

CRA RATINGS OF MASSACHUSETTS BANKS, CREDIT UNIONS, AND LICENSED MORTGAGE LENDERS IN 2019

MAHA's Twenty-Ninth 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-ninth 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 134 "Massachusetts banks" as of December 31, 2019.¹ This includes not only 111 banks that have headquarters in the state, but also 23 banks based elsewhere that have one or more branch offices in Massachusetts.² **Table A-1 provides a listing of the 134 Massachusetts banks and their current CRA ratings.**³ (The 24 federally-chartered banks and the 11 banks chartered by other states receive ratings only from their federal regulators; the 99 Massachusetts state-chartered banks receive ratings from both Massachusetts and federal regulators.)^{4, 5}

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 if it differs from the bank's overall rating.⁶ **Table A-2 provides information on the 44 banks that have branches both inside and outside of Massachusetts;** these banks are shown in italics in Table A-1.⁷

¹ In fact, two banks and one credit union that existed on Dec. 31, 2019, but were merged out of existence on Jan. 1, 2020, are excluded from this report's coverage. That is, they are treated as if their merger dates were Dec. 31, 2019.

² This report's definition of "Massachusetts Banks" excludes trust companies that specialize in serving investors;

² 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.

³ It is interesting to note, by comparing the first and last columns in Table 3, that the current number (134) 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.

⁴ 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."

⁵ 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 twelve out-of-state banks with branches here are federally-chartered and therefore not subject to state CRA oversight.

⁶ 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.

⁷ 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.

Table A-3 provides a listing of the current CRA ratings of the state's 62 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 2019; about the distribution of CRA ratings awarded during the calendar year 2019 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 77 CRA ratings awarded to Massachusetts banks during 2019, eleven (14.3%) were "Outstanding."** This is down from 19.5% in 2018, but above the share of "Outstanding" ratings in the previous three years (6.8%, 10.0%, and 11.7%). For federal regulators, the "Outstanding" share was 18.6% (8 of 43 ratings); for the state, the "Outstanding" share was 8.8% (3 of 34). (See Tables 1 and 2.)
- When each bank is classified by its most recent CRA rating, **17.6% of all banks had a most recent rating of "Outstanding" at year-end 2019. This is up from 15.2% a year earlier and is the second annual increase after a four-year downward trend from 22.2% in 2013 to 13.5% in 2017.** Another 13.7% of banks had a most recent rating of "High Satisfactory" (up from 9.4% a year earlier), and 67.2% of banks had a most recent rating of "Satisfactory" (down from 74.6%). **Only two banks had a most recent CRA rating of "Needs to Improve" – OneUnited Bank and Northmark Bank.**⁸ (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), Bank of America (#2), Citizens (#3), TD Bank (#5), and Eastern (#7). Until five 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 and 2018. Santander (#4), Rockland Trust (#6), First Republic (#8), People's United (#9), and Berkshire Bank (#10) have most recent ratings of "Satisfactory." Banks are ranked by total in-state deposits as reported by the FDIC for mid-2019. (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 two-thirds (69.5%) of Massachusetts banks have received at least one CRA rating (federal and/or state) within the past two years and only two banks have not received any CRA rating within the last five years.**⁹ (See Table 4.)
- For the sixth consecutive year, only two credit unions – Jeanne D'Arc CU in Lowell and Workers' CU in Fitchburg – have "Outstanding" ratings (3.3% of the 61 currently-rated state-chartered credit

⁸ 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."

⁹ 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?"

unions), while seven more (11.5%) have ratings of “High Satisfactory.” No credit union has a rating of “Needs to Improve.” **Sixteen credit union ratings were awarded in 2019, following only thirteen ratings in the previous two years combined; the 2019 number of ratings is consistent with providing a rating to each credit union “at least once every 48 months,” as specified in state policy.¹⁰ As of year-end 2019, twelve credit unions (19.7% of the total) had not received a CRA rating based on an exam dated within the last five years; this is three fewer than at the end of 2018. (See Tables 5, 6, and A-3.)**

