

PUBLIC DISCLOSURE

NOVEMBER 12, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**GREATER SPRINGFIELD CREDIT UNION
CERT # 67902**

**1030 WILBRAHAM ROAD
SPRINGFIELD, MASSACHUSETTS 01109**

**Division of Banks
1000 Washington St, 10th Floor
Boston, Massachusetts 02118**

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

The Community Reinvestment Act (CRA) requires the Massachusetts Division of Banks (Division) to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting its needs of its entire assessment area, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its assessment area.

This document is an evaluation of the CRA performance of Greater Springfield Credit Union (the Credit Union), prepared by the Division, the institution's supervisory agency, as of November 12, 2013. The Division rates the CRA performance of an institution consistent with the provisions set forth in Massachusetts Regulation 209 CMR 46.00 et seq.

INSTITUTION'S CRA RATING: This institution is rated "Satisfactory."

A CRA rating of "Satisfactory" is assigned. An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Greater Springfield Credit Union was evaluated according to Small Institution CRA Examination Procedures, which apply to an institution with assets of at least \$250 million, adjusted annually and currently at \$296 million, as of December 31 of both of the prior two calendar years. The rating is supported by the following conclusions:

- The Credit Union's average loan-to-share ratio for the past eight quarters is 43.3 percent and is considered adequate.
- The Credit Union originated a substantial majority of home mortgage loans and consumer loans inside the assessment area.
- The distribution of home mortgage loans and consumer loans reflects adequate penetration of borrowers of different income levels.
- The geographic distribution of home mortgage loans and consumer loans reflects adequate penetration throughout the assessment area.
- No CRA-related complaints were received during the evaluation period and there were no fair lending issues or concerns.

SCOPE OF THE EXAMINATION

This evaluation considered the Credit Union's home mortgage lending and consumer lending from January 1, 2012 to September 30, 2013. Under CRA, a home mortgage loan is considered to be a home purchase, home improvement, or refinancing of a dwelling-secured loan. Home mortgage loans considered in this evaluation were reported pursuant to the Home Mortgage Disclosure Act (HMDA). Data was obtained from the Loan Application Register (LAR) maintained pursuant to HMDA. Consumer loan data was obtained from internal reports provided by the Credit Union.

Based on the Credit Union's loan portfolio composition as of September 30, 2013, the Credit Union's primary lending activity by dollar volume consists of first mortgage real estate loans and other real estate loans and lines of credit at 82.0 percent. Consumer loans account for 72.5 percent of the Credit Union's loan portfolio composition by number of loans.

A sample of 42 consumer loans for each year 2012 and 2013 were incorporated into the Assessment Area Concentration, Borrower Profile, and Geographic Distribution analyses. The consumer loans sampled consisted of new and used vehicle loans, new recreation loans, special unsecured loans, personal loans, and open end loans.

PERFORMANCE CONTEXT

Description of the Institution

Greater Springfield Credit Union was chartered by the Commonwealth of Massachusetts in March 1927. According to its bylaws, the Credit Union was organized solely for the promotion of thrift among its members, by the accumulation of their savings and the loaning of such accumulations to its members only for provident purposes at a moderate rate of interest. Membership in the Credit Union is limited to federal, state, or municipal employees who work in Hampden or Hampshire County; individuals who work, reside or attend school in Hampden or Hampshire County; employees of the Credit Union and family members of such individuals and employees. As of September 30, 2013, the Credit Union has 8,585 members.

The Credit Union's main office is located at 1030 Wilbraham Road in Springfield, Massachusetts. In addition to the main office, the Credit Union operates one branch located at 157 Shaker Road in East Longmeadow, Massachusetts. Business hours for both locations are 9:00 a.m. to 4:00 p.m., Monday through Friday, with extended hours on Fridays at the main branch only, and 8:30 a.m. to 12:00 p.m. on Saturdays. Branch services and hours of operation are similar to those of competing institutions. The main office and the branch location offer uniform products and services and drive-up teller services. The Credit Union has a non-deposit ATM at each branch location, both of which are connected to the SUM network.

