

PUBLIC DISCLOSURE

August 4, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Align Credit Union
Charter Number: 66365**

87 Hale St
Lowell, Massachusetts 01851

Division of Banks
One Federal St, Suite 710
Boston, Massachusetts 02110-2012

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 concerning the safety and soundness of this financial institution.

TABLE OF CONTENTS

Institution Rating	1
Scope of Evaluation	2
Description of Institution	3
Description of Assessment Area.....	4
Conclusions on Performance Criteria	8
Discriminatory or Other Illegal Credit Practices Review	20
Glossary	21

This document is an evaluation of the CRA performance of **Align Credit Union (MCU)** prepared by the Massachusetts Division of Banks (Division), the institution's supervisory agency as of **August 4, 2025**. The Division rates the CRA performance of an institution consistent with the provisions set forth in Massachusetts Regulation 209 CMR 46.00.

INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated Outstanding. An institution in this group has an excellent 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.

The following points summarize the credit union's Lending Test and Community Development Test performance.

The Lending Test is rated High Satisfactory.

- The loan-to-share ratio (LTS) is reasonable given the credit union's size, financial condition, and assessment area credit needs.
- The credit union made a high percentage of its home mortgage and consumer loans in the assessment area.
- The geographic distribution of loans reflects good dispersion throughout the assessment area.
- The distribution of borrowers reflects excellent penetration of loans among individuals of different income levels.
- The credit union did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating. The credit union has a good record relative to its fair lending policies and procedures.

The Community Development Test is rated Outstanding.

- Align Credit Union demonstrated excellent responsiveness to the assessment area's community development needs through community development loans, qualified investments, and community development services. 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

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

This evaluation considered activity from the previous evaluation dated July 19, 2021, to the current evaluation dated August 4, 2025. Examiners used the Interagency Intermediate Small Institution CRA Examination Procedures to evaluate CRA performance. These procedures include the Lending Test and the Community Development Test.

The Lending Test considered the credit union's performance according to the following criteria:

- LTS ratio
- Assessment area concentration
- Geographic distribution
- Borrower profile
- Response to CRA-related complaints
- Fair Lending Program

The Community Development Test considered the following factors:

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

Loan Products Reviewed

Align Credit Union's major product lines are home mortgage and consumer loans, considering the credit union's business strategy and the number and dollar volume of loans originated during the evaluation period.

Examiners reviewed home mortgage loans reported on the credit union's 2023 and 2024 Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LARs). The credit union originated 317 HMDA-reportable loans totaling \$52.6 million in 2023 and 289 HMDA-reportable loans totaling \$46.6 million in 2024. Examiners compared credit union lending in 2023 and 2024 to aggregate HMDA data for the relevant year. Examiners also compared credit union lending to applicable demographic data

This evaluation considered all collected consumer loan data for 2023 and 2024 to draw conclusions about consumer lending performance. Align Credit Union originated 1,493 consumer loans totaling \$23.8 million in 2023, and the credit union originated 1,235 consumer

loans totaling \$18.7 million in 2024. Loan performance was compared to household demographic data as appropriate.

For the Lending Test, examiners reviewed the number and dollar volume of home mortgage and consumer loans. While the tables throughout this evaluation include both the number and dollar volume of loans, examiners emphasized credit union performance by number of loans, as the number of loans better indicates the number of individuals served.

The Community Development Test considered the number and dollar amount of community development loans, qualified investments, and community development services performed since the prior CRA evaluation dated July 19, 2021 through August 4, 2025 (YTD 2025). Financial data about the credit union was obtained from the June 30, 2025 Call Report issued to the NCUA.

DESCRIPTION OF INSTITUTION

Background

Align Credit Union is headquartered in Lowell Massachusetts and was established in 1922 as the Northern Massachusetts Telephone Workers Credit Union. Membership has expanded to include anyone who lives, works or attends school in Massachusetts Counties (including Middlesex, Essex, Suffolk, Norfolk and parts of Worcester County) and Southern New Hampshire communities. The credit union adopted the name Align Credit Union in 2013. As of March 31, 2025, the credit union has 27,804 members.

Align Credit Union received an “Outstanding” rating at its previous Division of Banks CRA Performance Evaluation dated July 19, 2021, based on the Interagency Intermediate Small Institution CRA Examination Procedures and the Division’s CRA Regulation at 209 CMR 46.