- Ten licensed mortgage lenders (LMLs) received CRA for Mortgage Lenders ratings during 2019; all ten ratings were “Satisfactory.” **Of the 68 currently-licensed LMLs that have ever received CRA for Mortgage Lenders ratings, three (4.4%) have current ratings of “High Satisfactory,” 60 (88.2%) have current ratings of “Satisfactory” and five (7.4%) have current ratings of “Needs to Improve.”** (See Tables 7 & 8; Table A-4 provides selected information for each of these 68 lenders.¹¹)
- **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.”¹² Compliance with that policy would require approximately twenty ratings per year, double the number awarded in 2019.¹³** The average number of ratings per year both over the last three-year period and over the last six-year period was thirteen ratings per year. (See Table 7.)
- **Four of the top twelve currently-licensed CRA-eligible LMLs, as ranked by total number of 2017 Massachusetts loans, have never received a rating: 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 an exam begun in 2016.¹⁴

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.mass.gov/orgs/division-of-banks) 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

¹⁰ The quotation is from the Division of Banks’ Regulatory Bulletin 1.3-105.

¹¹ In addition to the 68 lenders included in the body of Table A-4, the first note to that table lists the twenty-six not-currently-licensed lenders that have received CRA for Mortgage Lender ratings.

¹² 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.”

¹³ “Approximately” is used because the number of CRA-eligible LMLs is difficult to determine. An LML is CRA-eligible if it is currently licensed by the state and has made at least fifty loans in each of the two most recent years. For the previous report in this annual series I estimated that, as of year-end 2018, only 48 of the 86 then-CRA eligible LMLs (56%) had received a rating during the previous four-year period, and that 26 CRA-eligible lenders (30%) had never received a CRA for Mortgage Lenders rating. I have not attempted to update those numbers for year-end 2019.

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.

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" -- 1991-2019

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%
2018	48	34	82	18.8%	20.6%	19.5%	0.0%	0.0%	0.0%
2019	43	34	77	18.6%	8.8%	14.3%	2.3%	2.9%	2.6%

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

TABLE 2
CRA RATINGS OF MASSACHUSETTS BANKS
BY REGULATOR AND RATING, 1993-2019

	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
2018	2	9	0	11	1	7	0	8	6	23	0	29	7	8	19	0	34
2019	4	4	0	8	4	8	0	12	0	22	1	23	3	6	24	1	34
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%	
2018	50%	50%	0%		33%	67%	0%		0%	96%	4%		9%	18%	71%	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 1993-2019

Date	1993	1996	1999	2002	2005	2008	2011	2012	2013	2014	2015	2016	2017	2018	2019
Active Banks	286	255	228	216	194	179	165	159	169	166	159	153	143	140	134
Rated Banks	262	254	227	213	194	177	164	159	167	165	158	151	141	138	131
"Outstanding"	32	76	57	46	51	49	32	31	37	36	32	27	19	21	23
"High Satisfactory" #	n/a	n/a	21	24	6	7	24	21	19	18	18	15	15	13	18
"Satisfactory"	198	176	147	143	136	119	106	106	108	105	100	102	102	103	88
Below "Satisfactory"	32	2	2	0	1	2	2	1	3	6	8	7	5	1	2
% "Outstanding"	12.2%	29.9%	25.1%	21.6%	26.3%	27.7%	19.5%	19.5%	22.2%	21.8%	20.3%	17.9%	13.5%	15.2%	17.6%
% "High Satisfactory" #	n/a	n/a	9.3%	11.3%	3.1%	4.0%	14.6%	13.2%	11.4%	10.9%	11.4%	9.9%	10.6%	9.4%	13.7%
% "Satisfactory"	75.6%	69.3%	64.8%	67.1%	70.1%	67.2%	64.6%	66.7%	64.7%	63.6%	63.3%	67.5%	72.3%	74.6%	67.2%
% Below "Satisfactory"	12.2%	0.8%	0.9%	0.0%	0.5%	1.1%	1.2%	0.6%	1.8%	3.6%	5.1%	4.6%	3.5%	0.7%	1.5%

Note: For increased legibility, only every third year from 1993 to 2011 is shown in this table, with annual data for the last ten years.

