CRA RATINGS OF MASSACHUSETTS BANKS, CREDIT UNIONS, AND LICENSED MORTGAGE LENDERS IN 2018

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

Prepared for the

Massachusetts Affordable Housing Alliance

1803 Dorchester Avenue Dorchester MA 02124 mahahome.org

by

Jim Campen

Professor Emeritus of Economics University of Massachusetts/Boston jimcampen@gmail.com

January 2019

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-eighth 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 140 "Massachusetts banks" as of December 31, 2018. This includes not only 118 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 140 Massachusetts banks and their current CRA ratings.² (The 24 federally-chartered banks and the 11 banks chartered by other states receive ratings only from their federal regulators; the 105 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 41 banks that have branches both inside and outside of Massachusetts; these banks are shown in italics in Table A-1.⁶

Table A-3 provides a listing of the current CRA ratings of the state's 66 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.

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. One exception: this report does include State Street Bank & Trust, the state's largest bank in terms of deposits.

² It is interesting to note, by comparing the first and last columns in Table 3, that the current number (140) of "Massachusetts Banks" is now less than 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 five 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 eleven 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.

⁶ Although Capital One Bank's "cafes" are not counted as branches by the FDIC, the OCC evaluates that bank's CRA performance in Massachusetts as if they were. For this reason, Capital One is included in this report as a bank that has branches both outside and inside Massachusetts.

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 2018; about the distribution of CRA ratings awarded during the calendar year 2018 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:

- Of the 82 CRA ratings awarded to Massachusetts banks during 2018, sixteen (19.5%) were "Outstanding." This is a dramatic increase from the share of "Outstanding" ratings in the previous three years (7%, 10%, and 12%). This share is approaching the level in the 2011-2013 period, when more than 20% of all ratings were "Outstanding," although it is still well below the level in the 2005-2007 period, when over 30% of all ratings were "Outstanding." For federal regulators, the "Outstanding" share was 18.8% (9 of 48 ratings); for the state, the "Outstanding" share was 20.6% (7 of 34). (See Tables 1 and 2.)
- When each bank is classified by its most recent CRA rating, 15.2% of all banks had a most recent rating of "Outstanding" at year-end 2018. This reverses a four-year downward trend from 22.2% in 2013 to 13.5% in 2017, which was the lowest share of "Outstanding" ratings since 1993. Another 9.4% of banks had a most recent rating of "High Satisfactory," and 74.6% of banks had a most recent rating of "Satisfactory." Just one bank had a most recent rating of "Needs to Improve," down from five one year earlier. Only one bank, down from five at the end of 2017, had a most recent CRA rating of "Needs to Improve" OneUnited Bank.⁷ (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), Citizens (#3), TD Bank (#5), Eastern (#6), and Boston Private (#10). Until four 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, eight at the end of 2016, and five at the end of 2017. Bank of America (#2), Santander (#4), First Republic (#7), Rockland Trust (#8) and Berkshire Bank (#9) have most recent ratings of "Satisfactory." Banks are ranked by total in-state deposits as reported by the FDIC for mid-2018. (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 almost two-thirds (65.0%) of Massachusetts banks have received at least one CRA rating (federal and/or state) within the past two years and that only six banks have not received *any* CRA rating within the last five years.⁸ (See Table 4.)
- For the fifth consecutive year, only two credit unions Jeanne D'Arc CU in Lowell and Workers' CU in Fitchburg have "Outstanding" ratings (3.0% of the 66 current state-chartered credit unions), while

⁷ OneUnited's rating for Massachusetts was "Needs to Improve," while its overall rating was "Satisfactory." Although the bank's headquarters are in Boston, its Massachusetts branches accounted for only 7% of its total deposits and 5% of its total loans. The bank's performance in Florida (4% of loans and 10% of deposits) was also rated "Needs to Improve." However, OneUnited's California branches accounted for 83% of deposits and 91% of loans, and the bank's rating for California was "Satisfactory."

⁸ Table 4 and the summary statistics 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 Letter (CA 13-20). The FDIC's policy is in Section II-12.1 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?"

eight more (10.6%) have ratings of "High Satisfactory." Only one credit union has a rating of "Needs to Improve." Only five credit union ratings were awarded in 2018, following only eight ratings in 2017; this is far below the level needed to provide a rating to each credit union "at least once every 48 months," as specified in state policy.⁹ As of year-end 2018, fifteen credit unions (22.7% of the total) had not received a CRA rating based on an exam dated within the last five years; this is seven more than at the end of 2017 and nine more than at the end of 2016. (See Tables 5, 6, and A-3.)

- Eighteen licensed mortgage lenders (LMLs) received CRA for Mortgage Lenders ratings during 2018; one rating was "High Satisfactory," three ratings were "Needs to Improve," and the other fourteen ratings were "Satisfactory." Of the 69 currently-licensed LMLs that have ever received CRA for Mortgage Lender ratings, four have current ratings of "High Satisfactory," 59 have current ratings of "Satisfactory" and six have current ratings of "Needs to Improve." (See Tables 7 & 8; Table A-4 provides selected information for each of these 69 lenders.¹⁰)
- The Division of Banks remains far from compliance with its stated policy of examining each licensed mortgage lender (LML) "at least once every 48 months."¹¹ Of the 86 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 2016 and 2017 HMDA data, only 48 (55.8% of the total) have received a CRA rating within the last four years. Twelve additional lenders (14.0%) received ratings in 2014 or earlier and 26 lenders (30.2%) have never received a CRA rating.¹² Maintaining compliance with its stated policy would require approximately twenty ratings per year;¹³ the Division is now close to that pace by awarding eighteen ratings in 2018. (See Table 7.)
- Among the 26 currently-licensed CRA-eligible LMLs that have never received a rating are four of the top twelve, as ranked by total number of 2017 Massachusetts loans: Quicken Loans (ranked #1), CrossCountry Mortgage (#8), Homebridge (#9), and Caliber (#12). Quicken, which has been far above the fifty-loan threshold for ten years, received a Consent Order, rather than a rating, as a result of a recent exam.¹⁴ On the other hand, eleven of the 26 never-rated lenders became newly covered by CRA for Mortgage Lenders on the basis of their 2016 and 2017 lending.

