



PUBLIC DISCLOSURE

September 7, 2021

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Middlesex Federal Savings, F.A.
Charter Number: 701452

1 College Avenue
Somerville, MA 02144

Office of the Comptroller of the Currency

99 Summer Street
Suite 1400
Boston, MA 02110

NOTE: 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, and should not 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 federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The lending test is rated: Satisfactory.

The community development test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on Middlesex Federal Savings, F.A.'s (MFS or bank) record of performance in meeting the credit needs of the assessment area (AA) during the evaluation period through its lending activities. The evaluation period for the Lending Test is January 1, 2018 to December 31, 2020.
- Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio is more than reasonable.
- A majority of the bank's loans are in its assessment area.
- Overall, lending levels reflect reasonable responsiveness to assessment area credit needs.
- The bank was not subject to any CRA or Fair Lending (FL) related complaints during the evaluation period.
- The Community Development Test rating is based on Middlesex Federal Savings, F.A.'s record of performance in meeting the needs of the AA during the evaluation period through its community development activities. The evaluation period for the Community Development Test is the same period as the Lending Test – January 1, 2018 to December 31, 2020.
- Overall, the institution exhibits adequate responsiveness to the needs of its delineated AA through its community development activities.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, MFS' loan-to-deposit (LTD) ratio is more than reasonable.

Over the past 12 quarters since the last CRA evaluation, the LTD ratio averaged 111.37 percent. From January 1, 2018 to December 31, 2020, the LTD ratio ranged from a quarterly low of 102.35 percent to a quarterly high of 119.92 percent. MFS' average LTD ratio is significantly higher than the average of peer FDIC-insured institutions of similar size that operate in Middlesex County, MA. Peer institutions range in asset sizes from \$255 million to \$658 million and had an average LTD ratio of 94.76 percent.

Lending in Assessment Area

A majority of the bank's primary lending products, home mortgage loans, are inside its assessment area (AA).

The bank originated and purchased 60.1 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. MFS did not submit affiliate lending for consideration during this evaluation.

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										
2018	43	61.4	27	38.6	70	35,712	58.0	25,865	42.0	61,577
2019	49	55.7	39	44.3	88	34,248	44.8	42,258	55.2	76,506
2020	89	62.2	54	37.8	143	56,832	70.2	24,085	29.8	80,917
Subtotal	181	60.1	120	39.9	301	126,792	57.9	92,208	42.1	219,000
Total	181	60.1	120	39.9	301	126,792	57.9	92,208	42.1	219,000

*Source: Bank Data – 01/01/2018 – 12/31/2020
Due to rounding, totals may not equal 100.0%*

Description of Institution

Middlesex Federal Savings, F.A. is a mutual federal savings association headquartered in Somerville, MA. MFS had total assets of \$455.9 million as of December 31, 2020. In addition to the bank's main office located in Davis Square in Somerville, MFS has two full-service branches, one located in Teele Square in Somerville and the other located in Medford, MA. The bank has three operating subsidiaries including Highland Investment Corporation, Midshares, Inc., and One College, LLC. Affiliate activities were not considered in this evaluation. There were no branch locations opened or closed during the evaluation period. Operating hours are reasonable. All branches are open from 8:30am to 4:00pm Monday through Friday, and 8:30am to 12:00pm on Saturday. The full-service branch location in Somerville, MA has extended hours on Thursdays from 8:30am to 6:00pm. Due to the COVID-19 pandemic, there were some restrictions in access to bank branches from March 2020 through December 2020, as some branch lobbies were closed during certain hours or accepted customers by appointment only. Operating hours remained reasonable as drive-up access was available at the Teele Square Branch. All branches have automated teller machines (ATMs) available for 24-hour banking access.

Residential lending was the primary focus of this PE. Approximately 41 percent of gross loans are comprised of 1-4 family residential mortgage loans as of December 31, 2020. The bank also offers traditional home equity loans, lines of credits, commercial, multifamily, and consumer loans. The bank offers an array of deposit products including but not limited to, checking accounts, savings accounts, money market accounts, and certificate of deposits. The bank's website, www.middlesexfederal.com, provides a full listing of lending and deposit products.

As of December 31, 2020, MFS reported total assets of \$455.9 million, total deposits of \$355.1 million, and tier 1 capital of \$44.3 million. The loan portfolio totaled \$368.1 million or approximately 80.7 percent of total assets.

The table below provides a summary of the loan mix as of December 31, 2020:

Loan Portfolio Summary by Loan Product December 31, 2020	
Loan Category	% of Gross Loans and Leases
1-4 Family Residential Mortgages – Closed End	41.2
Multifamily	22.2
Other Real Estate (Commercial)	20.8
Construction & Development	12.5
Commercial & Industrial	2.7
Home Equity	<1
Consumer	<1
Total	100

Source: Federal Deposit Insurance Corporation (FDIC) Call Report, December 31, 2020.

