



PUBLIC DISCLOSURE

September 26, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Citizens Bank, N.A.

One Citizens Plaza
Providence, RI 02903

Office of the Comptroller of the Currency

Large Bank Supervision
Constitution Center
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, 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 **Outstanding**.

The following table indicates the performance level of Citizen’s Bank, N.A. with respect to the Lending, Investment, and Service Tests:

Performance Levels	Citizens Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on excellent performance in eleven of the 13 rating areas and good performance in two rating areas.
- The Investment Test rating is based on excellent performance in each of the 13 rating areas.
- The Service Test rating is based on excellent performance in seven of the 13 rating areas, good performance in five rating areas, and adequate performance in one rating area, with the Outstanding performances in the Boston Combined Statistical Area (CSA), Philadelphia CSA, and the state of Pennsylvania carrying the greatest weight.

Lending in Assessment Area

An adequate percentage of the bank's loans are in its assessment areas (AAs).

The bank originated and purchased 48.9 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. It was noted that the bank engages in mortgage lending that is offered nationwide or outside the bank's traditional footprint, which had the effect of lowering the in/out ratio. This had a neutral impact on the geographic distribution of lending by income level of the geography.

Table D - 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	210,558	41.1	301,864	58.9	512,422	45,122,014	34.3	86,335,233	65.7	131,457,247
Small Business	112,829	75.6	36,487	24.4	149,316	6,549,034	76.5	2,010,057	23.5	8,559,091
Total	323,387	48.9	338,351	51.1	661,738	51,671,048	36.9	88,345,290	63.1	140,016,337
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

Citizens Bank, N.A. (CBNA, Citizens, or the bank) is an interstate bank headquartered in Providence, RI. CBNA is a wholly owned subsidiary of Citizens Financial Group (CFG), also headquartered in Providence, RI. On January 2, 2019, Citizens Bank of Pennsylvania (CBP), a state-chartered affiliate bank, was merged into CBNA adding over 340 branches and \$34 billion in assets to CBNA. CBP was rated Outstanding by the Federal Deposit Insurance Corporation (FDIC) at its last CRA evaluation dated June 5, 2018.

As of December 31, 2021, CBNA had assets of \$188.1 billion, deposits of \$157.1 billion, tier 1 capital of \$17 billion, and was the 16th largest U.S. bank based on assets. The bank's loan portfolio totaled \$129.9 billion and included \$54 billion in real estate loans, \$41.3 billion in commercial loans, and \$31.6 billion in loans to individuals, with an allowance for loan and lease losses of \$1.8 billion.

CBNA is a full-service commercial bank that offers a broad range of retail and commercial banking products and services to individuals, small businesses, middle-market companies, large corporations, and institutions. As of December 31, 2021, CBNA had 942 branch office locations and 1,720 ATMs (1,588 deposit-taking) within its AAs. CBNA had 13 rating areas that included four multistate metropolitan statistical areas (MMSA) in which the bank operated in two or more states and nine state ratings. The bank conducts operations in Connecticut, Delaware, Massachusetts, Michigan, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, and Vermont. At the request of the bank, community development (CD) investments made by CitizensOne Community Development Corporation, a CBNA subsidiary, were considered in the evaluation. Additionally, donations and grants made by the Citizens Charitable Foundation were considered in the evaluation.

There are no legal, financial, or other impediments to CBNA's ability to help meet the credit needs within its communities.

CBNA received an Outstanding rating at its prior CRA evaluation by the OCC, dated September 30, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the large retail bank Lending, Investment, and Service Tests. The evaluation period is January 1, 2019, to December 31, 2021.

In March 2020, the U.S. began to face a pandemic from the coronavirus disease of 2019 (COVID-19) that resulted in economic uncertainties, including business shutdowns and increased unemployment. The federal government instituted several programs and initiatives to assist businesses and individuals, including the Payroll Protection Program (PPP), mortgage foreclosure and eviction protection programs, and extended unemployment benefits. OCC examiners considered the bank's participation in addressing community and customer needs during COVID-19 in the Lending, Investment, and Service tests of this evaluation.

