



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

May 6, 2013

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Windsor FS&LA  
Charter Number 703781

250 Broad Street  
Windsor, CT 06095

Office of the Comptroller of the Currency

New York Field Office (8109)  
343 Thornall Street, Suite 610  
Edison, NJ 08837

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, 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 federal financial supervisory agency concerning the safety and soundness of this financial institution.

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

**The Lending Test is rated: Satisfactory.**

**The Community Development Test is rated: Satisfactory.**

The factors supporting the institution's rating include:

- The bank's average loan-to-deposit ratio is reasonable.
- A majority of the bank's primary lending products originated during the evaluation period were made within the bank's assessment area.
- Residential mortgage lending products reflect a reasonable distribution of loans to low- and moderate-income borrowers when compared to aggregate lending data and area demographics.
- The geographic distribution of loans throughout census tracts of different income levels is reasonable when compared to aggregate lending data and area demographics.
- The bank demonstrated an adequate responsiveness to community development needs in its assessment area through community development lending, investments, and services.

## **Scope of Examination**

This Performance Evaluation assesses the bank's performance in meeting the credit needs of the communities in which it serves. We evaluated Windsor FS & LA under the Intermediate Small Bank (ISB) performance criterion, which includes a Lending Test and a Community Development (CD) Test.

The overall evaluation period covers November 12, 2009 (date of the prior CRA evaluation) through May 6, 2013. The evaluation period for the lending test covers the bank's performance from January 1, 2010 through December 31, 2012. Under the lending test, we focused our review on the bank's residential mortgage lending activity as this was the bank's primary lending product by number and dollar volume purchased and originated during the evaluation period. While the bank also engages in small business lending, it is not the primary lending product, and as such, small business loans were not included in our evaluation.

The CD test, which includes CD loans, CD investments, and CD services, was evaluated over the period November 12, 2009 through May 6, 2013. This test assesses the bank's responsiveness to identified community development needs and takes into consideration the volume, mix, and qualitative aspects of the activities. All CD activities were reviewed to ensure they met the regulatory definition for community development.

In assessing the bank's CRA performance, consideration is given to the bank's financial capacity, its size, local economic and demographic factors, market competition, and any legal impediments.

As part of this CRA evaluation, the bank's publicly filed information on HMDA loans was tested for accuracy. We found no significant errors in the loan data and used recorded information in our analysis.

## Description of Institution

Founded in 1936, Windsor Federal Savings & Loan Association (Windsor) is a federally chartered savings association located in Windsor, CT. Windsor is organized under a two-tiered mutual holding company structure, including Windsor Federal Mutual Holding Company and Windsor Federal Bancorp. The sole purpose of the Holding Company and the Bancorp is to support the bank operations of the Association (Windsor). The bank primarily serves the Hartford County area and operates five branches located in the towns of Windsor, Granby, and Bloomfield. Two of the branches within the town of Windsor are located in moderate-income census tracts. Business hours vary by branch, which open as early as 7:30 a.m., and close as late as 7:00 p.m.

Windsor offers a traditional range of loan and deposit products. Loan products include consumer loans, home equity loans, home equity lines of credit, residential mortgage loans, commercial loans, and commercial real estate loans. The bank also originates and participates in Federal Housing Administration (FHA), Connecticut Housing Finance Authority (CHFA), and Small Business Administration (SBA) guaranteed loans.

As of March 31, 2013, Windsor reported total assets of \$392 million, with \$233 million in total loans and \$314 million in total deposits. See Table 1 below for detailed information on the composition of the bank's loan portfolio.

Table 1 – Loan Distribution as of March 31, 2013		
Loan Type	Dollar Amount (000s)	Percent of Total Loans (%)
1-4 Family Residential Properties Closed-end	\$130,192	56.0
1-4 Family Residential Properties Open-end	10,578	4.5
1-4 Family Residential Construction	734	0.3
Commercial Construction and Land Development	1,022	0.4
Multifamily Residential	11,841	5.1
Owner Occupied Non-Farm Non-Residential Properties	39,727	17.1
Other Non-Farm Non-Residential Properties	15,390	6.6
<b>Total Real Estate Loans</b>	<b>\$209,484</b>	<b>90.0</b>
Commercial and Industrial	18,906	8.1
Consumer Open-end	879	0.4
All Other	3,379	1.5
<b>Total Loans</b>	<b>\$232,648</b>	<b>100</b>

Source: March 31, 2013 Consolidated Report of Income and Condition

There are no financial or legal factors impeding the bank's ability to help meet the credit

needs of the communities it serves. Windsor received a *Satisfactory* rating for the previous CRA evaluation dated November 12, 2009.