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, 2019

Regulator	Rated Banks* 12/31/19	Last Rated in 2019		Last Rated in 2018		Last Rated in 2017		Last Rated in 2016		Last Rated in 2015		Not in Last 5 Years*	
		#	%	#	%	#	%	#	%	#	%	#	%
FED	30	11	36.7%	8	26.7%	8	26.7%	2	6.7%	0	0.0%	1	3.3%
OCC	22	7	31.8%	11	50.0%	3	13.6%	1	4.5%	0	0.0%	0	0.0%
FDIC	79	22	27.8%	27	34.2%	22	27.8%	5	6.3%	1	1.3%	2	2.5%
MASS	98	31	31.6%	32	32.7%	27	27.6%	3	3.1%	2	2.0%	3	3.1%
All Banks	131	45	34.4%	46	35.1%	31	23.7%	6	4.6%	1	0.8%	2	1.5%

* Three banks are excluded from this table. New Valley B&T (Mass & FDIC) opened in 2019; JPMorgan Chase (OCC) opened its first Mass. branches in 2019; and Key Bank (OCC) opened its first Mass. branches in 2016. .

TABLE 5
DISTRIBUTION OF CRA RATINGS GIVEN TO MASS. CREDIT UNIONS
DURING EACH YEAR, 1991-2019

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%
2018	5	0	0	5	0	0.0%	0.0%	100.0%	0.0%
2019	16	1	3	12	0	6.3%	18.8%	75.0%	0.0%

Of of the state's 61 state-chartered credit unions with ratings, twelve (19.7%) have not received a CRA rating based on an exam dated within the last five years. Eight had their most recent ratings based on exams dated in 2014 and three had their most recent ratings based on exams dated in 2013. One CU converted from a federal to a state charter in 2018 and has not yet received a CRA exam or rating.

TABLE 6
DISTRIBUTION OF CURRENT CRA RATINGS OF MASSACHUSETTS CREDIT UNIONS
BY NUMBER OF RANKINGS AND PERCENT, YEAR-END 1993-2019

Date	1993	1995	1997	1999	2001	2003	2005	2007	2009	2011	2013	2015	2017	2018	2019
Rated CUs	29	123	122	117	111	108	101	96	91	87	78	71	67	66	61
"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	8	7	7
"Satisfactory"	14	98	113	104	96	91	84	80	72	67	60	57	56	56	52
Below "Satisfactory"	15	23	3	0	0	0	0	0	0	0	0	1	1	1	0
% "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%	3.0%	3.0%	3.3%
% "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%	11.9%	10.6%	11.5%
% "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%	83.6%	84.8%	85.2%
% 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%	0.0%

Note: For increased legibility, the columns for even-numbered years between 1994 and 2016 are not shown in this table.

TABLE 7
RATINGS OF LICENSED MORTGAGE LENDERS AWARDED, 2009-2019

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%
2018	18	0	1	14	3	0	0.0%	5.6%	77.8%	16.7%	0.0%
2019	10	0	0	10	0	0	0.0%	0.0%	100.0%	0.0%	0.0%
TOTAL	126	0	4	105	15	2	0.0%	3.2%	83.3%	11.9%	1.6%

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

TABLE 8
CURRENT RATINGS OF CURRENTLY-LICENSED MORTGAGE LENDERS
YEAR-END, 2013-2019

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%
2018	69	0	4	59	6	0	0.0%	5.8%	85.5%	8.7%	0.0%
2019	68	0	3	60	5	0	0.0%	4.4%	88.2%	7.4%	0.0%

TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2019 (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*	Cohasset	yes	SAT	Apr-17	12/05/16	FDIC	SAT	May-17	12/05/16
Adams Community Bank	Adams	yes	SAT	Feb-19	10/01/18	FDIC	SAT	Mar-19	10/01/18
Athol SB	Athol	yes	HS	Oct-17	07/11/17	FDIC	SAT	Nov-17	07/11/17
Avidia Bank	Hudson	yes	SAT	Oct-19	07/08/19	FDIC	SAT	Dec-19	07/08/19
Bank of America	Charlotte NC	no				OCC	OUT	Oct-19	01/08/18
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	May-19	02/04/19	Fed	SAT	May-19	02/04/19
Bank of New England	Salem NH	no				FDIC	SAT	Dec-16	08/01/16
BankFive*	Fall River	yes	OUT	Apr-19	08/13/18	Fed	OUT	Apr-19	08/13/18
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-19	04/22/19
Berkshire Bank	Pittsfield	yes	SAT	May-19	07/11/18	FDIC	SAT	Jun-19	07/11/18
Boston Private B&T	Boston	yes	OUT	Mar-19	04/23/18	Fed	OUT	Mar-19	04/23/18
Bridgewater SB	Raynham	yes	SAT	Aug-17	05/01/17	Fed	SAT	Sep-17	05/01/17
Bristol County SB	Taunton	yes	HS	Oct-19	06/24/19	FDIC	SAT	Dec-19	06/24/19
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	Gloucester	yes	SAT	Dec-18	09/04/18	FDIC	SAT	Jan-19	09/04/18
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	May-19	11/26/18
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-19	08/19/19	FDIC	SAT	Dec-16	01/19/16
Coastal Heritage Bank* +	Weymouth	yes	SAT	Jul-14	03/24/14	Fed	SAT	Apr-19	06/18/18
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	SAT	Dec-19	07/22/19
Cooperative Bank, The	Boston	yes	SAT	Jun-17	01/23/17	FDIC	SAT	Jul-17	01/23/17
Cornerstone Bank*	Spencer	yes	HS	Oct-19	10/15/18	Fed	SAT	Oct-19	10/15/18
Country BfS	Ware	yes	SAT	Jun-19	01/24/19	FDIC	SAT	Jul-19	01/24/19
Dean Coop Bank	Franklin	yes	HS	Jan-19	09/17/18	FDIC	SAT	Feb-19	09/17/18
Dedham Inst for Savings	Dedham	yes	SAT	Nov-18	08/06/18	FDIC	SAT	Dec-18	08/06/18
Eagle Bank	Everett	yes	SAT	May-19	01/14/19	FDIC	SAT	Jun-19	01/14/19
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

TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2019 (page 2 of 4)

Bank	City/Town	Mass Reg?	Mass Rating	Mass List	Mass ExamDate	Fed Reg	Fed Rating	Fed List	Fed ExamDate
<i>East West Bank</i>	<i>Pasadena CA</i>	<i>no</i>				<i>Fed</i>	<i>SAT</i>	<i>Aug-18</i>	<i>01/30/17</i>
<i>Eastern Bank</i>	<i>Boston</i>	<i>yes</i>	<i>OUT</i>	<i>May-18</i>	<i>01/22/18</i>	<i>FDIC</i>	<i>OUT</i>	<i>Jun-18</i>	<i>01/22/18</i>
Easthampton SB	Easthampton	yes	HS	Aug-15	01/12/15	Fed	SAT	Apr-18	06/19/17
<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>
Envision Bank*	Randolph	yes	SAT	Sep-17	06/05/17	FDIC	SAT	Oct-17	06/05/17
<i>Ethic*</i>	<i>Boston</i>	<i>no</i>				<i>OCC</i>	<i>SAT</i>	<i>Jul-18</i>	<i>03/05/18</i>
Everett Coop Bank	Everett	yes	SAT	May-19	03/11/19	FDIC	SAT	Jun-19	03/11/19
<i>Farmington Bank #</i>	<i>Farmington CT</i>	<i>no</i>				<i>FDIC</i>	<i>SAT</i>	<i>Sep-16</i>	<i>05/17/16</i>
Fidelity Coop Bank	Fitchburg	yes	HS	Mar-19	11/26/18	FDIC	SAT	[Apr-19]	11/26/18
First Ipswich Bank	Ipswich	yes	SAT	Jul-19	04/08/19	Fed	SAT	Aug-19	04/08/19
<i>First Republic Bank</i>	<i>San Francisco</i>	<i>no</i>				<i>FDIC</i>	<i>SAT</i>	<i>Nov-18</i>	<i>02/26/18</i>
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
<i>HarborOne Bank</i>	<i>Brockton</i>	<i>yes</i>	<i>OUT</i>	<i>Mar-18</i>	<i>12/18/17</i>	<i>FDIC</i>	<i>OUT</i>	<i>Apr-18</i>	<i>12/18/17</i>
<i>Haverhill Bank</i>	<i>Haverhill</i>	<i>yes</i>	<i>SAT</i>	<i>Jun-18</i>	<i>03/05/18</i>	<i>FDIC</i>	<i>SAT</i>	<i>Jul-18</i>	<i>03/05/18</i>
Hingham Inst for Savings	Hingham	yes	OUT	Nov-18	06/25/18	FDIC	OUT	Dec-18	06/25/18
<i>Hometown Bank</i>	<i>Oxford</i>	<i>yes</i>	<i>HS</i>	<i>Sep-18</i>	<i>06/11/18</i>	<i>Fed</i>	<i>SAT</i>	<i>Oct-18</i>	<i>06/11/18</i>
Inst for Savings	Newburyport	yes	SAT	Jul-18	03/26/18	FDIC	SAT	Aug-18	03/26/18
<i>JPMorgan Chase Bank</i>	<i>Colombus OH</i>	<i>no</i>				<i>OCC</i>	<i><new to MA in 2019></i>		
<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	OUT	Oct-19	05/28/19
Lee Bank	Lee	yes	SAT	Nov-19	07/29/19	FDIC	SAT	Aug-17	03/13/17
<i>Lowell Five Cent SB</i>	<i>Lowell</i>	<i>yes</i>	<i>HS</i>	<i>Sep-18</i>	<i>05/14/18</i>	<i>FDIC</i>	<i>SAT</i>	<i>Oct-18</i>	<i>05/14/18</i>
Main Street Bank*	Marlborough	yes	SAT	Aug-19	05/06/19	FDIC	SAT	Sep-19	05/06/19
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				OCC	SAT	Oct-18	07/09/18
Middlesex SB	Natick	yes	OUT	May-17	01/05/17	FDIC	OUT	Jun-17	01/05/17
<i>Milford Federal Bank</i>	<i>Milford</i>	<i>no</i>				<i>OCC</i>	<i>SAT</i>	<i>Oct-19</i>	<i>06/10/19</i>
Millbury NB	Millbury	no				OCC	SAT	Jul-19	04/01/19
Monson SB	Monson	yes	SAT	Jun-19	03/04/19	FDIC	SAT	Jul-19	03/04/19
MountainOne Bank	North Adams	yes	SAT	Feb-18	09/11/17	FDIC	SAT	Mar-18	09/11/17
MutualOne Bank	Framingham	yes	HS	Nov-18	08/06/18	FDIC	SAT	Dec-18	08/06/18
National Grand Bank	Marblehead	no				OCC	SAT	May-18	03/12/18
<i>NBT Bank</i>	<i>Norwich NY</i>	<i>no</i>				<i>OCC</i>	<i>SAT</i>	<i>Jan-18</i>	<i>09/05/17</i>
Needham Bank	Needham	yes	SAT	Mar-18	05/15/17	Fed	SAT	Apr-18	05/15/17

TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2019 (page 3 of 4)

Bank	City/Town	Mass Reg?	Mass Rating	Mass List	Mass ExamDate	Fed Reg	Fed Rating	Fed List	Fed ExamDate
New Valley B&T	Springfield	yes	<new in May 2019>			FDIC	<new in May 2019>		
Newburyport Five Cents SB	Newburyport	yes	SAT	Feb-19	10/09/18	FDIC	SAT	Mar-19	10/09/18
North Brookfield SB	No.Brookfield	yes	SAT	Dec-18	09/17/18	Fed	SAT	Jan-19	09/17/18
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	Oct-19	07/22/19	FDIC	SAT	Dec-19	07/22/19
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				Fed	OUT	May-19	10/15/18
Northmark Bank	N. Andover	yes	NI	Jan-19	08/06/18	FDIC	NI	Feb-19	08/06/18
Norwood Coop Bank	Norwood	yes	SAT	Dec-19	09/23/19	FDIC	SAT	Jun-17	01/23/17
OneUnited Bank #	Boston	yes	NI	Mar-17	10/18/16	FDIC	NI	Apr-17	10/18/16
Patriot Community Bank	Woburn	yes	SAT	Sep-19	06/03/19	Fed	SAT	Sep-19	06/03/19
Pentucket Bank	Haverhill	yes	SAT	Apr-19	01/14/19	FDIC	SAT	May-19	01/14/19
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
Pittsfield Coop Bank	Pittsfield	yes	SAT	Jul-17	03/13/17	FDIC	SAT	Aug-17	03/13/17
Provident Bank, The	Amesbury	yes	SAT	Nov-19	07/22/19	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	Nov-19	08/19/19	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-19	08/12/19	Fed	OUT	Dec-19	08/12/19
StonehamBank	Stoneham	yes	SAT	Apr-19	01/07/19	FDIC	SAT	May-19	01/07/19
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	Apr-19	04/02/18
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
United Bank	Rockville CT	no				FDIC	SAT	Mar-19	10/30/18
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	HS	Sep-19	01/14/19	Fed	SAT	Sep-19	01/14/19

TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2019 (page 4 of 4)

Bank	City/Town	Mass Reg?	Mass Rating	Mass List	Mass ExamDate	Fed Reg	Fed Rating	Fed List	Fed ExamDate
<i>Webster Bank #</i>	<i>Waterbury CT</i>	<i>no</i>				<i>OCC</i>	<i>SAT</i>	<i>May-18</i>	<i>08/07/17</i>
Webster Five Cents SB	Webster	yes	HS	Jul-19	03/11/19	FDIC	SAT	Aug-19	03/11/19
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	May-18	01/08/18	FDIC	SAT	Jun-18	01/08/18
Winter Hill Bank	Somerville	no				OCC	OUT	Dec-19	07/29/19
Wrentham Coop Bank	Wrentham	yes	SAT	Mar-19	01/14/19	FDIC	SAT	Apr-19	01/04/19

Italic type indicates the 44 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 seven banks with potentially confusing recent names, including from name changes within the last four years:

Abington Bank, was until May 2019, Pilgrim Bank; Pilgrim acquired Abington Bank, then adopted its name

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

Coastal Heritage Bank was, until April 2019, Equitable Bank; Equitable acquired Coastal, then adopted its name

Cornerstone Bank was, until June 2017, Spencer Savings Bank

Envision Bank was, until March 2018, Randolph Savings Bank

Ethic was, until October 2019, Admirals Bank

Main Street Bank was, until April 2017, Marlborough SB

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

Farmington Bank - OUT; Northeast Community - OUT; OneUnited - SAT; and Webster Bank - OUT.

+ The current Coastal Heritage Bank (CHB) is a complicated story. On April 1, 2019, Equitable Bank acquired CHB in a merger, but adopted the CHB name. The Mass DoB's 2019 exam/rating of "CHB" was of the bank that was merged out of existence. Its most recent reported exam of the surviving bank, Equitable, is as listed above. The Fed's 2019 exam, listed above, took place when the bank was still named Equitable Bank.

TABLE A-2
BANKS WITH BRANCHES BOTH INSIDE AND OUTSIDE OF MASSACHUSETTS
(Data as of June 30, 2019)