Description of Factors Considered Under Each Performance Test

Lending Test

In evaluating the bank's lending performance, the OCC reviewed and evaluated home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA), small loans to businesses reported under the Community Reinvestment Act (CRA), and CD loans. The bank did not originate or purchase any farm loans during the evaluation period. Mortgage loans were the bank's primary loan product in each of its AAs. CBNA did not elect to have consumer loans considered during this CRA evaluation and consumer loans do not constitute a significant majority of lending.

The OCC generally gave equal weighting to geographic and borrower distribution components of the Lending Test. When evaluating the geographic distribution of loans within an AA, the OCC gave greater weight to CBNA's performance in moderate-income tracts in instances where there were a limited number of owner-occupied housing units or businesses in the low-income tracts in that AA. When evaluating the distribution of home mortgage loans based on the income level of the borrower, the OCC considered the poverty level and housing affordability in the AAs to identify challenges to home mortgage lending within the bank's AAs. The OCC also considered the volume of CD loans and the degree of responsiveness of those loans to the needs in the community. To provide perspective regarding the relative level of CD lending, examiners allocated a portion of the bank's tier 1 capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The level of CD lending in each AA had a positive, neutral, or negative effect on the rating area's lending test, as applicable.

To assess the bank's lending activity in each AA, the OCC compared the bank's market share and rank of loans using peer loan data to its market share and rank in deposits using FDIC deposit market share data as of June 30, 2021. Deposit market share data includes deposit data for FDIC-insured institutions such as banks and savings and loan associations but not credit unions. For mortgage loans, the OCC utilized market share reports as of 2021, and for small loans to businesses, market share reports as of 2020 because more current data was not available when this evaluation was performed.

Investment Test

The OCC's analysis of qualified investments included the investment portfolio as well as donations and grants made during the evaluation period that had CD as its primary purpose. Qualified investments included investments that met the definition of CD and were made prior to the current evaluation period and were still outstanding or were made during the current evaluation period. Examiners considered prior-period investments at the book value of the investment at the end of the current evaluation period and current-period investments at their original investment amount. To provide perspective regarding the relative level of qualified investments, examiners allocated a portion of the bank's tier 1 capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The OCC also considered the responsiveness of investments to the needs of the communities, the complexity of investments, and whether the bank acted in a leadership position. The bank utilized low-income housing tax credits (LIHTC), New Market Tax Credits (NMTC), and Historical Tax Credits (HTC) in many of its AAs.

Service Test

The OCC gave primary consideration to CBNA's performance in delivering retail products and services to geographies and individuals of different income levels through the distribution of branches. The OCC focused on branches in low- and moderate-income (LMI) geographies. The OCC evaluated the range of products and services offered by CBNA through its branch network with emphasis on accessibility to LMI borrowers. Products and services offered are consistent throughout the branch network. The OCC specifically focused on any differences in branch hours and services in LMI geographies compared to those in middle- and upper-income (MUI) geographies. CBNA offers a wide range of traditional deposit and banking products and services. The bank offers multiple alternative delivery systems (ADS) commensurate with standard industry offerings including automated teller machines (ATMs), telephone and online banking (OLB), electronic bill-pay, remote deposit capture, and mobile banking options. The OCC evaluated the level of retail services provided to LMI borrowers through a bank-provided analysis by comparing the level of ADS usage at the start of the exam period and the end of the exam period for LMI customers as well as the level of usage by LMI households. ADS usage had a positive impact on each full-scope assessment area. The OCC evaluated CBNA's record of providing CD services. The primary consideration was responsiveness of the services to the needs of the community. The OCC gave the most consideration to CD services that addressed critical needs and/or were most impactful to the AA.