⁹ The quotation is from the Division of Banks' Regulatory Bulletin 1.3-105.

¹⁰ In addition to the 69 lenders included in the body of Table A-4, the first note to that table lists the twenty-one notcurrently-licensed lenders that have received CRA for Mortgage Lender ratings.

¹¹ 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."

¹² The 69 current ratings noted in the text and listed in Table A-4 include nine 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, 2018.

¹³ "Approximately" is used because the number of CRA-eligible LMLs continually varies. LMLs become CRAeligible 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.

¹⁴ The exam, dated (i.e., begun) August 2, 2016, was unable to evaluate Quicken's lending performance because of serious problems with the validity of Quicken's HMDA data. The Consent Order, dated April 20, 2018, mandates that Quicken remedy these problems; it also applies to Quicken's affiliate, One Reverse Mortgage, LLC.

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 (<u>www.mass.gov/orgs/division-of-banks</u>) and of the federal bank regulators: the Federal Deposit Insurance Corporation (<u>www.fdic.gov</u>); the Office of the Comptroller of the Currency (<u>www.occ.treas.gov</u>); and the Federal Reserve (<u>www.federalreserve.gov</u>).
- 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, down-loaded, 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

	Nun	ber of Rat	ings	%	Outstandin	g	% Bek	ow Satisfac	tory*
Year	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%
2018	48	34	82	18.8%	20.6%	19.5%	0.0%	0.0%	0.0%

TOTAL CRA RATINGS GIVEN TO MASSACHUSETTS BANKS & PERCENT THAT WERE "OUTSTANDING" OR BELOW "SATISFACTORY" -- 1991-2018

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

		00	CC		0	DTS of	r Fed*			FD	IC			I	MASS		
	Out	Sat	NI	All	Out	Sat	NI	All	Out	Sat	NI	All	Out	HSat	Sat	NI	All
А.	Numb	ers of	Ratin	gs													
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	<u>9</u> 8	1	10 12	28	72 57	3	103	29	*	<u>89</u> 63	1	119
1996 1997	1 2	6 6	0 0	7 8	4	8 5	0 1	12	29 22	57 51	1 0	87 73	34 21	5	63 45	1 0	98 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 2004	0	2 3	0 0	2 3	02	3 5	0 0	3 7	8 14	40 44	0 0	48 58	8 8	7 5	8 17	0 0	23 30
2004	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 0	6	1 4	4	0	5	3 4	33 24	1	37	3 4	6	16	0	25
2010 2011	0	3	0	3	2	6	1 0	11 4	4	24	0	28 25	4	5	17 18	0	26 34
2011	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	52	2	0	74	0	$\frac{3}{10}$	0	3	02	20 23	0	20 26	0 4	<u>1</u> 5	19 26	0	20 36
2017 2018	2	9	0	4	1	10	0	8	6	23 23	0	20 29	4	8	20 19	0	30 34
		ntage	-								-		,	0		0	
1993	14%	86%	0%		0%	86%	14%		19%	72%	9%		13%	0%	80%	7%	
1994		100%	0%		8%	83%	8%		11%	81%	8%		24%	0%	74%	3%	
1995	14%		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 1998	25%	75% 100%	0% 0%		14% 33%	71% 67%	14% 0%		30% 25%	70% 75%	0% 0%		30% 25%	7% 25%	63% 51%	0% 0%	
1999	50%	50%	0%		25%	75%	0%		14%	83%	3%		26%	19%	55%	0%	
2000		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		100%	0%		0%	100%	0%		17%	83%	0%		22%	27%	51%	0%	
2003		100%	0%		0%	100%	0%		17%	83%	0%		35%	30%	35%	0%	
2004 2005		100% 100%	<u>0%</u> 0%		29% 50%	71% 50%	<u>0%</u> 0%		24% 36%	76% 62%	0% 2%		27% 17%	17% 10%	57% 73%	0% 0%	
2005		100%	0%		60%	40%	0%		38%	63%	0%		28%	13%	59%	0%	
2007	67%		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%		0%		20%	80%	0%		8%	89%	3%		12%	24%	64%	0%	
2010		100%	0%		36%	55% 50%	9%		14%	86%	0%		15%	<u>19%</u> 24%	65%	0%	
2011 2012	50% 38%	50% 63%	0% 0%		50% 33%	50% 67%	0% 0%		16% 17%	84% 81%	0% 2%		21% 18%	24% 18%	53% 64%	3% 0%	
2012	73%	27%	0%		33%	50%	17%		8%	88%	4%		16%	12%	72%	0%	
2013	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%		0%		0%	100%	0%		0%	100%	0%		0%	5%	95%	0%	
2017	50%	25%	25%		9% 120/	91%	0%		8%	88% 70%	4%		11%	14%	72%	3%	
2018	18%	82%	0%		13%	88%	0%		21%	79%	0%		21%	24%	30%	0%	

TABLE 2CRA RATINGS OF MASSACHUSETTS BANKSBY REGULATOR AND RATING, 1993-2018

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 mergining into OCC. Ratings shown for 2011 and later are those of the Fed, which gave between 0 and 2 ratings per year before 2011.

