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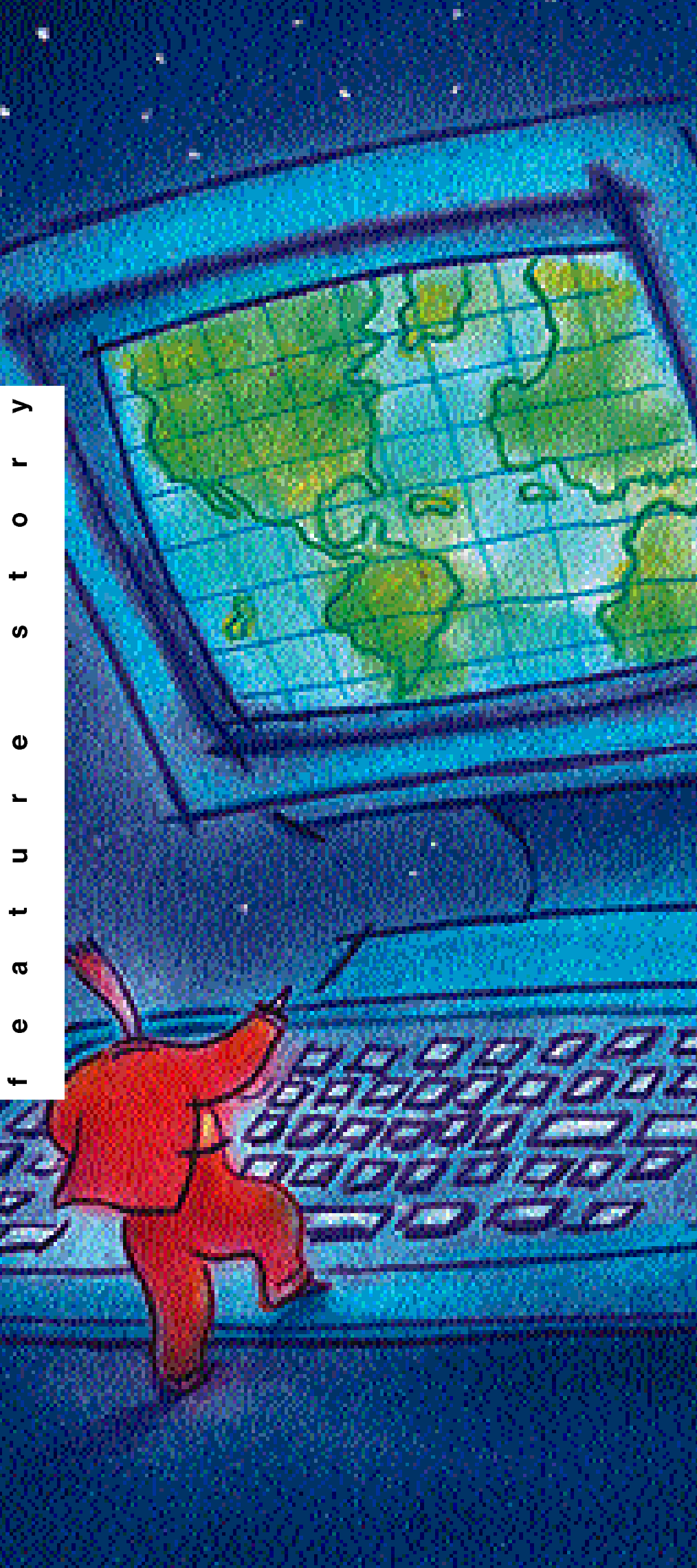
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Feature Story: -----

Community profiling:
planning for a change

Determining local needs

Community developers—in both the public and the nonprofit sectors—can best make investment decisions when they understand all of the community’s needs. Community investment decisions may require millions of dollars and thus should involve substantial research to assure that communities invest where the funds will best meet the needs of the area population. By creating a profile, community developers can better understand the local population, housing needs, and business makeup. A well-researched profile can then be used to help the community determine appropriate levels of investment, set priorities, identify resources, and recognize strengths and weaknesses. The profile can also form a basis for long-term planning and development.

Developing an understanding of community needs, however, requires significant time, resources, and expertise. Often the lack of resources for such research causes many community development projects to be fashioned based on financial assumptions alone, leaving many questions about the development context unanswered. Answering such questions is critical to establishing an

effective community investment program.

