

CRA RATINGS OF MASSACHUSETTS BANKS, CREDIT UNIONS, AND LICENSED MORTGAGE LENDERS IN 2017

MAHA's Twenty-Seventh 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-seventh 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 143 "Massachusetts banks" as of December 31, 2017. This includes not only 122 banks that have headquarters in the state, but also 21 banks based elsewhere that have one or more branch offices in Massachusetts.¹ **Table A-1 provides a listing of the 143 Massachusetts banks and their current CRA ratings.**² (The 25 federally-chartered banks and the 11 banks chartered by other states receive ratings only from their federal regulators; the 107 Massachusetts state-chartered banks receive ratings from both Massachusetts and federal regulators.)^{3,4}

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.⁵ **Table A-2 provides information on the 40 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 67 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 2017; about the distribution of CRA ratings awarded during the calendar year 2017 and during earlier years; and about the number and distribution of

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 It is interesting to note, by comparing the first and last columns in Table 3, that the current number (143) of "Massachusetts Banks" is precisely one-half of the number in 1993 (286). All of the banks in 1993 had their headquarters in Massachusetts.

³ 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."

⁴ Although the eleven 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.

⁵ 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.

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:

- **Of the 77 CRA ratings awarded to Massachusetts banks during 2017, only nine (11.7%) were “Outstanding.” Although this is a modest increase from the share of “Outstanding” ratings in 2016, 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.”** For federal regulators, the “Outstanding” share was 12.2% (5 of 41 ratings); for the state, the “Outstanding” share was 11.1% (4 of 36). (See Tables 1 and 2.)
- When each bank is classified by its most recent CRA rating, **just 13.5% of all banks had a most recent rating of “Outstanding” at year-end 2017, continuing a four-year downward trend from 22.2% in 2013, and the lowest share of “Outstanding” ratings since 1993.** Another 10.6% of banks had a most recent rating of “High Satisfactory,” and 71.6% of banks had a most recent rating of “Satisfactory.” Five banks (3.5%) had a most recent rating of “Needs to Improve,” down from seven one year earlier. Four of these five (East-West, NBT, People’s United, and Santander) are out-of-state banks given low ratings by their federal regulators for their performance in Massachusetts. **Only one Massachusetts-based bank had a most recent CRA rating of “Needs to Improve” – OneUnited Bank.** (See Tables 3 and A-1.)
- **Only five of the state’s ten biggest banks were rated “Outstanding” in their most recent CRA exams: State Street (#1), TD Bank (#5), Eastern (#6), Boston Private (#9), and Middlesex Savings (#10).** Until three years ago, it was routine for all ten of the biggest banks to have ratings of “Outstanding.” Then the number of “Outstanding” ratings among the top ten banks fell to eight at the end of 2014, seven at the end of 2015, and eight at the end of 2016. Bank of America (#2), Citizens (#3), First Republic (#7) and Rockland Trust (#8) have most recent ratings of “Satisfactory.” The most recent rating of Santander (#4) is “Needs to Improve.”⁶ Banks are ranked by total in-state deposits as reported by the FDIC for mid-2017. (See Table A-1 for ratings of all individual banks.)
- When banks are classified, for each regulator, by the year in which they most recently received a CRA rating, the data reveal that **over one-half (51.1%) of Massachusetts banks have received at least one CRA rating (federal and/or state) within the past two years and that only two banks have not received any CRA rating within the last five years.**⁷ (See Table 4 and Table 1.)
- For the fourth consecutive year, only two credit unions – Jeanne D’Arc CU in Lowell and Workers’ CU in Fitchburg – have “Outstanding” ratings (3.0% of the 67 current state-chartered credit unions), while eight more (11.9%) have ratings of “High Satisfactory.” Only one credit union has a rating of “Needs to Improve.” **Only eight credit union ratings were awarded in 2017; this is far below the**

⁶ On the basis of a joint examination by its two regulators, Boston Private Bank received a rating of “Outstanding” for Massachusetts, although its overall rating was “High Satisfactory” from the state and “Satisfactory” from the FDIC. Bank of America and Santander had the ratings that they would have received on the basis of the lending, investment, and service tests reduced by one step because of serious “fair lending or other illegal credit practices.”

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?”

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 2017, eight credit unions (11.9% of the total) had not received a CRA rating based on an exam dated within the last five years; this is two more than at the end of 2016, but far lower than the 17 credit unions (23.9% of the total) at year-end 2015 and the 32 credit unions (42.1% of the total) at year-end 2014. (See Tables 5, 6, and A-3.)