The bank has no financial or legal impediments in meeting the credit needs of its AA.

MFS' prior CRA Performance Evaluation (PE) dated July 9, 2018 assigned a Satisfactory rating using intermediate small bank (ISB) procedures stemming from Satisfactory Lending and Community Development Tests.

Scope of the Evaluation

Evaluation Period/Products Evaluated

MFS was evaluated using ISB evaluation procedures, which includes a Lending Test and Community Development Test. The evaluation period for both tests covers the bank's performance from January 1, 2018 through December 31, 2020. The Lending Test evaluates the bank's record of meeting the credit needs of its AA through primary lending activities, while the Community Development Test includes an assessment of CD loans, qualified investments, grants and donations, and CD services.

The scope of our evaluation was based on the bank's primary loan products which consisted solely of home mortgage information for 2018, 2019, and 2020 as required by the Home Mortgage Disclosure Act (HMDA) and reported CD activities. Examiners determined the HMDA data submitted was reliable and accurate and also verified CD activities submitted by management.

We compared the bank's 2018-2020 lending performance to 2015 American Community Survey (ACS) and 2020 Dun and Bradstreet (D&B) data. 2020 Peer Mortgage data was used as supporting performance context (as applicable). Peer 2020 deposit market share data is as of June 30, 2020 and based on information from the Federal Deposit Insurance Corporation (FDIC). HMDA aggregate lending and market share percentages consider only lenders that submit HMDA data. Lenders that collect but do not submit data are not considered in the percentages.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the ‘Scope’ section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

The CRA requires an institution to define the AA in which it will be evaluated. MFS has delineated a single, full-scope AA that meets the requirements of the regulation by consisting of wholly-contiguous political subdivisions (counties), containing the entirety of the customer deposit base, and by not arbitrarily excluding any low- or moderate-income census tracts (CT). Middlesex Federal Savings, F.A.’s AA consists of a single full-scope area, the MFS_2020 Middlesex County AA, which is comprised of the entirety of Middlesex County (#017), a subset of the larger Cambridge-Newton-Framingham, MA Metropolitan Division (MD) (#15764).

Ratings

The bank’s overall rating is based on the state of Massachusetts rating.

The state rating is based on performance in all bank AAs. Refer to the ‘Scope’ section under each state section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Massachusetts

CRA rating for the State of Massachusetts:	Satisfactory
The Lending Test is rated:	Satisfactory
The Community Development Test is rated:	Satisfactory

The major factors that support this rating include:

- The bank exhibits excellent geographic distribution of loans in the state.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels.
- There were no CRA or FL related complaints received by the bank or the agency since the previous CRA ISB PE nor were there any noted complaints occurring during the evaluation period.
- Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

Description of Institution's Operations in Massachusetts

As previously discussed, the bank's full-scope AA includes the entirety of Middlesex County (#017), a subset of the Cambridge-Newton-Framingham, MA MD (#15764), and all bank locations, as well as all contiguous towns and cities surrounding the bank's offices. MFS operates two branches in Somerville and one branch in Medford. The bank also has a loan production center that is connected to the bank's main branch in Davis Square, Somerville, MA. The bank's AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income census tracts.

MFS operates in a very competitive market that has several other local commercial banks, savings banks, and credit unions. MFS ranked 94th among 136 competing institutions on the FDIC's Deposit Market Share Report dated for June 30, 2020. Over the past three calendar years (2018-2020), the bank has held between 0.07 percent and 0.08 percent of deposits in the local market. As of June 30, 2020, the top three institutions with highest deposit market share are State Street Bank and Trust Company (27.28 percent), Bank of America, National Association (19.82 percent), and Citizens Bank, National Association (10.28 percent). These three institutions jointly held approximately 57.4 percent of the total deposits in the AA. Local competitors include, but are not limited to, Leader Bank, Rockland Trust Company, and Middlesex Savings Bank.

As part of performance context when evaluating lending performance, we considered the disparity between the median income of families within the AA compared to the median cost of housing and the overall impact to home ownership. Within the full-scope MFS_2020 Middlesex County AA, approximately 5.6 percent of families were noted as being below the poverty level and 38.3 percent of households are low- or moderate-income (LMI). Conversely, 45.4 percent of households were classified

as upper income. Consequently, high home prices limit the availability of affordable housing for LMI groups within the bank's delineated AA.

