

**PUBLIC DISCLOSURE**

**SEPTEMBER 8, 2025**

**MORTGAGE LENDER COMMUNITY INVESTMENT  
PERFORMANCE EVALUATION**

**MUTUAL OF OMAHA MORTGAGE, INC. dba KELLER HOME LOANS  
dba MUTUAL OF OMAHA REVERSE MORTGAGE  
MC1025894**

**3131 CAMINO DEL RIO NORTH, SUITE 1100  
SAN DIEGO, CA 92108**

**DIVISION OF BANKS  
ONE FEDERAL STREET, SUITE 710  
BOSTON, MA 02110**

**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.

## GENERAL INFORMATION

This document is an evaluation of the Mortgage Lender Community Investment (CRA) performance of **Mutual of Omaha Mortgage, Inc. dba Keller Home Loans dba Mutual of Omaha Reverse Mortgage (Lender or Mutual of Omaha)** 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 **September 8, 2025**.

## 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 related to CRA.

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

- (a) origination of loans and other efforts to assist low- and moderate-income (LMI) 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 Mutual of Omaha's community investment performance. These procedures utilize two performance tests: the Lending Test and the Service Test. This evaluation considered Mutual of Omaha's lending and community development activities for the period of January 1, 2023, through December 31, 2024. 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 for 2023 and 2024 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 both years 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 who 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 of the Commonwealth 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 adequate dispersion in LMI census tracts.
- Given the demographics of Massachusetts, the loan distribution to borrowers reflects a good record of serving the credit needs among individuals of different income levels.
- Mutual of Omaha makes use of flexible lending products, which are provided in a safe and sound manner to address the credit needs of LMI individuals.
- Lending practices and products did not show an undue concentration or a systematic pattern of lending resulting in mortgage loans that were not sustainable.
- Fair lending policies and practices are considered adequate.

### **Service Test: "Satisfactory"**

- The Lender provides an adequate level of community development services within the Commonwealth during the evaluation period.
- Service delivery systems are accessible to geographies and individuals of different income levels in the Commonwealth.

## **PERFORMANCE CONTEXT**

### **Description of Mortgage Lender**

Mutual of Omaha has been licensed in Massachusetts as a mortgage lender and mortgage broker since 2019. Mutual of Omaha is headquartered in San Diego, California and licensed nationwide. It maintains four branches in Massachusetts in Hanover, Hyannis, Mashpee and Uxbridge. The Lender offers conventional, Federal Housing Administration (FHA), Department of Veterans Affairs (VA), United States Department of Agriculture (USDA), and MassHousing loans. Loans that are sold have servicing rights either retained or released. Those for which servicing rights are retained are subserviced by a third-party loan servicer.

During 2023 and 2024, Mutual of Omaha originated and purchased 859 loans totaling approximately \$335.5 million in Massachusetts.

### **Demographic Information**

The Division's regulation 209 CMR 54.00 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.

<b>DEMOGRAPHIC INFORMATION OF THE COMMONWEALTH</b>						
<b>Demographic Characteristics</b>	<b>Amount</b>	<b>% Low</b>	<b>% Moderate</b>	<b>% Middle</b>	<b>% Upper</b>	<b>% N/A</b>
Geographies (Census Tracts)	1,620	10.5	19.1	37.0	30.0	3.4
Population by Geography	7,029,917	9.4	19.0	37.8	32.6	1.2
Owner-Occupied Housing by Geography	1,654,892	3.1	14.6	43.1	38.9	0.3
Family Distribution by Income Level	1,673,992	22.8	16.4	19.8	41.0	0.0
Distribution of Low- and Moderate-Income Families	655,582	15.8	27.3	37.1	19.1	0.7
Median Family Income	\$114,076	Median Housing Value				\$449,342
Households Below Poverty Level	10.6%	2024 Unemployment Rate				4.0%*
2023 HUD Adjusted Median Family Income	\$127,700	2024 HUD Adjusted Median Family Income				\$136,200

Source: 2020 US Census; \*Bureau of Labor Statistics annual average

Based on the 2020 United States (US) Census, the Commonwealth's population was above 7 million people with a total of 2.9 million housing units. Of the total housing units, almost 1.6 million or 56.8 percent are owner-occupied, 992,088 or 34.1 percent are rental-occupied, and 9.1 percent are vacant units.

According to the 2020 US Census, there are 2.6 million households in the Commonwealth with a median household income of \$91,426. Nearly 40 percent of households are classified as LMI. Over ten 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 1.67 million. Of all family households, 22.8 percent were low-income, 16.4 percent were moderate-income, 19.8 percent were middle-income, and 41.0 percent were upper-income. The median family income according to the 2020 US Census data stood at \$114,076. The Department of Housing and Urban Development (HUD) adjusted median family income was \$127,700 in 2023 and increased to \$136,200 in 2024. The HUD adjusted median family income is updated yearly and takes into account inflation and other economic factors.