Both the [Guide to Community Assessment](#) and the [Lending Profile Reports](#) are designed to assist lenders, public officials, nonprofit organizations, and bank regulators in doing just that. They will help economic developers answer questions such as these: Does a community need more affordable single-family homes for purchase, or would more investments in affordable multi-family rental housing make more sense? Are investments in temporary shelters or in permanent single-room occupancy dwellings needed?

Valuable tools for lenders

Lenders, too, are involved more than ever in community development efforts. They depend on accurate community profile information to estimate the feasibility of community reinvestment projects, to identify underserved areas, to make bank branching decisions, and to target lending products and marketing programs. Finally, bank regulators who examine lenders' CRA performance also depend on community profiles to help determine each bank's performance context. The more information about its own performance context a lender can supply, the more efficiently an examiner can complete his or her analysis.

[People, Homes, and Businesses: A Guide to Community Assessment](#) suggests a format and offers advice on building a community profile. It includes the following information:

Presentation formats. The Guide describes a number of different presentation formats, including narra-

The Federal Reserve Bank of Boston announces new community development publications

People, Homes and Businesses: A Guide to Community Assessment

This publication provides a template for preparing a community profile, emphasizing important statistics on population, housing, and small business. To be available in Spring 1998.

Community Lending Profile Reports

Each profile report in this series of publications is devoted to an individual city in New England and incorporates many of the elements outlined in the *Guide*. Reports for Providence, Rhode Island and New Haven, Connecticut are now available. During 1998, the Federal Reserve Bank of Boston will issue ten additional reports.

To receive any of these publications contact Susan Cournoyer, by phone at 617.973.3174, or by e-mail at susan.m.cournoyer@bos.frb.org.

tive, data, graphics, and computerized mapping, each of which has its strengths and weaknesses in conveying information to the reader. Depending on the level of information needed, and depending on an organization's technical capacity, one format maybe chosen over another. For example, information on income levels in various parts of a community is most clearly depicted in some mapping formats. Graphs, however, may work better for other types of information, such as comparative numbers of mortgage loans originated. The Guide presents examples of each of these formats.

Geography. One of the first decisions the profiler must make is which geographic boundary unit to use: ZIP code, census tract, metropolitan statistical area (MSA), or block numbering area (BNA). This first step ensures consistency in data collection and comparisons. The Guide defines each of these geographic boundary units and outlines the advantages and disadvantages of using data based on each. For example, lenders may want to use MSA and census tract boundaries to construct profiles in preparation for CRA exams. ZIP codes, however, may be a more familiar and useful boundary for a profile intended for a general audience.

Community Context Outreach. Beyond the data, valuable contextual information about an area may be gathered through meetings and

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information

exchange

Mark your calendars now for Microenterprise Development Training. The program will be offered twice, first in Lewiston, Maine on April 16 and 17, then in Bangor, Maine on May 12 and 13. Co-sponsored by the Federal Reserve Bank of Boston and Micronet (a Maine association of microenterprise organizations), this two-day program is designed for public and nonprofit microenterprise lenders as well as for bankers interested in microenterprise lending. You'll learn about microenterprise program design, entrepreneurial training, operational due diligence, microenterprise loan application evaluation, and post-loan technical assistance. So hold the date for this informative program and watch your mail for more information. If you'd like to find out more, please contact Susan Cournoyer at the Federal Reserve Bank of Boston, by phone at 617.973.3174, or by e-mail: susan.m.cournoyer@bos.frb.org.

Enterprising

Making it work in South Providence

Moving from welfare and unemployment to business ownership and self-sufficiency takes more than just a good business idea. It takes entrepreneurial and managerial skills and it takes juggling of personal and financial demands. For any new entrepreneur, this transition can be difficult. For low-income people, the transition can be all the more trying. That is why Greater Elmwood Neighborhood Services (GENS), a community development corporation, and South Providence Neighborhood Ministries (SPNM), a social services agency, have joined forces to work with entrepreneurs through the crucial stages of business start-up and growth.

The collaboration is called "Making It Work," and it is funded through a partnership of the United Way and Rhode Island's Human Resources Investment Council. Operating in the five poorest neighborhoods in Providence, the two agencies offer business training and technical



assistance as well as case management and support services. We believe that this holistic approach, which marries practical business training and technical assistance to counseling and numerous social services, is why the program has worked for the past three years for more than 150 clients.