Date	1993	1995	1997	1999	2001	2003	2005	2007	2009	2011	2013	2015	2016	2017	2018
Active Banks	286	257	245	228	220	210	194	185	176	165	169	159	153	143	140
Rated Banks	262	257	243	227	219	207	194	182	173	164	167	158	151	141	138
"Outstanding"	32	57	70	57	47	44	51	57	41	32	37	32	27	19	21
"High Satisfactory"#	n/a	n/a	5	21	21	17	6	11	20	24	19	18	15	15	13
"Satisfactory"	198	196	168	147	150	146	136	112	112	106	108	100	102	102	103
Below "Satisfactory"	32	4	0	2	1	0	1	2	0	2	3	8	7	5	1
% "Outstanding"	12.2%	22.2%	28.8%	25.1%	21.5%	21.3%	26.3%	31.3%	23.7%	19.5%	22.2%	20.3%	17.9%	13.5%	15.2%
% "High Satisfactory"#	n/a	n/a	2.1%	9.3%	9.6%	8.2%	3.1%	6.0%	11.6%	14.6%	11.4%	11.4%	9.9%	10.6%	9.4%
% "Satisfactory"	75.6%	76.3%	69.1%	64.8%	68.5%	70.5%	70.1%	61.5%	64.7%	64.6%	64.7%	63.3%	67.5%	72.3%	74.6%
% Below "Satisfactory"	12.2%	1.6%	0.0%	0.9%	0.5%	0.0%	0.5%	1.1%	0.0%	1.2%	1.8%	5.1%	4.6%	3.5%	0.7%

TABLE 3 DISTRIBUTION OF MOST RECENT CRA RATINGS OF MASSACHUSETTS BANKS BY NUMBER OF RANKINGS AND PERCENT, YEAR-END 1993-2018

Note: For increased legibility, the columns for even-numbered years before 2016 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 13 banks with a 2018 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, 2018

	D 1		Last Rated		t Rated		t Rated		t Rated		Rated		in Last
	Banks	ın	in 2018		2017	ın	2016	ın	2015	ın	2014	5 1	ears*
Regulator	12/31/18	#	%	#	%	#	%	#	%	#	%	#	%
FED	32	8	25.0%	11	34.4%	2	6.3%	7	21.9%	4	12.5%	0	0.0%
OCC	24	11	45.8%	3	12.5%	5	20.8%	1	4.2%	1	4.2%	3	12.5%
FDIC	84	29	34.5%	25	29.8%	18	21.4%	7	8.3%	3	3.6%	2	2.4%
MASS	105	34	32.4%	35	33.3%	17	16.2%	11	10.5%	3	2.9%	5	4.8%
All Banks	140	50	35.7%	41	29.3%	25	17.9%	12	8.6%	6	4.3%	6	4.3%

* The numbers in the final column for OCCand All Banks include two banks that have not received CRA ratings since they acquired MA branches: Community Bank and KeyBank.

		Number o	of Ratings	Awarded		Distrib	ution of Rati	ings During	Year
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%
2018	5	0	0	5	0	0.0%	0.0%	100.0%	0.0%

TABLE 5 DISTRIBUTION OF CRA RATINGS GIVEN TO MASS. CREDIT UNIONS DURING EACH YEAR, 1991-2018

Of of the state's 66 state-chartered credit unions, fifteen (22.7%) have not received a CRA rating based on an an exam dated within the last five years. Ten had their most recent ratings based on exams dated in 2013 and five had their most recent ratings based on exams dated in 2012.

TABLE 6

DISTRIBUTION OF CURRENT CRA RATINGS OF MASSACHUSETTS CREDIT UNIONS BY NUMBER OF RANKINGS AND PERCENT, YEAR-END 1993-2018

Date	1993	1995	1997	1999	2001	2003	2005	2007	2009	2011	2013	2015	2016	2017	2018
Rated CUs	29	123	122	117	111	108	101	96	91	87	78	71	68	67	66
"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	11	7	8	7
"Satisfactory"	14	98	113	104	96	91	84	80	72	67	60	57	58	56	56
Below "Satisfactory"	15	23	3	0	0	0	0	0	0	0	0	1	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%	2.8%	2.9%	3.0%	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%	15.5%	10.3%	11.9%	10.6%
% "Satisfactory"	48.3%	79.7%	92.6%	88.9%	86.5%	84.3%	83.2%	83.3%	79.1%	77.0%	76.9%	80.3%	85.3%	83.6%	84.8%
% Below "Satisfactory"	51.7%	18.7%	2.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.4%	1.5%	1.5%	1.5%

Note: For increased legibility, the columns for even-numbered years between 1994 and 2014 are not shown in this table.

		1	Number o	of Rating	S			Perc	ent of Rati	ngs	
Year	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%
2018	18	0	1	14	3	0	0.0%	5.6%	77.8%	16.7%	0.0%
TOTAL	116	0	4	95	15	2	0.0%	3.4%	81.9%	12.9%	1.7%

 TABLE 7

 RATINGS OF LICENSED MORTGAGE LENDERS AWARDED, 2009-2018

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

TABLE 8CURRENT RATINGS OF CURRENTLY-LICENSED MORTGAGE LENDERS
YEAR-END, 2013-2018

		Numbe	er of Len	ders with	n Rating			Perc	ent of Rat	tings	
Year	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%
2018	69	0	4	59	6	0	0.0%	5.8%	85.5%	8.7%	0.0%