## Description of Assessment Area

Windsor’s assessment area (AA) consists of five of the 29 cities and towns within Hartford County, including the towns of Granby, East Granby, Windsor Locks, Windsor, and Bloomfield. Hartford County is part of the Hartford-West Hartford-East Hartford, CT Metropolitan Statistical Area (MSA) #25540. Windsor’s AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income (LMI) geographies. It has not changed since the prior CRA examination. Windsor’s performance in 2010 and 2011 is evaluated using 2000 US Census Data and the bank’s performance in 2012 is evaluated using 2010 US Census Data. Table 2 below illustrates the demographic information for Windsor’s AA for 2010-2011.

Table 2 - Demographic Information for Windsor’s Assessment Area in 2010-2011						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	19	0.00	10.53	63.16	26.32	0.00
Population by Geography	74,959	0.00	6.67	60.89	32.44	0.00
Owner-Occupied Housing by Geography	23,002	0.00	5.79	58.63	35.58	0.00
Business by Geography	9,640	0.00	6.75	56.93	36.32	0.00
Farms by Geography	283	0.00	2.83	43.11	54.06	0.00
Family Distribution by Income Level	20,454	14.01	18.25	23.53	44.22	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	6,597	0.00	11.46	67.41	21.13	0.00
Median Family Income		\$64,156	Median Housing Value		\$227,600	
HUD Adjusted Median Family Income for 2011		\$86,500	Unemployment Rate		8.7%	
Households Below Poverty Level		5%	(BLS 2011)			

(\*) The NA category consists of geographies that have not been assigned an income classification. Source: 2000 US Census Data, 2011 HUD updated MFI, 2011 Bureau of Labor Statistics, and 2011 National Association of Realtors.

According to the 2000 US Census, the total population of the AA was 74,959 with 23,002 households and 20,454 families. The AA consists of 19 census tracts (CTs). Of the 19 CTs, 10.53 percent are moderate-income geographies, 63.16 percent are middle-income geographies, and 26.32 percent are upper-income geographies. There are no low-income geographies in this AA, limiting the bank’s opportunities to serve LMI geographies.

The 2011 Housing and Urban Development Agency (HUD) adjusted median family income for this assessment area was \$86,500. Within this AA, 14.01 percent of the families were low-income, 18.25 percent were moderate-income, and 5.00 percent of all households had incomes below the poverty level.

Table 2A below illustrates the demographic information for Windsor’s AA for 2012.

Table 2A – Demographic Information for Windsor’s Assessment Area in 2012						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	19	0.00	26.32	47.37	26.32	0.00
Population by Geography	78,458	0.00	19.62	49.13	31.25	0.00
Owner-Occupied Housing by Geography	25,247	0.00	18.13	46.63	35.24	0.00
Business by Geography	9,021	0.00	17.86	49.72	32.42	0.00
Farms by Geography	285	0.00	10.88	40.35	48.77	0.00
Family Distribution by Income Level	21,170	14.15	17.04	25.28	43.53	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	6,603	0.00	30.65	50.02	19.32	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		82,299 87,700 5%		Median Housing Value Unemployment Rate (BLS 2012)		222,800 8.7%

(\*) The NA category consists of geographies that have not been assigned an income classification. Source: 2010 US Census Data, 2012 HUD updated MFI, 2012 Bureau of Labor Statistics, and 2012 National Association of Realtors.

The 2010 US Census reported total population of this AA at 78,458 with 25,247 households and 21,170 families. The number of census tracts (CTs) in the AA remained unchanged at 19 CTs. Of the 19 CTs, 26.32 percent are moderate-income geographies, 47.37 percent are middle-income geographies, and 26.32 percent are upper-income geographies. Again, there are no low-income geographies in this AA, limiting the bank’s opportunities to serve LMI geographies.