The Credit Union maintains a website at www.grscu.org. The Credit Union's website includes information about products and services, loan rates, savings rates, branch locations, hours of operation, and online-banking services such as viewing account balances, account history, account transfers, bill pay, e-statements, and check requests.

The Credit Union offers a range of products aimed to meet the personal needs of its members. Loan products include personal loans, home improvement loans, auto loans, equity loans and lines of credit, mortgages, energy loans and holiday loans. The Credit Union offers regular savings accounts, checking accounts, holiday and vacation clubs, and additional services such as money orders, notary services, direct deposit and payroll deduction.

As of September 30, 2013, the Credit Union's assets totaled \$138.3 million and loans totaled \$60.8 million, or 43.9 percent of total assets. Since the previous examination, the Credit Union's assets have increased by 30.3 percent and the loans have increased 1.4 percent. The increase in assets can be attributed to an increase in total investments of approximately 80.0 percent from the prior evaluation.

As reflected in Table 1, the Credit Union is primarily a real estate lender. Total first mortgage real estate loans/lines of credit and total other real estate loans/lines of credit account for 82.0 percent of the portfolio. Used vehicle loans account for the second largest portion of the loan portfolio at 12.1 percent.

Table 1 Loan Portfolio Distribution as of September 30, 2013		
Loan Type	Dollar Amount \$ ('000s)	Percent of Total Loans
Total 1st Mortgage Real Estate Loans/Lines of Credit	42,523	69.9
Total Other Real Estate Loans/Lines of Credit	7,365	12.1
Used Vehicle Loans	6,374	10.5
All Other Unsecured Loans/Lines of Credit	2,223	3.7
New Vehicle Loans	1,982	3.3
Total All Other Loans/Lines of Credit	329	0.5
Total	60,796	100.00

Source: September 30, 2013 Call Report

The Credit Union was last examined for compliance with the CRA by the Division on April 15, 2009. The examination resulted in a CRA rating of Satisfactory.

There are no apparent financial or legal impediments that would limit the Credit Union's ability to help meet the credit needs of its assessment area.

Description of Assessment Area

CRA requires financial institutions to define an assessment area within which its CRA performance will be evaluated. The Credit Union's assessment area, as currently defined, meets the technical requirements of the CRA regulation since it: (1) consists of one or more political subdivisions, (2) includes the geographies where the Credit Union has its main office, branches, and deposit-taking ATMs, as well as the surrounding geographies in which the institution originated a substantial portion of its loans, (3) consists of whole census tracts, (4) does not extend substantially beyond state boundaries, (5) does not reflect illegal discrimination, and (6) does not arbitrarily exclude low- and moderate-income areas.

The Credit Union's assessment area is comprised of all cities and towns located in Hampden and Hampshire Counties. Refer to the table below for pertinent demographic information.

Table 2 Assessment Area Demographic Information						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A % of #
Geographies (Census Tracts)	139	15.8	19.4	33.8	29.5	1.4
Population by Geography	621,570	13.0	20.7	33.9	31.9	0.5
Owner-Occupied Housing by Geography	151,878	3.2	16.3	40.5	40.0	0.0
Family Households by Income Level	149,160	23.8	16.2	19.2	40.8	0.0
Distribution of Low and Moderate Income Families throughout AA Geographies	59,694	19.8	29.3	31.6	19.3	0.0
Median Family Income		\$67,185	Median Housing Value			\$231,936
Families Below Poverty Level		11.5%	Unemployment Rate			8.9%
Households Below Poverty Level		15.5%	Unemployment Rate (2012)			7.0%

Sources: 2010 U.S. Census data & 2012 Bureau of Labor Statistics

The Credit Union's assessment area is comprised of 139 census tracts, of which 15.8 percent are low-income, 19.4 percent are moderate-income, 33.8 percent are middle-income, and 29.5 percent are upper income. Of the 22 low-income census tracts in the assessment area, there are 14 in Springfield, 6 in Holyoke, 1 in Chicopee and 1 in Amherst. Of the 27 moderate-income census tracts, there are 14 in Springfield, 5 in Chicopee, 3 in Holyoke, 1 in West Springfield, 2 in Westfield, 1 in Ware, and 1 in Northampton. The 2 N/A census tracts in the assessment area are Amherst College and Hampshire College.

