

PUBLIC DISCLOSURE

December 4, 2017

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

**Community Credit Union of Lynn
Certificate Number: 67558**

**One Andrew Street
Lynn, Massachusetts 01901**

**Division of Banks
1000 Washington Street, 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>
--

GENERAL INFORMATION

This document is an evaluation of the Community Reinvestment Act (CRA) performance of Community Credit Union of Lynn (Credit Union) prepared by the Division of Banks, the institution's supervisory agency, as of December 4, 2017. The Division of Banks rates the CRA performance of the Credit Union as per the provisions set forth in 209 CMR 46.00.

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

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.

This evaluation was based upon an analysis of the Credit Union's performance in providing loans to its membership, providing loans to individuals of various incomes, including low- to moderate-income members, response to CRA complaints, and the Credit Union's fair lending performance. The rating is supported by the following summary of results.

- The Credit Union's average loan-to-share (LTS) ratio for the period is more than reasonable (114.6 percent) given the institution's size, financial condition, and credit needs of its assessment area.
- A majority of the Credit Union's residential loans are made inside the assessment area.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.
- The distribution of home mortgage loans to borrowers of different income levels is reasonable.
- The institution did not received any CRA-related complaints during the evaluation period.

SCOPE OF EVALUATION

The Small Institution Examination Procedures include the Lending Test, which evaluates the Credit Union's performance according to the following criteria:

- Loan-to-share (LTS) ratio,
- Assessment area concentration,
- Geographic distribution,
- Borrower profile, and
- Response to CRA-related complaints.

Loan Products Reviewed

Examiners determined that the Credit Union's dominant product lines are home mortgage and consumer loans. This conclusion considered the Credit Union's business strategy and the number and dollar volume of loans originated during the evaluation period. Credit Union records indicated that the lending focus and product mix remained relatively consistent throughout the evaluation period.

This evaluation considered all home mortgage loans reported on the Credit Union's 2016 and 2017 Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LARs). In 2016, the Credit Union originated 116 HMDA-reportable loans totaling \$31.1 million. In 2017, it originated 66 HMDA-reportable loans totaling \$17.4 million. The Credit Union's 2016 performance was compared to aggregate data. For 2017, examiners compared the Credit Union data with the demographic data, as aggregate data is not yet available for that year. In addition, examiners sampled 25 consumer loans for both 2015 and 2016. This sample was considered representative of the Credit Union's performance during the evaluation period.

For the Lending Test, examiners reviewed the number and dollar volume of home mortgage and consumer loans. While number and dollar volume of loans are presented, examiners assigned more weight to performance by number of loans because the number of loans is a better indicator of the number of individuals served.

DESCRIPTION OF INSTITUTION

Background

Community Credit Union of Lynn was established in 1955 with a commitment to meeting the financial needs of the local community. Membership is available to all those living or working in the Greater Lynn area and surrounding North Shore communities. There are currently more than 6400 members.

The Credit Union is a designated low-income credit union by the Commissioner of Banks and in accordance with National Credit Union Administration (NCUA) standards. Eligibility is based in part due to the majority of the Credit Union's membership being low-income.

Examiners noted that the NCUA Rules and Regulations Part 701.34(2) stipulates that low-income members are those members whose family income is 80% or less than the median family income for the metropolitan area where they live or national metropolitan area, whichever is greater, or those members who earn 80% or less than the total median earnings for individuals for the metropolitan area where they live or national metropolitan area, whichever is greater. This differs from CRA standards, which designates those earning less than 50% of the median family income as low-income; by NCUA standards, a low-income designation captures a larger group of members than would otherwise be recognized for CRA purposes.

The Credit Union received a "High Satisfactory" rating as a result of the previous evaluation performed by the Division of Banks, dated September 23, 2013.

Operations

Credit Union headquarters are located at One Andrew Street in Lynn, Massachusetts in a low-income census tract. A branch office and mortgage center is located at 32 Central Street in Peabody, also in a low-income census tract. The Credit Union opened an additional branch during the evaluation period, located at 377 Summer Street in Somerville, within an upper-income census tract. No branches were closed since the prior evaluation.

