

PUBLIC DISCLOSURE

March 5, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Haverhill Bank
Certificate Number: 26411

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Haverhill, Massachusetts 01830

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This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. 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 or the Federal Deposit Insurance Corporation concerning the safety and soundness of this financial institution.

TABLE OF CONTENTS

Institution Rating	1
Scope of Evaluation	2
Description of Institution	4
Description of Assessment Area	6
Conclusions on Performance Criteria	10
Discriminatory or Other Illegal Credit Practices Review	19
Division of Banks Fair Lending Policies and Procedures	20
Glossary	22

INSTITUTION RATING

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.

Haverhill Bank's satisfactory Community Reinvestment Act (CRA) performance under the Lending Test and Community Development Test supports the overall rating. Examiners did not identify any evidence of discriminatory or other illegal credit practices. The following points summarize the bank's Lending Test and Community Development Test performance.

The Lending Test is rated Satisfactory.

- The loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and assessment area credit needs.
- The bank made a majority of its home mortgage and small business loans in the assessment area.
- The geographic distribution of loans reflects excellent dispersion throughout the assessment area.
- The distribution of borrowers reflects reasonable penetration of loans among individuals of different income levels and businesses of different sizes.
- The institution took appropriate action in response to substantiated complaints about its performance in meeting assessment area credit needs.

The Community Development Test is rated Satisfactory.

- The institution demonstrated adequate responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services, as appropriate. Examiners considered the institution's capacity and the need and availability of such opportunities for community development in the assessment area.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated March 2, 2015, to the current evaluation dated March 5, 2018. Examiners used the Interagency Intermediate Small Institution Examination Procedures to evaluate Haverhill Bank's CRA performance. These procedures include two tests: the CRA Small Bank Lending Test and the Community Development Test.

The Lending Test considered the institution's performance according to the following criteria.

- Loan-to-deposit ratio
- Assessment area concentration
- Geographic distribution
- Borrower profile
- Response to CRA-related complaints

The Community Development Test considered the following factors.

- Number and dollar amount of community development loans, qualified investments, and community development services
- The responsiveness of such activities to the community development needs of the assessment area

Banks must achieve at least a Satisfactory rating under each test to obtain an overall Satisfactory rating. This evaluation does not include any lending activity performed by affiliates.

Loan Products Reviewed

Examiners determined that the bank's major product lines are home mortgage and small business loans. This conclusion considered the bank's business strategy and the number and dollar volume of loans originated during the evaluation period.

The bank's record of originating home mortgage loans contributed more weight to overall conclusions due to the larger loan volume when compared to small business lending over the evaluation period. No other loan types, such as small farm or consumer loans, represent major product lines. Therefore, they provided no material support for conclusions or ratings and are not presented.

Examiners considered all home mortgage loans reported on the institution's 2016 and 2017 Home Mortgage Disclosure Act Loan Application Registers (HMDA LARs). Home mortgage loans include home purchases, home improvement, and refinancing of dwelling-secured loans. For 2016, Haverhill Bank reported 126 home mortgage loans totaling \$33.5 million, and for 2017, 126 home mortgage loans totaling \$31.3 million. Examiners compared the institution's performance under the Geographic Distribution and Borrower Profile criteria to 2016 aggregate loan data and 2010 U.S. Census data. Examiners compared the institution's performance for 2017 to the 2015 American Community Survey (ACS) Census data.

In addition, examiners selected a sample of small business loans originated in 2017. This sample represents the bank's performance during the entire evaluation period. Examiners analyzed 30 small business loans totaling \$6.5 million, from a universe of 94 small business originations totaling \$23.0 million in 2017. D&B data for 2017 provided a standard of comparison for the sampled small business loans.

For the Lending Test, examiners reviewed and analyzed both the number and dollar volume of home mortgage and small business loans. Examiners emphasized performance by number of loans because the number of loans is a better indicator of the number of individuals and businesses served.

For the Community Development Test, bank management provided data on qualified community development loans, investments, and services since the prior CRA evaluation dated March 2, 2015.

The Interstate Banking and Branching Efficiency Act of 1994 require ratings and conclusions for each Multi-State Metropolitan Statistical Area (MSA) in addition to the rating and conclusions for overall performance. The vast majority of the assessment area is in the Boston-Cambridge-Quincy, Massachusetts (MA) – New Hampshire (NH) MSA. The bank's assessment area does not extend substantially beyond the MSA boundaries; however, the assessment area includes three census tracts located in the Manchester-Nashua, NH MSA where the bank does not have a branch. As Haverhill Bank's assessment area is located almost entirely within the Multi-State MSA, and all branches are within the Multi-State MSA, examiners presented a single rating and conclusions that apply to the overall and Multi-State MSA performance.