- Twelve licensed mortgage lenders (LMLs) received CRA for Mortgage Lenders ratings during 2017; all of these ratings were “Satisfactory.” **Of the 62 currently-licensed LMLs that have ever received CRA for Mortgage Lender ratings, three have current ratings of “High Satisfactory,” 54 have current ratings of “Satisfactory” and five have current ratings of “Needs to Improve.”** (See Tables 7 & 8; Table A-4 provides selected information for each of these 62 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 84 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 both 2015 and 2016 HMDA data, only 40 (47.6% of the total) have received a CRA rating within the last four years.** Sixteen additional lenders (19.0%) received ratings in 2013 or earlier and 28 lenders (33.3%) have never received a CRA rating.¹¹ **Although maintaining compliance with its stated policy would require approximately twenty ratings per year,¹² the Division awarded only twelve ratings in 2017, and a total of only sixty-two ratings during the past six years.** (See Table 7.)
- **Among the 28 currently-licensed CRA-eligible LMLs that have never received a rating are four of the top fifteen, as ranked by total number of 2016 Massachusetts loans: Quicken Loans (ranked #2), Ocwen Loan (#12), Ditech Mortgage (#13), and CrossCountry Mortgage (#14).** Quicken has been far above the fifty-loan threshold for nine years. On the other hand, fourteen of the 28 never-rated lenders became newly covered by CRA for Mortgage Lenders on the basis of their 2015 and 2016 lending.

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

⁹ In addition to the 62 lenders included in the body of Table A-4, the first note to that table lists the twenty not-currently-licensed lenders that have received CRA for Mortgage Lender ratings.

¹⁰ This policy is in the Division’s Regulatory Bulletin 1.3-105, Section 2.2. 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 2018) of each lender that reported fifty or more Massachusetts loans in the 2016 HMDA LAR data and of every other lender that has ever received a CRA for Mortgage Lenders rating. The 62 current ratings noted in the text include six ratings of currently-licensed lenders that did not make 50 or more Massachusetts loans in both 2015 and 2016. 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 December 31, 2017.

¹² “Approximately” is used because the number of CRA-eligible LMLs continually varies. LMLs become CRA-eligible by becoming newly licensed by the state and/or by initially meeting the threshold of at least fifty loans in two consecutive years. LMLs lose their CRA-eligibility by becoming unlicensed and/or if their number of Massachusetts loans falls below the threshold.

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 lists provided by the DoB cannot be filtered or sorted, and they are much less comprehensive than the searchable databases provided by the three federal regulators. In particular they provide no information about or access to (1) ratings and Performance Evaluations of lenders that are no longer active and (2) previous ratings and Performance Evaluations of lenders who have received more than one.**
- 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" -- 1991-2017

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%
2017	41	36	77	12.2%	11.1%	11.7%	4.9%	2.8%	3.9%

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

**TABLE 2
CRA RATINGS OF MASSACHUSETTS BANKS
BY REGULATOR AND RATING, 1993-2017**

	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
2017	2	1	1	4	1	10	0	11	2	23	1	26	4	5	26	1	36
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%	
2017	50%	25%	25%		9%	91%	0%		8%	88%	4%		11%	14%	72%	3%	

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 1993-2017**

Date	1993	1995	1997	1999	2001	2003	2005	2007	2009	2011	2013	2014	2015	2016	2017
Active Banks	286	257	245	228	220	210	194	185	176	165	169	166	159	153	143
Rated Banks	262	257	243	227	219	207	194	182	173	164	167	165	158	151	141
"Outstanding"	32	57	70	57	47	44	51	57	41	32	37	36	32	27	19
"High Satisfactory" #	n/a	n/a	5	21	21	17	6	11	20	24	19	18	18	15	15
"Satisfactory"	198	196	168	147	150	146	136	112	112	106	108	105	100	102	101
Below "Satisfactory"	32	4	0	2	1	0	1	2	0	2	3	6	8	7	5
% "Outstanding"	12.2%	22.2%	28.8%	25.1%	21.5%	21.3%	26.3%	31.3%	23.7%	19.5%	22.2%	21.8%	20.3%	17.9%	13.5%
% "High Satisfactory" #	n/a	n/a	2.1%	9.3%	9.6%	8.2%	3.1%	6.0%	11.6%	14.6%	11.4%	10.9%	11.4%	9.9%	10.6%
% "Satisfactory"	75.6%	76.3%	69.1%	64.8%	68.5%	70.5%	70.1%	61.5%	64.7%	64.6%	64.7%	63.6%	63.3%	67.5%	71.6%
% Below "Satisfactory"	12.2%	1.6%	0.0%	0.9%	0.5%	0.0%	0.5%	1.1%	0.0%	1.2%	1.8%	3.6%	5.1%	4.6%	3.5%

Note: For increased legibility, the columns for even-numbered years before 2014 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 of the 15 banks with a 2017 most recent rating of "High Satisfactory" had federal ratings of "Satisfactory" from concurrent (Fed) or joint (FDIC) exams.

