

PUBLIC DISCLOSURE

JANUARY 23, 2020

**MORTGAGE LENDER COMMUNITY INVESTMENT
PERFORMANCE EVALUATION**

**MSA MORTGAGE, LLC
MC1984**

**354 MAIN STREET
WINTHROP, MA 02152**

**DIVISION OF BANKS
1000 WASHINGTON STREET
BOSTON, MA 02118**

<p>NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this mortgage lender. The rating assigned to this mortgage lender does not represent an analysis, conclusion or opinion of the Division of Banks concerning the safety and soundness of this mortgage lender.</p>
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GENERAL INFORMATION

This document is an evaluation of the Mortgage Lender Community Investment (CRA) performance of **MSA Mortgage, LLC (Lender or MSA)** pursuant to Massachusetts General Laws chapter 255E, section 8 and the Division of Banks' (Division) regulation 209 CMR 54.00, prepared by the Division, the Lender's supervisory agency, as of **January 23, 2020**.

SCOPE OF EXAMINATION

An evaluation was conducted using examination procedures, as defined by CRA guidelines. A review of the Division's records, as well as the Lender's public CRA file, did not reveal any complaints.

The CRA examination included a comprehensive review and analysis, as applicable, of MSA's:

- (a) origination of loans and other efforts to assist low and moderate income residents, without distinction, to be able to acquire or to remain in affordable housing at rates and terms that are reasonable considering the mortgage lender's history with similarly situated borrowers, the availability of mortgage loan products suitable for such borrowers, and consistency with safe and sound business practices;
- (b) origination of loans that show an undue concentration and a systematic pattern of lending resulting in the loss of affordable housing units;
- (c) efforts working with delinquent residential mortgage customers to facilitate a resolution of the delinquency; and
- (d) other efforts, including public notice of the scheduling of examinations and the right of interested parties to submit written comments relative to any such examination to the Commissioner of Banks (Commissioner), as, in the judgment of the Commissioner, reasonably bear upon the extent to which a mortgage lender is complying with the requirements of fair lending laws and helping to meet the mortgage loan credit needs of communities in the Commonwealth of Massachusetts (Commonwealth or Massachusetts).

CRA examination procedures were used to evaluate MSA's community investment performance. These procedures utilize two performance tests: the Lending Test and the Service Test. This evaluation considered MSA's lending and community development activities for the period of January 1, 2017 through December 31, 2018. The data and applicable timeframes for the Lending Test and the Service Test are discussed below.

The Lending Test evaluates the mortgage lender's community investment performance pursuant to the following six criteria: geographic distribution of loans, lending to borrowers of different incomes, innovative and flexible lending practices, loss mitigation efforts, fair lending, and loss of affordable housing.

Home mortgage lending data for 2017 and 2018 is presented in the geographic distribution, lending to borrowers of different incomes and the minority application flow tables. Comparative analysis of the Lender's lending performance for the year of 2017 is provided. The aggregate lending data is used for comparison purposes within the evaluation and is a measure of loan demand. It includes

lending information from all Home Mortgage Disclosure Act (HMDA) reporting mortgage lenders that originated loans in the Commonwealth.

In addition to gathering and evaluating statistical information relative to a mortgage lender's loan volume, the CRA examination also reflects an in-depth review of the entity's mortgage lending using qualitative analysis. This analysis includes, but is not limited to: an assessment of the suitability and sustainability of the mortgage lender's loan products by reviewing the lender's internally maintained records of delinquencies and defaults as well as information publicly available through the Federal Reserve Banks and through local Registries of Deeds and through other sources available to the examination team. The examination included inspection of individual loan files for review of compliance with consumer protection provisions and scrutiny of these files for the occurrence of disparate treatment based on a prohibited basis.

The Service Test evaluates the mortgage lender's record of helping to meet the mortgage credit needs by analyzing the availability and effectiveness of a mortgage lender's systems for delivering mortgage loan products, the extent and innovativeness of its community development services, and, if applicable, loss mitigation services to modify loans and/or efforts to keep delinquent home borrowers in their homes.

MORTGAGE LENDER'S CRA RATING:

This mortgage lender is rated “Satisfactory”.

Lending Test: “Satisfactory”

- The geographic distribution of the Lender’s loans reflects satisfactory dispersion in low- and moderate-income level census tracts.
- Given the demographics of Massachusetts, the loan distribution to borrowers reflects an adequate record of serving the credit needs among individuals of different income levels.
- MSA offers a variety of flexible lending products, which are provided in a safe and sound manner to address the credit needs of low- and moderate-income level individuals.
- Lending practices and products do not show a systematic pattern of lending resulting in mortgage loans that are not sustainable, nor do these practices or products show an undue concentration of early payment defaults, resulting in consequent loss of affordable housing units.
- Fair lending procedures and practices are considered adequate.