DESCRIPTION OF INSTITUTION

Background

Haverhill Bank is a Massachusetts-chartered mutual cooperative bank headquartered in Haverhill, MA. The bank has one subsidiary, Haverhill Securities Corporation, which buys, sells, and holds securities. Haverhill Bank operates in the northeastern part of MA in Essex County and the southeastern part of NH in Rockingham and Hillsborough Counties. The institution received a Satisfactory rating at its previous FDIC and Division joint Performance Evaluation, dated March 2, 2015, based on Interagency Intermediate Small Institution Examination Procedures.

Operations

Haverhill Bank operates six full-service branches. Two branches are in Haverhill, MA, including the main office. Additionally, the bank operates two limited-service branches in Haverhill at Whittier Vocational School and Haverhill High School. Other branches are in Bradford, Merrimac, and West Newbury, MA, and Salem, NH. The main office is in a low-income census tract and the Bradford branch and Haverhill High School locations are in moderate-income census tracts. The West Newbury branch opened during the evaluation period in September 2016. Haverhill Bank also closed its Lafayette Square branch in Haverhill, located in a low-income census tract, in 2017. Although the bank closed this office, the other two full-service branches and the remaining Lafayette Square automated teller machine (ATM) adequately service the low- and moderate-income census tracts in Haverhill. The bank has not been involved in any merger or acquisition activity since the previous evaluation.

Haverhill Bank offers a variety of loan products including home mortgages, home equity loans and lines of credit, personal loans, auto loans, and commercial loans and lines of credit. The bank is primarily a home mortgage lender. Since the last evaluation, the bank introduced a first time homebuyer program for low- and moderate-income borrowers. The bank provides a variety of deposit services to consumer and business customers, including checking, savings, money market deposit accounts, certificates of deposit, and individual retirement accounts. Alternative banking delivery systems include online and mobile banking, electronic bill pay, and telephone banking. Haverhill Bank maintains ATMs at each branch and a stand-alone ATM in Lafayette Square in Haverhill. The institution also provides customers surcharge-free access to a network of ATMs across the country.

Ability and Capacity

Assets totaled approximately \$390.7 million as of December 31, 2017, and included total loans of \$288.7 million and securities totaling \$56.2 million. The following table illustrates the loan portfolio.

Loan Portfolio Distribution as of 12/31/17		
Loan Category	\$(000s)	%
Construction and Land Development	27,570	9.5
Secured by Farmland	279	0.1
1-4 Family Residential	187,525	65.0
Multi-family (5 or more) Residential	9,543	3.3
Commercial Real Estate	29,672	10.3
Total Real Estate Loans	254,589	88.2
Commercial and Industrial	33,218	11.5
Agricultural	0	0.0
Consumer	817	0.3
Other	31	0.0
Less: Unearned Income	0	0.0
Total Loans	288,655	100.0
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet assessment area credit needs.

DESCRIPTION OF ASSESSMENT AREA

The CRA requires each financial institution to define one or more assessment areas within which examiners will evaluate its CRA performance. Haverhill Bank designated a single assessment area in the Boston-Cambridge-Newton, MA-NH Multi-State MSA and the Manchester-Nashua, NH MSA. The following sections discuss demographic and economic information for the assessment area.

Economic and Demographic Data

The assessment area includes 63 census tracts within portions of Essex County in MA (44) and Rockingham (16) and Hillsborough Counties (3) in NH. Essex County is in the Cambridge-Newton-Framingham, MA Metropolitan Division (MD) (15764). Rockingham County is in the Rockingham County-Strafford County, NH MD (40484). Together, the MDs make up the Boston-Cambridge-Newton, MA-NH MSA (14460). Although the assessment area does not extend substantially beyond the MSA, the assessment area includes three census tracts in Hillsborough County, located in the Manchester-Nashua, NH MSA (31700). At the previous evaluation, the assessment area consisted of 23 census tracts and included Haverhill, Groveland, and Merrimac in MA, and Atkinson, Plaistow, and Salem in NH. In 2015, the bank expanded its assessment area to include Amesbury, West Newbury, Newburyport, Newbury, Boxford, North Andover, and Methuen in MA, and Newton, Derry, Windham, and Pelham in NH. According to the 2015 ACS Census, the 63 census tracts in the assessment area reflect the following income designations:

- 5 low-income census tracts,
- 10 moderate-income census tracts,
- 35 middle-income census tracts, and
- 13 upper-income census tracts.

