

PUBLIC DISCLOSURE

DECEMBER 15, 2017

**MORTGAGE LENDER COMMUNITY INVESTMENT
PERFORMANCE EVALUATION**

MORTGAGE NETWORK INC.

MC2668

**99 CONIFER HILL DRIVE, SUITE 300
DANVERS MA. 01923**

**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

Massachusetts General Laws chapter 255E, section 8 and the Division of Banks' (Division) regulation 209 CMR 54.00, Mortgage Lender Community Investment (CRA), require the Division to use its authority when examining mortgage lenders subject to its supervision who have made 50 or more home mortgage loans in the last calendar year, to assess the mortgage lender's record of helping to meet the mortgage credit needs of the Commonwealth, including low- and moderate-income neighborhoods and individuals, consistent with the safe and sound operation of the mortgage lender. Upon conclusion of such examination, the Division must prepare a written evaluation of the mortgage lender's record of meeting the credit needs of the Commonwealth.

This document is an evaluation of the CRA performance of **Mortgage Network Inc. (the Lender or Mortgage Network)** prepared by the Division, the Lender's supervisory agency, as of **December 15, 2017**.

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 mortgage lender's public CRA file, did not reveal any complaints.

The CRA examination included a comprehensive review and analysis, as applicable, of Mortgage Network'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, 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.

CRA examination procedures were used to evaluate Mortgage Network's community investment performance. These procedures utilize two performance tests: the Lending Test and the Service Test. This evaluation considered Mortgage Network's lending and community development activities for the period of January 2015 through December 2016. 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 five criteria: geographic distribution of loans, lending to borrowers of different incomes, innovative and flexible lending practices, fair lending, and loss of affordable housing.

Home mortgage lending for 2015 and 2016 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 2016 is provided because it is the most recent year for which aggregate HMDA lending data is available. 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 HMDA reporting mortgage lenders which originated loans in the Commonwealth of Massachusetts. Interim home mortgage lending data for 2017 is referenced in the narrative to illustrate trends in Mortgage Network's lending performance.

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, which 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".

- The geographic distribution of the Lender's loans reflects adequate 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.
- Mortgage Network 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 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.
- Lending practices or products do not show an undue concentration or a systematic pattern of lending, including a pattern of early payment defaults, resulting in the loss of affordable housing units.
- The Lender provides a relatively high level of community development services and qualified investments; and its service delivery systems are accessible to geographies and individuals of different income levels in the Commonwealth.

PERFORMANCE CONTEXT

Description of Mortgage Lender

Mortgage Network was established in the Commonwealth of Massachusetts in 1988, and was granted a mortgage lender license by the Division in 1992. Since the December 2001 reorganization, the Lender has been a wholly-owned subsidiary of Mortgage Network Business Trust. Mortgage Network is a retail lender engaging primarily in the origination and sale of residential mortgage loans. In addition to the Mortgage Company license, Mortgage Network also holds Third Party Loan Servicer license in Massachusetts. As of the date of the examination the lender was licensed or authorized to conduct business in 25 states and the District of Columbia.

The Lender offers a variety of mortgage loan products to meet the needs of the Commonwealth's borrowers. Mortgage Network is an approved lender for the Federal Housing Administration (FHA), Veteran Administration (VA), US Department of Agriculture (USDA), and offers a selection of MassHousing loans.

All underwriting and major functions in the loan process are done at Mortgage Network's main office, as well as two of its branch office locations. Approved loans are funded through established warehouse lines of credit.

Mortgage Network's business development relies primarily on internet lead generators, direct marketing, referrals and repeat customers. Originated loans are closed in Lender's name and sold immediately to secondary market investors. Servicing is retained on loans sold directly to an agency, remaining loans are sold with servicing rights released.

Demographic Information

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

2010 CENSUS DEMOGRAPHIC INFORMATION						
Demographic Characteristics	Amount	Low %	Moderate %	Middle %	Upper %	N/A %
Geographies (Census Tracts)	1,474	10.8	20.0	40.7	27.1	1.4
Population by Geography	6,547,629	8.9	18.9	42.8	29.2	0.2
Owner-Occupied Housing by Geography	1,608,474	2.9	13.7	48.9	34.5	0.0
Family Distribution by Income Level	1,600,588	19.2	17.8	24.4	38.6	0.0
Distribution of Low and Moderate Income Families Throughout AA Geographies	592,420	7.7	18.4	43.6	30.3	0.0
Median Family Income		\$86,272	Median Housing Value			373,206
Households Below Poverty Level		11.1%	Unemployment Rate			3.7*
2015 HUD Adjusted Median Family Income		\$87,300	2016 HUD Adjusted Median Family Income			\$86,904

Source: 2010 US Census; *as of 10/31/2017

Based on the 2010 Census, the Commonwealth's population stood at 6.55 million people with a total of 2.79 million housing units. Of the total housing units, 1.61 million or 57.7 percent are owner-occupied, 904,078 or 32.5 percent are rental-occupied, and 9.8 percent are vacant units.

