



PUBLIC DISCLOSURE

October 11, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Cayuga Lake National Bank
Charter Number: 412

165 Cayuga Street, P.O. Box 512
Union Springs, NY 13160

Office of the Comptroller of the Currency

5000 Brittonfield Parkway, Suite A132
East Syracuse, NY 13057

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 major factors that support this rating include:

- The Lending Test rating is based on the bank's performance in the assessment area (AA) in the state of New York, which demonstrated an overall reasonable distribution of loans to borrowers of different income levels and businesses of different sizes and overall reasonable distribution of loans to geographies of different income levels.
- Cayuga Lake National Bank's (CLNB or bank) average loan-to-deposit (LTD) ratio is reasonable based on the bank's size, financial condition, and credit needs of the AA.
- A majority of home mortgage and small business loans originated during the evaluation period are inside the AA.
- The bank has had no consumer complaints regarding its community reinvestment performance during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable.

CLNB's average LTD ratio for the 16-quarter period following the date of the prior evaluation period, December 31, 2017, through the end of the current evaluation period, December 31, 2021, is 58.2 percent. In comparison, the quarterly average LTD ratio of three similarly situated financial institutions in the surrounding areas was 47.5 percent during the same period, ranging from a low of 31.8 percent to a high of 60.0 percent.

Lending in Assessment Area

A majority of the bank's loans are inside its AA.

The bank originated and purchased 80.5 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. CLNB was not required to maintain data in accordance with the Home Mortgage Disclosure Act (HMDA) or maintain a CRA register; therefore, home mortgage and small business performance were assessed based on a loan sample and does not include the entire population of loan originations and purchases.

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	34	79.1	9	20.9	43	4,288	71.3	1,727	28.7	6,015
Small Business	36	81.8	8	18.2	44	2,775	64.4	1,535	35.6	4,310
Total	70	80.5	17	19.5	87	7,063	68.4	3,262	31.6	10,325

Description of Institution

CLNB is a \$237.6 million, single-state, community bank headquartered in Union Springs, N.Y. The bank, established in 1864, is a wholly owned subsidiary of Cayuga Lake Bank Corporation, a one bank holding company. CLNB has two branches located in Cayuga County (Union Springs and Aurora), which are not part of a metropolitan statistical area (MSA). The bank opened a new branch location in Tompkins County (Lansing) in July 2021, which is part of the Ithaca-Cortland NY Combined Statistical Area (CSA). The bank has not been involved in any mergers or acquisitions since the prior CRA evaluation, nor have any branch locations closed.

The bank has two AAs, the NY Non MSA AA and the Ithaca-Cortland NY CSA AA. The NY Non MSA AA includes 20 census tracts located in Cayuga County, which is not part of a MSA. The Ithaca-Cortland NY CSA AA includes 23 census tracts located in Tompkins County and 12 census tracts located in Cortland County. The bank's AAs meet the requirements of the regulation and do not arbitrability exclude low- or moderate-income geographies.

CLNB's strategy during the evaluation period focused on organic loan and deposit growth throughout its branch network and AAs. The bank offers traditional and non-complex lending and deposit products and services to customers in its market area through its three branch locations, online banking, and mobile banking application. The Union Springs and Lansing locations offer drive-up capabilities with extended hours on Thursday and Friday, as well as Saturday hours. The Aurora location does not offer drive-up or Saturday hours. All branch locations offer access an automated teller machine (ATM).

CLNB reported total loans of \$146.7 million, representing 61.7 percent of total assets, as of December 31, 2021. Loan portfolio composition was as follows: 57.8 percent residential real estate loans, 17.3 percent commercial and industrial loans, 16.3 percent commercial real estate loans, 5.4 percent consumer loans, 2.9 percent farmland loans, and 0.3 percent in other loans. Deposits totaled \$214.6 million and tier 1 equity capital totaled \$21.9 million as of December 31, 2021.

