefield CU	Grafton	SAT	03/30/15
HTM CU	Haverhill	SAT	02/24/14
Jeanne D'Arc CU	Lowell	OUT	09/10/12
Landmark CU	North Adams	SAT	10/04/13
Leominster CU	Leominster	SAT	01/19/16

Credit Union Name	City/Town	Rating	ExamDate
Liberty Bay CU	Boston	SAT	11/30/15
Lowell Firefighters CU	Lowell	SAT	08/15/14
Luso-American CU	Peabody	SAT	07/23/12
Lynn Muni Empls CU	Lynn	SAT	03/16/15
Lynn Police CU	Lynn	SAT	01/21/14
Lynn Teachers CU	Lynn	SAT	09/13/10
Mass Bay CU	Boston	SAT	11/22/10
Mass Family CU	Lynn	SAT	08/15/16
Members Plus CU	Boston	SAT	02/11/13
<i>Metro CU</i>	<i>Chelsea</i>	<i>HS</i>	<i>01/04/16</i>
Naveo CU [was: Camb-Port CU]	Somerville	SAT	06/23/14
New Bedford CU	New Bedford	SAT	12/14/15
One Twenty CU	Boston	SAT	6/17/14/
Polish National CU	Chicopee	SAT	06/10/13
Premier Source CU	Springfield	SAT	06/04/12
Pressers Union...CU	Boston	NI	01/13/15
Quincy CU	Quincy	SAT	12/29/14
Revere Firefighters CU	Revere	SAT	10/24/12
River Works CU	Lynn	SAT	07/21/14
Sharon CU	Sharon	SAT	02/11/13
Southbridge CU	Southbridge	SAT	11/16/15
<i>Southern Mass CU</i>	<i>Fairhaven</i>	<i>HS</i>	<i>11/27/12</i>
Springfield Street RR Empls CU	Springfield	SAT	02/17/16
St. Anne CU	New Bedford	SAT	11/02/15
St. Anne's CU	Fall River	SAT	09/25/12
St. Jean's CU	Lynn	SAT	07/14/14
St. Mary's CU	Marlborough	SAT	05/11/15
St. Vincent Hosp CU	Worcester	SAT	03/20/13
Tremont CU	Boston	SAT	05/16/16
Waltham Muni Empls CU	Waltham	SAT	08/05/13
Watertown Municipal CU	Watertown	SAT	02/21/12
Worcester CU	Worcester	SAT	06/13/16
Worcester Fire Dept CU	Worcester	SAT	04/11/16
Workers' CU	Fitchburg	OUT	09/12/11

Of the 68 current state-chartered credit unions, 58 have a current rating of SATisfactory. The two current **OUTstanding ratings** and the one current **Needs to Improve (NI) rating are shown in bold**. The seven current *High Satisfactory (HS) ratings are shown in italics*.

TABLE A-4
CURRENT CRA RATINGS OF CURRENTLY-LICENSED# MORTGAGE LENDERS
UNDER THE MORTGAGE LENDER COMMUNITY INVESTMENT REGULATION
(CRA FOR MORTGAGE LENDERS), As of December 31, 2016 (page 1 of 2)

Lender	Headquarters	Rating*	List Date	Exam Date	2015 Rank Among LMLs^
Academy Mortgage	Draper UT	SAT	Dec-16	07/19/16	26
American Equity Mortgage	St. Louis MO	SAT	Jun-15	01/17/14	BT (29)
American Internet Mortgage*	San Diego CA	NI	Jan-16	05/19/15	77
Ark-La-Tex Financial Services	Plano TX	SAT	Feb-16	04/13/15	73
Atlantic Home Lending	Canton MA	SAT	Jan-12	12/07/10	68
Broker Solutions	Irvine CA	SAT	Jun-12	06/02/11	65
Commonwealth Mortgage, LLC	Woburn MA	SAT	Nov-13	04/22/13	17
Crescent Mortgage	Atlanta GA	SAT	Apr-13	04/04/12	54
Drew Mortgage	Shrewsbury MA	SAT	Sep-14	09/03/13	41
E Mortgage Management	Cherry Hills NJ	SAT	Apr-16	07/09/15	88
Embrace Home Loans	Middletown RI	SAT	May-10	02/02/10	29
Envoy Mortgage	Houston TX	SAT	Dec-15	10/27/14	47
Finance of America/Gateway Fundng^^	Horsham PA	SAT	Jan-11	12/11/09	NL
First Home Mortgage	Baltimore MD	SAT	Aug-16	12/30/15	34
Franklin American Mortgage	Franklin TN	SAT	Nov-10	06/09/10	30
Franklin First Financial	Melville NY	SAT	Nov-11	04/12/11	BT (24)
Freedom Mortgage*	Mt. Laurel NJ	NI	Sep-16	10/20/15	16
GMH Mortgage Services	Conshohocken PA	SAT	Apr-13	09/20/12	46
Guaranteed Rate	Chicago IL	SAT	Jun-15	08/04/14	3
Home Point Financial/Maverick Funding^^	Ann Arbor MI	SAT	Aug-13	01/02/13	NL
Homestead Funding	Albany NY	SAT	Jul-11	12/22/10	69
iFreedom Direct	Salt Lake City UT	SAT	Jul-11	02/03/11	89
JG Wentworth/Weststar Mortgage^^	Woodbridge VA	SAT	Feb-15	09/10/13	83
Member Advantage Mortgage*	Grand Rapids MI	SAT	Jun-15	09/22/14	57
Members Mortgage	Woburn MA	SAT	Nov-11	05/16/11	38
Mid-Island Mortgage	Westbury NY	SAT	Oct-13	05/09/13	63
MLD Mortgage	Florham Park NJ	SAT	Nov-11	03/24/11	BT (23)
Monument Mortgage	Lexington MA	SAT	Oct-09	04/21/09	NL
Mortgage Financial	Twesbury MA	SAT	Apr-11	09/07/10	13
Mortgage Lenders of America	Overland Park KS	SAT	Sep-14	07/09/13	93
Mortgage Master/loanDepot.com##	Foothill Ranch CA	NI	Aug-15	11/24/14	1
Mortgage Network	Danvers MA	SAT	Apr-13	08/06/11	5
Mort Rsrch Ctr(Vets United Hme Lns)	Columbia MO	SNC*	Jun-14	07/30/12	37
MSA Mortgage*	Winthrop MA	SAT	Aug-14	08/12/13	11
Nationstar Mortgage	Dallas TX	SAT	Jan-14	08/14/12	21
New Day Financial	Fulton MD	SAT	Sep-16	03/10/16	78
New Fed Mortgage	Danvers MA	SAT	Sep-15	01/08/15	20
NFM	Linthicum MD	SAT	Nov-11	05/23/11	BT (3)
Northpoint Mortgage	Sturbridge MA	SAT	Jul-15	08/05/14	43