Banking hours are considered convenient and accessible to the Credit Union's members across all locations. The Credit Union maintains two deposit-taking ATM machines, one located at its Peabody branch and the other at its Somerville branch. The Credit Union is a member of the SUM, NYCE, and PLUS ATM networks, providing members with access to thousands of ATMs nationwide without incurring an ATM surcharge.

The Credit Union offers personal and business checking accounts, money market and savings accounts, mortgage loans, automobile and personal loans, debit cards, online banking, and other related services. Additionally, the Credit Union has partnered with Kasasa Ltd. to expand its product offerings. These include Kasasa Cash, Kasasa Cash Back, and Kasasa Saver, which provides members with free checking, no minimum balances, ATM fee refunds, and high-yield savings accounts.

Ability and Capacity

As of September 30, 2017, the Credit Union had total assets of approximately \$141.2 million and total shares and deposits of \$100.2 million. Loans totaled \$112.1 million and represented 79.4 percent of total assets.

The Credit Union is primarily a residential lender with a majority of the loan portfolio secured by residential properties. As noted in the table below, approximately 57.4 percent of the loans are secured by first mortgage real estate loans and lines of credit, as well as other real estate loans and lines of credit. New and used vehicle loans also comprise a significant portion of the loan portfolio.

The following table illustrates the distribution of the Credit Union's loan portfolio as of the most recently available Call Report.

Loan Portfolio Distribution as of September 30, 2017		
Loan Type	Dollar Amount (\$)	Percent of Total Loans
Total Other Real Estate Loans/Lines of Credit	32,912,037	29.4
Total 1 st Mortgage Real Estate Loans/Lines of Credit	31,426,774	28.0
Used Vehicle Loans	17,245,542	15.4
New Vehicle Loans	17,192,313	15.3
Total All Other Loans/Lines of Credit	9,252,238	8.3
All Other Unsecured Loans/Lines of Credit	3,996,982	3.6
Unsecured Credit Card Loans	\$93,034	0.1
Total Loans	112,118,920	100.0

DESCRIPTION OF ASSESSMENT AREA

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. Community Credit Union of Lynn has designated its assessment area to include the following municipalities: Arlington, Belmont, Beverly, Cambridge, Danvers, Everett, Lynn, Lynnfield, Marblehead, Medford, Nahant, Peabody, Salem, Saugus, Somerville, and Swampscott. Revere is located in Suffolk County and is part of the Boston, MA Metropolitan Division (MD). Arlington, Belmont, Cambridge, Everett, Medford, and Somerville are located in Middlesex County, part of the Cambridge-Newton-Framingham MD. The other municipalities are located in Essex County, also a part of the Cambridge-Newton-Framingham MD. Both areas are contained within the Boston-Worcester-Manchester, MA-RI-NH Consolidated Statistical Area.

Economic and Demographic Data

The assessment area includes 165 census tracts (CTs). These tracts reflect the following income designations according to the 2010 U.S. Census:

- 21 low-income tracts,
- 48 moderate-income tracts,
- 60 middle-income tracts,
- 35 upper income tracts, and
- 1 tract without an income designation.