There were no legal, financial, or other impediments hindering the bank's ability to meet the credit needs of its AA. CLNB was rated "Satisfactory" at its last CRA evaluation dated July 9, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation (PE) assessed the bank's lending performance in its AA under the Community Reinvestment Act (CRA). Examiners evaluated CLNB using the Small Bank evaluation procedures, which included the Lending Test. The Lending Test evaluates the bank's record of meeting

the credit needs of its AA through its lending activities. Examiners reviewed the bank's primary loan products, home mortgage and small business loans, originated during the time period of January 1, 2019, through December 31, 2021, to evaluate performance under the Lending Test. The Lending Test for this PE included an assessment of performance within the NY Non MSA AA. Examiners did not evaluate performance within the Ithaca-Cortland NY CSA AA because there was an insufficient volume of loan originations to conduct a meaningful analysis due to the limited period of operations within the AA.

CLNB was not required to maintain loan data in accordance with HMDA during the evaluation period. In July 2021, CLNB opened a branch in Lansing, NY, which is located in a MSA; therefore, the bank will begin reporting HMDA data in 2022. The bank was also not required to maintain a CRA register for small business/farm data. Therefore, examiners determined the bank's performance under the Lending Test using a loan sample for both home mortgage and small business loans.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA or 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 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.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The bank's overall rating is based on the rating for the state of New York. The State Rating is based on the full-scope review of the bank's NY Non MSA AA.

The state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state rating 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) in determining a national banks 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 Consumer Financial Protection Bureau, 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 New York

CRA rating for the State of New York: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans is reasonable.
- The distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable.
- Management did not receive any complaints regarding CLNB's CRA performance.

Description of Institution's Operations in State of New York

As of December 31, 2021, CLNB had two AAs within the state of New York, the NY Non MSA AA and the Ithaca-Cortland NY CSA AA. The NY Non MSA AA included the entire political subdivision of Cayuga County, and the Ithaca-Cortland NY CSA AA included the entire political subdivisions of Tompkins and Cortland Counties. All New York State AAs met the requirements of the CRA regulation and did not arbitrarily exclude any low- or moderate-income areas.

No adjustments or revisions to the bank's designated AAs were necessary.

The following table provides a summary of the demographics that includes housing, business, and farm information for the NY Non MSA AA.

NY Non MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: NY Non MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	5.0	10.0	60.0	20.0	5.0
Population by Geography	79,173	5.4	10.7	62.5	21.3	0.0
Housing Units by Geography	36,405	4.0	11.9	62.6	21.5	0.0
Owner-Occupied Units by Geography	22,028	1.9	7.6	64.2	26.4	0.0
Occupied Rental Units by Geography	8,944	9.7	25.6	55.0	9.7	0.0
Vacant Units by Geography	5,433	3.1	7.3	68.7	20.9	0.0
Businesses by Geography	4,656	7.2	13.3	52.9	26.6	0.0
Farms by Geography	381	0.3	2.1	69.3	28.3	0.0
Family Distribution by Income Level	19,797	17.3	17.0	21.5	44.2	0.0
Household Distribution by Income Level	30,972	21.4	14.8	18.6	45.2	0.0
Median Family Income Non-MSAs - NY		\$59,570	Median Housing Value			\$115,141
			Median Gross Rent			\$676
			Families Below Poverty Level			8.0%
<i>Source: 2015 ACS and 2021 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>						

The NY Non MSA AA consisted of the 20 contiguous census tracts in the political subdivision of Cayuga County, which is not part of a MSA. Per the 2015 American Community Survey (ACS) data, census tracts for the NY Non MSA AA were designated as follows: one low-income, two moderate-income, 12 middle-income, four upper-income, and one with an unassigned income classification.

CLNB offered its full range of products and services through its two branch locations and two deposit-taking ATMs located in the AA, as well as its online banking and mobile banking application. The bank's primary lending focus in the NY Non MSA AA included both home mortgage and small business loans, consistent with the bank's overall strategy. During the COVID-19 pandemic, the bank offered and approved payment deferrals, participated in the Small Business Administration's (SBA) Paycheck Protection Program (PPP), and waived certain deposit related fees to provide relief to customers experiencing temporary hardship.

The bank's deposit base is primarily sourced within its AA. As of June 30, 2021, CLNB had \$188.9 million in deposits, resulting in a deposit market share of 10.7 percent, ranking third among all banks in the AA. The top competitors in the AA included KeyBank, National Association and Tompkins Trust Company with market shares of 25.6 percent and 14.5 percent, respectively.