**TABLE A-4
CURRENT CRA RATINGS OF CURRENTLY-LICENSED# MORTGAGE LENDERS
UNDER THE MORTGAGE LENDER COMMUNITY INVESTMENT REGULATION
(CRA FOR MORTGAGE LENDERS), As of December 31, 2016 (page 2 of 2)**

Lender	Headquarters	Rating*	List Date	Exam Date	2015 Rank Among LMLs [^]
PHH Home Loans/NE Moves* ^{^^}	Waltham MA	SAT	Oct-15	02/12/15	12
Plaza Home Mortgage*	San Diego CA	HS	Feb-16	12/02/15	22
Poli Mortgage Group	Canton MA	NI	Oct-11	03/03/11	28
Primary Residential Mortgage	Salt Lake City UT	SAT	Nov-11	07/13/11	44
PrimeLending	Dallas TX	SAT	Feb-15	10/09/13	24
Prospect Mortgage	Sherman Oaks CA	SAT	Oct-16	03/09/16	7
Provident Funding	San Bruno CA	NI	May-14	05/29/13	40
Pulte Mortgage	Englewood CA	SAT	Aug-10	03/02/10	61
Radius Financial Group*	Norwell MA	HS	Apr-15	06/02/14	10
Regency Mortgage*	Hooksett NH	SAT	Aug-16	04/04/16	53
Ross Mortgage*	Westborough MA	SAT	Mar-15	06/04/14	55
Shamrock Financial*	E. Providence RI	SAT	Dec-15	05/11/15	45
Sierra Pacific Mortgage	Folsom CA	SAT	Aug-10	02/15/10	27
Stearns Lending	Santa Ana CA	SAT	Oct-12	12/06/11	8
Suntrust Mortgage	Richmond VA	HS	Sep-10	03/11/10	66
TBI Mortgage	Horsham PA	SAT	Oct-14	07/25/13	76
Total Mortgage Services	Milford CT	SAT	Sep-14	01/13/14	BT (21)
United Shore/United Wholesale Mort	Troy MI	SAT	Sep-13	12/12/12	15
Village Mortgage	Avon CT	NI	Feb-15	11/25/13	25
William Raveis Mortgage	Shelton CT	SAT	Sep-11	10/12/10	35

Currently licensed means licensed as of December 31, 2016. In addition to the 59 current lenders shown above, sixteen other lenders that have received ratings are no longer licensed as mortgage lenders in the state: Advanced, American Interbank, Clearpoint, Continental, First Residential, Greenpark, Leader, Merrimack, MetroBoston, Mortgage Partners, Omega, Reliant, Roundpoint, Schaefer, Superior, and Union Capital. (Also, see ## note on Mortgage Master.) All of these lenders are included in the Division of Banks' online list: "CRA for Mortgage Lenders - Ratings and Public Evaluations." That online list also includes three lenders whose exams resulted in consent orders rather than ratings. The licensing status of any mortgage lender can be found at www.nmlsconsumeraccess.org.

[^] Lenders are ranked by total number of Massachusetts loans reported in 2015 HMDA data: 174 licensed lenders reported one or more loans, with 97 of these reporting fifty or more loans. In this column, **BT** indicates that the lender's 2015 HMDA-reported loans were **B**elow the **T**hreshold of 50; **NL** indicates no loans reported in 2015 HMDA data.

* Indicates that this lender has also received a previous rating.

^{^^} Indicates lenders with changes of name. The current name is listed first, then the name at the time of the performance evaluation.

The case of Mortgage Master and loanDepot.com [typed correctly: only the D is uppercase] is particularly confusing. Mortgage Master was acquired by loanDepot.com in late 2014 and surrendered its mortgage lender license in January 2015; six months later its rating and evaluation were listed in the DoB's August 2015 Monthly Activity Report (MAR), under the name CALM, Inc.) The Division's MAR for December 2015 listed a new rating for loanDepot.com, based on its lending before it acquired Mortgage Master. Currently, loanDepot.com is the entity with the license, but it does business in Massachusetts under the Mortgage Master name. Since there is only one license, only one of the two 2015 ratings can be included in this table. It seems most appropriate to include the Mortgage Master exam and rating because, according to 2013 and 2014 HMDA data, it made eight times more loans in the state than did loanDepot.com. Only loanDepot.com was a 2015 HMDA reporter.