The 2012 HUD adjusted median family income for this assessment area was \$87,700. Within this AA, 14.15 percent of the families were low-income, 17.04 percent were moderate-income, and 5.00 percent of all households had incomes below the poverty level.

The unemployment rate as of year-end 2012 for Hartford County was 8.7 percent, which is higher than the national average of 7.8 percent. There is no single dominant industry within the AA. The majority of businesses are small and typically do not hire a large volume of employees. Adjacent to the AA, the city of Hartford has long been known as a hub for the insurance industry, as a heavy concentration of insurance and financial corporations are headquartered throughout the region. According to the January 2013 Moody’s Analytics report, the largest industry sectors in the Hartford County MSA are Education and Health Services (17.5%), Government (14.9%), Professional and Business Services (11.5%) and Financial Activities (11.1%).

Windsor’s market for lending opportunities is competitive. The bank competes with local, regional, and nationwide financial institutions. According to the Federal Deposit Insurance Company (FDIC) deposit market share report as of June 2012, Windsor ranked 13 out of 29 institutions within the Hartford area MSA, with a deposit market share of 0.81 percent. In regards to loan market share, Windsor ranked fourth out of 196 institutions with a market share of 4.52 percent in 2011.

We contacted two local community organizations regarding community credit needs and business opportunities. The organizations rely on donations and grants from local financial institutions to service the community. With respect to community development needs, the contacts identified affordable housing, specifically special needs and elderly housing, as well as financial literacy programs to assist borrowers with low/no credit.

## Conclusions with Respect to Performance Tests

### LENDING TEST

Windsor's performance under the lending test is satisfactory. Windsor's loan-to-deposit ratio is reasonable given the bank's size, lending opportunities, and market area. A majority of the bank's residential mortgages were originated within the assessment area. When considering the bank's overall performance context, Windsor's record of lending to borrowers of different income and geographies is reasonable and meets the standard for satisfactory performance. Moreover, there were no CRA-related complaints filed during the evaluation period.

### Loan-to-Deposit Ratio

Windsor's quarterly average loan-to-deposit (LTD) ratio is reasonable given the bank's size, capacity to lend, demographic and economic factors, and credit needs of the AA. The average LTD ratio was calculated using quarterly information derived from the bank's Report of Condition over the past 14 quarters (September 31, 2009 – December 31, 2012) since the last CRA examination. The calculated LTD ratio was 74.72 percent. Quarterly LTD ratios for the bank ranged from a low of 71.02 percent at June 30, 2011, to a high of 81.61 percent at September 30, 2009.

Windsor's LTD ratio was above the peer group's average of 60.53 percent. The peer group consisted of four institutions of similar asset size and location. Of the four comparable institutions, only one had a higher LTD ratio. The bank's LTD ratio indicates an adequate responsiveness to community credit needs and meets the standards for satisfactory performance.

### Lending in Assessment Area

Windsor originated a majority of loans inside its assessment area in 2010 and 2011. Table 3 below illustrates the bank's lending activities by volume and dollar amount of loans. Based on 2010-2011 HMDA data, approximately 61 percent of total loans by number were made within the AA. The bank meets the standard for satisfactory performance in 2010-2011 under this criterion.

Table 3 - Lending in the Assessment Area in 2010-2011										
Loan Product Type	Number of Loans					Dollars of Loans (000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	42	47.19	47	52.81	89	6,176	32.30	12,945	67.70	19,121
Refinancing	215	59.89	144	40.11	359	27,044	48.49	28,728	51.51	55,772
Home Improvement	112	70.00	48	30.00	160	5,613	56.16	4,381	43.84	9,994
<b>Totals</b>	<b>369</b>	<b>60.69</b>	<b>239</b>	<b>39.31</b>	<b>608</b>	<b>38,833</b>	<b>45.75</b>	<b>46,054</b>	<b>54.25</b>	<b>84,887</b>

Source: 2010-2011 HMDA Data; 2000 U.S. Census Data

In 2012, Windsor originated a majority of loans inside its assessment area by both volume and dollar amount. Table 3A below illustrates the bank’s lending activities by volume and dollar amount of loans for 2012. Based on 2012 HMDA data, approximately 65 percent of total loans by number, and 64 percent by dollar amount were made within the AA. The bank meets the standard for satisfactory performance in 2012 under this criterion.