Operations

The credit union’s main office and operation’s center location is 87 Hale Street in Lowell, MA. The credit union maintains five-branch locations in addition to the main office, located in the Massachusetts municipalities of Amesbury, Danvers, Framingham, and Haverhill, as well as one branch in Seabrook, New Hampshire. Three branches are located in moderate-income census tracts, and three branches are located in middle-income census tracts. The credit union operates two standalone Automated Teller Machines (ATMs), one located in a middle-income census tract in Haverhill, and the other located in a moderate-income tract in Lowell. Hours and operations are consistent across the branch network.

The credit union closed three branches since the previous evaluation, in Lowell, Wilmington, and Methuen, MA.

The credit union offers a variety of loan products, including home mortgage, consumer, and commercial loans, along with a range of deposit services including checking and savings options

for personal and business purposes. Members have access to financial services through the credit union's online and mobile banking, and can apply for loans, open new accounts, and make loan payments or deposit transactions.

Ability and Capacity

Align Credit Union's assets totaled approximately \$717.9 million as of March 31, 2021, including total loans of approximately \$376.1 million and total shares and deposits of \$592.5 million. Residential loans represent the primary credit product with approximately 67.6 percent of the loan portfolio.

Loan Portfolio Distribution as of 6/30/2025		
Loan Category	\$(000)	%
Total 1 st Mortgage Loans/Lines of Credit	195,633	50.8
Total Other Real Estate Loans/Lines of Credit	64,660	16.8
Residential Loans	260,293	67.6
Commercial Loans/Lines of Credit Real Estate Secured	66,809	17.3
Commercial Loans/Lines of Credit (Not RE)	1,450	0.4
Total Commercial	68,259	17.7
Unsecured Credit Cards	10,673	2.8
Student Loans	3,451	0.90
Unsecured Loans/Lines of Credit	19,330	5.0
Secured Loans/ Lines of Credit	787	0.2
New Vehicle Loans	5,622	1.5
Used Vehicle Loans	16,410	4.3
Total Consumer	56,273	14.6
Total Loans	384,825	100.0
<i>Source: Reports of Condition and Income</i>		

DESCRIPTION OF THE ASSESSMENT AREA

The CRA requires financial institutions to define one or more assessment areas within which examiners will evaluate its CRA performance. Align Credit Union has designated one single assessment area which covers several counties in Massachusetts and New Hampshire. All counties included fall within the Boston-Worcester-Providence, MA-RI-NH Combined Statistical Area (CSA). The assessment area, as currently defined, meets the technical requirements of the Division of Bank's CRA regulation.

The following table is a list of cities and towns the credit union has designated within its assessment area.

Align Credit Union Assessment Area Description					
State	County	Municipality			
MA	Middlesex	Full Counties			
	Essex				
	Suffolk				
	Norfolk				
	Worcester	Berlin	Bolton	Boylston	Clinton
		Grafton	Harvard	Hopedale	Lancaster
		Mendon	Milford	Northborough	Northbridge
		Shrewsbury	Southborough	Upton	Westborough
NH	Hillsborough	Amherst	Bedford	Brookline	Goffstown
		Hollis	Hudson	Litchfield	Manchester
		Merrimack	Milford	Mont Vernon	Nashua
		New Boston	Pelham	Weare	
	Rockingham	Atkinson	Auburn	Brentwood	Chester
		Danville	Derry	East Kingston	Epping
		Exeter	Fremont	Greenland	Hampstead
		Hampton	Hampton Falls	Kensington	Kingston
		Londonderry	Newfields	Newington	Newton
		North Hampton	Plastow	Portsmouth	Raymond
		Rye	Salem	Sandown	Seabrook
		Stratham	South Hampton	Windham	

Economic and Demographic Data

The credit union’s assessment area consists of 1,117 census tracts that reflect the following income designations according to the 2015 American Community Survey (ACS):

- 112 low-income tracts;
- 196 moderate-income tracts;
- 389 middle-income tracts;
- 376 upper-income tracts;
- 44 unknown income census tracts.