According to the 2010 Census there are 2.51 million households in the Commonwealth with a median household income of \$69,101. Nearly 40 percent of the households are classified as low and moderate-income. In addition, over 11 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 1.60 million. Of all family households, 19.2 percent were low-income, 17.8 percent were moderate-income, 24.4 percent were middle-income, and 38.6 percent were upper-income. The median family income according to the 2010 census was \$86,272. The Housing and Urban Development (HUD) adjusted median family income is \$86,904 in 2016. The adjusted median family income is updated yearly and takes into account inflation and other economic factors.

The Commonwealth of Massachusetts contained 1,474 Census tracts. Of these, 160 or 10.8 percent are low-income; 295 or 20.0 percent are moderate-income; 600 or 40.7 percent are middle-income; 399 or 27.1 percent are upper-income; and 20 or 1.4 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 \$373,206 according to the 2010 Census. The unemployment rate for the Commonwealth of Massachusetts stood at 3.7 percent as of October 2017, which was a decrease from July 2017 when the unemployment rate was at 4.3 percent. Employment rates would tend to affect a borrower's ability to remain current on mortgage loan obligations and also correlates to 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. Mortgage Network'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 Mortgage Network.

Mortgage Network's Lending Test performance was determined to be "Satisfactory".

I. Geographic Distribution

The geographic distribution of loans was reviewed to assess how well Mortgage Network is addressing the credit needs throughout the Commonwealth of Massachusetts' low, moderate, middle, and upper-income census tracts.

The following table presents, by number, Mortgage Network's 2015 and 2016 HMDA reportable loans in low, moderate, middle, and upper-income geographies, in comparison to the percentage of owner-occupied housing units in each of the census tract income categories, and the 2016 aggregate lending data (inclusive of Mortgage Network).

Distribution of HMDA Loans by Income Level Category of the Census Tract						
Census Tract Income Level	Total Owner-Occupied Housing Units	2015 Mortgage Network		2016 Aggregate Lending Data	2016 Mortgage Network	
		#	%	% of #	#	%
Low	3.1	69	2.4	3.5	90	2.4
Moderate	13.0	382	13.5	12.9	478	12.7
Middle	48.3	1,466	51.7	47.0	1,972	52.7
Upper	35.6	920	32.4	36.6	1,205	32.2
N/A		1	0.0	0.0	0	0.0
Total	100.0	2,838	100.0	100.0	3,745	100.0

Source: 2015 & 2016 HMDA LAR Data and 2010 U.S. Census Data.

As reflected in the above table, of the total loans originated in 2015 and 2016, 15.9 and 15.1 percent respectively, were in the low- and moderate-income census tracts. The percentages were comparable to the percentage of the area's owner occupied housing units in low- and moderate-income census tracts, as well as the aggregate percentages. A preliminary review of the interim data for 2017 confirms this trend with 15.9 percent of loans being originated in low- and moderate-income census tracts.

The highest concentration of residential loans was originated in the middle and upper-income level census tracts for both 2015 and 2016. Given that over 80.0 percent of the area's owner-occupied

housing units are in middle and upper-income level census tracts, it is reasonable to find the majority of loans originated within these designated census tracts.

Overall, the geographic distribution of residential mortgage loans reflects an adequate dispersion throughout low- and moderate-income 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 Mortgage Network’s 2015 and 2016 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 2016 aggregate lending data (inclusive of Mortgage Network).

Distribution of HMDA Loans by Borrower Income Level						
Median Family Income Level	% of Families	2015 Mortgage Network		2016 Aggregate Lending Data	2016 Mortgage Network	
		#	%	% of #	#	%
Low	22.2	157	5.5	4.2	159	4.2
Moderate	16.5	644	22.7	14.9	707	18.9
Middle	20.6	872	30.7	22.5	1,135	30.3
Upper	40.7	1,128	39.8	44.4	1,714	45.8
N/A	0.0	37	1.3	14.0	30	0.8
Total	100.0	2,838	100.0	100.0	3,745	100.0

Source: 2015 & 2016 HMDA LAR Data and 2010 U.S. Census Data.

As shown in the above table, lending to low-income borrowers in 2015 and 2016 was in-line with the aggregate data. Mortgage Network’s lending to moderate-income borrowers during that same period was above the aggregate data and demographics.