In the full-scope AAs, examiners considered branches located in MUI geographies that served and improved access for LMI customers or customers in LMI geographies if those branches were physically close to LMI geographies and if those branches served a larger population of LMI individuals, as determined by transactional data, than the population living in those geographies. Examiners gave positive consideration when a MUI branch was within one-quarter of a mile from one or more LMI census tracts. For those proximity qualified branches, examiners determined if LMI tract residents opened demand deposit accounts at a rate higher than the overall LMI population in the rating area.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), MMSA, 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 section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings and multistate CSA ratings. The PE is presented by multistate CSA rating areas followed by each state in alphabetical order.

The multistate CSA ratings are based on the bank's performance within that CSA. State ratings are based primarily on conclusions in the AA(s) reviewed using full-scope procedures while also considering performance in the limited-scope AAs.

Limited-scope procedures focused primarily on quantitative data, with consideration of qualitative data generally limited to demographic and competitive factors. Performance in limited-scope AAs was considered as stronger than, weaker than, or consistent with overall performance in full-scope AAs within the rating area. Based on these conclusions, there was a positive, negative, or neutral impact on the state rating.

In each AA, mortgage loans were weighted more heavily than small loans to businesses. The loan distribution analyses compared HMDA loans and loans to small businesses to demographic and aggregate data under the applicable lending test components. Aggregate data illustrates how the bank is performing relative to other lenders in the AA and provides context as to the reasonableness of the bank's performance. Examiners weighted demographic comparisons more heavily than aggregate performance.

In arriving at overall conclusions, the Boston CSA was most heavily weighted as this area accounted for 51.4 percent of the bank's total domestic deposits, and 38.5 percent of the bank's HMDA and small loans to businesses lending during the evaluation period. The Philadelphia CSA, which represented 13.7 percent of deposits and 16.2 percent of lending, and the state of Pennsylvania, which represented 9.7 percent of deposits and 10.8 percent of lending, were also given considerable weight based on the volume of deposits and lending.

Other Information

Assessment Areas (AAs) - The OCC determined that all bank AAs consisted of whole geographies and met the requirements of the regulation. The areas reasonably reflected the different trade areas that CBNA's branches serviced and did not arbitrarily exclude any LMI areas.

Deposit Market Share - The OCC used summary deposit data reported to the FDIC as of June 30, 2021. This was the most recent public data available during the evaluation period.

Lending Market/Peer Data – Due to timing and release of data, the OCC used 2021 peer mortgage data and 2020 peer small loans to businesses data reported to the Federal Financial Institutions Examination Council.

Lending Gap Analysis – Summary reports and maps were reviewed, and lending activity of home mortgage loans and small loans to business were analyzed over the evaluation period to identify any gaps in the geographic distribution of loans in each full-scope AA.

Unemployment rate – In most cases, unemployment rates referenced are the MSA non-seasonally adjusted rate as published monthly by the U.S. Bureau of Labor Statistics (BLS). In a CSA, the rate is for the MSA comprising most of the CSA unless otherwise noted.

CD Lending outside of CBNA AAs¹ – CBNA originated 15 CD loans totaling \$313 million for activities that occurred outside of its delineated AAs. Nine of these loans, totaling \$210.4 million, were originated while the June 2020 rule was in effect and support the bank’s overall rating.

Flexible and Innovative Lending Products

The bank’s innovative and flexible loan product offerings include both bank-developed and government-sponsored loan programs that help to meet the credit needs of LMI borrowers. CBNA originated loans through the Federal Housing Administration (FHA), Veteran’s Administration (VA), Massachusetts Housing Partnership (MHP), Pennsylvania Housing Finance Agency (PHFA), Connecticut Housing Finance Authority (CHFA), and State of New York Mortgage Agency (SONYMA). Although products provided through the federal or state governments are not necessarily innovative, the loan products provide flexibility to consumers and businesses seeking financing. A summary of CBNA’s innovative and/or flexible loan products or programs offered are as follows:

GoalBuilder Home Equity Line of Credit (HELOC) – Introduced in the fourth quarter of 2020, this new product was designed to address the specific needs of LMI borrowers and borrowers situated in LMI communities. A customer is eligible to apply if their primary residence is in a LMI geography or if the customer’s income is 80 percent or less than the average area median income (AMI). Additional features are a lower minimum line (\$5,000) and no annual fee. By remaining available during the pandemic, the GoalBuilder HELOC offered eligible LMI homeowners a credit solution in tough economic times. During the evaluation period, 307 loans were originated totaling \$6.2 million.