Per the 2010 U.S. Census, there were 3 low-income census tracts, 9 moderate-income census tracts, 35 middle-income census tracts, and 16 upper-income census tracts. Because of the 2015 ACS Census, the assessment area includes a few additional low- and moderate-income census tracts; however, no major changes that affect performance context.

There are no distressed, underserved, or designated disaster areas within the assessment area. 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)	63	7.9	15.9	55.6	20.6	0.0
Population by Geography	315,717	7.1	15.7	54.7	22.5	0.0
Housing Units by Geography	126,164	7.1	17.1	55.1	20.7	0.0
Owner-Occupied Units by Geography	86,941	2.6	12.7	58.6	26.1	0.0
Occupied Rental Units by Geography	32,507	18.0	28.2	46.3	7.4	0.0
Vacant Units by Geography	6,716	11.4	20.8	52.9	14.9	0.0
Businesses by Geography	21,814	6.1	14.1	56.5	23.4	0.0
Family Distribution by Income Level	83,687	21.2	18.1	22.0	38.6	0.0
Median Family Income MSA - 15764 Cambridge-Newton-Framingham, MA MD		\$100,380	Median Housing Value			\$312,237
Median Family Income MSA - 31700 Manchester-Nashua, NH MSA		\$85,966	Median Gross Rent			\$1,116
Median Family Income MSA - 40484 Rockingham County-Strafford County, NH MD		\$90,150	Families Below Poverty Level			5.5%
<i>Source: 2015 ACS Census and 2017 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to 2017 D&B data, there were 21,814 non-farm businesses operating in the assessment area. Gross annual revenues (GARs) for these businesses are as follows:

- 85.6 percent have \$1 million or less.
- 6.3 percent have more than \$1 million.
- 8.1 percent have unknown revenues.

The analysis of small business loans under the Borrower Profile criterion compares the distribution of businesses by the GAR level. Service industries represent the largest portion of businesses at 47.8 percent; followed by retail trade (13.6 percent); construction (10.6 percent); and finance, insurance, and real estate (8.1 percent). Additionally, 82.8 percent of businesses have GARs of \$0.5 million or less, indicating that the majority of businesses in the area are very small. Lastly, 72.0 percent of businesses have four or fewer employees, and 90.4 percent operate from a single location.

Examiners used the FFIEC-updated median family income levels to analyze home mortgage loans under the Borrower Profile criterion. The following table illustrates the low-, moderate-, middle-, and upper-income categories.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Cambridge-Newton-Framingham, MA MD Median Family Income (15764)				
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
Manchester-Nashua, NH MSA Median Family Income (31700)				
2016 (\$83,100)	<\$41,550	\$41,550 to <\$66,480	\$66,480 to <\$99,720	≥\$99,720
2017 (\$78,400)	<\$39,200	\$39,200 to <\$62,720	\$62,720 to <\$94,080	≥\$94,080
Rockingham County-Strafford County, NH MD Median Family Income (40484)				
2016 (\$87,900)	<\$43,950	\$43,950 to <\$70,320	\$70,320 to <\$105,480	≥\$105,480
2017 (\$93,800)	<\$46,900	\$46,900 to <\$75,040	\$75,40 to <\$112,560	≥\$112,560
<i>Source: FFIEC</i>				
<i>Due to rounding, totals may not equal 100.0</i>				

Data obtained from the U.S. Bureau of Labor Statistics indicates that unemployment rates have decreased in the assessment area during the evaluation period. The unemployment rates for Essex County, MA, decreased from 5.0 percent as of year-end 2015 to 3.8 percent at year-end 2016. The unemployment rate in Rockingham County, NH, decreased from 3.6 percent in 2015 to 3.0 percent at year-end 2016. According to February 2018 data from Moody's Regional Workstation (Moody's), the assessment area continues to benefit from high-wage technology jobs. This sector generates above average income, which benefits low- and mid-wage job creation. As a result, house prices and new home construction are increasing. Per Moody's, the top employers include Harvard University, Massachusetts Institute of Technology, TJX Co. Inc., DeMoulas Super Markets Inc., and Lahey Health.

The Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units. Of the 126,164 housing units in the assessment area, 68.9 percent are owner-occupied, 25.8 percent are rental units, and 5.3 percent are vacant. Only 7.1 percent of housing units in the assessment area are in low-income census tracts and 17.1 percent are in moderate-income census tracts.

Competition

The assessment area is moderately competitive in the market for financial services. According to 2016 Peer Deposit Data, there were 27 financial institutions operating 101 full-service branches within the assessment area. Of those institutions, Haverhill Bank ranked 12th with a 3.9 percent deposit market share.

There is a high level of competition for home mortgage loans among several banks, credit unions, and non-depository lenders in the assessment area. In 2016, 403 lenders reported 14,697 originated or purchased home mortgage loans. Haverhill Bank ranked 44th, reporting 91 home mortgage loans totaling \$20.4 million. This represents a 0.6 percent market share by number and 0.5 percent market share by dollar amount. The majority of top ranked lenders are large national banks and mortgage companies, such as Wells Fargo Bank, Quicken Loans, and JP Morgan Chase Bank, NA.

The bank is not required to collect or report its small business loan data and elected not to do so. Therefore, the small business loan analysis under the Lending Test does not include comparisons to aggregate data. Additionally, aggregate data is not available for 2017 to indicate the demand level for small business loans in the assessment area.

Community Contact

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit and community development opportunities are available.

Examiners contacted a representative of a planning and economic development organization based in Haverhill that serves the Merrimack Valley region. The organization offers a revolving loan program to provide gap financing for business loans. Local banks participate in this program with the organization to finance loans that might be too risky for the bank to fully fund. The contact discussed the need for loans to smaller businesses, particularly start-ups. The contact also stated the need for more housing stock in the area, especially affordable housing for low- and moderate-income individuals and families. The contact discussed that businesses may experience difficulties getting workers to accept jobs in the area because of the high home costs. The contact also suggested that financial institutions could assist in alleviating this problem by offering programs, such as a First Time Home Buyer program, to help individuals afford a home.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that affordable housing and small business loans for small businesses, particularly start-ups, represent the primary credit needs for the assessment area. The low percentage of owner-occupied housing units in low- and moderate-income census tracts and the median housing value in the assessment area support the conclusion that affordable housing is also a community credit need. Additionally, the high percentage of businesses with GARs of \$0.5 million or less provide additional support for the need for loans to very small businesses.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Haverhill Bank demonstrated reasonable performance under the Lending Test. Geographic Distribution and Borrower Profile performance primarily support this conclusion.

Loan-to-Deposit Ratio

The LTD ratio is reasonable given the institution's size, financial condition, and assessment area credit needs. The bank's LTD ratio, calculated from Call Report data, averaged 83.0 percent over the past 12 calendar quarters from March 31, 2015, to December 31, 2017. The ratio ranged from a low of 78.8 percent as of December 31, 2015, to a high of 86.7 percent as of December 31, 2016. Overall, the ratio remained stable during the evaluation period.

Examiners selected comparable institutions based on asset size, geographic location, and lending focus. Haverhill Bank maintained an average LTD ratio below those of comparable institutions. However, the average LTD ratio is reasonable given the high competition for loans in the assessment area.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 12/31/17 \$(000s)	Average Net LTD Ratio (%)
Haverhill Bank	390,684	83.0%
Beverly Bank	447,075	97.0%
Northmark Bank	357,975	100.4%
Salem Co-Operative Bank	421,264	109.7%

Source: Reports of Condition and Income 3/31/15 through 12/31/17

Assessment Area Concentration

Haverhill Bank made a majority of home mortgage and small business loans, by number and dollar volume, within its assessment area. See the following table for details.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2016	91	72.2	35	27.8	126	20,379	60.8	13,124	39.2	33,503
2017	87	69.0	39	31.0	126	19,125	61.0	12,223	39.0	31,348
Subtotal	178	70.6	74	29.4	252	39,504	60.9	25,347	39.1	64,851
Small Business										
2017	20	66.7	10	33.3	30	4,091	63.3	2,370	36.7	6,461
Subtotal	20	66.7	10	33.3	30	4,091	63.3	2,370	36.7	6,461
Total	198	70.2	84	29.8	282	43,595	61.1	27,717	38.9	71,312
<i>Source: Evaluation Period: 1/1/2016 - 12/31/2017 Bank Data Due to rounding, totals may not equal 100.0</i>										

Geographic Distribution

The geographic distribution of loans reflects excellent dispersion throughout the assessment area. The bank's excellent performance of home mortgage lending and reasonable performance of small business lending supports this conclusion. Examiners focused on the percentage by number of home mortgage loans and sampled small business loans in low- and moderate-income census tracts.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the assessment area. Examiners compared the bank's 2016 performance to 2016 aggregate data and 2017 bank performance to demographics as 2017 aggregate data was unavailable at the time of the evaluation.