GENS offers business training classes, a certificate of completion, ongoing technical assistance, and access to microloans. SPNM offers social work case management, including counseling, emergency food and heating oil, summer and after-school programs, adult classes in English as a Second Language, and referral to other needed resources.

Thinking like an entrepreneur

We begin with entrepreneurial training. We believe that business viability is validated through finding, serving, and satisfying customers. So we help entrepreneurs learn how to start their businesses by identifying how to meet a need (with their product or service), by locating people who need it (paying customers), and by getting their customers to help them establish their new business (by placing orders). We emphasize that qualifying for a loan is not the objective; the objective is to establish a successful enterprise.

When the training sessions end, it is not the end of the learning process, and graduation does not mean that entrepreneurs are on their own. Every business person needs outside support and resources. For low-income people, those resources may not be readily accessible. With technical assistance available from GENS, access to microloan funds, and social

support from SPNM, we believe that entrepreneurs have a better chance to succeed.

Creating a social network

SPNM often functions as a personal network. Case managers begin working with entrepreneurs as soon as they complete the training, offering counseling and other assistance so the client families have both moral support and access to a range of services. “We become a trusted friend, to whom entrepreneurs know they can turn,” states Wanda Michaelson, executive director of SPNM.

Michaelson emphasizes that what SPNM provides is often the same kind of support that friends, family,

We emphasize that qualifying for a loan is not the objective; the objective is to establish a successful enterprise.

and associates provide to more well-established entrepreneurs. “Often, these are people who are out of the social and economic mainstream. We help draw them into the mainstream and connect them to economic opportunities.” For example, an entrepreneur who makes and sells handbournines (like a tambourine) markets his products by traveling to fairs around the region. SPNM has helped him augment that network by linking him to opportunities to sell at local church fairs.

Working closely with each family, the case manager also helps families work through problems before they become so big they jeopardize the entrepreneur’s livelihood. One single mother runs a home-based child care center. When her house burned, she lost her home and she might have lost her business. SPNM helped her to relocate while her house was being repaired, helped her meet the mortgage payments, and helped her re-establish her business. Today she is back in her home, a successful day care provider who supports herself and her family through her business.

SPNM can be a vital partner in ensuring that entrepreneurs receive the technical assistance and financing they need. One bakery owner, operating around-the-clock shifts in order to fill demand, needed a larger facility. His case manager referred him to GENS where he could get the financing he needed to expand.

Why it works

We began the microbusiness program because entrepreneurship works. We know that every large enterprise began as a much smaller one, and oftentimes it was hatched in a garage and then grew through the perseverance of the entrepreneur. Every small enterprise has the potential to grow. Frequently it is simply a matter of education, training, loan funds, and support. We have seen that by partnering two strong local nonprofit organizations to address the needs of the new entrepreneur, residents have created new businesses, jobs, and positive community economic development on the Southside of Providence.

Ken Proudfoot
Johnson & Wales University



Productive Partnerships:

Maine's Community Reinvestment Corporation is financing affordable housing development

Can Maine's financial institutions work together to create flexible resources for affordable housing? Can the state's largest banks collaborate with small community and independent banks to create a pool of non-competitive funds serving the diverse needs of Maine citizens? Can Maine's banking community lead the way in creating partnerships between the nonprofit, government, and private sectors?

The answer to these questions is a resounding "Yes," through the Maine Community Reinvestment Corporation (MCRC), a private nonprofit corporation offering \$30 million in lending resources for affordable housing. The corporation has thirteen founding members representing institutions of all sizes from around the state. The MCRC offers a variety of

loan products designed to meet the needs of developers of affordable housing. Permanent long-term fixed-rate loans for acquisition, rehabilitation, and new construction are available; equity bridge loans providing interim lending for projects utilizing tax credit investment financing are also available. In addition, the MCRC offers a line of credit to finance warehousing, acquisition and rehabilitation, and resale of single-family or rental properties.

The founding members of the MCRC also recognized the importance of technical support and shared expertise in affordable housing ventures. To support this part of the effort, the Maine Housing Investment Fund of Portland has been contracted to act as Program Administrator.

The Maine Housing Investment Fund, led by its president, Peter J. Roche, coordinates outreach activities, provides technical support to applicants and project developers, provides staff support to the Loan Committee and Board of the MCRC, and ensures the continuity of contact and support to bring complex projects from concept through to completion.