		-				-			
		Mass	Mass	Mass	Mass	Fed	Fed	Fed	Fed
Bank	City/Town	Reg?	Rating	List	ExamDate	Reg	Rating	List	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
Admirals Bank	Boston	no				OCC	SAT	Jul-18	03/05/18
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
Bank of America @	Charlotte NC	no				OCC	SAT	Oct-14	12/31/11
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
Bank of New England	Salem NH	no				FDIC	SAT	Dec-16	08/01/16
BankFive*	Fall River	yes	HS	Sep-15	05/11/15	Fed	OUT	Sep-15	05/11/15
BankGloucester	Gloucester	yes	HS	May-11	02/22/11	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
BayCoast Bank	Fall River	yes	HS	Jan-18	09/05/17	FDIC	SAT	Feb-18	09/05/17
Beal Bank USA	Las Vegas NV	no				FDIC	SAT	Oct-16	04/11/16
Belmont SB	Belmont	yes	SAT	Aug-17	04/03/17	FDIC	SAT	Sep-17	04/03/17
Berkshire Bank	Pittsfield	yes	SAT	Jul-15	01/20/15	FDIC	SAT	Jul-15	01/20/15
Beverly Bank	Beverly	yes	SAT	Oct-18	06/18/18	FDIC	SAT	Nov-18	06/18/18
Blue Hills Bank	Boston	yes	SAT	Apr-16	09/28/15	FDIC	SAT	Apr-16	09/25/15
Boston Private B&T^ #	Boston	yes	OUT	Jun-15	10/14/14	Fed	OUT	Jun-15	10/14/14
Bridgewater SB	Raynham	yes	SAT	Aug-17	05/01/17	Fed	SAT	Sep-17	05/01/17
Bristol County SB	Taunton	yes	HS	Oct-16	05/16/16	FDIC	SAT	Nov-16	05/16/16
Brookline Bank	Brookline	yes	SAT	Apr-18	10/16/17	Fed	SAT	May-18	10/16/17
Cambridge SB	Cambridge	yes	OUT	Feb-18	09/25/17	FDIC	OUT	Mar-18	09/25/17
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	Glouscester	yes	SAT	Dec-18	09/14/18	FDIC	SAT	Dec-15	08/24/15
Cape Cod Coop Bank	Yarmouth Port	yes	SAT	Feb-18	10/16/17	FDIC	SAT	Apr-18	10/16/17
Cape Cod Five Cents SB	Harwich Port	yes	OUT	Sep-17	05/09/17	FDIC	OUT	Oct-17	05/09/17
Capital One, NA	McLean VA	no				OCC	OUT	Jul-18	07/24/17
Cathay Bank	Los Angeles CA	no				FDIC	SAT	Aug-16	03/07/16
Century B&T	Somerville	yes	HS	Feb-18	11/06/17	FDIC	SAT	Mar-18	11/06/17
Charles River Bank	Medway	yes	SAT	Feb-17	11/28/16	Fed	SAT	Apr-17	11/28/16
Citizens Bank	Providence RI	no				OCC	OUT	Oct-18	01/04/16
Clinton SB	Clinton	yes	SAT	Nov-16	01/19/16	FDIC	SAT	Dec-16	01/19/16
Coastal Heritage Bank*	Weymouth	yes	SAT	Jun-18	02/05/18	FDIC	SAT	Jul-18	02/05/18
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
Community Bank	Canton NY	no				OCC	[no rati	ing of MA p	erformance]
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, 2018 (page 1 of 4)

	1								r
		Mass	Mass	Mass	Mass	Fed	Fed	Fed	Fed
Bank	City/Town	Reg?	Rating	List	ExamDate	Reg	Rating	List	ExamDate
Dedham Inst for Savings	Dedham	yes	SAT	Nov-18	08/06/18	FDIC	SAT	Dec-18	08/06/18
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
East West Bank	Pasadena CA	no				Fed	SAT	Aug-18	01/30/17
Eastern Bank	Boston	yes	OUT	May-18	01/22/18	FDIC	OUT	Jun-18	01/22/18
Easthampton SB	Easthampton	yes	HS	Aug-15	01/12/15	Fed	SAT	Apr-18	06/19/17
Enterprise B&T	Lowell	yes	HS	Jun-17	02/14/17	FDIC	SAT	Jul-17	02/14/17
Envision Bank*	Randolph	yes	SAT	Sep-17	06/05/17	FDIC	SAT	Oct-17	06/05/17
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
Farmington Bank #	Farmington C	no				FDIC	SAT	Sep-16	05/17/16
Fidelity Coop Bank	Fitchburg	yes	SAT	Jan-16	09/28/15	FDIC	SAT	Feb-16	09/28/15
First Ipswich Bank	Ipswich	yes	SAT	Sep-15	03/23/15	Fed	SAT	Jul-15	03/23/15
First Republic Bank	San Francisco	no				FDIC	SAT	Nov-18	02/26/18
Florence SB	Florence	yes	HS	Jun-18	02/12/18	FDIC	SAT	Jul-18	02/12/18
Foxboro Federal Savings	Foxboro	no				OCC	SAT	Jul-18	03/05/18
Greenfield Coop Bank	Greenfield	yes	HS	Jul-17	04/03/17	Fed	OUT	Aug-17	04/03/17
Greenfield SB	Greenfield	yes	OUT	Sep-18	06/04/18	FDIC	OUT	Oct-18	06/04/18
HarborOne Bank	Brockton	yes	OUT	Mar-18	12/18/17	FDIC	OUT	Apr-18	12/18/17
Haverhill Bank	Haverhill	yes	SAT	Jun-18	03/05/18	FDIC	SAT	Jul-18	03/05/18
Hingham Inst for Savings	Hingham	yes	OUT	Nov-18	06/25/18	FDIC	OUT	Dec-18	06/25/18
Hometown Bank	Oxford	ves	HS	Sep-18	06/11/18	Fed	SAT	Oct-18	06/11/18
Inst for Savings	Newburyport	yes	SAT	Jul-18	03/26/18	FDIC	SAT	Aug-18	03/26/18
KeyBank, NA	Cleveland OH	no				OCC			erformance]
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
Lowell Five Cent SB	Lowell	ves	HS	Sep-18	05/14/18	FDIC	SAT	Oct-18	05/14/18
Main Street Bank*	Marlborough	yes	SAT	Jul-17	06/06/16	FDIC	SAT	Aug-17	06/06/16
Mansfield Coop Bank	Mansfield	yes	SAT	Nov-18	02/26/18	Fed	SAT	Dec-18	02/26/18
Marblehead Bank	Marblehead	yes	SAT	Oct-18	07/16/18	Fed	SAT	Nov-18	06/16/18
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	Oct-18	08/06/18	FDIC	SAT	Nov-18	08/06/18
Melrose Coop Bank	Melrose	yes	SAT	May-18	02/26/18	FDIC	SAT	Jun-18	02/26/18
Methuen Coop Bank	Methuen	yes	SAT	Jan-14	08/26/13	FDIC	SAT	Mar-14	08/26/13
Middlesex Federal Savings	Somerville	no	~***	v mii 1 1	00,20,10	OCC	SAT	Oct-18	07/09/18
Middlesex SB	Natick	yes	OUT	May-17	01/05/17	FDIC	OUT	Jun-17	01/05/17
Milford Federal Bank	Milford	no	001	2. mg 17	01/00/17	OCC	SAT	Aug-16	05/02/16
Millbury NB	Millbury	no				0000	SAT	Jan-15	10/20/14
Millbury SB	Millbury		SAT	Sep-10	06/07/10	FDIC	SAT	Apr-13	11/13/12
-	-	yes		-					
Monson SB	Monson	yes	SAT	Dec-16	09/12/16	FDIC	SAT	Jan-17	09/12/16