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)	1,117	10.0	17.5	34.8	33.7	3.9
Population by Geography	4,842,947	9.2	18.0	36.3	35.4	1.1
Housing Units by Geography	1,929,265	8.8	18.2	37.3	34.7	1.0
Owner-Occupied Units by Geography	1,102,710	3.2	13.5	40.4	42.4	0.5
Occupied Rental Units by Geography	720,073	17.1	25.5	32.6	23.1	1.7
Vacant Units by Geography	106,482	10.6	18.1	36.1	33.2	2.0
Family Distribution by Income Level	1,147,041	22.0	16.4	20.0	41.6	0.0
Household Distribution by Income Level	1,822,783	25.8	14.4	16.9	42.8	0.0
Median Family Income MSA - 14454 Boston, MA		\$112,607	Median Housing Value			\$509,270
Median Family Income MSA - 15764 Cambridge-Newton-Framingham, MA		\$121,481	Median Gross Rent			\$1,580
Median Family Income MSA - 31700 Manchester-Nashua, NH MSA		\$103,238	Families Below Poverty Level			5.9%
Median Family Income MSA - 40484 Rockingham County-Strafford County, NH		\$107,377				
Median Family Income MSA - 49340 Worcester, MA MSA		\$99,320				
<i>Source: 2020 ACS, 2024 D&B Data, and FFIEC Estimated Median Family Income.</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The assessment area's lending trends reflect increasing housing prices. The average credit extended for a purchase transaction in 2023 was \$587,847. The average credit extended for a purchase transaction increased in 2024, to approximately \$608,555. Higher prices may suggest a more difficult market for first-time homebuyers.

The FFIEC Median Family Income level is used to analyze home mortgage loans under the Borrower Profile criterion.

The following table displays the low-, moderate-, middle-, and upper-income categories for each year during the review period.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Boston, MA Median Family Income (14454)				
2023 (\$136,900)	<\$68,450	\$68,450 to <\$109,520	\$109,520 to <\$164,280	≥\$164,280
2024 (\$136,200)	<\$68,100	\$68,100 to <\$108,960	\$108,960 to <\$163,440	≥\$163,440
Cambridge-Newton-Framingham, MA Median Family Income (15764)				
2023 (\$146,200)	<\$73,100	\$73,100 to <\$116,960	\$116,960 to <\$175,440	≥\$175,440
2024 (\$146,600)	<\$73,300	\$73,300 to <\$117,280	\$117,280 to <\$175,920	≥\$175,920
Manchester-Nashua, NH MSA Median Family Income (31700)				
2023 (\$121,800)	<\$60,900	\$60,900 to <\$97,440	\$97,440 to <\$146,160	≥\$146,160
2024 (\$126,000)	<\$63,000	\$63,000 to <\$100,800	\$100,800 to <\$151,200	≥\$151,200
Rockingham County-Strafford County, NH Median Family Income (40484)				
2023 (\$135,200)	<\$67,600	\$67,600 to <\$108,160	\$108,160 to <\$162,240	≥\$162,240
2024 (\$138,600)	<\$69,300	\$69,300 to <\$110,880	\$110,880 to <\$166,320	≥\$166,320
Worcester, MA-CT MSA Median Family Income (49340)				
2023 (\$115,600)	<\$57,800	\$57,800 to <\$92,480	\$92,480 to <\$138,720	≥\$138,720
Worcester, MA MSA Median Family Income (49340)				
2024 (\$114,100)	<\$57,050	\$57,050 to <\$91,280	\$91,280 to <\$136,920	≥\$136,920
<i>Source: FFIEC</i>				

In the credit union’s counties that comprise the assessment area, unemployment rates oscillated over the evaluation period. The average unemployment rate fell from a high of 4.7 percent in 2021, to an average 2022 unemployment rate of 3.2 percent. The average unemployment rate reached a low of 3.1 percent in 2023, before rising to 3.6 percent in 2024.

Increasing home purchase prices coupled with higher unemployment may reflect difficulty in obtaining credit for low- and moderate-income families.

Competition

The assessment area represents a competitive market for financial services. According to 2024 Peer Deposit Market Share data, 214 financial institutions operated 1,662 full-service branches within the credit union’s assessment area. Of the institutions that reported deposit market share, Align Credit Union ranked 39th with a 0.1 percent deposit market share.

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. In 2024, 635 lenders reported 90,445 residential mortgage loans originated or purchased in the credit union’s assessment area. Align Credit Union ranked 66th with a 0.3 percent market share. The highest ranked institutions in the assessment area are

mortgage companies and national banks, including Leader Bank NA, Guaranteed Rate Inc., and Citizens Bank NA, totaling approximately 15.1 percent of the market.

Community Contact

The examination team reached out to a community organization serving Northern Middlesex and Essex County, to obtain context on the assessment area. The contact primarily focuses on supporting affordable housing initiatives and low- and moderate-income homebuyers and homeowners.

The contact noted the need for additional investments in the construction of affordable housing, including both rental units and single-family homes, and in financial support of non-profit organizations providing in depth financial literacy assistance to low- and moderate-income individuals.