The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	165	12.7	29.1	36.4	21.2	0.6
Population by Geography	751,438	11.6	30.4	38.6	19.3	0.0
Housing Units by Geography	311,932	11.3	30.3	39.3	19.0	0.0
Owner-Occupied Units by Geography	152,421	6.2	25.7	43.8	24.3	0.0
Occupied Rental Units by Geography	140,827	16.8	35.2	34.8	13.2	0.0
Vacant Units by Geography	18,684	11.9	32.1	37.2	18.8	0.0
Businesses by Geography	50,896	11.0	26.4	38.9	23.5	0.1
Farms by Geography	724	7.9	22.9	43.2	26.0	0.0
Family Distribution by Income Level	169,683	27.8	18.4	20.4	33.4	0.0
Household Distribution by Income Level	293,248	29.5	16.1	17.4	36.9	0.0
Median Family Income MSA - 14454 Boston, MA MD		\$90,699	Median Housing Value			\$416,930
Median Family Income MSA - 15764 Cambridge-Newton-Framingham, MA MD		\$100,380	Median Gross Rent			\$1,348
			Families Below Poverty Level			8.5%
<i>Source: 2010 U.S. Census & 2015 ACS Census and 2017 D&B Data</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Federal Financial Institutions Examination Council (FFIEC) updated median family income level is used to analyze home mortgage loans under the Borrower Profile criterion. The low-, moderate-, middle-, and upper-income categories are presented in the following table.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Boston, MA MD Median Family Income (14454)				
2015 (\$90,000)	<\$45,000	\$45,000 to <\$72,000	\$72,000 to <\$108,000	≥\$108,000
2016 (\$90,800)	<\$45,400	\$45,400 to <\$72,640	\$72,640 to <\$108,960	≥\$108,960
2017 (\$94,300)	<\$47,150	\$47,150 to <\$75,440	\$75,440 to <\$113,160	≥\$113,160
Cambridge-Newton-Framingham, MA MD Median Family Income (15764)				
2015 (\$101,700)	<\$50,850	\$50,850 to <\$81,360	\$81,360 to <\$122,040	≥\$122,040
2016 (\$98,600)	<\$49,300	\$49,300 to <\$78,880	\$78,880 to <\$118,320	≥\$118,320
2017 (\$104,800)	<\$52,400	\$52,400 to <\$83,840	\$83,840 to <\$125,760	≥\$125,760
<i>Source: FFIEC</i>				

There are 311,293 housing units in the assessment area. Of these, 49 percent are owner-occupied, 45 percent are occupied rental units, and 6 percent are vacant. The Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units. Data obtained from the U.S. Bureau of Labor and Statistics indicates that the June 2017 unemployment rate was 4.3 percent for Massachusetts statewide, 4.3 percent in the Boston MD, and 3.7 percent in the Cambridge-Newton-Framingham MD.

Competition

The assessment area is highly competitive in the market for home mortgage loans. Market share data for 2016 indicates that 474 lenders originated 37,926 mortgage loans in the assessment area totaling nearly \$14 billion. The average loan amount was \$375,000. The five most prominent lenders in the assessment area were large national lenders and accounted for over 23 percent of total market share.

Community Contact

As part of the examination process, examiners consulted with a local nonprofit housing agency to gain a better understanding of the credit needs of the communities in the Credit Union's assessment area.

The community contact was concerned about rising home prices in the region and the subsequent inability of low- and moderate-income individuals and families to afford housing. The contact expressed a desire for municipalities with substantial urban areas to revisit existing zoning laws so as to allow for more new housing developments. The contact felt that financial institutions were generally supportive of housing initiatives in the region, but are constrained in their ability to extend home mortgage loans to low- and moderate-income applicants because of high housing prices.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Community Credit Union of Lynn demonstrated satisfactory performance under the Lending Test.

Loan-to-Share Ratio

This performance criterion determines what percentage of the Credit Union's share base is reinvested in the form of loans. This ratio is based on total loans net of unearned income and net of the allowance for loan and lease losses as a percentage of total shares. The LTS ratio since the previous evaluation is more than reasonable given the institution's size, financial condition, and assessment area credit needs.

The Credit Union's net LTS ratio, as calculated from NCUA 5300 Quarterly Call Report data, averaged 114.6 percent over the past eight calendar quarters from December 31, 2015 through September 30, 2017. The ratio ranged from a low of 104.7 percent as of March 2016, to a high of 124.7 percent as of December 2016; the LTS ratio exhibited minor fluctuations throughout the evaluation period. Over the past eight calendar quarters, net loans have increased by 7.3 percent, and shares have increased by 12.4 percent. The Credit Union attributes its high LTS ratio to its business focus on lending as opposed to other forms of investment, coupled with a desire to continuously to meet the credit needs of those who seek to secure loans with the Credit Union.

To evaluate the Credit Union's LTS ratio, examiners selected comparable institutions based on their asset size, geographic location, and lending focus. Please refer to the following table.