As depicted in the following table, the bank's 2016 performance in low-income census tracts was 5.6 percent above aggregate performance. In moderate-income tracts, the bank's lending was also higher, at 11.0 percent, as compared to aggregate performance at 9.7 percent. In 2017, the bank's performance in low-income census tracts increased to 11.5 percent, greatly exceeding the percentage of owner-occupied units at 2.6 percent. The bank's performance in moderate-income census tracts also increased to 24.1 percent, which significantly exceeded the percentage of owner-occupied units at 12.7 percent.

Market share data further supports the bank's excellent performance. In 2016, the bank ranked 12th out of 90 lenders in lending in low-income census tracts with a 2.3 percent market share. This exceeds the bank's overall market share ranking of 44th out of 403 lenders. The bank ranked 47th out of 187 lenders in lending to moderate-income tracts. The following table shows the bank's geographic distribution of home mortgage loans.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2016	1.8	2.1	7	7.7	1,199	5.9
2017	2.6	--	10	11.5	1,149	6.0
Moderate						
2016	10.0	9.7	10	11.0	1,508	7.4
2017	12.7	--	21	24.1	6,110	31.9
Middle						
2016	58.7	56.7	49	53.8	10,276	50.4
2017	58.6	--	38	43.7	8,109	42.4
Upper						
2016	29.5	31.5	25	27.5	7,396	36.3
2017	26.1	--	18	20.7	3,757	19.6
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	91	100.0	20,379	100.0
2017	100.0	--	87	100.0	19,125	100.0
<i>Source: 2010 U.S. Census & 2015 ACS Census; 2016 HMDA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0</i>						

Small Business Loans

The geographic distribution of sampled small business loans reflects reasonable dispersion. In addition to the percentage of businesses, examiners also considered competition and the bank's capacity. The following table shows that the bank originated 5.0 percent of the sampled small business loans in low-income census tracts, which is slightly below the percentage of businesses at 6.1 percent. In moderate-income tracts, the bank's lending performance exceeded the percentage of businesses in moderate-income tracts by approximately 6.0 percent. This activity reflects reasonable performance.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	6.1	1	5.0	150	3.7
Moderate	14.1	4	20.0	1,087	26.6
Middle	56.4	13	65.0	2,233	54.5
Upper	23.4	2	10.0	621	15.2
Total	100.0	20	100.0	4,091	100.0

Source: 2017 D&B Data, Bank Records 1/1/2017-12/31/2017

Borrower Profile

The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes. The bank's reasonable performance in home mortgage and small business lending supports this conclusion. Examiners focused primarily on the percentage, by number, of home mortgage loans to low- and moderate-income borrowers, as well as the percentage of small business loans to businesses with GARs of \$1 million or less.

Home Mortgage Loans

The distribution of borrowers reflects reasonable penetration among individuals of different income levels. Examiners focused on the comparison to aggregate data and market share reports.

As shown in the following table, the bank made 6.6 percent of 2016 home mortgage loans to low-income borrowers in the assessment area. This level of activity was above aggregate performance of 5.8 percent. In 2017, the bank's lending to low-income borrowers increased to 9.2 percent, showing a positive trend. According to the 2015 ACS Census, 5.5 percent of assessment area families have incomes below the poverty level. Thus, those families would not likely qualify for a mortgage under conventional underwriting standards. This decreases the demand and opportunity to lend to low-income families and helps explain the difference between bank performance and percent of low-income families in the assessment area.

In 2016, the bank made 14.3 percent of all home mortgage loans to moderate-income borrowers in the assessment area, which was below aggregate performance of 18.8 percent. In 2017, Haverhill Bank's performance in lending to moderate-income borrowers increased slightly to 16.1 percent, showing a positive trend.