Additionally, the contact noted a lack of loan products being offered by financial institutions for the construction of accessory dweller units (ADU), particularly those that are accessible to new homeowners who lack sufficient equity to get a home equity loan or line of credit to fund the construction of the ADU. The contact also stated that there is currently a knowledge gap in the lending community regarding Section 8 to homeownership programs that are desperately needed in the community.

Credit and Community Development Needs and Opportunities

Examiners considered information gathered from the community contact, the credit union, and available economic data to determine the primary credit needs of the assessment area. Based on this information, examiners determined that the community's primary credit needs are affordable housing and services for low- and moderate-income individuals.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Align Credit Union demonstrated good performance under the Lending Test. The institution's excellent geographic distribution and strong penetration among individuals of different income levels, combined with the reasonable loan-to-share ratio and high percentage of loan originations within the assessment area, support this conclusion.

Loan-to-Share Ratio

The LTS ratio is reasonable given the institution's size, financial condition, and assessment area credit needs. The credit union's quarterly net LTS ratio, calculated from Call Report data, averaged 69.2 percent over the last 8 calendar quarters from September 30, 2023, to June 30, 2025. The ratio ranged from a low of 67.2 percent as of March 31, 2025, to a high of 70.6 percent as of December 31, 2023.

Examiners compared the credit union’s average LTS ratio to that of three similarly situated institutions. Examiners selected similarly situated institutions based on asset size, lending focus, and geographic location. The following table shows that Align Credit Union’s ratio was in line with one of the three similarly situated institutions, demonstrating its reasonable performance.

Loan-to-Share (LTS) Ratio Comparison		
Institution	Total Assets as of 6/30/2025 (\$000s)	Average Net LTS Ratio (%)
Align Credit Union	652,071	69.2
Liberty Bay Credit Union	811,972	114.2
All One Credit Union	883,764	91.6
Quincy Credit Union	708,697	69.1
<i>Source: Reports of Condition and Income 09/30/2023-6/30/2025</i>		

Assessment Area Concentration

The institution originated a high percentage of loans within its assessment area. The share of loans increased from 2023 to 2024. The table below highlights Align Credit Union’s lending inside and outside the assessment area by loan category.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2023	276	87.1	41	12.9	317	46,709	88.8	5,894	11.2	52,603
2024	266	92.0	23	8.0	289	42,575	91.4	4,013	8.6	46,588
Subtotal	542	89.4	64	10.6	606	89,284	90.0	9,907	10.0	99,191
Consumer										
2023	1,411	94.5	82	5.5	1,493	22,657	95.0	1,184	5.0	23,841
2024	1,162	94.1	73	5.9	1,235	17,741	95.0	940	5.0	18,681
Subtotal	2,573	94.3	155	5.7	2,728	40,398	95.0	2,124	5.0	42,522
Total	3,115	93.4	219	6.6	3,334	129,682	91.5	12,031	8.5	141,713
<i>Source: Credit Union Data</i>										

Geographic Distribution

The geographic distribution of loans reflects good dispersion throughout the assessment area, particularly to low-or moderate-income geographies in the assessment area. The credit union’s performance in both home mortgage and consumer lending supports this conclusion. Examiners focused on the number and percentage of loans in low- and moderate-income census tracts.

Home Mortgage

The geographic distribution of home mortgage loans reflects good dispersion throughout the assessment area. The credit union's performance in low-income census tracts is comparable to aggregate lending percentage to the same areas for 2023. The credit unions lending in low-income census tracts improved in 2024, above the aggregate lender performance. The performance of both years exceeds the demographic of owner-occupied homes in low-income census tracts.

The credit union's activity also exceeds aggregate lending and demographic lending in moderate-income census tracts by several percentage points. This metric is consistent from 2023 to 2024.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2023	3.2	4.7	12	4.3	5,619	12.0
2024	3.2	4.5	15	5.6	6,357	14.9
Moderate						
2023	13.5	13.8	48	17.4	7,982	17.1
2024	13.5	14.6	46	17.3	5,992	14.1
Middle						
2023	40.2	36.9	135	48.9	19,336	41.4
2024	40.4	40.4	131	49.2	18,664	43.8
Upper						
2023	42.5	43.7	81	29.3	13,772	29.5
2024	42.4	40.0	74	27.8	11,562	27.2
Not Available						
2023	0.5	0.9	0	0.0	0	0.0
2024	0.5	0.6	0	0.0	0	0.0
Total						
2023	100.0	100.0	276	100.0	46,709	100.0
2024	100.0	100.0	266	100.0	42,575	100.0

Source: 2020 ACS; Credit Union Data, 2023 & 2024 HMDA Aggregate Data.