The assessment area has a total population of 621,570, of which 13.0 percent live in low-income tracts, 20.7 percent live in moderate-income tracts, 33.9 percent live in middle-income tracts, 31.9 percent live in upper-income tracts, and 0.5 percent live in N/A tracts. The assessment area contains 149,160 family households, of which 23.8 percent are low-income, 16.2 percent are moderate-income, 19.2 percent are middle-income, and 40.8 percent are upper-income. Of all families, 11.6 percent are below the poverty level.

Of the 253,927 housing units in the assessment area, 59.8 percent are owner-occupied, 33.3 percent are rental units, and 6.9 percent are vacant. Of the owner-occupied housing units, 3.3 percent are in low-income tracts, 16.3 percent are in moderate-income tracts, 40.5 percent are in middle-income tracts, and 40.0 percent are in upper-income tracts. According to the 2010 U.S. Census, the median housing value in the assessment area is \$231,936. More recent data indicates that as of September 2013, the median housing values for Hampden and Hampshire Counties are \$175,000 and \$232,000, respectively.

According to the 2010 U.S. Census, the unemployment rate of the assessment area is 8.9 percent. More recent data indicates that as of August 2013, the unemployment rates for Hampden and Hampshire counties are 9.2 percent and 6.3 percent, respectively.

Community Contact

A community contact was performed in conjunction with the CRA review. Examiners met with three individuals from a local organization that specializes in affordable housing, neighborhood revitalization, financial literacy, rental assistance, career training, and self-sufficiency.

The organization stated the primary credit need of the area was providing opportunities for first time homebuyers through programs such as down payment assistance and financial literacy seminars. In addition, the organization felt assistance to landlords to make capital improvements to their properties was of vital importance for the revitalization of neighborhoods. The contact also cited the need for career training opportunities and for more jobs with livable wages as a way for local residents to move out of poverty.