Table 3A - Lending in the Assessment Area in 2012										
Loan Product Type	Number of Loans					Dollars of Loans (000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	32	54.24	27	45.76	59	4,367	44.76	5,389	55.24	9,756
Refinancing	185	66.79	92	33.21	277	29,457	66.93	14,554	33.07	44,011
Home Improvement	43	70.49	18	29.51	61	2,963	80.78	705	19.22	3,668
<b>Totals</b>	<b>260</b>	<b>65.49</b>	<b>137</b>	<b>34.51</b>	<b>397</b>	<b>36,787</b>	<b>64.05</b>	<b>20,648</b>	<b>35.95</b>	<b>57,435</b>

Source: 2012 HMDA Data; 2010 U.S. Census Data

### Lending to Borrowers of Different Incomes

Windsor’s lending reflects reasonable distribution among borrowers of different income levels. Table 4 below illustrates the bank’s lending to borrowers of different income levels for 2010-2011. Windsor’s major product by number and dollar volume was refinance loans. Of the 215 refinance loans, 26.04 percent (9.30 to low- plus 16.74 to moderate-income) were made to low- and moderate-income (LMI) borrowers. This is below the aggregate lender’s level of 31.33 percent of total home mortgage refinance loans originated. Moreover, the bank made fewer loans relative to area demographics (% of AA Families). Home improvement loans amounted to 112 loans during the period. Of these, 40.18 percent (12.50 to low- plus 27.68 to moderate-income) of the bank’s home improvement loans were made to LMI borrowers. This exceeds the aggregate lender’s level of 36.41 percent, and is greater than area demographics. Finally, home purchase loans amounted to 42 loans during the same period. Of these, 47.62 percent (16.67 to low- plus 30.95 to moderate-income) of its home purchase loans were made to LMI borrowers. This is near the aggregate lender’s level of 49.63 percent, and exceeds area demographics. The bank meets the standard for satisfactory performance for 2010-2011.

Table 4 - Borrower Distribution of Residential Real Estate Loans in AA for 2010-2011													
Borrower Income Level		Low		Moderate		Middle		Upper		Low	Mod	Mid	Upper
Loan Type	# of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	Aggregate Lending Data			
Purchase	42	14.01	16.67	18.25	30.95	23.53	33.33	44.22	19.05	12.82	36.81	24.91	25.46
Home Improvement	112	14.01	12.50	18.25	27.68	23.53	28.57	44.22	31.25	14.29	22.12	27.19	36.41
Refinance	215	14.01	9.30	18.25	16.74	23.53	27.44	44.22	44.19	9.57	21.76	27.39	41.28

Source: 2010-2011 HMDA Data; 2000 U.S. Census Data.

Windsor’s lending in 2012 also reflects reasonable distribution among borrowers of different income levels. Table 4A below illustrates the bank’s lending to borrowers of different income levels for 2012. Given that aggregate lending data was not yet

available at the time of the evaluation, the bank’s performance was compared to demographic data (% of AA Families). Again, Windsor’s major product by number and dollar volume was refinance loans. Of these, lending to low-income borrowers was lower than area demographics (6.49 percent compared to 14.15 percent). However, the bank’s lending to moderate-income borrowers exceeded area demographics (23.24 percent compared to 17.04 percent). For home improvement loans, the bank exceeded area demographics for both low- and moderate-income borrowers. For home purchase loans, the bank was near area demographics for low-income borrowers and exceeded demographics for moderate-income borrowers. Overall, the bank meets the standard for satisfactory performance.

Table 4A - Borrower Distribution of Residential Real Estate Loans in AA for 2012													
Borrower Income Level		Low		Moderate		Middle		Upper		Low	Mod	Mid	Upper
Loan Type	# of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	Aggregate Lending Data			
Purchase	32	14.15	12.50	17.04	28.13	25.28	34.38	43.53	21.88	*	*	*	*
Home Improvement	43	14.15	16.28	17.04	37.21	25.28	23.26	43.53	20.93	*	*	*	*
Refinance	185	14.15	6.49	17.04	23.24	25.28	27.03	43.53	43.24	*	*	*	*

Source: 2012 HMDA Data; 2010 U.S. Census Data.