Consumer Loans

The credit union's consumer lending reflects good geographic distribution. The credit union's activity in low-income tracts is below the demographic of households in the same areas. The performance remained consistent from 2023 to 2024.

The credit union’s performance in moderate-income tracts is above that of the demographic of households in the same areas. While the number of consumer loans decreased in 2023, the percentage of loans in moderate-income tracts improved.

Geographic Distribution of Consumer Loans					
Tract Income Level	% of Households	#	%	\$(000s)	%
Low					
2023	8.7	68	4.8	735	3.2
2024	8.7	60	5.2	814	4.6
Moderate					
2023	18.2	293	20.8	4,066	17.9
2024	18.2	267	23.0	3,563	20.1
Middle					
2023	37.2	709	50.2	11,281	49.8
2024	37.3	585	50.3	8,505	47.9
Upper					
2023	34.9	339	24.0	6,533	28.8
2024	34.8	250	21.5	4,859	27.4
Not Available					
2023	1.0	2	0.1	42	0.2
2024	1.0	0	0.0	0	0.0
Total					
2023	100.0	1,411	100.0	22,657	100.0
2024	100.0	1,162	100.0	17,741	100.0

Source: 2020 ACS; Credit Union Data.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, excellent penetration among retail customers of different income levels. This is supported by the credit union’s good performance of home mortgage and consumer lending to low- and moderate-income borrowers.

Home Mortgage

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

Home mortgage lending to low-income borrowers was above aggregate lending trends in 2023 and 2024. The credit union’s lending to low-income borrowers fell by number and percentage year-over-year but remained above aggregate. The percentage of loans to low-income borrowers is far less than the percentage of low-income families (for both the institution and aggregate

lenders), which reflects the difficulty for a low-income family (earning less than \$73,000) to qualify for a mortgage (with an average credit request of \$608,555) under conventional underwriting standards.

The credit union’s performance to moderate-income lenders exceeded aggregate lending trends and demographic data consistently.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2023	22.0	5.2	28	10.1	2,007	4.3
2024	22.0	4.7	23	8.6	1,779	4.2
Moderate						
2023	16.3	14.7	71	25.7	8,674	18.6
2024	16.4	15.2	60	22.6	5,594	13.1
Middle						
2023	19.9	21.2	76	27.5	11,648	24.9
2024	20.0	22.9	71	26.7	11,182	26.3
Upper						
2023	41.7	37.3	89	32.2	16,405	35.1
2024	41.6	41.9	105	39.5	18,953	44.5
Not Available						
2023	0.0	21.6	12	4.3	7,975	17.1
2024	0.0	15.3	7	2.6	5,067	11.9
Total						
2023	100.0	100.0	276	100.0	46,709	100.0
2024	100.0	100.0	266	100.0	42,575	100.0
<i>Source: 2020 ACS; Credit Union Data, 2023 & 2024 HMDA Aggregate Data.</i>						

Consumer Lending

The credit union’s consumer lending reflects excellent penetration of households of different income levels. The credit union’s activity among low-income households is above the demographic of low-income households in the assessment area. The performance remained consistent from 2023 to 2024.

The credit union’s performance among moderate-income households is similarly above that of the demographic of moderate-income households in the assessment area. While the number of consumer loans decreased in 2023, the percentage of loans in moderate-income tracts improved.

Distribution of Consumer Loans by Borrower Income Level					
Borrower Income Level	% of Households	#	%	\$(000s)	%
Low					
2023	25.8	578	41.0	6,663	29.4
2024	25.8	467	40.2	4,518	25.5
Moderate					
2023	14.4	363	25.7	5,767	25.5
2024	14.4	323	27.8	5,157	29.1
Middle					
2023	16.9	272	19.3	5,497	24.3
2024	16.9	201	17.3	3,783	21.3
Upper					
2023	42.8	198	14.0	4,730	20.9
2024	42.8	171	14.7	4,283	24.1
Not Available					
2023	0.0	0	0.0	0	0.0
2024	0.0	0	0.0	0	0.0
Total					
2023	100.0	1,411	100.0	22,657	100.0
2024	100.0	1,162	100.0	17,741	100.0
<i>Source: 2020 ACS; Credit Union Data.</i>					

Response to Complaints and Fair Lending Policies and Procedures

The credit union did not receive any CRA-related complaints during the evaluation period; therefore, this criterion did not impact the CRA rating.