Service Test: “Needs to Improve”

- The Lender provides a modest level of community development services, and its service delivery systems are accessible to geographies and individuals of different income levels in the Commonwealth.

PERFORMANCE CONTEXT

Description of Mortgage Lender

MSA was established in Massachusetts in 2001, and was granted a mortgage lender license by the Division on December 3, 2001. MSA is a retail lender engaging primarily in the origination and sale of residential mortgage loans. As of the date of examination, the Lender was licensed or authorized to conduct business in 10 states, with a predominant focus in the New England region. The Lender is solely owned by President Robert L. Deeb. In addition to its main office in Winthrop, MSA maintains branch offices in the Commonwealth in Salem and Revere.

All underwriting and major functions in the loan process are done at MSA's main office. Approved loans are funded through established warehouse lines of credit and closed loans are sold to secondary market investors with servicing rights released. MSA's business development relies primarily on repeat customers and professional referrals; however, local and social media advertising is also utilized.

Demographic Information

The Division's regulation requires mortgage lenders to be evaluated on their performance within the Commonwealth. Demographic data is provided below to offer contextual overviews of the economic climate along with housing and population characteristics for Massachusetts.

MASSACHUSETTS DEMOGRAPHIC INFORMATION						
Demographic Characteristics	Amount	Low %	Moderate %	Middle %	Upper %	N/A %
Geographies (Census Tracts)	1,478	12.2	19.1	37.5	29.2	2.0
Population by Geography	6,705,586	10.1	18.6	38.9	31.9	0.5
Owner-Occupied Housing by Geography	1,583,667	3.4	13.8	44.4	38.3	0.1
Family Distribution by Income Level	1,620,917	23.3	16.4	19.4	40.9	0.0
Distribution of Low and Moderate Income Families	643,491	17.8	25.8	37.6	18.7	0.1
Median Family Income		\$93,145	Median Housing Value		\$358,764	
Households Below Poverty Level		12.0%	Unemployment Rate		2.8%*	
2017 HUD Adjusted Median Family Income		\$91,119	2018 HUD Adjusted Median Family Income		\$95,779	

Source: 2015 ACS

*as of 10/30/2019

Based on the 2015 American Community Survey (ACS), the Commonwealth's population was above 6.7 million people with a total of 2.8 million housing units. Of the total housing units, almost 1.6 million or 56.4 percent are owner-occupied, 966,054 or 34.5 percent are rental-occupied, and 9.1 percent are vacant units.

According to the 2015 ACS data, there are 2.5 million households in the Commonwealth with a median household income of \$74,527. Over 41 percent of households are classified as low- and

moderate-income. Twelve percent of the total number of households are living below the poverty level. Individuals in these categories may find it challenging to qualify for traditional mortgage loan products.

Households classified as “families” totaled slightly over 1.62 million. Of all family households, 23.3 percent were low-income, 16.4 percent were moderate-income, 19.4 percent were middle-income, and 40.9 percent were upper-income. The median family income according to the 2015 ACS data stood at \$93,145. The Department of Housing and Urban Development (HUD) adjusted median family income was \$91,119 in 2017 and \$95,779 in 2018. The adjusted median family income is updated yearly and takes into account inflation and other economic factors.

The Commonwealth contains 1,478 Census tracts. Of these, 181 or 12.2 percent are low-income; 282 or 19.1 percent are moderate-income; 555 or 37.5 percent are middle-income; 431 or 29.2 percent are upper-income; and 29 or 2.0 percent are NA or have no income designation. The tracts with no income designation are located in areas that contain no housing units and will not be included in this evaluation since they provide no lending opportunities. These areas are made up of correctional facilities, universities, military installations, and uninhabited locations such as the Boston Harbor Islands.

Low-income is defined as individual income that is less than 50 percent of the area median income. Moderate-income is defined as individual income that is at least 50 percent and less than 80 percent of the area median income. Middle-income is defined as individual income that is at least 80 percent and less than 120 percent of the area median income. Upper-income is defined as individual income that is more than 120 percent of the area median income.