(\*) Aggregate lending data for 2012 was not available at the time of the evaluation.

### Geographic Distribution of Loans

The geographic distribution of home loans within the Windsor AA reflects reasonable distribution throughout census tracts of different income levels and meets the standards for satisfactory performance in both 2010-2011 and in 2012.

The bank’s AA, which includes five of the 29 cities and towns in the Hartford MSA, has a total of 19 census tracts. Of these, 10.53 percent (2) are designated moderate-income tracts, 63.16 percent (12) are designated middle-income tracts, and 26.32 percent (5) are designated upper-income tracts. There are no census tracts designated low-income, limiting the bank’s ability to lend to LMI borrowers.

Table 5 below reflects the percentage of owner-occupied housing units in each income tract and the percentage of bank loans made in each income tract during 2010-2011.

Table 5 - Geographic Distribution of Residential Real Estate Loans in AA for 2010-2011													
Census Tract Income Level		Low		Moderate		Middle		Upper		Low	Mod	Mid	Upper
Loan Type	# of Loans	% of AA Owner Occupied Housing	% of # of Loans	% of AA Owner Occupied Housing	% of # of Loans	% of AA Owner Occupied Housing	% of # of Loans	% of AA Owner Occupied Housing	% of # of Loans	Aggregate Lending Data			
Purchase	42	0.00	0.00	5.79	0.00	58.63	57.14	35.58	42.86	0.00	3.81	56.99	39.20
Home Improvement	112	0.00	0.00	5.79	5.36	58.63	53.57	35.58	41.07	0.00	3.21	55.50	41.28
Refinance	215	0.00	0.00	5.79	1.86	58.63	50.23	35.58	47.91	0.00	1.72	50.79	47.49

Source: 2010-2011 HMDA Data; 2000 U.S. Census Data



We placed the most emphasis on refinance loans as this was the major product by number and dollar volume of loans. Of the 215 refinance loans, the bank made 1.86 percent in moderate-income tracts, which is just above the 1.72 percent achieved by aggregate lenders. Windsor made 5.36 percent of its home improvement loans in moderate-income tracts, which also exceeds the 3.21 percent achieved by aggregate lenders. The bank’s home improvement loans were also near area demographics of 5.79 (% of AA Owner Occupied Housing) percent for moderate-income tracts.

No home purchase loans were made to moderate-income tracts in 2010-2011, however this was not a major product as only 42 loans were made during this period. Additionally, the high cost of housing in this marketplace makes homeownership difficult for most LMI borrowers.

Overall, the bank’s lending in geographies of different income levels meets the standard for satisfactory performance in 2010-2011.

Table 5A below reflects the percentage of owner-occupied housing units in each income tract and the percentage of bank loans made in each income tract in 2012.

Table 5A - Geographic Distribution of Residential Real Estate Loans in AA for 2012													
Census Tract Income Level		Low		Moderate		Middle		Upper		Low	Mod	Mid	Upper
Loan Type	# of Loans	% of AA Owner Occupied Housing	% of # of Loans	% of AA Owner Occupied Housing	% of # of Loans	% of AA Owner Occupied Housing	% of # of Loans	% of AA Owner Occupied Housing	% of # of Loans	Aggregate Lending Data			
Purchase	32	0.00	0.00	18.13	18.75	46.63	31.25	35.24	50.00	*	*	*	*
Home Improvement	43	0.00	0.00	18.13	23.26	46.63	44.19	35.24	32.56	*	*	*	*
Refinance	185	0.00	0.00	18.13	7.03	46.63	37.30	35.24	55.68	*	*	*	*

Source: 2012 HMDA Data; 2000 U.S. Census Data.

(\*) Aggregate lending data for 2012 was not available at the time of the evaluation.