**TABLE 4
YEAR OF MOST RECENT CRA RATINGS OF MASSACHUSETTS BANKS
BY REGULATOR AND OVERALL, AS OF DECEMBER 31, 2017**

Regulator	Banks 12/31/17	Last Rated in 2017		Last Rated in 2016		Last Rated in 2015		Last Rated in 2014		Last Rated in 2013		Not in Last 5 Years*	
		#	%	#	%	#	%	#	%	#	%	#	%
FED	32	11	34.4%	2	6.3%	11	34.4%	6	18.8%	2	6.3%	0	0.0%
OCC	25	4	16.0%	6	24.0%	5	20.0%	5	20.0%	2	8.0%	1	4.0%
FDIC	86	27	31.4%	21	24.4%	24	27.9%	10	11.6%	2	2.3%	2	2.3%
MASS	107	36	33.6%	19	17.8%	32	29.9%	12	11.2%	3	2.8%	4	3.7%
All Banks	143	44	30.8%	29	20.3%	40	28.0%	19	13.3%	6	4.2%	2	1.4%

* The numbers in the final column do not include three banks that are included the totals in the second column:
 OCC: Most recent exams of KeyBank and Community Bank were conducted before they acquired MA branches
 MASS: Coastal Heritage Bank (2015) recently changed from federal to state charter.

**TABLE 5
DISTRIBUTION OF CRA RATINGS GIVEN TO MASS. CREDIT UNIONS
DURING EACH YEAR, 1991-2017**

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%
2017	8	1	1	6	0	12.5%	12.5%	75.0%	0.0%

Of the state's 67 state-chartered credit unions, eight have not received a CRA rating based on an exam dated within the last five years; seven had their most recent ratings based on exams dated in 2012 and one based on an exam dated in 2011. This is 12% 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 1993-2017**

Date	1993	1995	1997	1999	2001	2003	2005	2007	2009	2011	2013	2014	2015	2016	2017
Rated CUs	29	123	122	117	111	108	101	96	91	87	78	76	71	68	67
"Outstanding"	0	2	6	7	7	7	7	6	7	6	3	2	2	2	2
"High Satisfactory" #	n/a	n/a	0	6	8	10	10	10	12	14	15	14	11	7	8
"Satisfactory"	14	98	113	104	96	91	84	80	72	67	60	60	57	58	56
Below "Satisfactory"	15	23	3	0	0	0	0	0	0	0	0	0	1	1	1
% "Outstanding"	0.0%	1.6%	4.9%	6.0%	6.3%	6.5%	6.9%	6.3%	7.7%	6.9%	3.8%	2.6%	2.8%	2.9%	3.0%
% "High Satisfactory" #	n/a	n/a	0.0%	5.1%	7.2%	9.3%	9.9%	10.4%	13.2%	16.1%	19.2%	18.4%	15.5%	10.3%	11.9%
% "Satisfactory"	48.3%	79.7%	92.6%	88.9%	86.5%	84.3%	83.2%	83.3%	79.1%	77.0%	76.9%	78.9%	80.3%	85.3%	83.6%
% 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%	1.4%	1.5%	1.5%

Note: For increased legibility, the columns for even-numbered years between 1994 and 2012 are not shown in this table.

**TABLE 7
RATINGS OF LICENSED MORTGAGE LENDERS AWARDED, 2009-2017**

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%
2017	12	0	0	12	0	0	0.0%	0.0%	100.0%	0.0%	0.0%
TOTAL	98	0	3	81	12	2	0.0%	3.1%	82.7%	12.2%	2.0%

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

**TABLE 8
CURRENT RATINGS OF CURRENTLY-LICENSED MORTGAGE LENDERS
YEAR-END, 2013-2017**

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%
2017	62	0	3	54	5	0	0.0%	4.8%	87.1%	8.1%	0.0%

**TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2017 (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	HS	Oct-17	07/11/17	FDIC	SAT	Nov-17	07/11/17
Avidia Bank	Hudson	yes	SAT	Sep-16	05/09/16	FDIC	SAT	Oct-16	05/09/16
<i>Bank of America @</i>	<i>Charlotte NC</i>	<i>no</i>				<i>OCC</i>	<i>SAT</i>	<i>Oct-14</i>	<i>12/31/11</i>
Bank of Canton	Canton	yes	SAT	Dec-17	07/17/17	FDIC	SAT	Jan-18	07/17/17
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	HS	Sep-17	04/24/17	FDIC	SAT	Sep-17	04/24/17
<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	Aug-17	04/03/17	FDIC	SAT	Sep-17	04/03/17
<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>Boston Private B&T^ #</i>	<i>Boston</i>	<i>yes</i>	<i>OUT</i>	<i>Jun-15</i>	<i>10/14/14</i>	<i>Fed</i>	<i>OUT</i>	<i>Jun-15</i>	<i>10/14/14</i>
Bridgewater SB	Raynham	yes	SAT	Aug-17	05/01/17	Fed	SAT	Sep-17	05/01/17
<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	Nov-17	08/14/17	FDIC	SAT	Dec-17	08/14/17
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	Sep-17	05/09/17	FDIC	OUT	Oct-17	05/09/17
<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-17	11/28/16	Fed	SAT	Apr-17	11/28/16
<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-17	12/06/16
Commonwealth Coop Bank	Boston	yes	SAT	Sep-17	07/10/17	Fed	SAT	Oct-17	09/06/17
<i>Community Bank</i>	<i>Canton NY</i>	<i>no</i>				<i>OCC</i>	<i>[no rating of MA performance]</i>		
Cooperative Bank, The	Boston	yes	SAT	Jun-17	01/23/17	FDIC	SAT	Jul-17	01/23/17
Cornerstone Bank*^	Spencer	yes	HS	Aug-14	03/03/14	Fed	SAT	Oct-14	03/03/14
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

**TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2017 (page 2 of 4)**

Bank	City/Town	Mass Reg?	Mass Rating	Mass List	Mass ExamDate	Fed Reg	Fed Rating	Fed List	Fed ExamDate
Dedham Inst for Savings	Dedham	yes	SAT	Jun-15	01/21/15	FDIC	SAT	Jun-15	01/21/15
Eagle Bank	Everett	yes	SAT	Mar-16	11/09/15	FDIC	SAT	Mar-16	11/09/15
East Boston SB	Boston	yes	SAT	Nov-17	06/19/17	FDIC	SAT	Dec-17	06/19/17
East Cambridge SB	Cambridge	yes	SAT	May-17	01/23/17	Fed	SAT	May-17	01/23/17
<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>
Easthampton SB	Easthampton	yes	HS	Aug-15	01/12/15	Fed	SAT	May-15	01/12/15
<i>Enterprise B&T</i>	<i>Lowell</i>	<i>yes</i>	<i>HS</i>	<i>Jun-17</i>	<i>02/14/17</i>	<i>FDIC</i>	<i>SAT</i>	<i>Jul-17</i>	<i>02/14/17</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 C.</i>	<i>no</i>				<i>FDIC</i>	<i>SAT</i>	<i>Sep-16</i>	<i>05/17/16</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
Greenfield Coop Bank	Greenfield	yes	HS	Jul-17	04/03/17	Fed	OUT	Aug-17	04/03/17
Greenfield SB	Greenfield	yes	SAT	Jul-15	02/24/15	FDIC	SAT	Jul-15	02/24/15
HarborOne Bank	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
<i>Hometown Bank^</i>	<i>Oxford</i>	<i>yes</i>	<i>SAT</i>	<i>Oct-14</i>	<i>05/12/14</i>	<i>Fed</i>	<i>SAT</i>	<i>Nov-14</i>	<i>05/12/14</i>
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	Jul-17	03/13/17	FDIC	SAT	Aug-17	03/13/17
<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>
Main Street Bank*	Marlborough	yes	SAT	Jul-17	06/06/16	FDIC	SAT	Aug-17	06/06/16
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
Martha's Vineyard SB	Edgartown	yes	HS	Jan-17	10/24/16	Fed	SAT	Feb-17	10/24/16
Mechanics Coop Bank	Taunton	yes	HS	Dec-15	08/10/15	FDIC	SAT	Jan-16	08/10/15
Melrose Coop Bank	Melrose	yes	SAT	Jul-15	02/23/15	FDIC	SAT	Jul-15	02/23/15
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	May-17	01/05/17	FDIC	OUT	Jun-17	01/05/17
<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
Millbury SB	Millbury	yes	SAT	Sep-10	06/07/10	FDIC	SAT	Apr-13	11/13/12

TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2017 (page 3 of 4)

Bank	City/Town	Mass Reg?	Mass Rating	Mass List	Mass ExamDate	Fed Reg	Fed Rating	Fed List	Fed ExamDate
Monson SB	Monson	yes	SAT	Dec-16	09/12/16	FDIC	SAT	Jan-17	09/12/16
MountainOne Bank	North Adams	yes	SAT	Nov-14	06/09/14	FDIC	SAT	Dec-14	06/09/14
Mutual Bank	Whitman	yes	SAT	Jan-17	08/29/16	Fed	SAT	Jan-17	08/29/16
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
<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	Aug-17	05/01/17	FDIC	SAT	Sep-17	05/01/17
<i>Northern Trust Co. #</i>	<i>Chicago IL</i>	<i>no</i>				<i>Fed</i>	<i>SAT</i>	<i>Jan-17</i>	<i>07/27/15</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	May-17	01/23/17	FDIC	SAT	Jun-17	01/23/17
<i>OneUnited Bank #</i>	<i>Boston</i>	<i>yes</i>	<i>NI</i>	<i>Mar-17</i>	<i>10/18/16</i>	<i>FDIC</i>	<i>NI</i>	<i>Apr-17</i>	<i>10/18/16</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-17	12/05/16	FDIC	SAT	May-17	12/05/16
Pittsfield Coop Bank	Pittsfield	yes	SAT	Jul-17	03/13/17	FDIC	SAT	Aug-17	03/13/17
<i>Provident Bank</i>	<i>Amesbury</i>	<i>yes</i>	<i>SAT</i>	<i>Jan-17</i>	<i>09/26/16</i>	<i>FDIC</i>	<i>SAT</i>	<i>Feb-17</i>	<i>09/26/16</i>
Radius Bank*	Boston	no				OCC	SAT	Jul-15	12/01/14
Randolph SB	Randolph	yes	SAT	Sep-17	06/05/17	FDIC	SAT	Oct-17	06/05/17
Reading Coop Bank	Reading	yes	SAT	Jan-17	10/24/16	Fed	SAT	Jan-14	09/16/13
Rockland Trust Co	Rockland	yes	SAT	Oct-17	05/31/17	FDIC	SAT	Nov-17	05/31/17
Rollstone B&T	Fitchburg	no				OCC	OUT	Mar-17	10/31/16
Sage Bank	Lowell	yes	SAT	Apr-17	04/18/16	FDIC	SAT	May-17	04/18/16
<i>Salem Coop Bank</i>	<i>Salem NH</i>	<i>no</i>				<i>FDIC</i>	<i>SAT</i>	<i>Feb-17</i>	<i>09/26/16</i>
<i>Salem Five Cents SB</i>	<i>Salem</i>	<i>yes</i>	<i>SAT</i>	<i>Jun-13</i>	<i>01/14/13</i>	<i>FDIC</i>	<i>SAT</i>	<i>Aug-13</i>	<i>01/14/13</i>
<i>Salisbury B&T</i>	<i>Lakeville CT</i>	<i>no</i>				<i>FDIC</i>	<i>SAT</i>	<i>Jul-17</i>	<i>01/23/17</i>
<i>Santander Bank @</i>	<i>Wilmington DE</i>	<i>no</i>				<i>OCC</i>	<i>NI</i>	<i>Feb-17</i>	<i>12/31/13</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	Dec-17	06/22/15	Fed	SAT	Dec-17	11/07/17
State Street B&T	Boston	yes	OUT	Nov-17	07/10/17	Fed	OUT	Jul-15	02/17/15
StonehamBank	Stoneham	yes	SAT	Apr-16	12/07/15	FDIC	SAT	Apr-16	12/07/15
Stoughton Coop Bank	Stoughton	yes	SAT	Oct-16	06/13/16	Fed	SAT	Oct-16	06/13/16

**TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2017 (page 4 of 4)**

Bank	City/Town	Mass Reg?	Mass Rating	Mass List	Mass ExamDate	Fed Reg	Fed Rating	Fed List	Fed ExamDate
<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>Glenville NY</i>	<i>no</i>				<i>OCC</i>	<i>SAT</i>	<i>Oct-17</i>	<i>06/12/17</i>
UniBank for Savings	Whitinsville	yes	SAT	Nov-17	06/07/17	FDIC	SAT	Dec-17	06/07/17
<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	SAT	Mar-17	11/28/16	Fed	SAT	Apr-17	11/28/16
Washington SB	Lowell	yes	OUT	Jun-13	02/19/13	Fed	OUT	Jun-13	02/19/13
Watertown SB	Watertown	yes	OUT	Jan-17	09/26/16	Fed	SAT	Jan-17	09/26/16
<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	Aug-17	05/15/17	FDIC	SAT	Sep-17	05/15/17
<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	May-17	02/07/17	FDIC	SAT	Jun-17	02/07/17
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

Italic type indicates the 40 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.

