



## **PUBLIC DISCLOSURE**

September 16, 2013

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Madison Square Federal Savings Bank  
Charter Number 708156

8615 Ridgely's Choice Drive  
Suite 111  
Baltimore, MD 21236

Office of the Comptroller of the Currency

400 7th Street S.W.  
Washington, DC 20219

**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 major factors supporting the institution's rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the bank's size and competitive factors.
- A majority of the loans originated during the evaluation period were inside the institution's assessment areas (AA).
- The distribution of borrowers, given the demographics of the AA, reflects an overall reasonable dispersion and satisfactory performance.
- The geographic distribution of loans reflects reasonable dispersion throughout the AA.

**SCOPE OF EXAMINATION**

CRA activities at Madison Square Federal Savings Bank (Bank) were completed using full-scope review procedures for its AA. Our review covered the Bank's performance from January 1, 2011 through December 31, 2012. Residential mortgage loans were determined to be the bank's primary loan product and were reviewed as part of this examination.

The institution reports data under the requirements of Home Mortgage Disclosure Act (HMDA). In order to ensure the reliability of HMDA loan data, we performed a data integrity examination during the first quarter of 2013. In conjunction with the data integrity examination, we evaluated processes employed by Madison Square to ensure the accuracy of collected HMDA data and tested a sample of Madison Square's reported HMDA loans. Specifically, we tested the accuracy of the Bank's HMDA loan data by comparing it against Madison Square's loan file documentation. Results of this testing evidenced the data is reasonably accurate and can be relied upon for this evaluation. Therefore, the lending test includes all HMDA data from January 1, 2011 through December 31, 2012.

The evaluation period under the lending test consists of two distinct time periods: January 1, 2011 through December 31, 2011 (2011 evaluation period) and January 1, 2012 through December 31, 2012 (2012 evaluation period). The first time period is evaluated using 2000 U.S. Census demographic information, and the second time period is evaluated using 2010 U.S. Census demographic information. The loan date was analyzed separately due to the significant changes in the demographic information between the two time periods. The 2012 peer mortgage data and aggregate lending data were not available at the time of the examination.

## **DESCRIPTION OF INSTITUTION**

Madison Square Federal Savings Bank, established in 1870, is a federally chartered thrift stock institution headquartered in the Perry Hall community of Baltimore County, Maryland.

The institution operates four full-service branches, including the main branch near its headquarters. The branches are located in Perry Hall, Fallston, Bel Air and Baltimore City. All of the branches are located within the Baltimore-Towson, Maryland (MD) Metropolitan Statistical Area (MSA). Each branch has an automated teller machine (ATM) and drive up facilities.

Madison Square relocated its Fallston, Maryland, branch in January 2009, which was opened in August 2008. The Bank also relocated its administrative offices from Baltimore City to Perry Hall in Baltimore County in March 2011.

Madison Square primarily originates residential permanent home purchase and refinances mortgage loans. However, it also offers construction loans, home equity loans and lines of credit, consumer loans (including new and used auto loans), and commercial loans. Madison Square retains these loans in its portfolio. Conservative underwriting standards are applied in the residential mortgage lending process as loans are originated exclusively to hold in the Bank's portfolio.

At June 30, 2013, Madison Square maintained total assets of \$149.8 million. As of the same date, Madison had net loans of \$84.4 million, total deposits of \$135.7 million and Tier One Capital of \$11.9 million. Net loans represent 56.3 % of total assets. The Bank's loan portfolio consists primarily of one-to four family residential real estate loans.

There are no financial or legal impediments to hinder Madison Square's ability to help meet the credit and CD needs of its assessment area.

Madison Square's last Public Evaluation (PE) was dated February 4, 2008, and the Bank was assigned an overall "Satisfactory" rating.

## **DESCRIPTION OF ASSESSMENT AREA(S)**

Madison Square has one assessment area (AA) located within the Baltimore-Towson, Maryland (MD) Metropolitan Statistical Area (MSA). The below chart reflects demographic information based on the 2000 U.S. Census information. Madison Square's 2011 performance is compared to this information.