Massachusetts contains 1,620 census tracts. Of these, 170 or 10.5 percent are low-income; 309 or 19.1 percent are moderate-income; 599 or 37.0 percent are middle-income; 486 or 30.0 percent are upper-income; and 56 or 3.4 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 \$449,342 according to the 2020 US Census data. The unemployment rate for Massachusetts stood at an annual average of 4.0 percent for 2024, an increase from the 2023 annual average rate of 3.4 percent, according to the Bureau of Labor Statistics. 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. Mutual of Omaha’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 Mutual of Omaha.

Mutual of Omaha’s Lending Test performance was determined to be “**Satisfactory**”.

#### *I. Geographic Distribution*

The geographic distribution of loans was reviewed to assess how well Mutual of Omaha is addressing credit needs throughout Massachusetts. The following table presents, by number, Mutual of Omaha’s 2023 and 2024 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 2023 and 2024 aggregate lending data (inclusive of Mutual of Omaha).

<b>Geographic Distribution of HMDA Loans by Census Tract</b>					
<b>Tract Income Level</b>	<b>Year</b>	<b>% of MA Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>Mutual of Omaha #</b>	<b>Mutual of Omaha %</b>
Low	2023	3.1	4.6	10	3.2
	2024		4.6	18	3.3
Moderate	2023	14.6	15.6	47	14.9
	2024		16.3	80	14.7
Middle	2023	43.1	40.8	160	50.8
	2024		43.0	262	48.2
Upper	2023	38.9	38.4	98	31.1
	2024		35.7	183	33.6
Not Available	2023	0.3	0.6	0	0.0
	2024		0.4	1	0.2
<b>Total</b>	<b>2023</b>	100.0	<b>100.0</b>	<b>315</b>	<b>100.0</b>
	<b>2024</b>		<b>100.0</b>	<b>544</b>	<b>100.0</b>

*Source: 2020 US Census; 1/1/2023 - 12/31/2024 Lender HMDA Data, 2023 and 2024 HMDA Aggregate Data*

The Lender’s lending performance in low- and moderate-income census tracts was below that of the aggregate in 2023 and 2024. The Lender’s lending performance was above the percentage of owner-occupied housing units in Massachusetts in both low- and moderate-income categories. Lending performance was found to be adequate.

## II. Borrower Characteristics

The distribution of loans by borrower income was reviewed to determine the extent to which the Lender is addressing the credit needs of the Commonwealth’s residents. The following table shows Mutual of Omaha’s 2023 and 2024 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 2023 and 2024 aggregate lending data (inclusive of Mutual of Omaha).

Distribution of HMDA Loans by Borrower Income					
Borrower Income Level	Year	% of MA Families	Aggregate Performance % of #	Mutual of Omaha #	Mutual of Omaha %
Low	2023	22.8	6.1	160	50.8
	2024		5.6	148	27.2
Moderate	2023	16.4	16.4	46	14.6
	2024		16.1	78	14.3
Middle	2023	19.8	22.2	55	17.5
	2024		23.3	124	22.8
Upper	2023	41.0	35.8	54	17.1
	2024		39.5	193	35.5
Not Available	2023	0.0	19.5	0	0.0
	2024		15.5	1	0.2
Total	2023	100.0	100.0	315	100.0
	2024		100.0	544	100.0

Source: 2020 US Census; 1/1/2023 - 12/31/2024 Lender HMDA Data, 2023 and 2024 HMDA Aggregate Data

The Lender’s lending performance to low-income borrowers was significantly above that of the aggregate in 2023 and 2024. The Lender’s lending performance to moderate-income borrowers was below the aggregate. The Lender’s performance was also above the demographics in the low-income category in both 2023 and 2024, while it was below in both years in the moderate-income category. Lending performance to LMI borrowers was found to be good at this time.

## III. Innovative or Flexible Lending Practices

Mutual of Omaha offers flexible lending products, which are provided in a safe and sound manner to address the credit needs of LMI individuals or geographies.

Mutual of Omaha maintains HUD-approved Non-Supervised FHA Loan Correspondent status. Although they contain imbedded insurance premiums, FHA products provide generally competitive interest rates and smaller down payments for LMI first-time homebuyers and existing homeowners. During the review period, Mutual of Omaha originated 439 FHA loans totaling approximately \$136.2 million. Of these, 333 loans or 76 percent benefited low- to moderate-income borrowers, while 90 loans or 20 percent were originated in low- and moderate-income level geographies.

The Lender is also a VA Automatic Approval Agent. The VA Home Loan Guarantee Program is designed specifically for the unique challenges facing service members and their families. Through VA-approved lenders like Mutual of Omaha, 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 related to mortgage interest rates and foreclosure proceedings. During the review period, Mutual of Omaha originated 37 VA loans totaling approximately \$16.3 million. Fifteen of these loans or 40 percent benefited low- to moderate-income borrowers, while nine or 24 percent were originated in low- and moderate-income level geographies.