TABLE A-1CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2018 (page 2 of 4)

		Mass	Mass	Mass	Mass	Fed	Fed	Fed	Fed
Bank	City/Town	Reg?	Rating	List	ExamDate	Reg	Rating	List	ExamDate
MountainOne Bank	North Adams	yes	SAT	Feb-18	09/11/17	FDIC	SAT	Mar-18	09/11/17
Mutual Bank	Whitman	yes	SAT	Jan-17	08/29/16	Fed	SAT	Jan-17	08/29/16
MutualOne Bank	Framingham	yes	HS	Nov-18	08/06/18	FDIC	SAT	Dec-18	08/06/18
National Grand Bank	Marblehead	no	110	1107 10	00/00/10	OCC	SAT	May-18	03/12/18
NBT Bank	Norwich NY	no				OCC	SAT	Jan-18	09/05/17
Needham Bank	Needham	yes	SAT	Mar-18	05/15/17	Fed	SAT	Apr-18	05/15/17
Newburyport Five Cents SB	Newburyport	yes	SAT	Nov-15	07/13/15	FDIC	SAT	Dec-15	07/13/15
North Brookfield SB	No.Brookfield	yes	SAT	Dec-18	09/17/18	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	Easton	yes	SAT	Mar-18	11/13/17	FDIC	SAT	Apr-18	11/13/17
North Shore Bank	Peabody	yes	SAT	Nov-16	07/05/16	FDIC	SAT	Dec-16	07/15/16
Northeast Community Bank #	White Plains NY	no				FDIC	SAT	Jun-18	08/21/17
Northern B&T	Woburn	yes	SAT	Aug-17	05/01/17	FDIC	SAT	Sep-17	05/01/17
Northern Trust Co. #	Chicago IL	no		e		Fed	SAT	Jan-17	07/27/15
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
OneUnited Bank #	Boston	ves	NI	Mar-17	10/18/16	FDIC	NI	Apr-17	10/18/16
Patriot Community Bank	Woburn	yes	SAT	Sep-15	04/21/15	Fed	SAT	Aug-15	04/21/15
Pentucket Bank	Haverhill	yes	SAT	Mar-16	10/26/15	FDIC	SAT	Mar-16	10/26/15
People's United Bank	Bridgeport CT	no				OCC	SAT	May-18	11/07/16
PeoplesBank	Holyoke	yes	SAT	Sep-18	04/25/18	FDIC	SAT	Oct-18	04/25/18
Pilgrim Bank	Cohasset	yes	SAT	Apr-17	12/05/16	FDIC	SAT	May-17	12/05/16
Pittsfield Coop Bank	Pitts field	yes	SAT	Jul-17	03/13/17	FDIC	SAT	Aug-17	03/13/17
Provident Bank	Amesbury	yes	SAT	Jan-17	09/26/16	FDIC	SAT	Feb-17	09/26/16
Radius Bank	Boston	no				OCC	SAT	Aug-18	04/30/18
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
Salem Coop Bank	Salem NH	no				FDIC	SAT	Feb-17	09/26/16
Salem Five Cents SB	Salem	yes	SAT	Jan-18	03/07/16	FDIC	SAT	Feb-18	03/07/16
Salisbury B&T	Lakeville CT	no				FDIC	SAT	Jul-17	01/23/17
Santander Bank @	Wilmington DE	no				OCC	SAT	May-18	10/16/17
Savers Coop Bank	Southbridge	yes	HS	Mar-18	10/23/17	FDIC	SAT	Apr-18	10/23/17
Savings Bank, The	Wakefield	yes	SAT	Oct-16	07/18/16	FDIC	SAT	Nov-16	07/18/16
Seamen's Bank	Provincetown	yes	OUT	Sep-18	04/30/18	FDIC	OUT	Oct-18	04/30/18
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
TD Bank	Wilmington DE	no				OCC	OUT	Oct-16	12/31/13
TrustCo Bank	Glenville NY	no				OCC	SAT	Oct-17	06/12/17
UniBank for Savings	Whitinsville	yes	SAT	Nov-17	06/07/17	FDIC	SAT	Dec-17	06/07/17

TABLE A-1CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2018 (page 3 of 4)

		Mass	Mass	Mass	Mass	Fed	Fed	Fed	Fed
Bank	City/Town	Reg?	Rating	List	ExamDate	Reg	Rating	List	ExamDate
United Bank	Rockville CT	no				FDIC	SAT	May-15	12/01/14
Village Bank	Newton	yes	SAT	Sep-18	05/14/18	FDIC	SAT	Oct-18	05/14/18
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-18	03/26/18	Fed	OUT	Aug-18	03/26/18
Watertown SB	Watertown	yes	OUT	Jan-17	09/26/16	Fed	SAT	Jan-17	09/26/16
Webster Bank #	Waterbury CT	no				OCC	SAT	May-18	08/07/17
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
Westfield Bank	Westfield	no				OCC	OUT	Dec-16	07/05/16
Winchester Coop Bank	Winchester	yes	SAT	May-17	02/07/17	FDIC	SAT	Jun-17	02/07/17
Winchester SB	Winchester	yes	SAT	May-18	01/08/18	FDIC	SAT	Jun-18	01/08/18
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

TABLE A-1CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2018 (page 4 of 4)

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.