Demographic Information for MSFSB's Assessment Area – 2011						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	183	2.73	18.03	53.01	25.68	0.55
Population by Geography	731,252	2.20	19.51	51.19	27.06	0.04
Owner-Occupied Housing by Geography	300,559	0.59	14.15	53.71	31.55	0.00
Family Distribution by Income Level	193,543	17.04	18.68	24.35	39.93	0.00
Census Median Family Income (MFI)		59,301	Median Housing Value			136,879
HUD-Adjusted MFI: 2011		84,500	Unemployment Rate			7.0%
Families Below the Poverty Level		7.07%				

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 2000 US Census and 2011 HUD updated MFI; Unemployment rate as of December 2011

Madison Square’s assessment area is located in parts of Baltimore City, Baltimore County, and Harford County. The assessment area includes census tracts surrounding, and within reasonable distance of, its branch locations. The assessment area meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income census tracts.

During the 2011 evaluation period, Madison Square’s AA was comprised of 183 census tracts: 5 or 2.73% are low-income geographies, 33 or 18.03% are moderate-income geographies, 97 or 53.01% are middle-income geographies, 47 or 25.68% are upper-income geographies, and 1 or 0.55% has not been assigned an income classification.

According to the 2000 U.S. Census data, the AA had a total population of 731,252. The AA contains 193,543 families and 17.04% are low-income, 18.68% are moderate-income, 24.35% are middle-income, and 39.93% are upper-income. There are 285,282 households and 20,168 or 7% of the households are below the poverty level. The 2011 HUD updated median family income was \$84,500.

The 2000 U.S. Census data reported 300,559 housing units in the AA. Approximately 66% are owner-occupied, 29% are rental occupied, and 5% are vacant housing units. Of all owner-occupied housing, 0.59% is located in low-income geographies, 14.15% is located in moderate-income geographies, 53.71% is located in middle-income geographies, and 31.55% is located in upper-income geographies. The median housing cost is \$136,879.

The below chart reflects updated demographic information based on the 2010 U.S Census information. Madison Square’s performance in 2012 is compared to this information.

Demographic Information for MSFSB's Assessment Area – 2012						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	202	4.46	24.75	41.09	29.21	0.50
Population by Geography	798,377	4.34	26.18	39.95	29.05	0.48
Owner-Occupied Housing by Geography	324,421	1.63	19.61	45.04	33.69	0.02
Family Distribution by Income Level	200,598	18.89	18.68	22.72	39.71	0.00
Census Median Family Income (MFI)	81,788	Median Housing Value				284,433
HUD-Adjusted MFI: 2012	85,600	Unemployment Rate				6.9%
Families Below the Poverty Level	7.16%					

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2012 HUD updated MFI; Unemployment rate as of December 2012

Madison Square did not change its AA in 2012; however, the AA demographics did change as a result of the 2010 U.S. Census. Based on the 2010 U.S. Census, there are now 202 census tracts in the Bank's AA. The major change relative to the 2010 U.S. Census reclassifications is that the moderate-income geographies increased to 50 census tracts from 33 census tracts and low-income tracts increased to nine census tracts from five census tracts. Overall, 9 or 4.46% are low-income, 50 or 24.75% are moderate-income, 83 or 41.09% are middle-income, 59 or 29.21% are upper-income, and one or 0.50% have not been assigned an income classification.

According to the 2010 U.S. Census data, the AA had a total population of 798,377. The AA contains 200,598 families and 18.89% are low-income, 18.68% are moderate-income, 22.72% are middle-income, and 39.71% are upper-income. There are 304,180 households and 21,793 or 7% of the households are below the poverty level. The 2012 HUD updated median family income is \$85,600.

According to the Bureau of Labor Statistics, the January 31, 2011 unemployment rate for the Baltimore-Towson MD MSA was 7.0%. The unemployment rate has been trending down since then and was 6.9% as of December 31, 2012. High unemployment rates can affect a Bank's ability to extend credit. As of December 31, 2012, the Maryland unemployment rate was 6.7% and the national unemployment rate was 7.8%.

Competition for loans and deposits is strong in this AA. Based on the June 30, 2012 FDIC Summary of Deposit Market Share report, Madison Square has a 0.23% deposit market share in the Baltimore-Towson MD MSA. Bank of America, National Association ranks 1<sup>st</sup> with 100 offices and a 24.87% deposit market share, Manufacturers and Traders Trust Company ranks 2<sup>nd</sup> with 110 offices and a 23.28% deposit market share, and PNC Bank, National Association ranks 3<sup>rd</sup> with 98 offices and a 10.27% deposit market share.