Bank Name	Fed Reg	Headquarters	Branches			Deposits (\$ millions)		
			Mass.	Other	Mass. %	Mass.	Other	Mass. %
A. Banks with Massachusetts Headquarters								
BankFive^	Fed	Fall River	12	1	92.3%	860	23	97.4%
BayCoast Bank	FDIC	Fall River	18	3	85.7%	1,355	78	94.6%
Berkshire Bank	FDIC	Pittsfield	53	81	39.6%	6,096	4,546	57.3%
Boston Private B&T	Fed	Boston	11	12	47.8%	4,376	2,110	67.5%
Bristol County SB	FDIC	Taunton	17	1	94.4%	1,708	107	94.1%
Cambridge Trust Co	FDIC	Cambridge	10	7	58.8%	1,930	404	82.7%
Eastern Bank	FDIC	Boston	85	6	93.4%	9,145	323	96.6%
Enterprise B&T	FDIC	Lowell	17	7	70.8%	2,264	566	80.0%
Ethic	OCC	Boston	1	1	50.0%	108	63	63.2%
HarborOne Bank	FDIC	Brockton	17	11	60.7%	2,517	464	84.4%
Haverhill Bank	FDIC	Haverhill	8	1	88.9%	320	17	95.0%
Hometown Bank	Fed	Oxford	8	5	61.5%	449	226	66.5%
Lowell Five Cents SB	FDIC	Lowell	15	1	93.8%	957	39	96.1%
Milford Federal Bank	OCC	Milford	3	1	75.0%	295	35	89.4%
Newburyport Five Cents SB	FDIC	Newburyport	7	5	58.3%	679	99	87.3%
North Shore Bank	FDIC	Peabody	11	1	91.7%	703	31	95.8%
OneUnited Bank	FDIC	Boston	3	3	50.0%	26	358	6.8%
Pentucket Bank	FDIC	Haverhill	4	2	66.7%	499	167	74.9%
PeoplesBank	FDIC	Holyoke	20	4	83.3%	1,775	234	88.4%
Provident Bank	FDIC	Amesbury	3	4	42.9%	422	386	52.2%
Salem Five Cents SB	FDIC	Salem	35	1	97.2%	3,864	7	99.8%
Westfield Bank	OCC	Westfield	22	2	91.7%	1,570	80	95.2%
Total, 21 Banks			380	160	70.4%	41,918	10,362	80.2%
B. Banks with Non-Massachusetts Headquarters								
Bank of America, NA	OCC	Charlotte NC	206	4,129	4.8%	78,829	1,274,858	5.8%
Bank of New England	FDIC	Salem NH	3	6	33.3%	132	676	16.3%
Beal Bank, USA	FDIC	Las Vegas NV	1	22	4.3%	8.0	2,599	0.3%
Capital One, NA*	OCC	McLean VA	0	488	0.0%	0	249,355	0.0%
Cathay Bank	FDIC	Los Angeles CA	1	61	1.6%	99	13,958	0.7%
Citizens Bank NA	OCC	Providence RI	248	857	22.4%	42,363	82,883	33.8%
Community Bank	OCC	Canton NY	1	223	0.4%	32	8,672	0.4%
East West Bank	Fed	Pasadena CA	2	109	1.8%	425	33,765	1.2%
Farmington Bank	FDIC	Farmington CT	2	26	7.1%	131	2,340	5.3%
First Republic Bank	FDIC	San Francisco CA	5	76	6.2%	9,062	74,369	10.9%
JPMorgan Chase Bank, NA	OCC	Columbus OH	6	5,018	0.1%	179	1,311,040	0.0%
KeyBank, NA	OCC	Cleveland OH	6	1,117	0.5%	684	113,231	0.6%
NBT Bank, NA	OCC	Norwich NY	6	145	4.0%	115	7,528	1.5%
Northeast Community Bank	FDIC	White Plains NY	3	7	30.0%	163	620	20.8%
Northern Trust Co	Fed	Chicago IL	1	55	1.8%	158	34,392	0.5%
People's United Bank	OCC	Bridgeport CT	56	358	13.5%	6,459	33,374	16.2%
Salem Coop Bank	FDIC	Salem NH	1	1	50.0%	58	267	17.8%
Salisbury B&T	FDIC	Lakeville CT	3	11	21.4%	79	874	8.3%
Santander Bank	OCC	Wilmington DE	203	410	33.1%	18,990	39,149	32.7%
TD Bank, NA	OCC	Wilmington DE	143	1,101	11.5%	15,364	243,209	5.9%
TrustCo Bank	OCC	Glenville NY	4	144	2.7%	40	4,422	0.9%
United Bank	FDIC	Rockville CT	21	37	36.2%	1,469	4,301	25.5%
Webster Bank, NA	OCC	Waterbury CT	29	128	18.5%	2,167	20,635	9.5%
Total, 23 Banks			951	14,529	6.1%	177,006	3,556,517	4.7%