Windsor’s lending in 2012 also reflects reasonable distribution throughout census tracts of different income levels. Once again, aggregate lending data was not yet available at the time of the evaluation for 2012, therefore the bank’s performance was compared to demographic data (% of AA Owner Occupied Housing). Of the 185 refinance loans, the bank made 7.03 percent in moderate income tracts, which is below the 18.13 percent demographic. However, both home improvement loans and home purchase loans exceeded area demographics. The bank’s lending in geographies of different income levels meets the standard for satisfactory performance in 2012.

**Responses to Complaints**

A review of OCC’s Customer Assistance Group’s complaint records, as well as the bank’s Public CRA File, revealed no CRA-related complaints filed since the prior examination. Therefore, analysis of this criterion was not applicable.

## **COMMUNITY DEVELOPMENT TEST**

Windsor's level of responsiveness to community development (CD) needs in the bank's assessment area meets the standard of satisfactory performance.

### **Number and Amount of Community Development Loans**

During the review period, Windsor provided funding for seven community development loans totaling approximately \$1 million in its assessment area:

- \$310 thousand to a non-profit organization to purchase and renovate a property to serve as an assisted living facility/group home for the elderly and disabled, including low- or moderate-income (LMI) individuals.
- \$110 thousand to the same organization to refinance and renovate another property to also serve as an assisted living facility/group home for the elderly or disabled, including LMI individuals.
- \$265 thousand to a non-profit organization to purchase a property to provide housing for disabled LMI individuals.
- \$243 thousand and \$39 thousand to a non-profit organization that provides health care services to LMI individuals.
- \$50 thousand to a non-profit organization that provides community services to LMI individuals, including a soup kitchen and youth programs.
- \$30 thousand to a non-profit organization that provides a youth program for LMI individuals.

### **Number and Amount of Qualified Investments**

The bank invested in three state and municipal bonds totaling approximately \$2.4 million that supported community development activities and affordable housing in its assessment area. The following investments received positive CRA consideration:

- \$387 thousand that directly benefits the bank's assessment area by financing improvements for the Town of Windsor, including improvements to roads, sidewalks, park facilities, and Windsor High School.
- \$1.4 million that finances housing for LMI families and individuals throughout the State of Connecticut including the bank's assessment area.
- \$579 thousand that supports school construction and economic development throughout the State of Connecticut including the bank's assessment area.

Although the investments appearing below did not directly benefit the bank's assessment area, they had a positive impact on the bank's CD test rating as there are limited CD opportunities in the bank's assessment area. The following six CD investments totaled \$14.8 million:

- \$299 thousand that finances various public improvement projects for the City of Hartford, which borders the bank's assessment area.
- \$3.6 million in individual SBA and USDA loans.
- \$999 thousand in the SBA 504 loan program, the purpose of which is to improve the economy of a locality or to assist businesses owned by women, minorities, veterans, rural businesses, and other designated types of businesses.
- \$1.3 million in a mortgage-backed security secured by loans to LMI borrowers in towns surrounding the bank's assessment area.
- \$2.1 million in a SBA Development Company Participation Certificate; the SBA Development Company Program helps small businesses receive loans to invest in plants, machinery, equipment, and real estate.

- \$6.5 million in SBA Guaranteed Loan Pool Certificates.

In addition, the bank made 44 donations totaling \$33 thousand that directly supported community development activities. The bank made an additional 58 donations totaling \$28 thousand that also promoted community development however not to the full extent of the donations.

### **Extent to Which the Bank Provides Community Development Services**

In 2011, the bank opened a seasonal, full-service branch in the Windsor High School with the goal of increasing financial literacy and preparing students to enter the workforce. Students, supervised by bank employees, operate the branch, which serves the students, faculty, and staff at the high school.

In addition, bank officers and board members performed the following community development services:

- Bank officer serves on the affordable housing committee of a statewide industry association.
- Bank officer is a board member of an organization that advances economic development and employment opportunities in the local area surrounding the airport, which includes the assessment area.
- Board member serves on commission that promotes and develops the business and industrial resources of the local town.
- Board member oversees a non-profit, community based behavioral health agency that provides services to disabled individuals including LMI housing.

### **Responsiveness to Community Development Needs**

Given the bank's capacity and the limited amount of community development opportunities, Windsor demonstrates adequate responsiveness to community development needs in its assessment area through community development lending, investments, and services.

### **Fair Lending or Other Illegal Credit Practices Review**

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.