Market share data further supports the bank's reasonable performance. In 2016, the bank ranked 40th out of 147 lenders in lending to low-income borrowers with a 0.7 percent market share by number. The bank ranked 55th out of 229 lenders in lending to moderate-income borrowers with a 0.5 percent market share by number. Market share performance to both low- and moderate-income borrowers is reasonable compared to the bank's overall market share of 44th in the assessment area. The following table details bank and aggregate lending by borrower income level.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2016	18.6	5.8	6	6.6	778	3.8
2017	21.2	--	8	9.2	864	4.5
Moderate						
2016	17.6	18.8	13	14.3	2,729	13.4
2017	18.1	--	14	16.1	2,554	13.4
Middle						
2016	22.2	23.9	28	30.8	5,416	26.6
2017	22.0	--	27	31.0	5,025	26.3
Upper						
2016	41.6	35.4	36	39.6	9,453	46.4
2017	38.6	--	29	33.3	7,196	37.6
Income Not Available						
2016	0.0	16.1	8	8.8	2,003	9.8
2017	0.0	--	9	10.3	3,486	18.2
Total						
2016	100.0	100.0	91	100.0	20,379	100.0
2017	100.0	--	87	100.0	19,125	100.0
<i>Source: 2010 U.S. Census & 2015 ACS Census; 2016 and 2017 HMDA Reported Data; 2016 HMDA Aggregate Data; "--" data not available</i>						

Small Business Loans

The distribution of sampled small business loans in the assessment area reflects reasonable penetration of loans to businesses with GARs of \$1 million or less. Although the majority of sampled loans were to small businesses, the bank's lending to businesses with GARs of \$1 million or less was 30.6 percentage points below the percent of businesses in that revenue category. However, according to the most recent aggregate data in 2016, the top five small business lenders were national banks and credit card companies such as American Express, FSB and Bank of America, NA. Those five lenders captured more than 60 percent market share, illustrating high competition for small business loans in the assessment area. Given this, the bank's performance is reasonable. The following table shows the bank's distribution of small business loans by revenue category for 2017.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
≤ \$1,000,000	85.6	11	55.0	2,514	61.5
> \$1,000,000	6.3	9	45.0	1,577	38.5
Revenue Not Available	8.1	0	0.0	0	0.0
Total	100.0	20	100.0	4,091	100.0
<i>Source: 2017 D&B Data, Bank Records</i>					

Response to Complaints

Haverhill Bank received three CRA-related complaints during the evaluation period. All three pertained to the Lafayette Square branch closure. The bank appropriately responded to the complaints.

COMMUNITY DEVELOPMENT TEST

Haverhill Bank demonstrated adequate responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services. Examiners considered the institution’s capacity and the need and availability of such opportunities.

Community Development Loans

Haverhill Bank originated 13 community development loans totaling approximately \$2.4 million during the evaluation period. This activity level represents 0.6 percent of average total assets and 0.9 percent of average total loans since the prior CRA evaluation. The 13 community development loans include a \$42,500 loan that does not directly benefit the assessment area, but benefits a broader regional area. As the bank responded to the community development needs of its assessment area, examiners considered this loan. The following table illustrates the bank’s community development lending activity by year and purpose.

Community Development Lending												
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Neighborhood Stabilization		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2015	0	0	1	120	4	1,776	0	0	0	0	5	1,896
2016	0	0	0	0	4	380	0	0	0	0	4	380
2017	1	10	2	55	0	0	1	13	0	0	4	78
YTD 2018	0	0	0	0	0	0	0	0	0	0	0	0
Total	1	10	3	175	8	2,156	1	13	0	0	13	2,354

Source: Bank Records

The following are examples of the bank’s community development loans.

- In 2015 and 2016, the bank originated two loans totaling \$383,750 to a small business to purchase and improve a building located in a moderate-income census tract in the assessment area. The Massachusetts Capital Access Program offers loans that require job retention and/or job creation. These loans promoted economic development by creating and retaining 10 low- and moderate-income jobs in the assessment area.
- In 2017, the bank extended \$12,500 of a \$50,000 participation loan to a non-profit organization that operates in the Merrimack Valley region. Other local banks provided the remaining loan funds. The organization is a Community Development Financial Institution and focuses on revitalization, stabilization, and development in the Merrimack Valley by providing loans and technical assistance to low- and moderate-income communities.
- The bank made six SBA 504 loans totaling approximately \$1.8 million to businesses that operate in the assessment area as well as a broader regional area. The SBA 504 loan

program is an economic development program that offers small businesses an alternative method of financing that supports business and job growth.

Qualified Investments

Haverhill Bank’s qualified investment activity during the evaluation period consists of qualified donations, as the bank did not make any qualified equity investments. The bank made 173 qualified donations totaling \$178,953 during the evaluation period. The majority of donations helped various organizations provide community services to low- and moderate-income individuals and families. The following table illustrates the bank’s community development donations by year and purpose.