The Maine Community Reinvestment Corporation set out to develop adaptive and flexible loan underwriting guidelines. With a wide divergence of median incomes, average housing prices, and housing conditions across Maine's counties, loan guidelines that could adapt to local circumstances were needed. The mix of housing needs between Maine's metropolitan areas and more rural portions of our state, and the differences in addressing gaps in rental housing versus single-family residential resources, call for flexibility and a touch of creative common sense.

The Maine CRC applies an affordability test, measured by the greater of the state or local median income. The program does not prohibit some mixed-use or commercial components, and it further encourages market-sustainable solutions as well as rental or home ownership solutions which serve a mix of income levels in the same project. The MCRC affordability guidelines offer the following choices:

- at least 51 percent of the units reserved for families earning not more than 80 percent of the area median income; or
- at least 40 percent of the units reserved for families earning less than 60 percent of the area median income; or

*If you are interested in establishing a CRC in your state, contact Richard Walker at the Boston Fed
Phone: 617.973.3059
e-mail: richard.walker@bos.frb.org or call
Ted Shimanuki at
The Development Fund.
Phone: 415.981.1070*

Founding Member Banks

Androscoggin Savings Bank
Atlantic Bank
Bangor Savings Bank
First Federal Savings & Loan Association
Fleet Bank of Maine
Gorham Savings Bank
Kennebunk Savings Bank
Key Bank, N.A.
Machias Savings Bank
Maine Bank & Trust
Norway Savings Bank
Peoples Heritage Bank
Skowhegan Savings Bank

MCRC Officers

President
John A. Moore
Bangor Savings Bank
Vice President
Lawrence Connell
Atlantic Bank
Treasurer
Richard Vai
Peoples Heritage Bank
Secretary
Charles Kennedy
Key Bank
Clerk and Counsel
Attorney Richard Hackett
Pierce, Atwood

state and regional affordable housing conferences, and old-fashioned, over-the-back-fence conversations have been taking place.

The MCRC is also anxious to expand the number of participating institutions. Each year an open enrollment period offers an opportunity for institutions to join and participate in future credits on a proportional basis, as determined by their deposit size relative to the total deposits of the member institutions.

- at least 20 percent of the units reserved for families earning less than 50 percent of the area median income.

MCRC loan programs are available for nonprofit developers, for-profit developers, and projects involving mobile home parks, land trusts and co-ops, rehabilitation, new construction, and mixed-use housing developments.

The Maine Community Reinvestment Corporation's governing structure was designed to foster collaboration and creative interchange between its members and parties benefiting from and utilizing programs. An elected Board of twelve banks, with blocks of seats apportioned to the largest depositor institutions as well as to community banks with deposits of less than \$1 billion, directs the operations of the CRC. Seats for government members (for this term, David Lakari, Director of MSHA and Elsie Coffee of the Bangor Housing Authority) and seats for nonbank outside directors are also required.

MCRC loan activities are coordinated by a committee of seven repre-

sentatives. Major depositor institutions and community banks have designated seats with one member appointed from the housing development sector. The MCRC has chosen Peoples Heritage Bank to serve as agent bank, providing servicing and custodial services and support to member institutions and to the MCRC Program Administrator.

As the MCRC begins its work, participating members are actively engaged in outreach activities to publicize the availability of its programs to potential clients and affordable housing constituencies. Meetings with community action programs, panel presentations at

Additional information for interested banks is available upon request. The corporation's officers are available to meet with institutions wishing to join the CRC. Whether now a member of the MCRC or not, institutions in Maine that know of projects that may benefit from MCRC programs are welcome to make referrals for technical support or for loan applications.

John A. Moore
Bangor Savings Bank



Table 1. Community Profile Reports: Selected Contents

Area Demographics

Maps:

- Median family income by census tract
- Percent unemployment by census tract
- Households receiving public assistance
- Percent minority by census tract

Table: Selected 1990 Census information

Area Banking Presence

Tables:

- All institutions, by total deposits
- All institutions, CRA ratings and regulators
- Locations of bank branches and check cashers

Maps:

- Bank branches
- Check cashing agencies
- Number of branches per 10,000 people

Bank / SBA Small Business Lending

- Small business lending highlights
- 1996 small business lending performance of commercial banks with local branches

Housing and Household Statistics

Maps:

- Home ownership by census tract
- Density per tract (no. persons/household)
- Female householders by census tract

Mortgage Lending

Summary tables of 1995 HMDA data:

- Loan actions by income
- Loan actions by gender

Map series showing all applications and percent approvals and denials

Aggregate mortgage lending data

Local Small Business

Small business highlights

Firm size data, 1993

Minority- and women-owned businesses

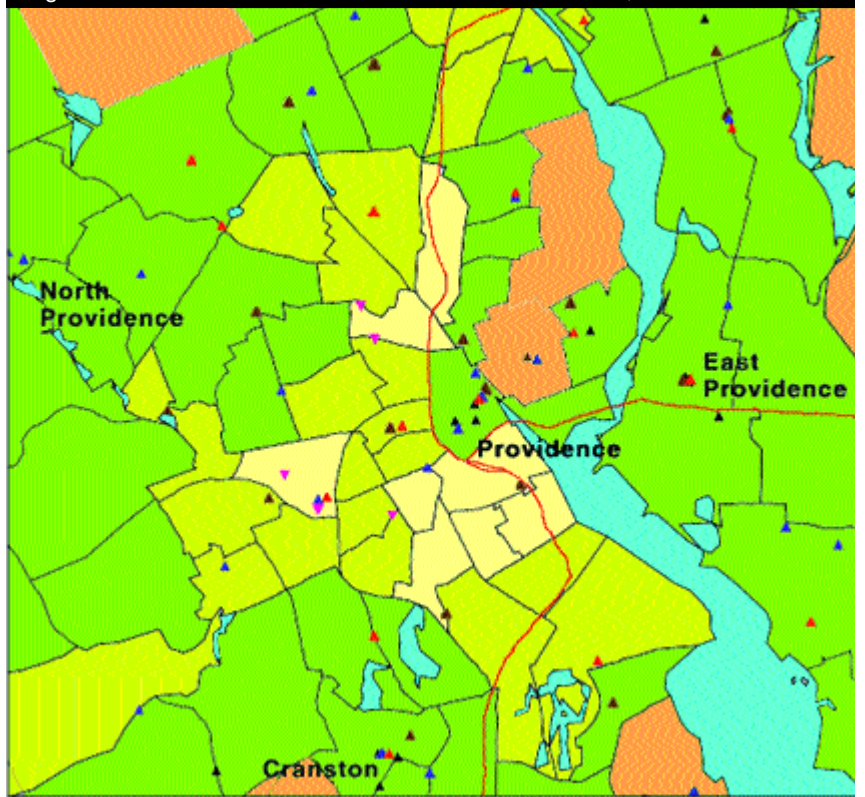
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conversations with leaders of community organizations and local business people. The Guide describes a range of community, business, and civic organizations that may provide valuable information to support or clarify profile data. The Guide also provides information about state and local housing and economic development organizations that may provide additional contextual information about the community.

Community Lending Profile Reports present population data and information related to the delivery of financial services for individual communities. Each profile features sections on demographics, housing and business statistics, and bank branching and lending information. Table 1 outlines the contents of the Reports, while Figure 1 maps bank branches in the city of Providence using census tract boundaries.

Whatever your organization's role in the community investment planning process, you will benefit from

Figure 1. Bank Branches in Providence, Rhode Island



understanding the needs of your community. And whatever the needs of your community, everyone will benefit from well-targeted investments that yield the greatest rewards for residents, business owners and potential entrepreneurs alike.

Paul Williams
Federal Reserve Bank of Boston

Legend

Overlays

- ▲ Fleet RI 199
- ▲ Citizens RI
- ▲ BankBoston R
- ▲ Check Cashing Agencies
- ▲ Additional Banks
- Interstate Highways