The median housing value for Massachusetts was \$358,764 according to the 2015 ACS. The unemployment rate for Massachusetts stood at 2.8 percent as of September 2019, a decrease from June 2019 when the unemployment rate was at 3.0 percent. Employment rates would tend to affect a borrower’s ability to remain current on mortgage loan obligations and also correlate with delinquency and default rates.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The Lending Test evaluates a mortgage lender’s record of helping to meet the mortgage credit needs of the Commonwealth through its lending activities. MSA’s lending efforts are rated under the six performance criteria: geographic distribution, borrower characteristics, innovative or flexible lending practices, loss mitigation efforts, fair lending policies and procedures, and loss of affordable housing. The following information details the data compiled and reviewed, as well as conclusions on the mortgage lending of MSA.

MSA’s Lending Test performance was determined to be “Satisfactory”.

I. Geographic Distribution

The geographic distribution of loans was reviewed to assess how well MSA is addressing the credit needs throughout Massachusetts. The following table presents, by number, MSA’s 2017 and 2018 HMDA reportable loans in low-, moderate-, middle-, and upper-income level geographies, in comparison to the percentage of owner-occupied housing units in each of the census tract income level categories, and the 2017 aggregate lending data (inclusive of MSA).

Distribution of HMDA Loans by Income Level Category of the Census Tract						
Census Tract Income Level	Total Owner-Occupied Housing Units	2017 MSA		2017 Aggregate Lending Data	2018 MSA	
		#	%	% of #	#	%
Low	3.4	66	11.00	4.84	49	5.72
Moderate	13.8	226	37.67	15.86	226	26.37
Middle	44.4	226	37.67	43.50	324	37.81
Upper	38.3	82	13.66	35.65	258	30.10
N/A	0.1	0	0.00	0.15	0	0.00
Total	100.0	600	100.00	100.00	857	100.00

Source: 2017 & 2018 HMDA LAR Data and 2015 ACS.

As reflected in the above table, of the total loans originated in 2017 and 2018, 48.67 and 32.09 percent respectively, were in the low- and moderate-income level census tracts. These percentages were above the percentage of the area’s owner-occupied housing units in low- and moderate-income level census tracts, as well as the aggregate percentages.

Considering that over 80 percent of the area’s owner-occupied housing units are in middle- and upper-income level census tracts, MSA’s overall geographic distribution of residential mortgage loans reflects a satisfactory dispersion throughout low- and moderate-income level geographies within the Commonwealth.

II. Borrower Characteristics

The distribution of loans by borrower income levels was reviewed to determine the extent to which the Lender is addressing the credit needs of the Commonwealth's residents. The following table shows MSA's 2017 and 2018 HMDA-reportable loans to low-, moderate-, middle-, and upper-income borrowers in comparison to the percentage of total families within the Commonwealth in each respective income group, and the 2017 aggregate lending data (inclusive of MSA).

Distribution of HMDA Loans by Borrower Income						
Median Family Income Level	% of Families	2017 MSA		2017 Aggregate Lending Data	2018 MSA	
		#	%	% of #	#	%
Low	23.3	36	6.00	5.24	32	3.73
Moderate	16.4	167	27.83	17.63	179	20.89
Middle	19.4	216	36.00	23.35	278	32.44
Upper	40.9	176	29.33	40.75	368	42.94
N/A	0.0	5	0.84	13.03	0	0.00
Total	100.0	600	100.00	100.00	857	100.00

Source: 2017 & 2018 HMDA LAR Data and 2015 ACS.

As shown in the above table, lending to low-income borrowers in 2017 and 2018 was generally comparable to the aggregate peer data. MSA's lending to moderate-income borrowers during that same period was above the aggregate data and demographics.

Although the percentage of lending to low-income borrowers decreased from 2017 to 2018, the Lender's overall lending performance to low- and moderate-income borrowers remains adequate.

III. Innovative or Flexible Lending Practices

MSA offers a variety of flexible lending products, which are provided in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

MSA is a HUD-approved Direct Endorsement Lender for Federal Housing Administration (FHA) loans. Although they contain imbedded insurance premiums, FHA products provide generally competitive interest rates and smaller down payments for low- and moderate-income first time homebuyers and existing homeowners. During the review period, MSA originated 223 FHA loans totaling approximately \$99 million. Of these, 76 loans benefited low- to moderate-income borrowers, while 160 loans were originated in low- and moderate-income level geographies.