* indicates six 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

Cornerstone Bank was, until June 2017, Spenser Savings Bank

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

Main Street Bank was, until April 2017, Marlborough SB

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

^ indicates four banks whose most recent federal CRA rating is from a different regulator than their current federal regulator

indicates seven banks whose rating for MA (shown in table) differs from their overall CRA rating. Overall ratings were:

Boston Private - HS; East West Bank - SAT; Farmington Bank - OUT; NBT Bank - SAT

Northern Trust - OUT; OneUnited - SAT; People's United - SAT

@ indicates two banks whose overall ratings were lowered because of fair lending violations. Accordingly I have lowered the reported CRA ratings for Massachusetts to correspond to the lowering of the overall ratings.

Bank of America's overall and MA ratings lowered from OUT to SAT; Santander's ratings lowered from SAT to NI.

TABLE A-2
BANKS WITH BRANCHES BOTH INSIDE AND OUTSIDE OF MASSACHUSETTS
(Data as of June 30, 2017)

Bank Name	Headquarters	Branches			Deposits (\$ millions)		
		Mass.	Other	Mass. %	Mass.	Other	Mass. %
A. Banks with Massachusetts Headquarters							
Admirals Bank	Boston	1	1	50.0%	206	79	72.3%
BankFive [^]	Fall River	12	1	92.3%	730	12	98.4%
BayCoast Bank	Fall River	17	1	94.4%	958	55	94.6%
Berkshire Bank	Pittsfield	37	61	37.8%	3,721	3,166	54.0%
Boston Private B&T	Boston	11	11	50.0%	4,421	2,032	68.5%
Bristol County SB	Tauton	16	1	94.1%	1,510	82	94.8%
Eastern Bank	Boston	86	6	93.5%	8,467	382	95.7%
Enterprise B&T	Lowell	17	6	73.9%	1,991	363	84.6%
Haverhill Bank	Haverhill	9	1	90.0%	320	14	95.8%
<i>Hometown Bank</i>	<i>Oxford</i>	<i>8</i>	<i>5</i>	<i>61.5%</i>	<i>406</i>	<i>208</i>	<i>66.1%</i>
Lowell Five Cents SB	Lowell	15	1	93.8%	861	17	98.1%
Milford Federal S&L	Milford	3	1	75.0%	286	36	88.8%
Newburyport Five Cents SB	Newburyport	7	2	77.8%	460	63	88.0%
North Shore Bank	Peabody	11	1	91.7%	632	30	95.5%
OneUnited Bank	Boston	3	2	60.0%	25	350	6.7%
Pentucket Bank	Haverhill	4	2	66.7%	430	132	76.5%
Provident Bank	Amesbury	3	5	37.5%	435	271	61.6%
<i>Salem Five Cents SB</i>	<i>Salem</i>	<i>34</i>	<i>1</i>	<i>97.1%</i>	<i>3,328</i>	<i>11</i>	<i>99.7%</i>
Westfield Bank	Westfield	21	2	91.3%	1,439	59	96.1%
Total, 19 Banks		315	111	73.9%	30,626	7,362	80.6%
B. Banks with Non-Massachusetts Headquarters							
Bank of America, NA	Charlotte NC	226	4,377	4.9%	73,267	1,196,884	5.8%
Bank of New England	Salem NH	3	6	33.3%	149	676	18.1%
Beal Bank, USA	Las Vegas NV	1	22	4.3%	0.2	2,725	0.0%
Cathay Bank	Los Angeles CA	1	57	1.7%	69	11,166	0.6%
Citizens Bank NA	Providence RI	245	580	29.7%	36,644	51,271	41.7%
<i>Community Bank</i>	<i>Canton NY</i>	<i>1</i>	<i>226</i>	<i>0.4%</i>	<i>66</i>	<i>8,637</i>	<i>0.8%</i>
East West Bank	Pasadena CA	2	119	1.7%	415	29,075	1.4%
Farmington Bank	Farmington CT	2	25	7.4%	121	2,157	5.3%
First Republic Bank	San Francisco CA	4	68	5.6%	7,284	56,010	11.5%
KeyBank, NA*	Cleveland OH	8	1,227	0.6%	1,069	104,275	1.0%
NBT Bank, NA	Norwich NY	6	150	3.8%	125	6,924	1.8%
Northeast Community Bank	White Plains NY	3	5	37.5%	142	436	24.6%
Northern Trust Co	Chicago IL	1	63	1.6%	87	36,791	0.2%
People's United Bank	Bridgeport CT	48	358	11.8%	3,825	28,239	11.9%
Salem Coop Bank	Salem NH	1	1	50.0%	52	225	18.8%
Salisbury B&T	Lakeville CT	3	11	21.4%	67	747	8.2%
Santander Bank	Wilmington DE	219	453	32.6%	17,945	39,346	31.3%
TD Bank, NA	Wilmington DE	142	1,136	11.1%	13,870	213,181	6.1%
TrustCo Bank	Glennville NY	4	140	2.8%	35	4,174	0.8%
United Bank	Rockville CT	21	32	39.6%	1,360	3,679	27.0%
Webster Bank, NA	Waterbury CT	35	133	20.8%	2,002	18,552	9.7%
Total, 21 Banks		976	9,189	9.6%	158,594	1,815,170	8.0%