Median Family Income Index (1994) 100=Average

- 0 < 50 Low
- 50 < 80 Moderate
- 80 < 120 Middle
- >= 120 Upper



Are you in search of tools to help you analyze **community reinvestment performance**? Financial institutions, community organizations, and reinvestment advocates may now choose from a variety of products and services designed to meet their needs. **Financial institutions** may use information technology products to analyze market demographics and lending patterns and, in turn, to meet marketing and compliance goals. **Software products** offering integrated data analysis and mapping capabilities address the needs of financial institutions for CRA- and HMDA-related analyses. They include: **CRA ANALYZER** from Tactician Corporation (508.475.4475), **CRA WIZ** from PCI Services (617.227.0090), and **HMDA PRO** from Geosegment Systems (603.424.2211). With these Windows-based products, users may import spreadsheets containing HMDA loan data to create custom maps, which may then be used to conduct self-assessments for CRA and HMDA compliance. The software may be used to **create maps** showing loan locations superimposed on demographic characteristics; it can also **create statistical reports** with market share and loan approval rates. Lenders may use the maps and data for **marketing purposes** as well, highlighting neighborhoods with targeted characteristics. **Community organizations**, and some **smaller financial institutions**, may wish to consider **lower-cost software products** with fewer features. **HMDA WORKS**, available from the Center for Community Change (202.342.0567), performs statistical analyses of lending performance. The US Department of Housing and Urban Development (800.998.9999) offers a mapping software tool called **COMMUNITY 2020**. CD-ROM-based HMDA data are available from the Federal Financial Institutions Examination Council (202.452.2016). Finally, Internet users can access additional tools such as the on-line HMDA database provided by the **Right-to-Know Network (RTK-Net)**. Community groups may get technical assistance through national nonprofit organizations specializing in CRA- and HMDA-related data analysis, including the **National Community Reinvestment Coalition** (202.628.8866) and the **Woodstock Institute** (312.427.8070). Listings by state of software vendors as well as CRA and HMDA sites are available on the Federal Financial Institutions Examination Council Internet site (www.ffiec.gov).

tools to use



Compliance Corner

The Fair Credit Reporting Act gets an overhaul

In 1996, twenty-five years after it was enacted, Congress concluded that the Fair Credit Reporting Act (FCRA) needed reform and significantly revised the Act. Congress was concerned about the large number of errors appearing in credit reports and the decreasing control by consumers over the dissemination and use of sensitive personal information, which resulted from advancements in computer technology. The amendments, which became effective September 30, 1997, increase the responsibilities of consumer reporting agencies and of users and furnishers of information in credit reports. What follows is a synopsis of some of the most important revisions to the Act.

Consumer reporting agencies

Generally, a consumer reporting agency (CRA) gathers and sells con-

sumer credit and other consumer information to creditors, employers, and other businesses. The most well-known of these agencies are the national credit bureaus. The CRA compiles information about the consumer into a consumer report, commonly referred to as a "credit report."

Accuracy of Information. Under the new provisions, a CRA must maintain reasonable procedures to ensure maximum accuracy of the information in the credit reports and to prevent the reappearance of deleted information. If the consumer disputes information in a credit file and notifies the CRA directly, the agency must reinvestigate the information at no charge to the consumer. Under the old provisions, CRAs were given a "reasonable period of time" to reinvestigate disputed information and were not required to notify the consumer of the investigation's outcome. The new provisions require that the CRA now complete a reinvestigation within 30 days and then notify the consumer of the results within five business days.

Any item deleted from a credit report as a result of the reinvestigation cannot be reinserted by the CRA unless the furnisher of the information certifies the item's accuracy and the agency notifies the consumer in writing.

Permissible Purpose. The CRA must maintain reasonable procedures limiting access to reports for permissible purposes only. It must also establish a notification system enabling the consumer to prohibit use of his or her credit file for unsolicited credit or insurance offers.

Summary of Rights. The consumer reporting agency is now required to provide a summary of rights directly to consumers as part of its file disclosures. CRAs operating nationwide must also provide a toll-free number where personnel are accessible to consumers during normal business hours.

Users of credit reports

Permissible Purpose Certification. Under the new provisions, those wishing to obtain a consumer's credit report must certify to the CRA that the purpose is permissible and certify that the report will not be used for any other purpose. The permissible purposes are listed in the Act. One provision redefines the "legitimate business purpose" as a "legitimate business need." Previously, a user simply claiming a legitimate business purpose could obtain a credit report. Now, the legitimate business need must either be in connection with a business transaction initiated by the consumer or to review an account to determine whether the consumer continues to meet account terms.

Adverse Action. A user taking adverse action based on information in the

credit report must notify the consumer. Under the FCRA, adverse action includes all business, credit, and employment actions which affect consumers negatively. The user taking adverse action must provide oral, written, or electronic notice to the consumer, giving the name, address, and telephone number of the CRA compiling the report. The notice must include a statement that the consumer reporting agency did not make the adverse action decision and cannot provide reasons for the decision. The user must also inform the consumer of his right to a free copy of his credit report and of his right to dispute its accuracy.

the right to prohibit the use of information in the consumer's file in connection with any unsolicited credit or insurance transactions. The user must provide the name and address of the CRA's notification system through which the consumer may "opt out" of the prescreening process.