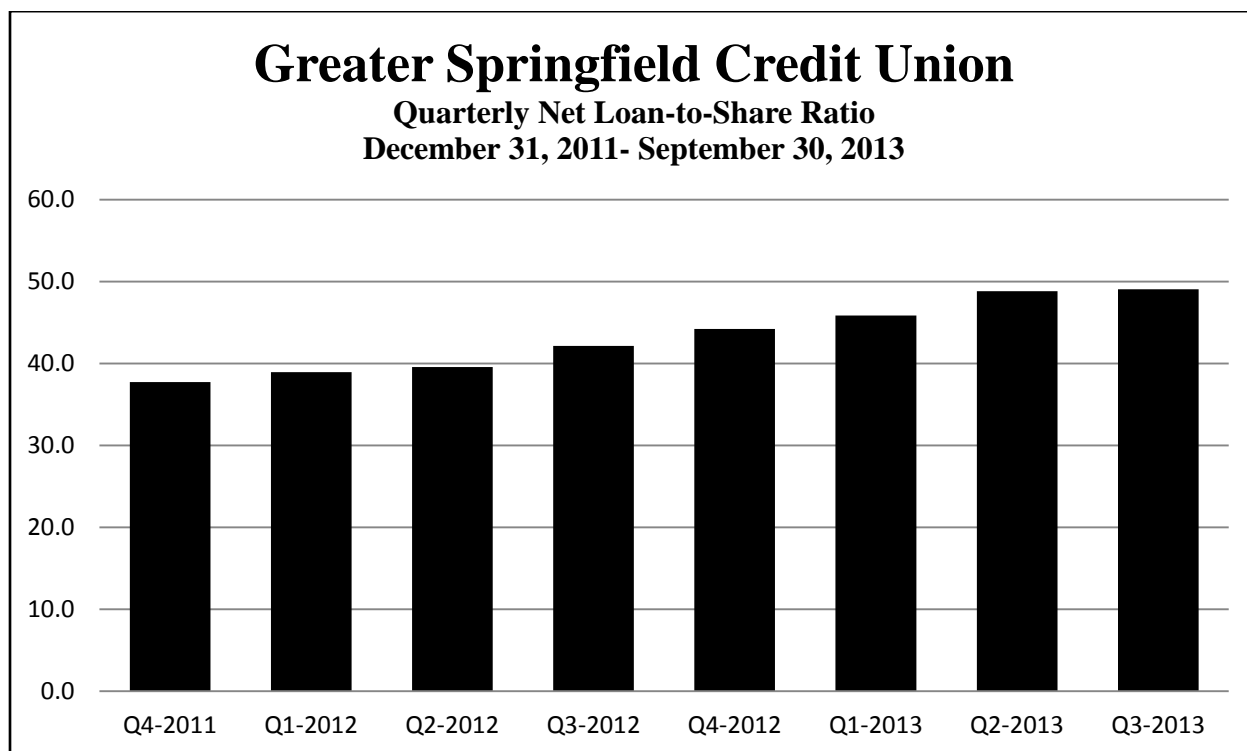
CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Small Institution CRA evaluation procedures were utilized to assess the CRA performance. These procedures consider the institution's performance pursuant to the following criteria: net loan-to-share ratio, assessment area concentration, lending to borrowers of different incomes, geographic distribution of loans, the institution's action in response to CRA complaints, and a fair lending review.

1. LOAN TO SHARE (LTS) ANALYSIS

This performance criterion determines what percentage of the Credit Union's share base is reinvested in the form of loans and evaluates its appropriateness.

The Credit Union's net LTS ratio as of September 30, 2013 was 49.1 percent. The Credit Union's average quarterly net LTS ratio was 43.3 percent and was calculated by averaging the previous eight quarterly net LTS ratios between December 31, 2011 and September 30, 2013. As shown in the graph below, the net LTS ratio reached a high of 49.1 percent in September 2013 and a low of 37.8 percent in December 2011.



Source: Call Reports from December 31, 2011 through September 30, 2013

Changes in loan and share amounts were analyzed to assess fluctuations in the net LTS ratios. Since the previous exam, the Credit Union's net LTS ratio has decreased significantly. Management attributed the decrease of the ratio to the fact that the institution began refinancing portfolio loans and selling them to Fannie Mae as of 2009. During this evaluation period, the Credit Union's LTS ratio increased at an average rate of 1.6 percent in each of the previous eight

quarters. This steady increase can be attributed to the Credit Union's strategy of increasing its consumer loan portfolio as well as originating more loans for its portfolio. Based on the preceding information and limited, but steady, growth over the previous eight quarters, the Credit Union's average LTS ratio is considered adequate.

2. COMPARISON OF CREDIT EXTENDED INSIDE AND OUTSIDE OF THE ASSESSMENT AREA(S)

This performance criterion evaluates whether the Credit Union is meeting the credit needs within its assessment area. The analysis includes both home mortgage loans and consumer loans. As shown in the table below, the Credit Union originated a substantial majority of home mortgage loans and consumer loans inside the assessment area.