The Lender is a Department of Veterans Affairs (VA) Non-Delegated Correspondent. The VA Home Loan Guarantee Program is designed specifically for the unique challenges facing service members and their families. Through VA-approved lenders like MSA, the program offers low closing costs, no down payment requirement, and no private mortgage insurance requirement. In addition, under certain circumstances the Service Members Civil Relief Act provides military

personnel with rights and protections on issues relative to mortgage interest rates and foreclosure proceedings. During the review period, MSA originated seven VA loans totaling over \$2 million. Of these, four loans benefited moderate-income borrowers and one loan was originated in a moderate-income level geography.

MSA also offers Massachusetts Housing Finance Agency (MassHousing) products. MassHousing is a self-supporting non-profit public agency that provides financing for homebuyers, homeowners, and developers and owners of affordable rental housing. The agency sells bonds to fund its credit programs. In 2017 and 2018, MSA originated 34 MassHousing loans for a total of more than \$8 million in volume.

In addition, MSA offers a variety of additional loan programs, including the FNMA HomeReady and FHLMC Home Possible product offerings. These programs are designed to extend to consumers certain benefits and flexible credit options in order to help them meet their home buying, refinance, or renovation needs, and allow mortgage lenders to confidently serve a market of creditworthy low- to moderate-income borrowers. During the review period, MSA closed 97 Massachusetts loans under these flexible lending programs totaling more than \$32 million in volume.

IV. Loss Mitigation Efforts

The Division reviews a mortgage lender's efforts to work with delinquent home mortgage loan borrowers to facilitate a resolution of the delinquency, including the number of loan modifications, the timeliness of such modifications, and the extent to which such modifications are effective in preventing subsequent defaults or foreclosures.

As MSA does not routinely service mortgage loans, it would not work directly with delinquent borrowers. Therefore, this review does not include an evaluation of loan mitigation and modification efforts as the Lender would not be accountable for such action. The review of investor score cards revealed minimal default rates.

For the review period, lending practices and products do not show an undue concentration or a systematic pattern of lending resulting in mortgage loans that were not sustainable.

V. Fair Lending

The Division examines a mortgage lender's fair lending policies and procedures pursuant to Regulatory Bulletin 1.3-106. The Lender's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. The review included, but was not limited to, review of written policies and procedures, interviews with MSA's personnel, and individual file review.

MSA has established an adequate record relative to fair lending procedures and practices. No evidence of discriminatory or illegal credit practices was identified.

Minority Application Flow

Examiners reviewed the Lender’s HMDA data to determine whether the mortgage application flow from various racial and ethnic groups was consistent with the area demographics.

During 2017 and 2018, MSA received 1,786 HMDA-reportable mortgage loan applications from within Massachusetts. For these applications, racial identity was not identified in 15.2 percent of applicants and ethnic identity was not specified in 15.8 percent of cases. Of the remaining applications, 172 or 9.63 percent were received from racial minority applicants, and 137 or 79.65 percent resulted in originations. For the review period, MSA received 538 or 30.12 percent of HMDA reportable applications from ethnic groups of Hispanic or Latino origin, and 427 or 79.37 percent were originated. This compares to an 81.58 percent overall ratio of mortgage loans originated by the Lender in Massachusetts, and the 72.3 percent approval ratio for the aggregate group.

Demographic information for Massachusetts reveals the total racial and ethnic minority population stood at 25.7 percent of the total population as of the 2015 ACS. At 15.2 percent, racial minorities consisted of 6.5 percent Black; 6.0 percent Asian/Pacific Islander; 0.1 percent American Indian/Alaskan Native; and 2.6 percent self-identified as Other Race. Ethnic minorities consisted of 10.5 percent Hispanic or Latino.

Refer to the following table for information on the Lender’s minority loan application flow as well as a comparison to aggregate lending data throughout the Commonwealth. The comparison of this data assists in deriving reasonable expectations for the rate of applications the Lender received from minority applicants.

MINORITY APPLICATION FLOW					
RACE	2017 MSA		2017 Aggregate Data	2018 MSA	
	#	%	% of #	#	%
American Indian/ Alaska Native	0	0.00	0.25	0	0.00
Asian	79	10.42	5.46	47	4.57
Black/ African American	8	1.06	4.14	15	1.46
Hawaiian/Pacific Islander	0	0.00	0.15	0	0.00
2 or more Minority	0	0.00	0.08	1	0.10
Joint Race (White/Minority)	7	0.92	1.44	15	1.46
Total Minority	94	12.40	11.52	78	7.59
White	565	74.54	66.95	777	75.58
Race Not Available	99	13.06	21.53	173	16.83
Total	758	100.00	100.00	1,028	100.00
ETHNICITY					
Hispanic or Latino	256	33.77	5.28	266	25.88
Joint (Hisp-Lat /Not Hisp-Lat)	6	0.79	1.13	10	0.97
Total Hispanic or Latino	262	34.56	6.41	276	26.85
Not Hispanic or Latino	398	52.51	72.38	568	55.25
Ethnicity Not Available	98	12.93	21.21	184	17.90
Total	758	100.00	100.00	1,028	100.00

Source: 2017 & 2018 HMDA LAR Data and 2015 ACS.