Competition for mortgage loans is strong and includes local commercial and savings banks and branches of larger regional and nationwide banks. The Institution Market Share report indicates that Madison Square competes with 123 lenders within its AA. The top five lenders are Wells Fargo Bank, Bank of America, JP Morgan Chase Bank, SunTrust Mortgage Inc., and Branch Banking and Trust Company. Madison Square ranks 190<sup>th</sup> with a market share of 0.04%.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA**

Madison Square's performance under the lending test is Satisfactory. Madison Square's quarterly average net loan-to-deposit ratio is reasonable. A majority of the institution's home mortgage loans were made within the Bank's assessment area. The distribution of loans reflects a reasonable distribution among individuals of different income levels. The geographic distribution of loans reflects reasonable distribution throughout census tracts of different income levels. All criteria of the lending test are documented below.

### **Loan-to-Deposit Ratio**

Madison Square's quarterly average loan-to-deposit ratio (LTD) is reasonable given the Bank's size, financial condition, and the credit needs of the AA, and it meets the standards for satisfactory performance. A review of the loan-to-deposit ratio for twelve quarters ended December 31, 2012 disclosed that Madison Square had an average loan-to-deposit ratio of 61.23%. The institution's peers had an average LTD ratio of 83.20% for the same period. During this time period, the ratio ranged from a quarterly low of 58.18% for the quarter ended June 30, 2012 to a quarterly high of 66.23% as of the quarter ended March 31, 2012.

### **Lending in Assessment Area**

Madison Square's lending in their AA is outstanding. Lending in the assessment area is considered reasonable with a majority of loans originated within the assessment area and the Bank meets the standard for satisfactory performance. During the evaluation period, 83.17% of the number and 81.87% of the dollar amount of total home mortgage loans were originated within the Bank's assessment area. The following table details the Bank's lending within the AA by number and dollar amount of loans:

<b>Table 1 - Lending in Assessment Area</b>										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	8	53.33%	7	46.67%	15	1,639	60.57%	1,067	39.43%	2,705
Home Improvement	18	85.71%	3	14.29%	21	2,515	82.35%	539	17.65%	3,054
Home Refinance	58	89.23%	7	10.77%	65	9,865	86.81%	1,499	13.19%	11,364
<b>Totals</b>	<b>84</b>	<b>83.17%</b>	<b>17</b>	<b>16.83%</b>	<b>101</b>	<b>14,019</b>	<b>81.87%</b>	<b>3,105</b>	<b>18.13%</b>	<b>17,123</b>

Source: HMDA – reported data from 1/1/11 – 12/31/12.

### **Lending to Borrowers of Different Incomes**

The distribution of loans reflects adequate penetration among individuals of different income levels, and Madison Square's record of lending to borrowers of different incomes meets the standard for satisfactory performance.

### **2011 Evaluation Period**

In our analysis, we took into consideration the lack of affordability for a low- or moderate-income family to purchase a home. Based on the 2000 U.S. Census data, the median cost of housing was \$136,879. Market share data extracted from the 2011 HMDA data shows that nationwide banks and mortgage companies dominate the local lending market. However, when considering that 7.07% of households within the assessment area are below the poverty level and may find it difficult to qualify for a home loan, the lending level to low-income borrowers is acceptable. Additionally, Madison is competing with larger financial institutions for the opportunities to lend to low and moderate income borrowers throughout the AA as five institutions: Wells Fargo, Bank of America, JP Morgan Chase, SunTrust Mortgage, and BB&T make up almost 32% of the market share of single family lending.

The level of home mortgage loan purchases originated to low-and moderate income borrowers is only slightly less than the percentage of low income families in the AA and is only marginally less than the aggregate lending data for HMDA reporters to low income families.

Out of the seven home improvement loans originated or purchased by Madison Square, none were to low-income borrowers. The percentage of home improvement loans made to moderate-income borrowers is lower than the percentage of moderate-income families in the AA as well as the aggregate lending data for HMDA reporters to moderate-income families.

The percentage of home refinance loans made to low-income borrowers is lower than the percentage of low-income families in the AA but exceeds the aggregate lending data

for HMDA reporters to low-income families. Madison Square did not originate or purchase home refinance loans to moderate income borrowers.

The following table shows the distribution of home loan products among borrowers of different income levels for the period of January 1, 2011 through December 31, 2011 as compared to the percent of families in each income category as well as the aggregate lending data for HMDA reporters within the bank's AA.

Table 2 - Borrower Distribution of Residential Real Estate Loans								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	17.04	14.29	18.68	14.29	24.35	14.29	39.93	57.14
Home Improvement	17.04	0.00	18.68	16.67	24.35	33.33	39.93	50.00
Home Refinance	17.04	10.00	18.68	0.00	24.35	60.00	39.93	30.00

Source: HMDA - reported data from 1/1/11 – 12/31/11; 2000 U.S. Census data.