Qualified Investments												
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Neighborhood Stabilization		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	0	0	0	0	0	0	0	0	0	0	0	0
2015	0	0	0	0	0	0	0	0	0	0	0	0
2016	0	0	0	0	0	0	0	0	0	0	0	0
2017	0	0	0	0	0	0	0	0	0	0	0	0
YTD 2018	0	0	0	0	0	0	0	0	0	0	0	0
Subtotal	0	0	0	0	0	0	0	0	0	0	0	0
Qualified Grants & Donations	20	19	144	141	0	0	9	19	0	0	173	179
Total	20	19	144	141	0	0	9	19	0	0	173	179

Source: Bank Records

The following are examples of the bank’s qualified donations.

- The bank donated \$15,600 to Emmaus, Inc., located in Haverhill, MA. Emmaus, Inc. provides immediate assistance and long-term solutions for homelessness through emergency shelters and affordable housing for low- and moderate-income individuals and families.
- Haverhill Bank donated \$10,700 to Opportunity Works. Opportunity Works is a non-profit organization that provides community services including specialized day habilitation, recreational services, and other programs for disabled adults in the bank’s assessment area. All individuals served by Opportunity Works are low- or moderate-income.
- The bank donated \$3,000 to the Merrimack Valley Project. The Merrimack Valley Project unites organizations in campaigns to expand economic opportunities and jobs,

save and create affordable housing, and address issues related to the welfare of the Merrimack Valley region. The organization primarily serves to revitalize and stabilize the Merrimack Valley region, particularly low- and moderate-income geographies, by attracting new and retaining existing businesses and residents.

- During 2016 and 2017, Haverhill Bank donated \$3,050 to the Liz Murphy Open Hand Pantry. This organization provides community services to low- and moderate-income individuals and households in the assessment area. The pantry aides in feeding the needy in the greater Haverhill area and provides necessities to over 300 Haverhill households each month.
- The bank donated \$38,114 to the Career Resources Corporation (CRC). The CRC is a non-profit organization that provides community services to teenagers and adults with developmental disabilities through programs such as day habilitation and career training. The majority of individuals served are low- and moderate-income individuals.

Community Development Services

During the evaluation period, bank employees provided 587 hours of financial expertise or technical assistance to ten different community development-related organizations in the assessment area. The majority of service activity consisted of employee involvement with community organizations that serve low- and moderate-income individuals. The following table shows the bank’s community development services by year and purpose.

Community Development Services						
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Neighborhood Stabilization	Totals
	#	#	#	#	#	#
2015	21	81	0	14	0	116
2016	52	128	0	33	0	213
2017	0	218	0	40	0	258
YTD 2018	0	0	0	0	0	0
Total	73	427	0	87	0	587

Source: Bank Records

The following are examples of community development services.

- Haverhill Bank’s president serves on the Board of Directors of the George C. Wadleigh Foundation. The foundation provides a community service to low- and moderate-income individuals by providing grants benefiting aged and indigent individuals in the greater Haverhill area.
- A senior vice president serves on the Board of Directors of Community Action, Inc. (CAI). Additionally, two bank vice presidents presented at five financial courses sponsored by CAI during the evaluation period. CAI provides community services to

low- and moderate-income individuals by providing resources and opportunities for individuals and families to overcome poverty, including food and clothing, fuel and energy assistance, housing and shelter, child day care and early education programs, and adult education. CAI serves the majority of the assessment area and a broader regional area.

- A vice president serves on the Board of Directors of Bethany Homes, a non-profit organization located in Haverhill. The organization provides quality, affordable housing to low- and moderate-income seniors.
- A loan officer served on the Boys & Girls Club of Greater Haverhill's (BGC) Board of Directors and Endowment Committee. The BGC serves children in the assessment area, particularly low- and moderate-income children, through needed programs, such a nutrition program to serve children who were going hungry. The majority of Haverhill consists of low- and moderate-income census tracts, and BGC is located in a low-income census tract.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution's overall CRA rating.

APPENDIX

FAIR LENDING POLICIES AND PROCEDURES

The Division of Banks provides comments regarding the institution's fair lending policies and procedures pursuant to Regulatory Bulletin 1.3-106. Examiners conducted the fair lending review in accordance with the Federal Financial Institutions Examination Council (FFIEC) Interagency Fair Lending Examination Procedures. Based on these procedures, no evidence of disparate treatment was noted.