Loan Category or Type	Number of Loans					Dollar Volume \$('000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
2012										
Home Purchase	27	90.0	3	10.0	30	4,331	86.8	660	13.2	4,991
Refinance	146	91.3	14	8.7	160	22,266	88.5	2,888	11.5	25,154
Home Improvement	3	100.0	0	0.0	3	195	100.0	0	0.0	195
2012 Total	176	91.2	17	8.8	193	26,792	88.3	3,548	11.7	30,340
2013 (Jan 1-Sept 30)										
Home Purchase	23	95.8	1	4.2	24	3,612	96.6	128	3.3	3,740
Refinance	78	96.3	3	3.7	81	11,723	96.2	459	3.8	12,182
Home Improvement	6	100.0	0	0.0	6	210	100.0	0	0.0	210
2013 Total	107	96.4	4	3.6	111	15,545	96.4	587	3.6	16,132
Total Home Loans	283	93.1	21	6.9	304	42,337	91.1	4,135	8.9	46,472
2012 Consumer Loans	41	97.6	1	2.4	42	374	96.4	14	3.6	388
2013 Consumer Loans	40	95.2	2	4.8	42	418	93.9	27	6.1	445
Grand Total	364	93.8	24	6.2	388	43,129	91.2	4,176	8.8	47,305

Sources: 2012 and, Q1-Q3 2013 HMDA LARs, Credit Union generated consumer loan reports

In 2012, the Credit Union originated 91.2 percent of home mortgage loans in the assessment area by number and 88.3 percent by dollar volume. In 2013, the Credit Union originated 96.4 percent of home mortgage loans inside the assessment area by number and 96.4 percent by dollar volume. For the entire evaluation period, the Credit Union originated 93.1 percent of home mortgage loans by number and 91.1 percent by dollar volume inside the assessment area.

In 2012, the Credit Union originated 97.6 percent of consumer loans inside the assessment area by number and 96.4 percent by dollar volume. In 2013, the Credit Union originated 95.2 percent of consumer loans inside the assessment area by number and 93.9 percent by dollar volume. For the entire evaluation period, the Credit Union originated 93.8 percent of home mortgage and consumer loans by number inside the assessment area.

3. DISTRIBUTION OF CREDIT BY INCOME LEVEL OF THE BORROWER

The distribution of loans by borrower income was reviewed to determine the extent to which the Credit Union is addressing the credit needs of the area’s residents, particularly those of low- or moderate-income. Residential mortgage loan conclusions are based primarily on the Credit Union’s performance of lending to low- and moderate-income borrowers relative to aggregate lending data and compared to assessment area demographics. The consumer loan conclusions are based primarily on the Credit Union’s lending activity to low- and moderate-income borrowers as compared to demographics of the assessment area.

Home Mortgage Loans

Table 5 Distribution of Home Mortgage Loans by Borrower Income								
Borrower Income Level	Family Distribution by Income Level	2012 Aggregate Lending Percentage	2012 Credit Union Lending Data		Credit Union Lending Data 1/1/2013 – 9/30/2013		Total Credit Union Lending Data	
			#	%	#	%	#	%
Low	23.8	10.1	5	2.8	2	1.9	7	2.5
Moderate	16.2	22.4	24	13.6	27	25.2	51	18.0
Middle	19.2	26.5	53	30.1	25	23.4	78	27.6
Upper	40.8	40.9	94	53.4	53	49.5	147	51.9
Total	100.0	100.0	176	100.0	107	100.0	283	100.0

Source: 2012 and Q1-Q3 2013 HMDA LARs, 2012 Aggregate Data, & 2010 U.S. Census.

In 2012, the Credit Union originated 2.8 percent of home mortgage loans to low-income borrowers, which is lower than the aggregate lending percentage to low-income borrowers at 10.1 percent and also lower than the percentage of low-income families in the assessment area at 23.8 percent. For the same year, the Credit Union originated 13.6 percent of home mortgage loans to moderate-income borrowers, which is below the aggregate lending percentage at 22.4 percent and below the percentage of moderate-income families in the assessment area at 16.2 percent.

In 2013, the Credit Union originated 1.9 percent of home mortgage loans to low-income borrowers, which is significantly lower and the distribution of low-income families in the assessment area at 23.8 percent. For the same year, the Credit Union originated 25.2 percent of home mortgage loans to moderate-income borrowers, which is higher than the percentage of moderate-income families in the assessment area. Overall, the Credit Union originated 2.5 percent of home mortgage loans to low-income borrowers and 18.0 percent to moderate-income borrowers.