Table 2A – Aggregate Lending Data for Borrower Distribution								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% Aggregate Data	% of Number of Loans	% Aggregate Data	% of Number of Loans	% Aggregate Data	% of Number of Loans	% Aggregate Data	% of Number of Loans
Home Purchase	14.76	14.29	29.59	14.29	24.80	14.29	30.86	57.14
Home Improvement	14.42	0.00	24.04	16.67	25.96	33.33	35.58	50.00
Home Refinance	8.44	10.00	19.58	0.00	26.43	60.00	45.55	30.00

Source: HMDA – reported data from 1/1/11-12/31/11; 2000 U.S. Census data

### **2012 Evaluation Period**

In our analysis, we took into consideration the lack of affordability for a low- or moderate-income family to purchase a home. Based on the 2010 census data, the median cost of housing is \$373,031. Market share data extracted from the 2011 HMDA data shows that nationwide banks and mortgage companies dominate the local lending market. However, when considering that 7.16% of households within the assessment area are below the poverty level and may find it difficult to qualify for a home loan, the lending level to low-income borrowers is acceptable.

The percentage of home purchase loans made to low- to moderate-income borrowers exceeds the percentage of low-income families in the AA.

Madison square did not originate or purchase home improvement loans to low-income borrowers. The percentage of home improvement loans made to moderate-income borrowers is significantly lower than the percentage of moderate-income families in the AA.

The percentage of home refinance loans made to low-and moderate income borrowers is significantly lower than the percentage of low-income families in the AA.

The following table shows the distribution of home loan products among borrowers of different income levels for the period of January 1, 2012 through December 31, 2012 as compared to the percent of families in each income category. The aggregate lending data was not available for 2012.

Table 2 - Borrower Distribution of Residential Real Estate Loans								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	18.89	100.00	18.68	0.00	22.72	0.00	39.71	0.00
Home Improvement	18.89	0.00	18.68	8.33	22.72	41.67	39.71	50.00
Home Refinance	18.88	10.64	18.68	4.26	22.72	29.79	39.71	55.32

Source: HMDA – reported data report 1/1/12 – 12/31/12; 2010 U.S. Census data.

Other Lending-Related Activities

**First Time Homebuyers Program**

Madison Square has developed a first-time homebuyers program for first-time homebuyers in the assessment area. The first-time homebuyers program is available only to those borrowers with a MFI of less than 80 percent of the MFI of the Baltimore MSA and has certain features that are more attractive to borrowers than the institution’s standard mortgage products. Some of the features are:

- Minimum down payment of three percent of borrowers own funds;
- No points;
- Homebuyer education program attendance required; and
- FHLB Grants.

In 2008, Madison Square originated six of these loans for a total of \$1.3 million. In 2011, the institution originated one loan totaling \$120,000 and in 2012, it originated two loans totaling \$341,920. Although these loans are HMDA-reportable and are included in the lending tables contained in this report, this program demonstrates the intent of management and board of directors to intentionally try to address the credit needs of lower-income residents of the institution’s assessment area.

## **Grants and Services**

Madison Square actively supports community development organizations operating in its assessment area. During 2008 through 2012, the institution donated \$65,094 to these organizations whose purpose is to make housing in their respective neighborhoods affordable to LMI residents. Institution employees also served as volunteers for some of these organizations.

Taking into consideration the competition for loans to LMI individuals within the AA and the other products and services offered by the institution to meet the credit needs of LMI individuals, the examiner concludes that Madison Square meets the standards for satisfactory performance for this test.

## **Geographic Distribution of Loans**

The geographic distribution of loans reflects reasonable dispersion throughout census tracts of different income levels, and Madison Square's performance meets the standard for satisfactory performance. There were no conspicuous gaps identified within MSFSB's AA.

### **2011 Evaluation Period**

In our analysis, we took into consideration performance context and the limited home mortgage lending opportunities in the low-income geographies in the Bank's AA. Only 0.59% or 1,174 owner-occupied units within the Bank's AA are in low-income geographies.

Madison Square did not originate or purchase home purchase loans in low-income geographies. The percentage of home purchase loans made in moderate-income geographies exceeds the percentage of owner-occupied housing units in these geographies as well as the performance of aggregate HMDA reporters within the AA.

Madison Square did not originate or purchase home improvement loans in low-income geographies. The percentage of home improvement loans made in moderate-income geographies exceeds the percentage of owner-occupied housing units in these geographies as well as the performance of aggregate HMDA reporters within the AA.