#### ***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.

Mutual of Omaha does not directly service mortgage loans for Massachusetts consumers. As such, this review does not include an evaluation of loan mitigation and modification efforts.

#### ***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 Mutual of Omaha's personnel, and individual file review.

Mutual of Omaha has established an adequate record relative to fair lending policies and procedural 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 2023 and 2024, Mutual of Omaha received 1,514 HMDA-reportable mortgage loan applications from within Massachusetts. For these applications, the racial and ethnic identity was not specified in approximately 22 percent of cases. Of the remaining applications, 164 or 14 percent were received from racial minority applicants, and 90 or 55 percent resulted in originations. For the review period, Mutual of Omaha received 78 or 6.6 percent of HMDA-reportable applications from ethnic groups of Hispanic or Latino origin, and 37 or 47 percent were originated.

This compares to the 54.6 percent overall ratio of mortgage loans originated by the Lender in Massachusetts in 2023 and the 53.3 percent approval ratio by the aggregate group in 2023. In

2024, the Lender originated 54.2 percent of applications, and the aggregate group originated 55.7 percent.

Demographic information for Massachusetts reveals the total racial minority population stood at 30.4 percent of total population as of the 2020 US Census data. Racial minorities consisted of 7.0 percent Black; 7.3 percent Asian/Pacific Islander; 0.3 percent American Indian/Alaskan Native; 8.7 percent two or more minority races; and 7.1 percent identified as Other Race. Ethnic minorities consisted of 12.6 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	2023 Aggregate Data	2023 Mutual of Omaha		2024 Aggregate Data	2024 Mutual of Omaha	
		% of #	#		%	% of #
American Indian/ Alaska Native	0.3	0	0.0	0.4	0	0.0
Asian	6.5	19	3.3	7.2	67	7.1
Black/ African American	5.9	18	3.1	6.4	43	4.6
Hawaiian/Pacific Islander	0.2	0	0.0	0.2	0	0.0
2 or more Minority	0.2	0	0.0	0.2	0	0.0
Joint Race (White/Minority)	1.7	3	0.5	1.8	14	1.5
<b>Total Minority</b>	<b>14.8</b>	<b>40</b>	<b>6.9</b>	<b>16.2</b>	<b>124</b>	<b>13.2</b>
White	57.3	367	64.1	59.6	642	68.2
Race Not Available	27.9	166	29.0	24.2	175	18.6
<b>Total</b>	<b>100.0</b>	<b>573</b>	<b>100.0</b>	<b>100.0</b>	<b>941</b>	<b>100.0</b>
Ethnicity	% of #			% of #		
Hispanic or Latino	7.6	18	3.1	8.5	46	4.9
Joint (Hisp-Lat /Non-Hisp-Lat)	1.5	4	0.7	1.7	10	1.1
<b>Total Hispanic or Latino</b>	<b>9.1</b>	<b>22</b>	<b>3.8</b>	<b>10.2</b>	<b>56</b>	<b>6.0</b>
Not Hispanic or Latino	63.8	395	69.0	66.5	708	75.2
Ethnicity Not Available	27.1	156	27.2	23.3	177	18.8
<b>Total</b>	<b>100.0</b>	<b>573</b>	<b>100.0</b>	<b>100.0</b>	<b>941</b>	<b>100.0</b>

Source: 1/1/2023 - 12/31/2024 Lender HMDA Data, 2023 & 2024 HMDA Aggregate Data

The rate of applications received by the Lender from racial minorities is below that of the aggregate in 2023 and 2024. The rate of applications received by the Lender from ethnic minorities was also below that of the aggregate in both 2023 and 2024.

## VI. Loss of Affordable Housing

This review concentrated on the suitability and sustainability of mortgage loans originated by Mutual of Omaha by considering delinquency and default rates of the Lender and those of the overall marketplace. Information provided by the Lender was reviewed, as were statistics available on delinquency and default rates for mortgage loans.

A 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.

## **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.

Mutual of Omaha's Service Test performance was determined to be **"Satisfactory"** 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.

Mutual of Omaha's employees provided educational workshops at various councils on aging throughout Massachusetts. In addition, an employee serves on the board of a Massachusetts regional elder services organization.

### **Mortgage Lending Services**

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

Mutual of Omaha provides an adequate delivery of mortgage lender services that are accessible to geographies and individuals of different income levels in the Commonwealth. Mutual of Omaha maintains multiple physical branches in Massachusetts, including one located in a moderate-income census tract in Hyannis. Consumers can apply online, over the telephone or in-person at a branch.

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 the Division's regulation 209 CMR 54.00, 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.