Loan-to-Share Ratio Comparison		
	Total Assets as of 9/30/2017 \$ (000s) \$ (000s)	Average Net LTS Ratio (%)
Community Credit Union of Lynn	141,156	114.6
St. Jean's Credit Union	223,843	83.6
River Works Credit Union	105,256	97.3
Brotherhood Credit Union	110,827	65.3
<i>Source: Reports of Income and Condition 12/31/15 through 9/30/2017</i>		

Assessment Area Concentration

The Credit Union originated a majority of its loans inside the assessment area. Examiners considered the number of loans originated, as well as the dollar amount of loans. More weight is given to the number of loans originated, as this figure better represents the amount of consumers served by the Credit Union.

The Credit Union originated a majority of its home mortgage loans inside the assessment area by both number and dollar volume. It made 74.2 percent of its loans by number and 68.2 percent of loans by dollar volume inside the assessment area.

In addition, the Credit Union originated a majority of the sampled consumer loans inside the assessment area by number and dollar volume. 52 percent of consumer loans by number and 56.9 percent of loans by dollar volume were originated inside the assessment area. Please refer to the following table.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans \$(000s)				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2016	89	76.7	27	23.3	116	21,923	70.4	9,208	29.6	31,131
2017	46	69.7	20	30.3	66	11,134	64.2	6,222	35.8	17,356
Subtotal	135	74.2	47	25.8	182	33,057	68.2	15,430	31.8	48,487
Consumer										
2015	10	40.0	15	60.0	25	126	28.4	317	71.6	443
2016	16	64.0	9	36.0	25	553	73.6	198	26.4	751
Subtotal	26	52.0	24	48.0	50	679	56.9	515	43.1	1,194
Total	161	69.4	71	30.6	232	33,736	67.9	15,945	32.1	49,681
<i>Source: 2015-2017 Bank Data</i>										

Geographic Distribution

Home Mortgage Lending

The Credit Union's geographic distribution of loans reflects reasonable dispersion throughout the assessment area. The geographic distribution of loans was reviewed to determine how 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.

In 2016, the Credit Union originated ten loans by volume or 11.2 percent of loans within a low-income census tract, exceeding aggregate performance. It originated 24 loans by volume or 27 percent of loans in moderate-income tracts, in line with aggregate performance.

In 2017, the Credit Union originated six loans or 13 percent of loans by volume in low-income census tracts, exceeding demographic figures. It originated 16 loans or 34.8 percent of its loans by volume in moderate-income tracts, which exceeds demographic data. Comparison to aggregate

data was not made because aggregate data for 2017 is not available. Please refer to the following table.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2016	4.2	5.0	10	11.2	1,905	8.7
2017	6.2	--	6	13.0	1,297	11.6
Moderate						
2016	24.8	26.2	24	27.0	5,577	25.4
2017	25.7	--	16	34.8	3,793	34.1
Middle						
2016	51.0	51.0	44	49.4	10,797	49.3
2017	43.8	--	20	43.5	4,878	43.8
Upper						
2016	20.0	17.7	11	12.4	3,644	16.6
2017	24.3	--	4	8.7	1,166	10.5
Not Available						
2016	0.0	0.0	0	0.0	0	0.0
2017	0.0	--	0	0.0	0	0.0
Totals						
2016	100.0	100.0	89	100.0	21,923	100.0
2017	100.0	--	46	100.0	11,134	100.0

Source: 2010 U.S. Census & 2015 ACS Census; 1/1/2016 - 12/31/2017 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.

Consumer Lending

The geographic distribution of sampled consumer loans reflects reasonable dispersion throughout the assessment area.

In 2015, the Credit Union originated one loan or 10 percent of sampled loans to a borrower located in a low-income census tract within the assessment area. This figure falls below demographic data of 29.5 percent. In 2016, the Credit Union originated four loans or 25 percent of sampled loans to borrowers in low-income census tracts. This performance falls slightly below demographic data.