Notes: This table ignores trust or investment banks with only branches that have no or minimal deposits.

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 2017

Credit Union Name	City/Town	Rating	ExamDate
Alden CU	Chicopee	SAT	08/01/16
<i>Align CU</i>	<i>Lowell</i>	<i>HS</i>	<i>03/13/17</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 Empl's CU	Marion	SAT	02/13/17
<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	07/31/17
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	08/14/17
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
Leominster CU	Leominster	SAT	01/19/16
Liberty Bay CU	Boston	SAT	11/30/15

Credit Union Name	City/Town	Rating	ExamDate
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	04/11/17
Mass Bay CU	Boston	SAT	11/28/16
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-PortCU]	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 St 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
<i>St. Jean's CU</i>	<i>Lynn</i>	<i>HS</i>	<i>07/14/14</i>
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	11/01/16
Worcester CU	Worcester	SAT	06/13/16
Worcester Fire Dept CU	Worcester	SAT	04/11/16
Workers' CU	Fitchburg	OUT	01/03/17

Of the 67 current state-chartered credit unions, 56 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 eight 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, 2017 (page 1 of 2)

Lender	Headquarters	Rating	List Date	Exam Date	2016 Rank Among LMLs^
Academy Mortgage	Draper UT	SAT	Dec-16	07/19/16	24
American Financial Resources	Parsippany NJ	SAT	none [2017]	01/21/16	48
American Internet Mortgage*	San Diego CA	NI	Jan-16	05/19/15	76
American Neighborhood Mortgage	Mt. Laurel NJ	SAT	Jul-17	11/29/16	53
Amerisave Mortgage	Atlanta GA	SAT	Jan-17	08/23/16	47
Ark-La-Tex Financial Services	Plano TX	SAT	Feb-16	04/13/15	78
Atlantic Home Lending	Canton MA	SAT	Jan-12	12/07/10	67
Broker Solutions	Tustin CA	SAT	Jun-12	06/02/11	83
Commonwealth Mortgage, LLC	Woburn MA	SAT	Nov-13	04/22/13	21
Crescent Mortgtage*	Atlanta GA	SAT	Mar-17	10/20/16	60
Drew Mortgage	Shrewsbury MA	SAT	Sep-14	09/03/13	36
E Mortgage Management	Cherry Hills NJ	SAT	Apr-16	07/09/15	62
Embrace Home Loans	Middletown RI	SAT	May-10	02/02/10	30
Envoy Mortgage	Houston TX	SAT	Dec-15	10/27/14	39
Fairway Independent Mortgage	Madison WI	SAT	Jan-17	04/19/16	5
Finance of America/Gateway Fundng^^	Horsham PA	SAT	Jan-11	12/11/09	42
First Home Mortgage	Baltimore MD	SAT	Aug-16	12/30/15	28
Franklin American Mortgage*	Franklin TN	SAT	Oct-17	11/29/16	40
Franklin First Financial	Melville NY	SAT	Nov-11	04/12/11	BT (22)
Freedom Mortgage*	Mt. Laurel NJ	NI	Sep-16	10/20/15	10
GMH Mortgage Services	Conshohocken PA	SAT	Apr-13	09/20/12	41
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	20
Homestead Funding	Albany NY	SAT	Jul-11	12/22/10	59
iFreedom Direct*	Salt Lake City UT	SAT	Nov-17	01/30/17	95
JG Wentworth/Weststar Mortgage^^	Woodbridge VA	SAT	Feb-15	09/10/13	91
loanDepot.com	Foothills Ranch CA	SAT	Dec-15	03/26/15	1
Member Advantage Mortgage*	Grand Rapids MI	SAT	Jun-15	09/22/14	56
Members Mortgage*	Woburn MA	SAT	Dec-17	03/01/17	34
Mid-Island Mortgage	Westbury NY	SAT	Oct-13	05/09/13	68
MLD Mortgage	Florham Park NJ	SAT	Nov-11	03/24/11	BT (40)
Monument Mortgage	Lexington MA	SAT	Oct-09	04/21/09	NL
Mort Rsrch Ctr(Vets United Hme Lns)*	Columbia MO	SAT	Jan-17	07/29/16	43
Mortgage Lenders of America	Overland Park KS	SAT	Sep-14	07/09/13	BT (44)
Mortgage Network	Danvers MA	SAT	Apr-13	08/06/11	6
MSA Mortgage*	Winthrop MA	SAT	Aug-14	08/12/13	15
Nationstar Mortgage	Dallas TX	SAT	Jan-14	08/14/12	26
New Day Financial	Fulton MD	SAT	Sep-16	03/10/16	74
New Fed Mortgage	Danvers MA	SAT	Sep-15	01/08/15	17