The Division of Banks provides comments regarding the institution’s fair lending policies and procedures pursuant to Regulatory Bulletin 1.3-106. A review of the credit union’s public comment file indicated the credit union received no complaints pertaining to the institution’s CRA performance since the previous examination. The fair lending review was conducted 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. The credit union has a good record relative to fair lending policies and practices.

Minority Application Flow

Examiners also reviewed the credit union’s 2023 and 2024 HMDA LARs to determine if the credit union’s application flow from different racial and ethnic groups reflected the assessment area’s demographics.

According to 2020 ACS data, the credit union’s assessment area contains a population of 4,842,947 individuals, of which 33.9 percent are minorities. The assessment area’s minority population is 7.3 percent Black/African American, 10.7 percent Asian, 0.1 percent American Indian, 12.4 percent Hispanic or Latino, and 6.5 percent Other.

The following table details the credit union’s minority application flow and aggregate data in its assessment area.

MINORITY APPLICATION FLOW						
RACE	Credit Union 2023		2023 Aggregate Data	Credit Union 2024		2024 Aggregate Data
	#	%	%	#	%	%
American Indian/ Alaska Native	2	0.5	0.2	3	0.7	0.3
Asian	24	5.4	9.0	26	5.7	10.0
Black/ African American	3	0.7	4.3	7	1.5	4.7
Hawaiian/Pacific Islander	3	0.7	0.2	3	0.7	0.2
2 or more Minority	2	0.5	0.2	0	0.0	0.2
Joint Race (White/Minority)	6	1.4	2.0	11	1.4	2.0
Total Racial Minority	40	9.0	15.9	50	10.1	17.4
White	341	77.2	55.0	347	76.3	58.6
Race Not Available	61	13.8	29.2	58	13.9	24.0
Total	442	100.0	100.0	455	100.0	100.0
ETHNICITY						
Hispanic or Latino	27	6.1	6.9	32	7.0	8.0
Joint (Hisp/Lat /Not Hisp/Lat)	7	1.6	1.6	10	2.2	1.7
Total Ethnic Minority	34	7.7	8.5	42	9.2	9.7
Not Hispanic or Latino	342	77.4	63.1	339	74.5	67.1
Ethnicity Not Available	66	15.0	28.4	74	16.3	23.2
Total	442	100.0	100.0	455	100.0	100.0

Source: ACS Census 2020, HMDA Aggregate Data 2023 and 2024, HMDA LAR Data 2023 and 2024

In 2023, the credit union received 442 HMDA-reportable loan applications from within its assessment area. Of these applications, the credit union received 40, or 9.0 percent, from racial minorities. This was below aggregate data of 15.9 percent. For the same period, the credit union received 34, or 7.7 percent, of its applications from ethnic minority consumers. The credit union’s performance was comparable to aggregate data of 8.5 percent to the same demographic of consumers.

In 2024, the credit union received 455 HMDA-reportable loan applications from within its assessment area. Of these applications, the credit union received 50, or 10.1 percent, of applications from racial minority applicants. This is below aggregate lending trends, which received 17.4 percent of its applications from racial minority individuals. The credit union received 42, or 9.2 percent, of applications from ethnic minority applicants, which was comparable to the aggregate performance of 9.7 percent.

Overall, the credit union’s minority application performance is adequate. Both the racial and ethnic minority application flow of the credit union have improved from 2023 to 2024. The

credit union’s marketing and outreach strategies reach Lawrence, Lowell, Lynn and Boston, areas with significant minority populations. The credit union also maintains a list of employees the complement local racial and ethnic demographics and are able to assist individuals with a limited English proficiency. The current efforts are commensurate with the resources and abilities of the credit union.

COMMUNITY DEVELOPMENT TEST

Align Credit Union demonstrated excellent responsiveness to the assessment area’s community development needs through community development loans, qualified investments, and community development services. Examiners also considered the institution’s capacity and the need and availability of such opportunities.

Community Development Loans

Align Credit Union originated 51 community development loans totaling approximately \$28million during the evaluation period. The credit union’s community development lending activity increased significantly from the previous examination, up from \$14.3 million. The credit union exhibited responsiveness in the areas of affordable housing and economic development of small businesses.

The following table illustrates the credit union’s community development lending activity by year and purpose.