In 2015, the Credit Union originated five loans representing 50 percent of sampled consumer loans to borrowers located in moderate-income census tracts. This figure exceeds demographic data, whereby 16.1 percent of moderate-income households in the assessment area received consumer loans. In 2016, the Credit Union again originated five sampled consumer loans to borrowers located in moderate-income census tracts, representing 31.3 percent of total sampled consumer

loans located in the assessment area. This figure exceeds demographic data. Please refer to the following chart.

Geographic Distribution of Consumer Loans					
Tract Income Level	% of Households	#	%	\$(000s)	%
Low					
2015	29.5	1	10.0	5	4.0
2016	29.5	4	25.0	36	6.5
Moderate					
2015	16.1	5	50.0	76	60.8
2016	16.1	5	31.3	55	10.0
Middle					
2015	17.4	4	40.0	44	35.2
2016	17.4	5	31.3	229	41.5
Upper					
2015	36.9	0	0.0	0	0.0
2016	36.9	2	12.4	232	42.0
Totals					
2015	100.0	10	100.0	125	100.0
2016	100.0	16	100.0	552	100.0

Source: 2010 U.S. Census; 2015 and 2016 Bank Data

Overall, the Credit Union’s performance under the Geographic Distribution criterion is considered reasonable.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among individuals of different income levels in the assessment area. The Credit Union’s performance of home mortgage and consumer lending supports this conclusion. Examiners focused on the percentage by number of home mortgage and consumer loans to low- and moderate-income borrowers.

Home Mortgage Lending

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels including low- and moderate-income and businesses of different sizes. 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 home 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.

In 2016, the Credit Union originated 15 loans or 16.9 percent of loans by volume to low-income borrowers, significantly exceeding aggregate performance. Examiners noted the Credit Union’s strong performance in this area was achieved despite the fact that a low-income borrower (annual average income of \$45,400 or less in the Boston MD, or \$49,300 or less in the Cambridge-Framingham-Newton MD) would likely not qualify for a traditional mortgage given the median

value in the assessment area of approximately \$417,000. In 2017, the Credit Union originated four loans or 8.7 percent of loans by volume to low-income borrowers. This figure was compared to demographic data due to the unavailability of 2017 aggregate performance figures. Although the Credit Union's performance falls below demographic figures, such performance is mitigated and considered reasonable in light of the relative inability of low-income borrowers to qualify for mortgages in the assessment area.

In 2016, the Credit Union originated 24 home mortgage loans, or 27 percent of loans by volume to moderate-income borrowers, exceeding aggregate performance. In 2017, it originated 11 loans or 23.9 percent of loans by volume to moderate-income borrowers, exceeding demographic figures.

Given the Credit Union's assessment area demographics, the home mortgage lending performance is considered reasonable. Please refer to the following chart.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2016	27.4	4.1	15	16.9	2,180	9.9
2017	27.8	--	4	8.7	492	4.4
Moderate						
2016	18.2	17.1	24	27.0	5,270	24.0
2017	18.4	--	11	23.9	2,507	22.5
Middle						
2016	20.6	24.9	27	30.3	6,886	31.4
2017	20.4	--	15	32.6	3,142	28.2
Upper						
2016	33.8	40.5	23	25.8	7,587	34.6
2017	33.4	--	16	34.8	4,993	44.8
Not Available						
2016	0.0	13.4	0	0.0	0	0.0
2017	0.0	--	0	0.0	0	0.0
Totals						
2016	100.0	100.0	89	100.0	21,923	100.0
2017	100.0	--	46	100.0	11,134	100.0

Source: 2010 U.S. Census & 2015 ACS Census; 1/1/2016 - 12/31/2017 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.

Consumer Lending

In 2015, the Credit Union extended five or 50 percent of sampled consumer loans to low-income borrowers in the assessment area, exceeding demographic comparisons. In 2016, the Credit Union originated eight or 50 percent of sampled consumer loans to low-income borrowers in the assessment area.

In 2016, the Credit Union originated one sampled loan to a moderate-income borrower situated in the assessment area, representing 10 percent of the total sample. This figure falls below demographic data of 16.1 percent. In 2017, the Credit Union improved its consumer lending to moderate-income borrowers, extending four loans to individuals in the assessment area, totaling 25 percent of the total sample. This figure exceeds demographic data.