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 [^]
NFM	Linthicum MD	SAT	Nov-11	05/23/11	66
Northpoint Mortgage	Sturbridge MA	SAT	Jul-15	08/05/14	50
PHH Home Loans/NE Moves* ^{^^}	Waltham MA	SAT	Oct-15	02/12/15	16
Plaza Home Mortgage*	San Diego CA	HS	Feb-16	12/02/15	38
Poli Mortgage Group	Canton MA	NI	Oct-11	03/03/11	23
Primary Residential Mortgage	Salt Lake City UT	SAT	Nov-11	07/13/11	52
PrimeLending	Dallas TX	SAT	Feb-15	10/09/13	29
Provident Funding	San Bruno CA	NI	May-14	05/29/13	27
Pulte Mortgage*	Englewood CA	SAT	Oct-17	04/12/17	64
Radius Financial Group*	Norwell MA	HS	Apr-15	06/02/14	9
Regency Mortgage*	Hooksett NH	SAT	Aug-16	04/04/16	81
Residential Mortgage	S. Portland ME	SAT	Jan-17	02/16/16	4
Ross Mortgage*	Westborough MA	SAT	Mar-15	06/04/14	54
Shamrock Financial*	E. Providence RI	SAT	Dec-15	05/11/15	45
Sierra Pacific Mortgage*	Folsom CA	SAT	Jun-17	08/10/16	33
Stearns Lending	Santa Ana CA	SAT	Oct-12	12/06/11	18
Suntrust Mortgage	Richmond VA	HS	Sep-10	03/11/10	63
TBI Mortgage	Horsham PA	SAT	Oct-14	07/25/13	93
Top Flite Financial	Williamston MI	SAT	Jul-17	12/13/16	98
Total Mortgage Services	Milford CT	SAT	Sep-14	01/13/14	97
United Shore/United Wholesale Mort	Troy MI	SAT	Sep-13	12/12/12	7
Village Mortgage	Avon CT	NI	Feb-15	11/25/13	32
William Raveis Mortgage	Shelton CT	SAT	Sep-11	10/12/10	37

* Indicates that lender has also received a previous CRA for Mortgage Lenders rating.

Currently licensed means licensed as of December 31, 2017. In addition to the 62 current lenders shown above, twenty other lenders that have received ratings are no longer licensed as mortgage lenders in the state: Advanced, American Equity, American Interbank, Clearpoint, Continental, First Residential, Greenpark, Leader, Merrimack, MetroBoston, Mortgage Financial, Mortgage Master, Mortgage Partners, Omega, Prospect, Reliant, Roundpoint, Schaefer, Superior, and Union Capital. 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 2016 HMDA data: 173 licensed lenders reported one or more loans, with 100 of these reporting fifty or more loans. In this column, **BT** indicates that the lender's 2016 HMDA-reported loans were **B**elow the **T**hreshold of 50 (three lenders); **NL** indicates no loans reported in 2016

^{^^} Indicates lenders with changes of name. The current name is listed first, then the name at the time of the rating. PHH Home Loans was assigned the rating of NE Moves, an affiliated lender that was merged into PHH in 2016.