Destination Home Loan Program (DHM) – This program offers eligible, prospective homeowners an opportunity to buy a home with a minimal down payment and an affordable, low-monthly mortgage payment. The flexible terms, absence of private mortgage insurance (PMI), and subsidized pricing of this loan product allows borrowers to qualify for a mortgage when they otherwise may not have been able to. This product is considered innovative because it offers eligible borrowers above market loan-to-value financing at a low, long-term fixed interest rate. The flexible combination of higher loan-to-values and low, long-term fixed interest rates allow CBNA to keep down-payment requirements low for homebuyers’ while keeping their monthly mortgage payments affordable. Eligible owner-occupant borrowers whose incomes do not exceed 80 percent of median income or, borrowers who purchase their homes in low- or moderate-income census tracts, could receive between 95 percent and 97 percent loan-to-value, 30-year, low fixed-rate financing for home purchases and limited-cash out refinances of 1–4-unit homes. A higher combined loan-to-value of 105 percent is permitted where borrowers leverage community second programs structured as deferred and/or forgivable loans that lowered overall home purchase prices. The absence of PMI allows these loans to be more affordable to LMI borrowers. CBNA requires home buyer education for first-time home buyers. The bank partners with HUD-approved housing counseling agencies to provide this service. During the evaluation period, CBNA originated 1,083 Destination Home Loans totaling \$215.1 million.

The Citizens Bank Closing Cost/Down Payment Assistance (CCA) Program - To address affordability gaps in the market, Citizens provides first-time homebuyers, specifically LMI borrowers and/or buyers of property located in a low- or moderate-income census tract, with standard grant funds of 3 percent up to a maximum of \$3,000 and up to \$7,500 in certain designated CRA areas to be used towards down payment and/or closing costs. Citizens CCA are eligible for use with DHM, Fannie Mae Home Ready, and FHA eligible purchase loans, while Down Payment Assistance can be used in conjunction with the DHM program. CBNA provided \$4.1 million in grants to 1,494 borrowers during the evaluation period.

¹ 12 CFR § 25.13 - General performance standards and presumptive rating

COVID-19 Efforts

The worldwide COVID-19 pandemic had a significant impact on the housing market, resulting in increased demand for housing, increased housing prices on a nationwide basis, and increased demand for mortgages. According to Federal Reserve Economic Data (FRED), 30-year interest rates declined to approximately 2.7 percent as of January of 2021 from approximately 4.5 percent as of January of 2019. Per FRED, the median home price for houses sold in the United States increased substantially as a result of increased demand and lower borrowing costs pushing the median national home sale price from \$313,000 in January of 2019 to \$423,000 in January of 2022, a 38 percent increase in three years. The median ‘Days on Market’ declined from 87 in January 2019 to a pandemic-low of 36 in June of 2021. At the same time, the supply of new homes declined from 6.9 months in January of 2019 to a pandemic-low of 3.3 months in August of 2020, before increasing to 5.6 months by December of 2021. These factors combined to make available housing more scarce and less affordable, especially for LMI households.

Further, per the Department of Health and Human Services, Office of Human Services Policy,² “In 2020, the COVID-19 pandemic and associated recession amplified preexisting employment inequalities. Low-wage workers lost jobs at five times the rate of middle-wage workers, while high-wage employment actually increased over the first year of the pandemic,” further exacerbating LMI households’ ability to obtain credit or purchase homes.