Furnishers of information

The furnishers of information to the CRAs have a duty to correct and update information. If a consumer notifies the furnisher of an inaccuracy at the address specified by the furnisher and there is in fact an inaccuracy, the furnisher must report the correction to the CRA. When the furnisher receives notice of a dispute



communities & banking seeks to further the practice of community and economic development by exploring effective ways for lenders to work with public, private, and nonprofit sector organizations toward proactive compliance with the Community Reinvestment Act.

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Views expressed are not necessarily those of the Federal Reserve Bank of Boston or the Federal Reserve System. Information about upcoming events and other organizations should be considered strictly informational, not as an endorsement of the activities.

Articles may be reprinted or abstracted if communities and banking is credited. Please send copies of the reprinted materials to the editor.

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The Fair Credit Reporting Act

Highlights of Revisions

Consumer Reporting Agencies

- Complete reinvestigation of any disputed information within 30 days
- Notify consumer of reinvestigation results within 5 days of completed reinvestigation
- Provide "Summary of Rights" to consumers with file disclosures
- Maintain notification system for consumer to opt out of prescreening

Furnishers of Information

- Correct and update information in credit reports
- Investigate disputed information, report results to CRA and notify nationwide CRAs of inaccuracies

Users of Credit Reports

- Certify permissible purpose of credit report
- Obtain consumer's written authorization for use for employment purposes
- Provide oral, written or electronic notice of adverse action to consumer
- Notify consumer of opt out option for pre-screening

Limitations on obtaining reports. A credit report may be used for employment purposes only if the user provides proper disclosures and obtains the consumer's written authorization.

Prescreening notification. "Prescreening" involves obtaining from the CRA a list of consumers fitting certain criteria. Those using such limited credit reports for unsolicited credit or insurance offers are required to give particular disclosures to the consumers. With each solicitation, the user must inform the consumer of

from the CRA, it must conduct an investigation and report the results to the CRA; if the disputed information is inaccurate, the furnisher must report the results to all other nationwide CRAs.

Carol Lewis
Federal Reserve Bank of Boston

The responsibilities of CRAs, users, and furnishers under the FCRA extend beyond those discussed here. All parties affected by the FCRA should also be aware of additional rights and responsibilities under state law.

Around New England

Around New England, state banking departments are posting valuable information on their Internet sites. From Connecticut to Maine, you'll find a wealth of information available to you just by visiting the appropriate web site.

Connecticut. www.state.ct.us/dob/: Connecticut has one of the most informative banking web sites we found. You'll find the locations of the state's institutions, their CRA ratings, and their relative sizes (by assets, capital, and deposits), as well as other information. You'll also find information on how to make an inquiry or file a complaint about a financial institution. News bulletins and legislative information have been incorporated into the web site, and you can send e-mail to any one of a number of key agency personnel.

Maine. www.state.me.us/pfr/bkg: In addition to useful information about the state's financial institutions, you'll find a variety of consumer information and education publications. Topics include basic money management and understanding the mortgage process. Visitors will also find the Bureau of Banking's bulletins, recent rulings, and text of new legislation. Finally, the site will link you to a whole host of banking and economic information.

Massachusetts. www.magnet.state.ma.us/dob/: Some of the most useful information on

this web site pertains to CRA examinations. You'll find the schedule for upcoming examinations as well as the CRA ratings for Massachusetts depository institutions. You'll also find a link to the Federal Financial Institutions Examination Council web site, which contains a wealth of information related to the Community Reinvestment Act and the Home Mortgage Disclosure Act. For inquiries regarding Massachusetts financial institutions, the site directs consumers to the Consumer Assistance Office.

New Hampshire. www.state.nh.us/agency/locator.html: New Hampshire's web site contains contact information for the state's banking department.

Rhode Island. www.state.ri.us/stdept/sd19.htm: The Rhode Island site lists the contact name, address, and phone number of the associate director and superintendent of banking at the state's department of business regulation.

Vermont. www.state.vt.us/bis: Consumer information abounds on Vermont's site. You'll find a quarterly survey of basic banking services, which lists the prices for financial services charged by the state's many financial institutions. You'll also find comparative interest rate and fee information, by financial institution, for credit cards and home mortgages. Vermont's site will also link you to the sites of federal regulators, to national banking-related trade organizations, and to state legislative information.