Community Development Loans										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize Or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
7/19/21-12/31/21	3	1,328	0	0	9	2,118	1	2,080	13	5,526
2022	12	14,997	0	0	11	1,960	0	0	23	16,957
2023	4	3,188	0	0	5	1,062	0	0	9	4,250
2024	2	998	0	0	2	69	0	0	4	1,067
YTD 2025	0	0	0	0	2	188	0	0	2	188
Totals	21	20,511	0	0	29	5,397	1	2,080	51	27,988

Source: Credit Union records

Below are notable examples of community development loans:

- The credit union originated a loan for \$3.2 million to purchase a 21-unit dwelling in 2022 located in Lynn, MA. All units are set below the area fair market rents as determined by Housing and Urban Development (HUD). The project qualifies as a community development loan supporting affordable housing.
- The credit union originated a loan for \$1.2 million to purchase a 6-unit dwelling in 2023 located in Salem, MA. All units are set below the area fair market rents as determined by

Housing and Urban Development (HUD). The project qualifies as a community development loan supporting affordable housing.

- The credit union originated two loans for the purchase and improvement of a 5-unit dwelling located in Lowell, MA. The originations totaled \$681,000 and occurred in 2022 and 2024. All units in the property are set below the area fair market rents as determined by Housing and Urban Development (HUD). The project qualifies as a community development loan supporting affordable housing.
- The credit union originated a \$2.1 million loan in 2021 to refinance and improve a commercial property in Lowell, MA. The property is located in a moderate-income census tract designated as an Opportunity Zone for investment. The loan qualifies for community development as revitalization of a low-income census tract.
- The credit union participated in a \$6.3 million loan in 2023 to purchase a hotel in Salem NH. The loan will retain employment for workers likely to be low- or moderate-income. The credit union’s participation totals \$1 million and the activity qualifies for community development as economic development by financing a small business.
- The credit union participated in the Lawrence Venture Fund partnership, a loan pool wherein financial institutions generated small business loans to support economic development in the area. The credit union’s participation totaled \$84,400 over the evaluation period through 13 loans. This activity qualifies for community development by supporting economic development through the financing of small businesses.

Qualified Investments

Align Credit Union made 131 qualified investments totaling approximately \$230,100. This represents a decrease from the previous evaluation. The credit union’s equity investment totals \$45,213, and qualified donations total \$184,887.

The following table details qualified investments by year and purpose.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize Or Stabilize		Totals	
	#	\$	#	\$	#	\$	#	\$	#	\$
7/19/21-12/31/21	0	0	20	25,125	0	0	1	5,000	21	30,125
2022	2	500	28	39,657	1	200	3	22,500	34	62,857
2023	0	0	20	29,000	4	4,655	4	13,000	28	46,655
2024	3	2,500	16	18,250	0	0	3	2,000	22	22,750
YTD 2025	2	6,000	22	16,000	0	0	1	500	25	22,500
Donation Subtotals	7	9,000	106	128,032	5	4,855	12	43,000	130	184,887

Investments	0	0	0	0	0	0	1	45,213	1	45,213
Totals	7	9,000	106	128,032	5	4,855	13	88,213	131	230,100
<i>Source: Credit Union records</i>										

Equity Investment

The credit union maintained one equity investment from the prior period in the Lowell Downtown Venture Fund. The aim of the fund is to revitalize the primarily low- and moderate-income area by providing capital access for small businesses. Several area institutions participated in the fund. The credit union’s investment was made in response to another financial institution revoking its funding. The credit union’s investment totaled \$45,213.

Qualified Donations

Below are notable examples of the credit union’s qualified donations:

- **The Lowell Plan** – The credit union made several donations to this initiative to revitalize the area of Lowell through economic development. The initiative collaborates between public, private, and non-profit sectors to develop a vision for Lowell’s success, a primarily low- and moderate-income area. These donations support revitalization for low- and moderate-income areas.
- **Project Learn** – This local non-profit organization develops programs to assist Lowell students. Programs include mentoring, book drives, fundraising, and college preparation. The credit union donated to this organization annually to support low- and moderate-income individuals.
- **Habitat For Humanity** – The credit union provided donations to several chapters of the organization in the assessment area. The goal of the organization is to develop affordable housing for low-income individuals, as well as renovate and furnish housing for individuals in need.
- **Merrimack Valley Food Bank** – This Lowell-based organization aims to provide low-income, homeless, and food insecure individuals with food and other essential items. Initiatives include a community market, a mobile pantry, food rescue from local supermarkets, and a summer program for youths in coordination with local organizations. The credit union provided several donations to this organization during the evaluation.
- **Boys and Girls Clubs** – The credit union provided donations and grant support to several Boys and Girls clubs in the Assessment Area, including Haverhill, Lowell, and Merrimack Valley. These clubs operated in low- and moderate-income areas and benefited families living in these areas.