It should be noted the Credit Union’s primary area for lending is in the City of Springfield, Massachusetts. According to the 2010 U.S. Census, 40.4 percent of families in the city are low-income and 18.4 percent are moderate-income. Overall, 22.6 percent of families in Springfield are living below the poverty level. Such demographics can be an indication of an individual’s reduced ability to qualify for a home mortgage loan. In addition, Springfield has been

particularly impacted by the recent financial crisis in terms of foreclosures, which has resulted in a depressed housing market. Given the demographics of the assessment area and in particular, the City of Springfield, the Credit Union achieved an adequate penetration of home mortgage loans among individuals of different incomes levels, including low- and moderate-income.

Consumer Loans

Borrower income for consumer loans was compared to the median family income (MFI) for the Springfield, MA Metropolitan Statistical Area (MSA) for 2012 and 2013. The median family income for the Springfield MSA was \$70,200 in 2012 and \$66,100 in 2013.

Because the Credit Union is predominately a consumer loan originator, the Credit Union typically relied upon the income of only one borrower to make the credit decision. Comparing one member’s income with the median family income of the Springfield, MA MSA potentially inflates the levels of lending to low- and moderate-income borrowers because the median family income typically includes the income of two individuals.

Table 6 Distribution of Consumer Loans by Borrower Income							
Borrower Income Level	% of Families by Income Level	2012		2013		Total	
		#	%	#	%	#	%
Low	23.8	8	19.5	7	17.5	15	18.5
Moderate	16.2	10	24.4	13	32.5	23	28.4
Middle	19.2	12	29.3	11	27.5	23	28.4
Upper	40.8	11	26.8	9	22.5	20	24.7
Total	100.0	41	100.0	40	100.0	82	100.0

Source: Credit Union generated consumer loan report, MFI for Springfield, MA MSA, and 2010 U.S. Census

In 2012, the Credit Union originated 19.5 percent of consumer loans to low-income borrowers and 24.4 percent to moderate-income borrowers. The percentage of lending to low-income borrowers is 4.3 percent below the percentage of low-income families and the lending percentage to moderate-income borrowers is 8.2 percent higher than the percentage of moderate-income families.

In 2013, the Credit Union originated 17.5 percent of consumer loans to low-income borrowers and 32.5 percent to moderate-income borrowers. The Credit Union’s consumer lending to low-income borrowers was still lower than the percentage of low-income families, but lending to moderate-income borrowers significantly increased from the prior year and was double that of the percentage of moderate-income families. Overall, the Credit Union originated 18.5 percent of consumer loans to low-income borrowers and 28.4 percent to moderate-income borrowers.

The distribution of borrowers reflects, given the demographics of the assessment area, an adequate penetration of consumer loans among individuals of different incomes levels, including low- and moderate-income, based on the sample.

4. GEOGRAPHIC DISTRIBUTION

The geographic distribution of loans was reviewed to determine how well the Credit Union is addressing the credit needs throughout the assessment area, particularly in low- and moderate-income tracts. Residential mortgage loan conclusions are based primarily on the Credit Union's performance of lending in low- and moderate-income tracts relative to aggregate lending data and compared to assessment area demographics. The consumer loan conclusions are based primarily on the Credit Union's lending activity in low- and moderate-income tracts as compared to demographics of the assessment area.

Home Mortgage Loans

Tract Income Level	% of Total Owner-Occupied Housing Units	2012 Aggregate Lending Percentage	2012 Credit Union Lending Data		Credit Union Lending Data 1/1/2013 – 9/30/2013		Total Credit Union Lending Data	
			#	%	#	%	#	%
Low	3.3	2.6	3	1.7	4	3.7	7	2.5
Moderate	16.3	13.7	21	11.9	7	6.5	28	9.9
Middle	40.5	39.0	54	30.7	33	30.8	87	30.7
Upper	40.0	44.7	98	55.7	63	58.9	161	56.9
Total	100.0	100.0	176	100.0	107	100.0	283	100.0

Source: 2012 and Q1-Q3 2013 HMDA LARs, 2012 Aggregate Data, & 2010 U.S. Census.