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

The four 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

* Capital 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 2019*

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
Brookline Municipal CU	Brookline	SAT	12/18/17
Brotherhood CU	Lynn	SAT	01/11/16
Cabot Boston CU	Boston	SAT	08/03/15
City of Boston CU	Boston	SAT	12/18/17
Comm. Utils Empl's CU	Marion	SAT	02/13/17
Community CU of Lynn	Lynn	SAT	12/04/17
Credit U of the Berkshires	Pittsfield	SAT	06/10/19
Energy CU	Waltham	SAT	04/06/15
<i>Fall River Muni CU</i>	<i>Fall River</i>	<i>HS</i>	<i>04/01/19</i>
First Priority CU	Boston	SAT	05/31/16
Freedom CU	Springfield	SAT	08/26/19
Gloucester Fire Dept CU	Gloucester	SAT	09/16/19
Gloucester Muni CU	Gloucester	SAT	09/09/19
Greater Springfield CU	Springfield	SAT	11/12/13
Harvard U Empls CU	Cambridge	SAT	08/14/17
Haverhill Fire Dept CU	Haverhill	SAT	02/19/19
<i>Holyoke CU</i>	<i>Holyoke</i>	<i>HS</i>	<i>07/07/14</i>
Holyoke Postal CU	Holyoke	SAT	09/23/19
Homefield CU	Grafton	SAT	05/28/19
HTM CU	Haverhill	SAT	02/24/14
Jeanne D'Arc CU	Lowell	OUT	11/13/18
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	08/11/14
Luso-American CU	Peabody	SAT	07/09/18
Lynn Muni Empls CU	Lynn	SAT	03/12/15
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	05/06/19
Merrimack Valley CU	Lawrence	<see note>	
<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	08/14/14
Polish National CU	Chicopee	SAT	04/01/19
Quincy CU	Quincy	SAT	12/29/14
Revere Firefighters CU	Revere	SAT	12/17/18
River Works CU	Lynn	SAT	07/21/14
Sharon & Crescent United CU	Sharon	SAT	12/03/18
Southbridge CU	Southbridge	SAT	11/16/15
<i>Southern Mass CU</i>	<i>Fairhaven</i>	<i>HS</i>	<i>09/23/19</i>
Springfield St RR Empls CU	Springfield	SAT	02/17/16
<i>St. Anne's CU</i>	<i>Fall River</i>	<i>HS</i>	<i>10/22/18</i>
St. Jean's CU	Lynn	SAT	02/19/19
St. Mary's CU	Marlborough	SAT	05/11/15
St. Vincent Hosp CU	Worcester	SAT	01/08/18
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 61 state-chartered credit unions with ratings, 52 have a current rating of SATisfactory. The two CUs with **OUTstanding ratings** 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 converted from a federal to a state charter in late 2018, and has not yet received a CRA exam or rating.

*Two CUs that merged out of existence on the first day of 2020 are excluded from this table: Pressers Union CU and Crescent 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, 2019 (page 1 of 2)

Lender	Headquarters	Rating	List Date	Exam Date	2016 Rank 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*	Tustin CA	SAT	Oct-19	5.24/19	60
Commonwealth Mortgage, LLC	Woburn MA	SAT	Nov-13	04/17/13	32
Crescent Mortgage*	Atlanta GA	SAT	Mar-17	10/20/16	66
Ditech Financial	Ft. Washington PA	SAT	Oct-18	04/02/18	11
Drew Mortgage*	Shrewsbury MA	SAT	Oct-19	04/08/19	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
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	Jan-19	11/16/18	13
Homestead Funding*	Albany NY	SAT	Jan-18	05/24/17	67
JG Wentworth/Weststar Mortgage^^*	Woodbridge VA	SAT	Oct-19	07/31/19	68
Lakeview Loan Servicing	Coral Gables FL	SAT	May-19	12/26/18	36
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
Mortgage Network*	Danvers MA	SAT	Apr-18	12/15/17	6
Mort Rsrch Ctr(Vets United Hme Lns)*	Columbia MO	SAT	Jul-19	03/18/19	33

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, 2019 (page 2 of 2)

Lender	Headquarters	Rating	List Date	Exam Date	2017 Rank Among LMLs [^]
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 Commercial. Group/Mort	Avon CT	SAT	none [2017]	06/08/16	45
Ocwen Loan Servicing	W. Palm Beach FL	SAT	May-19	11/07/18	21
PennyMac Loan Services	Westlake Village CA	SAT	Oct-19	04/18/19	44
PHH Mortgage	Mount Laurel NJ	SAT	Mar-19	10/15/18	62
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
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	SAT	Oct-19	05/15/19	24
William Raveis Mortgage*	Shelton CT	SAT	Feb-18	10/25/17	46
Zillow Home Loans/Mort Lndrs of Amer ^{^^}	Overland Park KS	SAT	Sep-14	07/09/13	89

Currently licensed means licensed as of December 31, 2019. In addition to lenders in the table, many others that are not currently licensed have received ratings, including: Advanced, American Equity, American Interbank, Clearpoint, Continental, First Residential, Franklin American, Franklin First, Greenpark, iFreedom Direct, Leader, Merrimack, MetroBoston, Mortgage Financial, Mortgage Master, Mortgage Partners, Omega, Pacific Union, PHH/NEMoves, Prospect, Reliant, Roundpoint, Schaefer, SunTrust, Superior, and Union Capital.
For the licensing status of any mortgage lender, see: 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 **Below 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.