* 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

- Envision Bank was, until March 2018, Randolph 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

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

- # indicates six banks whose rating for MA (shown in table) differs from their overall CRA rating. Overall ratings were: Boston Private - HS; Farmington Bank - OUT; Northeast Community - OUT; Northern Trust - OUT; OneUnited - SAT; Webster Bank - OUT.
- @ because Bank of America's overall rating was lowered one step because of fair lending violations, I have accordingly also lowered its reported CRA rating for Massachusetts by one step, from OUT to SAT.

TABLE A-2 BANKS WITH BRANCHES BOTH INSIDE AND OUTSIDE OF MASSACHUSETTS (Data as of June 30, 2018)

	Fed		Branches			Deposits (\$ millions)			
Bank Name	Reg	Headquarters	Mass.	Other	Mass. %	Mass.	Other	Mass. %	
A. Banks with Massachusetts Headquarters									
Admirals Bank	OCC	Boston	1	1	50.0%	141	48	74.8%	
BankFive^	Fed	Fall River	12	1	92.3%	776	13	98.3%	
BayCoast Bank	FDIC	Fall River	17	2	89.5%	1,089	60	94.8%	
Berkshire Bank	FDIC	Pittsfield	54	63	46.2%	5,716	3,199	64.1%	
Boston Private B&T	Fed	Boston	11	12	47.8%	4,612	2,067	69.1%	
Bristol County SB	FDIC	Tauton	17	1	94.4%	1,624	76	95.5%	
Eastern Bank	FDIC	Boston	88	6	93.6%	9,032	376	96.0%	
Enterprise B&T	FDIC	Lowell	17	7	70.8%	2,239	422	84.2%	
Haverhill Bank	FDIC	Haverhill	8	1	88.9%	325	15	95.6%	
Hometown Bank	Fed	Oxford	8	3	72.7%	440	220	66.7%	
Lowell Five Cents SB	FDIC	Lowell	15	1	93.8%	929	41	95.8%	
Milford Federal Bank	OCC	Milford	3	1	75.0%	287	35	89.2%	
Newburyport Five Cents SB	FDIC	Newburyport	7	2	77.8%	505	82	86.0%	
North Shore Bank	FDIC	Peabody	11	1	91.7%	655	31	95.5%	
OneUnited Bank	FDIC	Boston	3	2	60.0%	27	348	7.2%	
Pentucket Bank	FDIC	Haverhill	4	2	66.7%	454	147	75.5%	
Provident Bank	FDIC	Amesbury	3	5	37.5%	427	332	56.3%	
Salem Five Cents SB	FDIC	Salem	34	1	97.1%	3,615	13	99.6%	
Westfield Bank	OCC	Westfield	22	2	91.7%	1,488	70	95.5%	
Total, 19 Banks			335	114	74.6%	34,380	7,593	81.9%	
B. Banks with Non-Massa		-							
Bank of America, NA	OCC	Charlotte NC	217	4,255	4.9%	76,107	1,236,594	5.8%	
Bank of New England	FDIC	Salem NH	3	6	33.3%	136	606	18.3%	
Beal Bank, USA	FDIC	Las Vegas NV	1	22	4.3%	19.8	2,496	0.8%	
Capital One, NA*	OCC	McLean VA	0	604	0.0%	0	233,072	0.0%	
Cathay Bank	FDIC	Los Angeles CA	1	63	1.6%	78	12,780	0.6%	
Citizens Bank NA	OCC	Providence RI	247	551	31.0%	38,438	51,864	42.6%	
Community Bank	OCC	Canton NY	1	225	0.4%	37	8,627	0.4%	
East West Bank	Fed	Pasadena CA	2	110	1.8%	438	30,474	1.4%	
Farmington Bank	FDIC	Farmington CT	2	26	7.1%	131	2,340	5.3%	
First Republic Bank	FDIC	San Francisco CA	4	71	5.3%	8,719	64,053	12.0%	
KeyBank, NA*	OCC	Cleveland OH	8	1,191	0.7%	1,014	106,689	0.9%	
NBT Bank, NA	OCC	Norwich NY	6	148	3.9%	117	7,266	1.6%	
Northeast Community Bank	FDIC	White Plains NY	3	5	37.5%	140	529	21.0%	
Northern Trust Co	Fed	Chicago IL	1	58	1.7%	71	35,332	0.2%	
People's United Bank	OCC	Bridgeport CT	47	347	11.9%	3,994	28,723	12.2%	
Salem Coop Bank	FDIC	Salem NH	1	1	50.0%	49	244	16.7%	
Salisbury B&T	FDIC	Lakeville CT	3	11	21.4%	75	825	8.3%	
Santander Bank	OCC	Wilmington DE	209	426	32.9%	17,905	39,562	31.2%	
TD Bank, NA	OCC	Wilmington DE	142	1,116	11.3%	14,297	233,694	5.8%	
TrustCo Bank	OCC	Glenville NY	4	144	2.7%	34	4,222	0.8%	
United Bank	FDIC	Rockville CT	21	33	38.9%	1,393	4,052	25.6%	
Webster Bank, NA	OCC	Waterbury CT	32	132	19.5%	2,507	19,461	11.4%	
Total, 22 Banks			955	9,545	9.1%	165,700	2,123,503	7.2%	

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

Except for Capital One, all banks in this table were in the corresponding table last year.