Madison Square did not originate or purchase home refinance loans in low-income geographies. The percentage of home refinance loans made in moderate-income geographies exceeds the percentage of owner-occupied housing units in these geographies as well as the performance of aggregate HMDA reporters within the AA.

The following table details the Bank's performance as compared to the percentage of owner-occupied housing units in each census tract income level as well as the lending

data for all HDMA reporters within the Bank’s AA for the period of January 1, 2011 through December 31, 2011.

<b>Table 3 - Geographic Distribution of Residential Real Estate Loans</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	0.59	0.00	14.15	14.29	53.71	28.57	31.55	57.14
Home Improvement	0.59	0.00	14.15	16.67	53.71	33.33	31.55	50.00
Home Refinance	0.59	0.00	14.15	18.18	53.71	63.64	31.55	18.18

Source: HMDA – reported data 1/1/11 – 12/31/11; 2000 U.S. Census data.

<b>Table 3A – Aggregate Lending Data for Geographic Distribution</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% Aggregate Lending Data	% of Number of Loans	% Aggregate Lending Data	% of Number of Loans	% Aggregate Lending Data	% of Number of Loans	% Aggregate Lending Data	% of Number of Loans
Home Purchase	0.63	0.00	13.21	14.29	55.94	28.57	30.22	57.14
Home Improvement	0.18	0.00	11.09	16.67	51.67	33.33	30.67	50.00
Home Mortgage Refinance	0.52	0.00	7.72	18.18	49.16	63.64	42.61	18.18

Source: HMDA – reported data from 1/1/11-12/31/11; 2000 U.S. Census data.

**2012 Evaluation Period**

In our analysis, we took into consideration the limited home mortgage lending opportunities in the Bank’s AA. Only 1.63% or 3,531 owner-occupied housing units are located in low-income geographies.

Madison Square did not originate or purchase home purchase loans in low -or moderate-income geographies.

Madison Square did not originate or purchase home improvement loans in low- or moderate-income geographies.

Madison Square did not originate or purchase home refinance loans in low-income geographies. The percentage of home refinance loans made in moderate-income geographies is significantly lower than the percentage of owner-occupied housing units in these geographies.

The following table details the bank's performance as compared to the percentage of owner-occupied housing units in each census tract income level for the period of January 1, 2012 through December 31, 2012. The aggregate lending data for 2012 was not available.

Table 3 - Geographic Distribution of Residential Real Estate Loans								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	1.63	0.00	19.62	0.00	45.05	100.00	33.70	0.00
Home Improvement	1.63	0.00	19.62	0.00	45.05	75.00	33.70	25.00
Home Refinance	1.63	0.00	19.62	8.51	45.05	48.94	33.70	42.55

Source: HMDA – reported data 1/1/12 – 12/31/12; 2010 U.S. Census data.

### Other Lending-Related Activities

#### **Healthy Neighborhoods Loan Program**

Madison Square participated in a lending consortium of ten members to provide mortgage financing on properties in certain neighborhoods in Baltimore City that have shown early signs of decline. To be considered under the program, neighborhood organizations must apply to the city of Baltimore. If approved, purchasers and homeowners in that neighborhood are eligible for loans with more flexible underwriting criteria and more favorable terms than would be typically available in the market. Loans for home improvement, purchase/rehab, and refinance/rehab are available under this program. For prospective home purchasers in two of the neighborhoods, a loan for the purchase of a home is also available. There are currently ten neighborhoods eligible for loans under this program, two of which are located within Madison Square's assessment area.

Loans made by this consortium are not reportable on Madison Square's loan/application register, so they are not reflected in the lending tables in this evaluation. However, the institution maintains and analyzes records on these loans. This analysis revealed that the consortium has originated 130 loans, totaling \$17.7 million since the last performance evaluation. These loans do not contain a borrower income limit; however, the targeted neighborhoods include low- and moderate-income census tracts. Of the 130 loans originated by the consortium, 30 were secured by homes in low-income tracts and 62 were secured by homes in moderate-income tracts.

Madison Square's record of lending in LMI census tracts in 2012 is weak; however, through the institution's participation in the Healthy Neighborhoods lending consortium, management and the board have employed innovative methods to help provide credit in

LMI census tracts. Therefore, the institution meets the standards for satisfactory performance for this test.

### **Responses to Complaints**

During the review period, Madison Square received no known written complaints pertaining to its performance in helping to meet the credit needs within the assessment area.

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

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

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