In 2012, the Credit Union originated 1.7 percent of home mortgage loans in low-income tracts, which is slightly below both the aggregate home mortgage lending percentage at 2.6 percent and the percentage of owner-occupied housing units at 3.3 percent. For the same year, the Credit Union originated 11.9 percent of home mortgage loans in moderate-income tracts, which again is slightly below the aggregate lending percentage at 13.7 percent and the percentage of owner-occupied housing units at 16.3 percent.

In 2013, the Credit Union originated 3.7 percent of home mortgage loans in low-income tracts, which is 0.4 percent higher than the percentage of owner-occupied housing units within low-income tracts. For the same year, the Credit Union originated 6.5 percent of home mortgage loans in moderate-income tracts, which is 9.8 percent below the percentage of owner-occupied housing units in moderate-income tracts. Overall, the Credit Union originated 2.5 percent of home mortgage loans in low-income tracts and 9.9 percent in moderate-income tracts.

The distribution of home mortgage loans reflects an adequate penetration in the low- and moderate-income geographies.

Consumer Loans

Table 8 Distribution of Consumer Loans by Tract							
Tract Income Level	% of Households	2012		2013		Total	
		#	%	#	%	#	%
Low	11.2	5	12.2	3	7.5	8	9.9
Moderate	20.6	12	29.3	10	25.0	22	27.2
Middle	37.0	12	29.3	18	45.0	30	37.0
Upper	31.3	12	29.3	9	22.5	21	25.9
Total	100.0	41	100.0	40	100.0	81	100.0

Source: Credit Union generated consumer loan reports & 2010 U.S. Census. Percentage of households does not include NA tracts.

In 2012, the Credit Union originated 12.2 percent of consumer loans in low-income tracts and 29.3 percent in moderate income tracts. Consumer lending percentages in low- and moderate-income tracts exceeded the percentage of households within each tract level by 1.0 percent and 8.7 percent, respectively.

In 2013, the Credit Union originated 7.5 percent of consumer loans in low-income tracts, representing a decrease from the previous year, and was 3.7 percent lower than the percentage of households within low-income tracts. Consumer lending in moderate-income census tracts also decreased, but was still higher than the percentage of households in moderate-income tracts.

Overall, the Credit Union originated 9.9 percent of consumer loans in low-income tracts and 27.2 percent in moderate-income tracts. Although the percentage of consumer loans in low-income census tracts is below the percentage of households in low-income tracts, the percentage of consumer loans made in moderate-income tracts is higher than the percentage of households in moderate-income tracts.

The distribution of consumer loans reflects an adequate penetration in the low- and moderate-income geographies based on the sample.

5. RESPONSE TO CRA COMPLAINTS/FAIR LENDING POLICIES AND PRACTICES

The Division of Bank's provides comments regarding the institution's fair lending policies and procedures pursuant to the Regulatory Bulletin 1.3-106.

A review of the public file indicated that the Credit Union received no complaints pertaining to the institution's CRA performance since the previous examination.

The Credit Union has a written residential loan policy which incorporates elements of fair lending. All mortgage loans are written to secondary market guidelines with no exceptions to pricing. The Credit Union has a written consumer loan policy which also incorporates fair lending.

All loan denials are reviewed by the institution’s Credit Committee and then presented to the Board of Directors.

Based upon the review of the Credit Union’s public comment file and its performance relative to fair lending policies and practices, no violations of anti-discrimination laws and regulations were identified.