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

* Canital One is included in this table and this report because the OCC essentially treats its Massachusetts "cafes" as if they were branches

TABLE A-3

CURRENT RATINGS OF MASSACHUSETTS STATE-CHARTERED CREDIT UNIONS, YEAR-END 2018

Credit Union Name	City/Town	Rating	ExamDate	Credit Union Name	City/Town	Rating 1	ExamDate
Alden CU	Chicopee	SAT	08/01/16	Lowell Firefighters CU	Lowell	SAT	08/11/14
Align CU	Lowell	HS	03/13/17	Luso-American CU	Peabody	SAT	07/09/18
Allcom CU	Worcester	SAT	12/01/14	Lynn Muni Empls CU	Lynn	SAT	03/12/15
Alpha CU	Boston	SAT	10/05/15	Lynn Police CU	Lynn	SAT	01/21/14
Arrha CU	Springfield	SAT	08/03/15	Lynn Teachers CU	Lynn	SAT	04/11/17
Athol Credit Union	Athol	HS	08/15/16	Mass Bay CU	Boston	SAT	11/28/16
Billerica Muni Empls CU	Billerica	SAT	04/06/15	Mass Family CU	Lynn	SAT	08/15/16
Boston Firefighters CU	Boston	SAT	10/15/13	Members Plus CU	Boston	SAT	02/11/13
Bridgewater CU	Bridgewater	SAT	11/18/13	Metro CU	Chelsea	HS	01/04/16
Brookline Municipal CU	Brookline	SAT	12/18/17	Naveo CU [was: Camb-PortCU]	Somerville	SAT	06/23/14
Brotherhood CU	Lynn	SAT	01/11/16	New Bedford CU	New Bedford	SAT	12/14/15
Cabot Boston CU	Boston	SAT	08/03/15	One Twenty CU	Boston	SAT	08/14/14
City of Boston CU	Boston	SAT	12/18/17	Polish National CU	Chicopee	SAT	06/10/13
Comm. Utils Empl's CU	Marion	SAT	02/13/17	Premier Source CU	Springfield	SAT	06/04/12
Community CU of Lynn	Lynn	SAT	12/04/17	Pressers UnionCU	Boston	NI	01/12/15
Credit U of the Berkshires	Pitts field	SAT	08/26/13	Quincy CU	Quincy	SAT	12/29/14
Crescent CU	Brockton	HS	06/03/13	Revere Firefighters CU	Revere	SAT	10/24/12
Energy CU	Waltham	SAT	04/06/15	River Works CU	Lynn	SAT	07/21/14
Fall River Muni CU	Fall River	SAT	10/13/15	Sharon CU	Sharon	SAT	02/11/13
First Priority CU	Boston	SAT	05/31/16	Southbridge CU	Southbridge	SAT	11/16/15
Freedom CU	Springfield	SAT	09/14/15	Southern Mass CU	Fairhaven	HS	11/27/12
Gloucester Fire Dept CU	Gloucester	SAT	08/04/14	Springfield St RR Empls CU	Springfield	SAT	02/17/16
Gloucester Muni CU	Gloucester	SAT	09/08/15	St. Anne CU	New Bedford	SAT	11/02/15
Greater Springfield CU	Springfield	SAT	11/12/13	St. Anne's CU	Fall River	SAT	09/25/12
Harvard U Empls CU	Cambridge	SAT	08/14/17	St. Jean's CU	Lynn	HS	07/14/14
Haverhill Fire Dept CU	Haverhill	SAT	05/21/13	St. Mary's CU	Marlborough	SAT	05/11/15
Holyoke CU	Holyoke	HS	07/07/14	St. Vincent Hosp CU	Worcester	SAT	01/08/18
Holyoke Postal CU	Holyoke	SAT	02/10/16	Tremont CU	Boston	SAT	05/16/16
Homefield CU	Grafton	SAT	03/30/15	Waltham Muni Empls CU	Waltham	SAT	08/05/13
HTM CU	Haverhill	SAT	02/24/14	Watertown Municipal CU	Watertown	SAT	11/01/16
Jeanne D'Arc CU	Lowell	OUT	09/10/12	Worcester CU	Worcester	SAT	06/13/16
Leominster CU	Leominster	SAT	01/19/16	Worcester Fire Dept CU	Worcester	SAT	04/11/16
Liberty Bay CU	Boston	SAT	11/30/15	Workers' CU	Fitchburg	OUT	01/03/17

Of these 66 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 seven current *High Satisfactory (HS) ratings are shown in italics*.

Merrimack Valley CU (Lawrence) is not included in the above table, although it was an active state-chartered CU active at year-end 2018. This CU converted from a federal to a state charter in late 2018, and has not received a CRA exam or rating. On Feb. 1, 2019, Bridgewater CU is scheduled to merge into Merrimack Valley CU.

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, 2018 (page 1 of 2)