The Lender’s overall lending performance of lending to low- and moderate-income borrowers is adequate. This is further supported by a preliminary review of the interim data for 2017 that indicates that 25.9 percent of loans were originated to low- and moderate-income borrowers.

III. Innovative or Flexible Lending Practices

Mortgage Network 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.

Mortgage Network became a Housing and Urban Development approved Non-Supervised FHA Loan Correspondent (Direct Endorsement Lender) in 2007. FHA products provide competitive interest rates, smaller down payments for low and moderate income first time homebuyers and

existing homeowners. During the review period, Mortgage Network originated 837 HMDA reportable FHA loans totaling \$234 million. Of these, 315 loans benefited low- to moderate-income borrowers, while 199 loans were originated in low- and moderate-income geographies.

The Lender became a Veterans Administration's Automatic Approval Agent in 2008. The VA Home Loan Guarantee Program is designed specifically for the unique challenges facing service members and their families. Through VA-approved lenders like Mortgage Network, the program offers low closing cost, 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, Mortgage Network originated 326 HMDA reportable VA loans totaling \$102 million. Of these, 83 loans benefited low- to moderate-income borrowers, while 49 loans were originated in low- and moderate-income geographies.

Since 2007, Mortgage Network has offered loan products guaranteed by the USDA Rural Housing Program which is an innovative loan program that provides 100 percent financing for eligible homebuyers in rural-designated areas. This program is for home purchase transactions which offers fixed rates, and does not require a down payment and includes low and moderate income requirements. During the review period, Mortgage Network originated 46 loans totaling \$9.3 million. Of these, 21 loans benefited low- to moderate-income borrowers, and 3 loans were originated in low- or moderate-income geographies.

Mortgage Network offers loans under the FNMA Home Affordable Refinance Program (HARP) initiative that is designed to assist homeowners in refinancing their mortgage loans, even if they owe more than the home's current value. The primary expectation for HARP is that refinancing will put responsible borrowers in a better position by reducing their monthly principal and interest payments, reducing their interest rate, reducing the amortization period, or moving them from a more risky loan structure to a more stable product. The Lender originated 223 HARP loans in Massachusetts, through DU Refi Plus and Open Access programs totaling \$77.5 million.

Mortgage Network also offers Massachusetts Housing Finance Agency (MassHousing) products. MassHousing is a self-supporting not-for-profit public agency that provides financing for homebuyers and homeowners, and for developers and owners of affordable rental housing. The agency sells bonds to fund its credit programs. In 2015 and 2016, Mortgage Network originated 381 MassHousing loans for a total of \$89.8 million.

Licensee offers variety of additional loan programs, including FNMA My Community Loan Program; FNMA HomeStyle; FNMA HomeReady; and FHLMC Home Possible. These programs are designed to provide consumers with flexible credit options to help them meet their home buying, refinance or renovation needs, and help the mortgage lenders to confidently serve a market of creditworthy low to moderate-income borrowers. During the review period, Mortgage Network originated 70 loans for \$15.4 million under these programs.

IV. Loss Mitigation Efforts

The Division reviews 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 or such modifications, and the extent to which such modifications are effective in preventing subsequent defaults or foreclosures

Mortgage Network uses a third party to sub-service its retained servicing portfolio. The review of sub-servicer and investor score cards revealed overall default rates to be consistent with industry averages. For the review period, lending practices and products did 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 mortgage 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 Mortgage Network's personnel, and individual file review. No evidence of disparate treatment was identified.

Mortgage Network has established an adequate record relative to Fair Lending policies and practices.

Fair Lending is incorporated in Mortgage Network's company-wide policies and procedures that apply to all staff. Fair Lending training is incorporated into a comprehensive program called Mortgage Network University, where all employees are required to complete various courses, within the first week of employment, and continually on at least an annual basis. In addition, employees are instructed not to engage in any inappropriate conduct, take any action based upon prohibited basis, or steer consumers to loan products unsuitable for their needs.

The legal department in conjunction with management are responsible for ensuring that the Lender is in compliance with current laws and regulations, and for making necessary changes and updates to policies and procedures. Mortgage Network utilizes its internal review team, as well as an external vendor, to conduct targeted periodic reviews and annual audits for compliance with all regulatory standards, including CRA and Fair Lending.

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 2015 and 2016, Mortgage Network received 8,440 HMDA-reportable mortgage loan applications from within the Commonwealth of Massachusetts. Of these applications, 587 or 7.0 percent were received from racial minority applicants, and 368 or 62.7 percent resulted in originations. For the period, Mortgage Network received 327 or 3.9 percent of HMDA reportable applications from ethnic groups of Hispanic or Latino origin, and 240 or 73.4 percent were originated. This compares to the 78.0 percent overall ratio of mortgage loans originated by the Lender in Massachusetts, and the 70.8 percent approval ratio for the aggregate group.