In 2017 and 2018, MSA's overall racial minority application flow was in-line with the ACS demographic data and the aggregate lending data. The ethnic minority flow reflected similar levels of performance.

VI. Loss of Affordable Housing

This review concentrated on the suitability and sustainability of mortgage loans originated by MSA by taking into account delinquency and default rates of the Lender and those of the overall marketplace. Pertinent information provided by the Lender was reviewed, as were statistics available on delinquency and default rates for mortgage loans. Additionally, individual mortgage loans could be tracked for their status through local Registries of Deeds and other available sources including public records of foreclosure filings.

An extensive review of information and documentation, from both internal and external sources as partially described above, did not reveal lending practices or products that showed an undue concentration or a systematic pattern of lending, including a pattern of early payment defaults, resulting in the loss of affordable housing units. Overall delinquency rates were found to be at or below industry averages.

SERVICE TEST

The Service Test evaluates a mortgage lender's record of helping to meet the mortgage credit needs in the Commonwealth by analyzing both the availability and effectiveness of a mortgage lender's systems for delivering mortgage loan products; the extent and innovativeness of its community development services; and loss mitigation services to modify loans or otherwise keep delinquent home loan borrowers in their homes. Community development services must benefit the Commonwealth or a broader regional area that includes the Commonwealth.

MSA's Service Test performance was determined to be "**Needs to Improve**" at this time.

Community Development Services

A community development service is a service that:

- (a) has as its primary purpose community development; and
- (b) is related to the provision of financial services, including technical services

The Commissioner evaluates community development services pursuant to the following criteria:

- (a) the extent to which the mortgage lender provides community development services; and
- (b) the innovativeness and responsiveness of community development services.

During the examination period, MSA provided assistance to numerous local organizations benefiting Massachusetts residents; however, these activities did not meet the definition of community development service as defined by the Division's regulation 209 CMR 54.12.

Management is strongly encouraged to expand its commitment to community outreach activities that meet the definition of community development under the aforementioned regulation. Examples may include, but are not necessarily limited to: financial literacy education initiatives, homeownership promotion targeted to low- and moderate-income individuals, foreclosure prevention counseling throughout the Commonwealth, and/or technical assistance to community organizations in a leadership capacity.

Qualified Investments

For the purposes of this CRA evaluation, a Qualified Investment is a lawful investment, deposit, membership share, or grant, the primary purpose of which is community development. The evaluation considered (1) the number of investments and grants, (2) the extent to which community development opportunities have been made available to the institution, and (3) the responsiveness of the institution's community development grants to the assessment area's needs.

During the examination period, MSA provided donations to numerous local organizations, which included the National Association of Hispanic Real Estate Professionals, HomeStart Inc., and the Massachusetts Affordable Housing Alliance. These organizations provide diverse types of assistance to individuals and under-served communities in general.

Mortgage Lending Services

The Commissioner evaluates the availability and effectiveness of a mortgage lender's systems for delivering mortgage lending services to low- and moderate-income geographies and individuals.

MSA provides a satisfactory delivery of mortgage lender services that are accessible to geographies and individuals of different income levels in the Commonwealth. Business development relies primarily on repeat customers and professional referrals.

As described above, lending practices and products do not show an undue concentration or a systematic pattern of lending resulting in mortgage loans that were not sustainable.

PERFORMANCE EVALUATION DISCLOSURE GUIDE

Massachusetts General Laws Chapter 255E, Section 8, and 209 CMR 54.00, the CRA regulation, require all mortgage lenders to take the following actions within 30 business days of receipt of the CRA evaluation:

- 1) Make its most current CRA performance evaluation available to the public.
- 2) Provide a copy of its current evaluation to the public, upon request. In connection with this, the mortgage lender is authorized to charge a fee which does not exceed the cost of reproduction and mailing (if applicable).

The format and content of the mortgage lender's evaluation, as prepared by the Division of Banks, may not be altered or abridged in any manner. The mortgage lender is encouraged to include its response to the evaluation in its CRA public file.

The Division of Banks will publish the mortgage lender's Public Disclosure on its website no sooner than 30 days after the issuance of the Public Disclosure.