					2016 Rank
Lender	Headquarters	Rating	List Date	Exam Date	Among LMLs^
Academy Mortgage	Sandy UT	SAT	Dec-16	07/19/16	16
American Financial Resources	Parsippany NJ	SAT	none [2017]	01/21/16	49
American Internet Mortgage*	San Diego CA	NI	Jan-16	05/19/15	74
American Neighborhood Mortgage	Mt. Laurel NJ	SAT	Jul-17	11/29/16	57
Amerisave Mortgage	Atlanta GA	SAT	Jan-17	08/23/16	41
Ark-La-Tex Financial Services	Plano TX	SAT	Feb-16	04/06/15	65
Atlantic Home Lending	Canton MA	SAT	Jan-12	12/07/10	85
Broker Solutions	Irvine CA	SAT	Jun-12	06/02/11	60
Commonwealth Mortgage, LLC	Woburn MA	SAT	Nov-13	04/17/13	32
Crescent Morttage*	Atlanta GA	SAT	Mar-17	10/20/16	66
Ditech Financial	Ft. Washington PA	SAT	Oct-18	04/02/10	11
Drew Mortgage	Shrewsbury MA	SAT	Sep-14	09/03/13	48
E Mortgage Management	Cherry Hills NJ	SAT	Apr-16	07/09/15	47
Embrace Home Loans*	Middletown RI	SAT	Apr-18	10/03/16	27
Envoy Mortgage	Houston TX	SAT	Dec-15	10/22/14	20
Fairway Independent Mortgage	Madison WI	SAT	Jan-17	04/19/16	5
FBC Mortgage	Orlando FL	SAT	Nov-18	08/03/18	31
Finance of America/Gateway Fundng^^	Horsham PA	SAT	Jan-11	07/14/10	39
First Guaranty Mortgage	Tysons Corner VA	SAT	Oct-18	07/31/18	75
First Home Mortgage	Baltimore MD	SAT	Aug-16	12/30/15	30
Franklin American Mortgage*	Franklin TN	SAT	Oct-17	11/29/16	51
Franklin First Financial	Melville NY	SAT	Nov-11	04/12/11	BT (7)
Freedom Mortgage*	Mt. Laurel NJ	NI	Sep-16	10/20/15	18
GMH Mortgage Services*	Conshohocken PA	HS	Apr-18	08/04/17	37
Guaranteed Rate	Chicago IL	SAT	Jun-15	08/04/14	2
Guidance Residential	Reston VA	SAT	Jul-18	04/10/18	77
Home Point Financial/Maverick Funding^^	Ann Arbor MI	SAT	Aug-13	01/02/13	13
Homestead Funding*	Albany NY	SAT	Jan-18	05/24/17	67
iFreedom Direct*	Salt Lake City UT	SAT	Nov-17	01/30/17	BT (37)
JG Wentworth/Weststar Mortgage^^	Woodbridge VA	SAT	Feb-15	09/10/13	68
LendUS/Regency Mort	Hooksett NH	SAT	Aug-16	04/04/16	23
loanDepot.com*	Foothills Ranch CA	SAT	Dec-18	09/28/18	3
Member Advantage Mortgage*	Grand Rapids MI	SAT	Jun-15	09/22/14	63
Members Mortgage*	Woburn MA	SAT	Dec-17	03/01/17	35
Mid-Island Mortgage	Westbury NY	SAT	Oct-13	03/29/13	76
Mi-Lend	Augusta GA	NI	Sep-18	05/10/17	56
MLD Mortgage	Florham Park NJ	SAT	Nov-11	03/24/11	BT (26)
Monument Mortgage	Lexington MA	SAT	Oct-09	04/21/09	NL
Mortgage Equity Partners	Lynnfield MA	SAT	Jun-18	02/20/18	52

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, 2018 (page 2 of 2)

					2017 Rank
Lender	Headquarters	Rating	List Date	Exam Date	Among LMLs^
Mort Rsrch Ctr(Vets United Hme Lns)*	Columbia MO	SAT	Jan-17	07/29/16	33
Mortgage Lenders of America	Overland Park KS	SAT	Sep-14	07/09/13	89
Mortgage Network*	Danvers MA	SAT	Apr-18	12/15/17	6
MSA Mortgage*	Winthrop MA	SAT	Aug-14	08/08/13	26
Nationstar Mortgage	Dallas TX	SAT	Jan-14	08/14/12	14
New Day Financial	Fulton MD	SAT	Sep-16	03/10/16	64
New Fed Mortgage	Danvers MA	SAT	Sep-15	01/08/15	25
NFM	Linthicum MD	SAT	Nov-11	05/23/11	59
NorthPoint Mortgage	Sturbridge MA	SAT	Jul-15	09/03/14	42
Norwich Comm. Group (NorCom Mort)	Avon CT	SAT	none [2017]	06/08/16	45
Pacific Union Financial	Irving TX	SAT	Jan-18	07/03/17	29
Plaza Home Mortgage*	San Diego CA	HS	Feb-16	12/02/15	54
Poli Mortgage Group*	Canton MA	NI	Apr-18	09/25/17	NL
Primary Residential Mortgage*	Salt Lake City UT	SAT	Jul-18	04/09/18	53
PrimeLending	Dallas TX	SAT	Feb-15	10/09/13	34
Provident Funding*	San Bruno CA	NI	Dec-18	08/06/18	40
Pulte Mortgage*	Englewood CA	SAT	Oct-17	04/12/17	78
Radius Financial Group*	Norwell MA	HS	Apr-15	06/02/14	10
Residential Mortgage	S. Portland ME	SAT	Jan-17	02/16/16	4
Ross Mortgage*	Westborough MA	SAT	Mar-15	06/04/14	58
Shamrock Financial*	E. Providence RI	SAT	Dec-15	05/08/15	43
Sierra Pacific Mortgage*	Folsom CA	SAT	Jun-17	05/02/16	28
Stearns Lending*	Santa Ana CA	SAT	Aug-18	04/30/18	15
Suntrust Mortgage	Richmond VA	HS	Sep-10	03/11/10	88
TBI Mortgage	Horsham PA	SAT	Oct-14	07/25/13	BT (46)
Top Flite Financial	Williamston MI	SAT	Jul-17	12/13/16	BT (40)
Total Mortgage Services	Milford CT	SAT	Sep-14	01/13/14	87
United Shore/United Wholesale Mort*	Troy MI	SAT	May-18	01/29/18	7
Village Mortgage	Avon CT	NI	Feb-15	11/25/13	24
William Raveis Mortgage*	Shelton CT	SAT	Feb-18	10/25/17	46

Currently licensed means licensed as of December 31, 2018. In addition to the 69 current lenders shown above, many others that have received ratings are no longer licensed as mortgage lenders in Mass., including: Advanced, American Equity, American Interbanc, Clearpoint, Continental, First Residential, Greenpark, Leader, Merrimack, MetroBoston, Mortgage Financial, Mortgage Master, Mortgage Partners, Omega, PHH/NEMoves, Prospect, Reliant, Roundpoint, Schaefer, Superior, and Union Capital. For licensing status of any mortgage lender: www.nmlsconsumeraccess.org.

[^] Lenders are ranked by total number of Massachusetts loans reported in 2017 HMDA data: 183 licensed lenders reported one or more loans, with 95 of these reporting fifty or more loans. In this column, **BT** indicates that lender's 2017 HMDA-reported loans were **B**elow Threshold of 50; **NL** indicates No Loans reported in 2017.

* Indicates that this lender has also received one or more previous ratings.

^^ Indicates lenders with changes of name. The current name is listed first, then the name at the time of the rating.