Demographic information for Massachusetts reveals the total ethnic and racial minority population stood at 23.9 percent of the total population as of the 2010 Census. This segment of the population is comprised of 9.6 percent Hispanic or Latino ethnicities. At 14.3 percent, racial minorities consisted of 6.0 percent Black; 5.3 percent Asian/Pacific Islander; 0.2 percent American Indian/Alaskan Native; and 2.8 percent self-identified as Other Race.

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

MINORITY APPLICATION FLOW					
RACE	2015 Mortgage Network		2016 Aggregate Data	2016 Mortgage Network	
	#	%	% of #	#	%
American Indian/ Alaska Native	5	0.1	0.2	2	0.0
Asian	86	2.3	5.4	141	3.0
Black/ African American	65	1.7	3.6	89	1.9
Hawaiian/Pacific Islander	3	0.1	0.2	3	0.1
2 or more Minority	2	0.1	0.1	1	0.0
Joint Race (White/Minority)	60	1.6	1.3	60	1.3
Total Minority	221	5.9	10.8	296	6.3
White	3,046	81.7	68.9	3,741	79.4
Race Not Available	461	12.4	20.3	675	14.3
Total	3,728	100.0	100.0	4,712	100.0
ETHNICITY					
Hispanic or Latino	94	2.5	4.5	150	3.2
Joint (Hisp-Lat /Not Hisp-Lat)	37	1.0	1.1	46	1.0
Total Hispanic or Latino	131	3.5	5.6	196	4.2
Not Hispanic or Latino	3,174	85.1	74.5	3,879	82.3
Ethnicity Not Available	423	11.4	19.9	637	13.5
Total	3,728	100.0	100.0	4,712	100.0

Source: PCI Corporation CRA Wiz, Data Source: 2000 U.S. Census Data, 2015 & 2016 HMDA Data

In 2015 and 2016, Mortgage Network's overall racial minority application flow was below the census data and the aggregate data. The ethnic minority flow reflected similar levels of performance. A preliminary review of the interim data for 2017 shows that 6.4 percent of the applications are from racial minorities and 4.1 percent from ethnic minorities.

VI. Loss of Affordable Housing

This review concentrated on the suitability and sustainability of mortgage loans originated by Mortgage Network by taking into account delinquency and default rates of the mortgage 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.

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.

Mortgage Network's Service Test performance was determined to be "High 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.

During the examination period, Mortgage Network hosted or sponsored more than 30 home buyer seminars for the general public and various community groups, including municipal employees.

Several VA Home Buying Seminars were held at Veterans of Foreign Wars locations in Plymouth, Rockland, and Amesbury, Massachusetts.

Home Buying Lunch & Learn and One-on-One Mortgage Day events for Town of Framingham Employees were held at the Framingham Town Hall. Additional One-on-One Mortgage Day events were held at other Massachusetts locations during the review period. These events had Mortgage Network mortgage professionals available for 30 minute one-on-one appointments to answer consumer home buying questions.

Numerous other events included first time home buyer seminars at the Dedham Community House, Home Buying 101 events in Pembroke and Quincy, and more than ten home buying events for Babson College and Emerson College Employees.

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 review period, the Lender provided financial assistance totaling \$32,635 to several qualified community development organizations, including: Rebuilding Together Boston Inc., Anchor of Hope Diaper Bank, Dress for Success, Greater Lynn Senior Services Inc., MMBA Community College Scholarship Program, Cradles to Crayons, Healing Abuse Working for Change (HAWC), and the Community Action Partnership. These donations show Mortgage Network's commitment to the development and financial support of education, youth programs, and health and human service projects within the Commonwealth.

Mortgage Lending Services

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

Mortgage Network provides reasonable delivery of mortgage lender services that are accessible to geographies and individuals of different income levels in the Commonwealth. Business development is based on multiple platforms for mortgage loan applications, including partner referral programs, social media, as well as traditional marketing and advertising tools. Customers can also apply to Mortgage Network for a mortgage loan over the telephone and via the company's website.

In addition to the flexible loan products described in the Lending Test, the Lender also offers a variety of other credit options that consumers may also consider. These include: Lender-Paid Mortgage Insurance (LPMI) loans, Interest Only (IO) loans, FNMA 97% LTV Option' loans, and FHA reverse mortgage loans, also known as a Home Equity Conversion Mortgage (HECM).

PERFORMANCE EVALUATION DISCLOSURE GUIDE

Massachusetts General Laws Chapter 255E, Section 8, and 209 CMR 54.00, the CRA regulation, requires 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.