MINORITY APPLICATION FLOW

Examiners reviewed Haverhill Bank's 2016 and 2017 HMDA LARs to determine if the application flow from the different racial groups within the institution's assessment area reflected the assessment area's demographics.

According to the 2010 U.S. Census Data, the bank's assessment area contained a population of 309,181 individuals of which 12.5 percent are minorities. The assessment areas minority and ethnic population is 1.3 percent Black/African American, 2.4 percent Asian, 0.1 percent American Indian, 0.0 percent Hawaiian/Pacific Islander, 7.4 percent Hispanic or Latino, and 1.3 percent other.

In 2016, the bank received 129 HMDA reportable loan applications from within its assessment area. Of these applications, the bank received 4 or 3.1 percent from minority applicants. The aggregate received 20,796 HMDA reportable loan applications of which 1,045 or 5.0 percent were from minority applicants. For the same period, the bank also received 1 or 0.8 percent of applications from ethnic groups of Hispanic origin within its assessment area as compared to the aggregate that received 1,104 applications or 5.3 percent.

For 2017, the bank received 114 HMDA reportable loan applications from within its assessment area. Of these applications, the bank received 2 or 1.8 percent from minority applicants. For the same time, the bank received 4 or 3.5 percent of applications from ethnic groups of Hispanic origin.

Refer to the following table for information on the bank's minority application flow as well as the aggregate in the bank's assessment area.

MINORITY APPLICATION FLOW					
RACE	Bank 2016		2016 Aggregate Data	Bank 2017	
	#	%	%	#	%
American Indian/ Alaska Native	0	0.0	0.3	0	0.0
Asian	2	1.5	2.1	0	0.0
Black/ African American	1	0.8	1.5	0	0.0
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	0.8	1.0	2	1.8
Total Minority	4	3.1	5.0	2	1.8
White	97	75.2	75.0	87	76.3
Race Not Available	28	21.7	20.0	25	21.9
Total	129	100.0	100.0	114	100.0
ETHNICITY					
Hispanic or Latino	1	0.8	5.3	4	3.5
Not Hispanic or Latino	98	76.0	74.2	84	73.7
Joint (Hisp/Lat /Not Hisp/Lat)	2	1.5	1.0	1	0.9
Ethnicity Not Available	28	21.7	19.5	25	21.9
Total	129	100.0	100.0	114	100.0

Source: US Census 2010, HMDA Aggregate Data 2016, HMDA LAR Data 2016 and 2017 *Due to rounding, totals may not equal 100.0 percent.

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

GLOSSARY

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county. Census tract boundaries normally follow visible features, but they may follow governmental unit boundaries and other non-visible features in some instances. They always nest within counties. Census tracts average about 4,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogenous for population characteristics, economic status, and living conditions to allow for statistical comparisons.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or
- (5) Enable or facilitate projects or activities that address needs regarding foreclosed or abandoned residential properties in designated target areas.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
 - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Core Based Statistical Areas (CBSAs): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) an unemployment rate of at least 1.5 times the national average;
- (2) a poverty rate of 20 percent or more; or,
- (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family. Other family is further classified into “male householder” (a family with a male householder and no wife present) or “female householder” (a family with a female householder and no husband present).

Family Income: Includes the income of all members of a family that are age 15 and older.

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Disclosure Loan Application Register (HMDA LAR): The HMDA LARs record all applications received for residential purchase, refinance, home improvement, and temporary-to-permanent construction loans.

Home Mortgage Loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multi-family (five or more families) dwelling loans, loans to purchase manufactured homes, and refinancings of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Household Income: Includes the income of the householder and all other persons that are age 15 and older in the household, whether related to the householder or not. Because many households are only one person, median household income is usually less than median family income.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (for example, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Micropolitan Statistical Area: CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 and less than 120 percent in the case of a geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area: All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

Small Business Loan: A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: A loan included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Underserved middle-income nonmetropolitan geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for

- Population size, density, and dispersion indicating the area's population is sufficiently small, thin, and
- Distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

Upper-Income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent in the case of a geography.

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

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, and Part 345 of the Federal Deposit Insurance Corporation's Rules and Regulations, 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 180 Merrimack Street, Haverhill, MA 01830."

"You may obtain the public section of our most recent CRA Performance Evaluation, which was prepared by the Federal Deposit Insurance Corporation, at 180 Merrimack Street, Haverhill, MA 01830."

[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.