MINORITY APPLICATION FLOW

The Credit Union’s residential lending was compared with the 2012 aggregate’s lending performance. The comparison of this data assists in deriving reasonable expectations for the rate of applications the Credit Union received from minority residential loan applicants. Refer to the following table for information on the Credit Union’s minority application flow as well as a comparison of the aggregate lenders throughout the Credit Union’s assessment area.

MINORITY APPLICATION FLOW						
RACE	Credit Union 2012		2012 Aggregate Data		Credit Union 2013	
	#	%	#	%	#	%
American Indian/ Alaska Native	0	0.0	66	0.2	0	0.0
Asian	1	0.5	480	1.7	0	0.0
Black/ African American	9	4.7	660	2.3	7	6.0
Hawaiian/Pac Islander	1	0.5	59	0.2	0	0.0
2 or more Minority Races	0	0.0	14	0.1	0	0.0
Joint Race (White/Minority)	1	0.5	335	1.2	1	0.9
Total Minority	12	6.2	1,614	5.7	8	6.9
White	179	93.3	22,084	77.6	109	93.1
Race Not Available	1	0.5	4,746	16.7	0	0.0
Total	192	100.0	28,444	100.0	117	100.0
ETHNICITY						
Hispanic or Latino	3	1.6	1,220	4.3	3	2.6
Not Hispanic or Latino	187	97.4	22,118	77.8	114	97.4
Joint (Hisp/Lat /Not Hisp/Lat)	1	0.5	300	1.0	0	0.0
Ethnicity Not Available	1	0.5	4,806	16.9	0	0.0
Total	192	100.0	28,444	100.0	117	100.0

Source: 2012 and Q1-Q3 2013 HMDA LARs & 2012 HMDA Aggregate Data

The Credit Union’s racial minority application flow in 2012 exceeded the aggregate. The Credit Union received 12 applications, or 6.2 percent, from racial minorities while the aggregate received 5.7 percent. The Credit Union received 4 applications, or 2.1 percent from Hispanic or Latino applicants or joint applicants in which one applicant was Hispanic or Latino, while the aggregate received 5.3 percent of applications from the same group.

According to the 2010 U.S. Census, the Credit Union's assessment area contained a total population of 621,570 individuals of which 27.6 percent are minorities. The assessment area's minority and ethnic population is 6.3 percent Black/African American; 2.6 percent Asian; 0.2 percent American Indian; 1.7 percent "other" and 16.8 percent Hispanic or Latino.

In total for 2012 and 2013, the Credit Union received 309 HMDA reportable loan applications within its assessment area. Of these applications, 20 or 6.5 percent were received from racial minority applicants, of which 90.0 percent resulted in originations. The Credit Union also received 6, or 2.0 percent, from ethnic applicants of Hispanic origin within its assessment area, of which 85.7 percent resulted in originations.

In addition, for both 2012 and 2013, the Credit Union originated 90 percent of home mortgage applications in majority minority census tracts within the assessment area.

The Credit Union's minority application flow is adequate due to the demographic makeup of the assessment area.

PERFORMANCE EVALUATION DISCLOSURE GUIDE

Massachusetts General Laws Chapter 167, Section 14, as amended, and the Uniform Interagency Community Reinvestment Act (CRA) Guidelines for Disclosure of Written Evaluations, require all financial institutions to take the following actions within 30 business days of receipt of the CRA evaluation of their institution:

- 1) Make its most current CRA performance evaluation available to the public;
- 2) At a minimum, place the evaluation in the institution's CRA public file located at the head office and at a designated office in each assessment area;
- 3) Add the following language to the institution's required CRA public notice that is posted in each depository facility:

"You may obtain the public section of our most recent CRA Performance Evaluation, which was prepared by the Massachusetts Division of Banks at 1030 Wilbraham Road, Springfield, Massachusetts 01109."

- 4) Provide a copy of its current evaluation to the public, upon request. In connection with this, the institution is authorized to charge a fee which does not exceed the cost of reproduction and mailing (if applicable).

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