Per the 2015 ACS, there were 36,405 total housing units in the AA, of which, 60.5 percent were owner-occupied, 24.6 percent were rentals, and 14.9 percent were vacant. The median housing value was \$115,141 in the AA based on the 2015 ACS; however, per the Federal Reserve Economic Data (FRED) maintained by the Federal Reserve Bank of St. Louis, the median home listing price in Cayuga County was \$233,425 at its peak in July 2021. Cayuga County experienced a substantial increase from a median

listing price of \$159,950 in January 2019 due to increased market pressure from the COVID-19 pandemic but has since declined to \$196,564 in December 2021. The increase in median listing price would increase the principal and interest payment for a 30-year mortgage with no down payment and a fixed 5 percent interest rate from \$859 in January 2019 to \$1,253 at its peak or \$1,055 in December 2021. The mortgage payment is significantly higher than the median rent in the AA of \$676 and may be an impediment for low- and moderate-income individuals to obtain a home mortgage. Using the threshold of 30 percent of income for housing affordability, a low-income individual could afford a maximum monthly payment of \$868 without including additional expenses or real estate taxes, and a moderate-income individual could afford a maximum payment of \$1,388. When including these additional expenses, it becomes even more difficult for low-income individuals, and to a lesser extent moderate-income individuals, to afford a mortgage in the AA.

The 2021 Federal Financial Institutions Examination Council (FFIEC) updated median family income in the AA was approximately \$69,400, up from approximately \$59,600 in 2015. Cayuga County was moderately impacted by the economic effects of the COVID-19 pandemic, as evidenced by a three-year high unemployment rate of 17.2 percent in April 2020. However, in 2021, the average unemployment rate in Cayuga County decreased to 4.7 percent and has since declined to 3 percent in December 2021, below the New York State unemployment rate of 5.4 percent. The largest industries in the county include health care and social assistance and the top employers include Auburn Community Hospital, Department of Corrections, County of Cayuga, Auburn Enlarged City School District, and Unity House of Cayuga County.

As part of the evaluation, the OCC reviewed information for one community contact within the bank's AA to determine local economic conditions and community needs. The organization is a fundraising organization for local companies, area governments, and other nonprofits. The contact indicated a need for increased financial literacy education opportunities.

Scope of Evaluation in New York

Examiners completed a full-scope review of the NY Non MSA AA, which consists of 20 census tracts in Cayuga County, NY. Home mortgage lending and small business lending received equal weight in the assessment of performance in the NY Non MSA AA. Performance in the Ithaca-Cortland NY CSA AA was not assessed because there was an insufficient volume of loan originations to conduct a meaningful analysis due to the limited period of operations within the AA. Please refer to Appendix A: Scope of the Examination for additional information.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the NY Non MSA AA is adequate.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state of New York.

Home Mortgage Loans

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

NY Non MSA AA

The geographic distribution of home mortgage loans is reasonable. The bank's level of home mortgage loans to borrowers in low-income geographies exceeded both the distribution of owner-occupied housing units and aggregate performance during the evaluation period. The bank did not originate any home mortgage loans to borrowers in moderate-income geographies based on the examiners loan sample. However, based on a review of the bank's loan origination file, examiners noted 16 home mortgage loans that were originated in moderate-income geographies that were not included within the loan sample.

The assessment of performance considered the bank's market share in the limited number of low- and moderate-income census tracts in the AA and AA competition. The AA has one low-income and two moderate-income census tracts located in the city of Auburn, which is heavily banked. Based on 2021 HMDA market share data, 26 lenders made 49 home mortgage originations within the low-income census tract, and more than 30 lenders made 170 home mortgage originations in moderate-income census tracts. In addition, the assessment considered the number of owner-occupied housing units in the low- and moderate-income census tracts in the AA. The low-income census tracts in the AA had approximately 419 owner-occupied housing units and the moderate-income census tracts had approximately 1,674 owner-occupied housing units.