Community Development Services

The credit union is a leader in providing community development services. During the evaluation period, Align Credit Union provided 233 instances of community development services to over 40 qualified organizations through financial literacy classes, first-time home buyer sessions, technical assistance to small businesses, and Board and committee membership for local community organizations. During the evaluation period, employees, senior management members, and directors devoted time to community development organizations supporting community services, economic development, affordable housing, workforce development initiatives, and financial literacy. These activities were responsive to needs identified by the community contacts.

The credit union's community development program benefits from its strategic approach and utilization of designated Community Engagement Officer positions.

The following table summarizes the credit union's community development service by year and purpose:

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2022	0	9	8	5	22
2023	1	29	5	2	37
2024	0	91	13	0	104
YTD 2025	2	61	7	0	70
Totals	3	190	33	7	233

Source: Credit Union Data

The following samples highlight the community development services provided by the credit union.

Employee Involvement

- **Lawrence Venture Fund** – The Venture Loan Fund offers small businesses loans to Lawrence based existing and start-up businesses that cannot currently access financing from a traditional bank or credit union lender. The fund is backed by the Lawrence Partnership, which leverages public, private and philanthropic investments, including support from 11 local financial institutions including Align. A Commercial Loan Officer was a member of the organization's Credit Committee during the examination period. This activity qualifies for community development by supporting economic development through the financing of small businesses.
- **Boys and Girls Club of Greater Lowell** – The Boys and Girls Club of Greater Lowell provides a safe, low- or no cost space for low- and moderate-income children. The club is located in a low-income census tract and serves a community with a significant number

of low- and moderate-income census tracts. An Executive Vice President at the credit union served on the organization's Board of Directors during the evaluation period.

- **Community Teamwork** – Community Teamwork is a regional non-profit housing agency and community development corporation. The organization is located in Lowell and serves over 70 communities. During the evaluation period a Commercial Loan Officer at the credit union served on the organization's Loan Committee.
- **Worcester Community Housing Resources (WCHR)** – WCHR works to create and preserve affordable housing opportunities for low- and moderate-income households and support revitalization efforts in Worcester County. The President of the credit union serves on the organization's board of directors. While this activity is located outside of the credit union's assessment area, it supports affordable housing initiatives in a broader statewide area.

Financial Literacy and Education

- **Greater Lowell Technical Vocational High School Internship**– The credit union sponsors a workforce development experience available to students of the high school. The aim is to develop financial literacy skills as well as technical skills in the financial services industry. The credit union has provided this opportunity year-round to multiple students each year of the evaluation period. The majority of students come from the low- and moderate-income area of Lowell. The credit union's activity reflects leadership and qualifies for community development by providing a community service for low- and moderate-income individuals.
- **Credit Workshops and Reality Fairs** – The credit union participated in financial literacy programs at multiple schools and Boys and Girls Clubs and YMCA Clubs. throughout the assessment area and in a broader statewide area with a majority of students from low- and moderate-income households. The schools and clubs were located Framingham, Fitchburg, Haverhill, Lowell, and Marlborough. The aim is to help prepare students to make real personal financial decisions in the future, including career development and money management. Several credit union employees hosted and participated in the events.
- **Fraud Prevention** – During the evaluation period, the credit union spoke to children and seniors at several different organizations about preventing these particularly vulnerable groups from becoming victims of financial scams. Organizations included community service organizations, local senior centers, and YMCAs throughout the assessment area.

Other Technical Assistance

- **Branch Collection Fundraising** – The credit union uses its branch and member network to fundraise and collect supplies for local community organizations every year. Organizations include Catie's Closet, the Massachusetts Coalition for the Homeless, Daniel's Table, and The Community Giving Tree. These collections primarily benefit

low- and moderate-income individuals. The credit union's fundraising efforts qualify for community development by supporting community services for low- and moderate-income individuals.

- **Moderate-Income Branches** – The credit union's Lowell and Seabrook NH branches are located in moderate-income census tracts. These branches provide essential retail services for these communities.

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 credit union's overall CRA rating.

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 credit union 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 credit union or an affiliate for consideration in the credit union'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 credit union's assessment area(s) or a broader statewide or regional area including the credit union'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 credit union'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 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 87 Hale St, Lowell MA 01851"

[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.