The Credit Union’s performance with regards to consumer lending is considered reasonable, taking into account assessment area demographics. Please refer to the following chart.

Distribution of Consumer Loans by Borrower Income Level					
Borrower Income Level	% of Households	#	%	\$(000s)	%
Low					
2015	29.5	5	50.0	44	39.7
2016	29.5	8	50.0	257	46.6
Moderate					
2015	16.1	1	10.0	18	16.2
2016	16.1	4	25.0	50	9.0
Middle					
2015	17.4	2	20.0	31	27.9
2016	17.4	2	12.5	191	34.6
Upper					
2015	36.9	2	20.0	18	16.2
2016	36.9	2	12.5	54	9.8
Totals					
2015	100.0	10	100.0	111	100.0
2016	100.0	16	100.0	552	100.0

Source: 2010 U.S. Census; 2015 and 2016 Bank Data

Response to Complaints

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.

Fair Lending Policies and Practices

The Division of Banks provides comments regarding the institution’s fair lending policies and procedures pursuant to Regulatory Bulletin 1.3-106. Based on a review of the Credit Union’s public comment file and its performance relative to fair lending policies and practices, no violations of the anti-discrimination laws and regulations were identified.

Minority Application Flow

The Credit Union's HMDA LARs for 2016 and 2017 were reviewed to determine if the application flow from the different racial groups within the Credit Union's assessment area was reflective of the assessment area's demographics. The comparison of this data assists in deriving reasonable expectations for the rate of applications the Credit Union received from minority residential loan applicants.

According to the 2010 U.S. Census Data, the Credit Union's assessment area contained a total population of 751,438 individuals, of which 27.7 percent are minorities. The assessment area's minority and ethnic population is 6.1 percent Black/African American, 6.6 percent Asian, 0.1 percent American Indian, 11.7 percent Hispanic or Latino, and 3.2 percent other.

In 2016, the Credit Union received 111 HMDA-reportable loan applications within its assessment area. Of these applications, 13 or 11.7 percent were received from minority applicants, seven of which resulted in originations. This is compared to aggregate data whereby 19 percent were received from minority applicants and 17.5 percent were originated.

In 2017, the Credit Union received 72 HMDA-reportable loan applications from within its assessment area. Of these applications, 11 or 15.3 percent were received from minority applicants, 13 percent of which resulted in originations.

Please refer to the table below for information on the Credit Union's minority application flow.

MINORITY APPLICATION FLOW					
RACE	Credit Union 2016		2016 Aggregate Data	Credit Union 2017	
	#	%	%	#	%
American Indian/ Alaska Native	0	0.0	0.2	1	1.4
Asian	2	1.8	6.0	2	2.8
Black/ African American	3	2.7	2.9	5	6.9
Hawaiian/Pacific Islander	0	0.0	0.1	0	0.0
2 or more Minority	0	0.0	0.0	0	0.0
Joint Race (White/Minority)	1	0.9	1.8	1	1.4
Total Minority	6	5.4	11.0	9	12.5
White	70	63.1	67.2	40	55.6
Race Not Available	35	31.5	21.8	23	31.9
Total	111	100.0	100.0	72	100.0
ETHNICITY					
Hispanic or Latino	7	6.3	7.4	4	5.6
Not Hispanic or Latino	68	61.3	70.1	45	62.5
Joint (Hisp/Lat /Not Hisp/Lat)	0	0.0	1.3	0	0.0
Ethnicity Not Available	36	32.4	21.2	23	31.9
Total	111	100.0	100.0	72	100.0

Source: US Census 2010, HMDA Aggregate Data 2016, HMDA LAR Data 2016 and 2017

Considering the demographic composition of the assessment area and comparisons to aggregate data in 2016, the Credit Union's minority application flow is adequate.

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 One Andrew Street Lynn, MA 01901.

[Please Note: If the institution has more than one assessment area, each office (other than off-premises electronic deposit facilities) in that community shall also include the address of the designated office for that assessment area.]

- 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.