The OCC also leveraged data collected during 2019 from two community contacts within the Cambridge-Newton-Framingham, MA MD to understand the local economic conditions and community development needs. Both contacts are located within the adjacent Essex County (#009), however the scope of the community services offered by these local groups include Middlesex County (#017). Community contacts cited high housing prices and cost of living as significant pressures spurring affordable housing needs within the area for both low- and moderate-income borrowers. Contacts indicated that financial literacy is also a critical need for both low and moderate-income borrowers, including students, the elderly, and an increasing immigrant population, all of whom may not be aware or familiar with the banking system or their credit options.

Moody's Analytics Inc. reported that the Cambridge-Newton-Framingham metro area was still in the recovery phase of its business cycle as of January 2021. The area was heavily impacted by the COVID-19 pandemic and recovery during the end of 2020 and beginning of 2021 was slowed due to a spike in the level of local COVID-19 cases. In 2020, leisure and hospitality, transportation, healthcare, and other services were among the hardest hit industries, and many small businesses have permanently closed as a result of the pandemic. Moody's notes that the Cambridge-Newton-Framingham metro area's significant technology industry will continue to contribute positively towards the area's recovery and will aid local spending.

Top employers within the bank's AA include Harvard University, Massachusetts Institute of Technology, and The TJX Co. Inc., which all have 15,000 or greater employees. Other top employers include DeMoulas Super Markets Inc. and Lahey Health, which both have greater than 10,000 employees. There are several other large employers in the area with between 2,000 and 9,000 employees.

Table A – Demographic Information of the Assessment Area						
Assessment Area: MFS_2020 Middlesex Cnty AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	318	6.9	17.3	39.6	35.8	0.3
Population by Geography	1,556,116	6.2	16.9	41.4	35.4	0.0
Housing Units by Geography	617,089	6.1	17.2	42.4	34.3	0.0
Owner-Occupied Units by Geography	365,501	2.4	11.9	43.1	42.6	0.0
Occupied Rental Units by Geography	220,141	12.0	25.5	41.5	21.0	0.0
Vacant Units by Geography	31,447	7.6	21.2	40.1	31.1	0.0
Businesses by Geography	149,263	5.5	13.5	40.8	40.2	0.0
Farms by Geography	2,728	3.1	10.8	41.6	44.6	0.0
Family Distribution by Income Level	376,456	20.5	15.7	19.8	44.1	0.0
Household Distribution by Income Level	585,642	24.0	14.3	16.3	45.4	0.0
Median Family Income MSA - 15764 Cambridge-Newton-Framingham, MA		\$100,380	Median Housing Value			\$448,925
			Median Gross Rent			\$1,359
			Families Below Poverty Level			5.6%
<i>Source: 2015 ACS and 2020 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>						

Scope of Evaluation in Massachusetts

MFS delineated a single AA within the State of Massachusetts for analysis under the requirements of the CRA. The bank's AA consists of Middlesex County and includes all branches, as well as the contiguous towns/cities around these office locations. The bank's AA meets the requirements of the regulation and does not arbitrarily exclude any LMI geographies.

The bank's overall rating is based on the MFS_2020 Middlesex County AA, which received a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS

LENDING TEST

The bank's performance under the Lending Test in Massachusetts is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the State of Massachusetts is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table O in the state of MA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is considered excellent given performance context.

The percentage of home mortgage loans in low-income CTs significantly exceeded both the percentage of owner-occupied units and aggregate lending in the AA. The percentage of home mortgage loans in moderate-income CTs significantly exceeded both the percentage of owner-occupied units and aggregate lending in the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of MA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is considered reasonable given performance context.

The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and significantly exceeded aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers was below both the percentage of moderate-income families and aggregate lending in the AA.

The assessment of performance considered the affordability for low- and moderate-income borrowers and competition amongst lenders in the AA. Based on the 2020 median family income (MFI) of \$100,380, low-income families with maximum income of \$50,190 and moderate-income families with maximum income of \$80,304 would find it challenging to qualify for a mortgage loan given the \$448,925 median housing value.

Table A 2020 data	Median Family Income*	Median Housing Value	Low- Income Annual Income	Low- Income Monthly Income	Mod- Income Annual Income	Mod- Income Monthly Income	Monthly Mortgage Payment**	Low- Income Payment***	Moderate- Income Payment***
MFS_2020 Middlesex County AA	\$100,380	\$448,925	\$50,190	\$4,182.50	\$80,304	\$6,692.00	\$2,409.93	\$1,254.75	\$2,007.60

**Weighted Average of Census MSA Median Family Income via 2020 Demographic Data and 2015 ACS US Census data*

***Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses*

****Payments calculated at one-third of monthly income*

MFS faces significant competition from other large community banks and national mortgage lenders operating within the MFS_2020 Middlesex County AA. In 2020, MFS ranked 142nd among 359 competing lenders for home mortgage loans made to LMI borrowers in the AA with less than one percent market share at 0.10 percent via 18 instances of lending. The top five home mortgage lenders to LMI borrowers, Quicken Loans, LLC (7.50 percent), Citizens Bank, National Association (4.83 percent), Guaranteed Rate, Inc (4.48 percent), JPMorgan Chase Bank, National Association (3.38 percent), and Leader Bank, National Association (3.33 percent), had a combined market share of 23.52 percent with all lenders outside the top five individually maintaining less than a three percent market share.