Small Loans to Businesses

Refer to Table Q in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

NY Non MSA AA

The geographic distribution of small loans to businesses is poor. The bank's level of small loans to businesses in low-income geographies was significantly below the number of small businesses and aggregate lending. The bank's level of small loans to businesses in moderate-income geographies was well below the number of small businesses and aggregate lending. Conclusions were based on the examiners loan sample; however, examiners noted nine additional small loans to businesses originated in low-income geographies and 25 additional small loans to businesses originated in moderate-income geographies that were not included within the loan sample based on a review of the bank's loan origination file.

The assessment of performance considered the bank's market share in the limited number of low- and moderate-income census tracts in the AA and AA competition. The AA has one low-income and two moderate-income census tracts located in the city of Auburn, which is heavily banked. Based on 2020 peer small business data, there were 95 small business loan applications in the low-income census tract and 164 small business loan applications in the moderate-income census tracts, which included SBA PPP lending. The top five lenders were dominated by large and regional banks and had market shares of 58.9 percent and 75.6 percent of loan applications in low- and moderate-income census tracts, respectively. In addition, the assessment considered the number of businesses in the low- and moderate-

income census tracts in the AA. The low-income census tracts in the AA had approximately 335 businesses and the moderate-income census tracts had approximately 619 businesses.

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 Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

NY Non MSA AA

The borrower distribution of home mortgage loans is reasonable. Home mortgage lending to low-income borrowers is well below the number of low-income families and is below the aggregate lending to low-income families in the AA. Home mortgage lending to moderate-income borrowers exceeded the number of moderate-income families and aggregate lending to moderate-income families in the AA.

The assessment of performance considered housing affordability for a low-income individual during the evaluation period given the median listing price and median family income as previously discussed.

Small Loans to Businesses

Refer to Table R in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

NY Non MSA AA

The distribution of small loans to businesses of different sizes is reasonable. The distribution of small loans to business with less than \$1 million in revenue is below the number of businesses with less than \$1 million in revenue but significantly exceeds the aggregate lending in the AA.

Responses to Complaints

CLNB did not receive any CRA related complaints during the evaluation period.

COVID-19 Pandemic Activities

CLNB worked to meet community credit needs during the COVID-19 pandemic through implementing government loan programs and working with existing customers impacted by the pandemic. CLNB participated in the SBA PPP to support business impacted by the COVID-19 pandemic. During the evaluation period, CLNB originated 179 SBA PPP loans totaling \$21.1 million in the state of New York.

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 MSAs and non-MSAs 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:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Home mortgage and small business loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not applicable	Not applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of New York		
NY Non MSA AA	Full-Scope	Cayuga County

Appendix B: Summary State Ratings

RATINGS	
Overall Bank:	Lending Test Rating
Cayuga Lake National Bank	Satisfactory
State:	
New York	Satisfactory

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.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-21	
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		
NY Non MSA AA	34	4,288	100	2,025	1.9	2.9	2.4	7.6	0.0	8.4	64.2	41.2	61.8	26.4	55.9	27.4	0.0	0.0	0.0		
Total	34	4,288	100	2,025	1.9	2.9	2.4	7.6	0.0	8.4	64.2	41.2	61.8	26.4	55.9	27.4	0.0	0.0	0.0		

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2019-21	
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		
NY Non MSA AA	34	4,288	100	2,025	17.3	2.9	5.7	17.0	26.5	19.1	21.5	26.5	25.7	44.2	38.2	38.1	0.0	5.9	11.5		
Total	34	4,288	100	2,025	17.3	2.9	5.7	17.0	26.5	19.1	21.5	26.5	25.7	44.2	38.2	38.1	0.0	5.9	11.5		

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2019-21

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
NY Non MSA AA	36	2,775	100	1,181	7.2	2.8	8.0	13.3	8.3	13.9	52.9	50.0	50.4	26.6	38.9	27.7	0.0	0.0	0.0
Total	36	2,775	100	1,181	7.2	2.8	8.0	13.3	8.3	13.9	52.9	50.0	50.4	26.6	38.9	27.7	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2019-21

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
NY Non MSA AA	36	2,775	100.0	1,181	83.0	58.3	31.6	4.7	13.9	12.3	27.8
Total	36	2,775	100.0	1,181	83.0	58.3	31.6	4.7	13.9	12.3	27.8

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%