Responses to Complaints

There were no CRA or FL related complaints received by the bank or the OCC during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Massachusetts is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community development lending within the MFS_2020 Middlesex County AA is considered good. Within the full-scope AA, MFS made six qualified CD loans totaling approximately \$2.62 million or 5.92 percent of tier 1 capital.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
MFS_2020 Middlesex County AA	6	100.00	\$2,625	100.00

The highlights of the bank's CD loans are as follows:

- A \$925 thousand CD-qualified loan to consolidate the operations of a local small business located within the AA enabling continued function during the evaluation period.
- A \$550 thousand CD-qualified loan to a local small business in the AA for expansion of operations including equipment and property acquisitions during the evaluation period.

Number and Amount of Qualified Investments

Community development qualified investments and donations within the MFS_2020 Middlesex County AA are considered adequate. Combined qualified investment and donation activity during the evaluation period totaled approximately \$43.8 thousand and compares favorably to the level of qualified community development donations noted during the bank's previous performance evaluation. This level of activity consisted of 79 qualified donations that met the definition for community development primarily for community service and economic development purposes that provide assistance to low- and moderate-income geographies and populations within the AA.

The highlights of the bank's community development donations include the following:

- A \$1,000 donation to a local community health center that provides services to low- and moderate-income families located in the AA.
- A \$1,000 donation to a local homeless shelter that provides home and food services to low- and moderate-income populations in the AA.
- A \$1,000 sponsorship donation to a local community group to foster financial literacy learning for low- and moderate-income populations in the AA.
- Eight \$1,000 donations in the form of scholarships to low- and moderate-income students within the AA to further their education.

Extent to Which the Bank Provides Community Development Services

The bank provides a good level of community development services in the AA. During the evaluation period, bank employees provided approximately 371 hours of experience, leadership services, or community services to different community development eligible organizations within the AA. The services met the regulatory definition of community development and included the provision of financial literacy programs, food donations, clothing and school supply donations, and affordable housing and living services targeted to low- and moderate-income populations.

The highlights of the bank's community development services are as follows:

- An employee serves as volunteer staff for a local education organization in coordinating outreach efforts and learning seminars for low- and moderate-income students in the AA.
- An employee serves on the board of a local, mission-focused community group based within the AA that provides housing and food services for low- and moderate-income families in need.
- An employee provides hours of volunteer service teaching financial literacy courses to local students, including low- and moderate-income students, as they prepare for their secondary education.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	Lending and Community Development Tests – (01/01/2018 to 12/31/2020)	
Bank Products Reviewed:	HMDA-reportable home mortgage loans Community Development-eligible loans, investments/donations, and services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None reviewed.		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Massachusetts		
MFS_2020 Middlesex County AA	Full-scope	<ul style="list-style-type: none"> • Cambridge-Newton-Framingham, MA MD (#15764) • Full Middlesex County (#017)

Appendix B: Summary of MMSA and State Ratings

RATINGS – Middlesex Federal Savings, F.A.			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank State Rating
Middlesex Federal Savings, F.A.	Satisfactory	Satisfactory	Satisfactory
State:			
State of Massachusetts	Satisfactory	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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, other secured consumer loans, and other unsecured consumer loans.

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, which 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).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 conduct 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, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties 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.

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 percent 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 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

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 qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

Small Loan(s) to Farm(s): 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 or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
MFS_2020 Middlesex Cnty AA	181	126,792	100.0	97,884	2.4	3.9	2.4	11.9	22.7	11.1	43.1	54.1	42.6	42.6	19.3	43.9	0.0	0.0	0.0
Total	181	126,792	100.0	97,884	2.4	3.9	2.4	11.9	22.7	11.1	43.1	54.1	42.6	42.6	19.3	43.9	0.0	0.0	0.0

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
MFS_2020 Middlesex Cnty AA	181	126,792	100.0	97,884	20.5	4.4	4.0	15.7	12.7	15.2	19.8	26.0	23.0	44.1	27.6	47.6	0.0	29.3	10.1
Total	181	126,792	100.0	97,884	20.5	4.4	4.0	15.7	12.7	15.2	19.8	26.0	23.0	44.1	27.6	47.6	0.0	29.3	10.1

*Source: 2015 ACS Census ; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*