The COVID Loan Deferment (or Forbearance) program implemented by CBNA had a significant impact during the pandemic. Across all products, forbearance was granted based on a customer self-identifying as being impacted; documentation of COVID hardship was not required. This was done via the Self-Serve-eForm which allowed customers to request a COVID deferral for their loan(s) during the pandemic from their home or electronic device. This innovative option provided customers a self-serve tool to use to obtain their loan’s deferral. The portal was very successful and less than a week after launch over 30 percent of the total deferrals were submitted through this portal. Approximately 200,000 customers, across all product lines, received at least one forbearance during the pandemic. Approximately 70 percent of CBNA customers returned to a “current” status after exiting the forbearance period.

Further, Citizen’s effectively responded to economic disruptions caused by the COVID-19 pandemic. The bank was a leading lender in the PPP, originating 86,000 PPP loans totaling more than \$6.5 billion. These loans provided critical funding for businesses in need during a time of significant economic uncertainty. Citizens achieved this success by utilizing resources from all across the organization and quickly deploying new internal processes.

² [low-income-covid-19-impacts.pdf \(hhs.gov\)](https://www.hhs.gov/low-income-covid-19-impacts.pdf)

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. § 25.28(c) in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area 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 (CFPB), as applicable.

The OCC does not have public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

The CRA performance rating was not lowered as a result of these findings. Considered were the nature, extent, and strength of the evidence of the practices; the extent to which the institution had policies and procedures in place to prevent the practices; and the extent to which the institution has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information.

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.

Multistate Metropolitan Statistical Area Rating

Boston-Worcester-Providence, MA-RI-NH-CT (Boston) CSA

CRA rating for the Boston CSA³: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic and borrower distributions of lending were good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's service delivery systems were readily accessible to geographies and individuals of different incomes and the bank was a leader in providing CD services.

Description of Institution's Operations in the Boston CSA

The bank delineated multiple AAs within the Boston-Worcester-Providence, MA-RI-NH-CT CSA. These AAs consisted of geographies in Massachusetts, New Hampshire, Connecticut, and Rhode Island and included a substantial portion of the Boston-Cambridge-Newton, MA-NH MSA, the entire Barnstable Town, MA, Providence-Warwick, RI-MA, Worcester, MA-CT, and Manchester-Nashua, NH MSAs, and two non-MSA counties in New Hampshire. The OCC combined these bank-delineated AAs into a single AA (Boston CSA) for analysis and presentation purposes. Refer to appendix A for a list of the counties reviewed.

The Boston CSA represented the largest retail market for the bank in terms of lending, deposits, branches, and ATMs.

CBNA had \$78.4 billion in deposits in the Boston CSA representing 51.1 percent of the bank's retail deposits as of June 30, 2021. The local banking environment was highly competitive with 150 FDIC-insured institutions operating 2,325 branches. CBNA ranked third in deposit market share with 12.4 percent. The top two banks in terms of deposit market share are State Street Bank and Trust with 27.9 percent and Bank of America, N.A. with 19.3 percent. CBNA operated 292 branches and 698 ATMs, of which 623 were deposit-taking, in the rating area, representing 31.0 percent of total branches and 40.6 percent of total ATMs. During the evaluation period, the bank originated and purchased \$19.9 billion, or 38.5 percent of its total volume of home mortgage loans and small loans to businesses in this AA.

³ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

The following table provides a summary of the demographics, including housing, business, and economic information for the Boston CSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Boston CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,768	11.1	19.2	39.8	28.1	1.8
Population by Geography	8,055,793	9.4	18.6	41.0	30.7	0.3
Housing Units by Geography	3,402,398	9.0	19.3	42.4	29.0	0.2
Owner-Occupied Units by Geography	1,931,765	3.2	13.7	46.4	36.5	0.1
Occupied Rental Units by Geography	1,143,685	18.7	28.3	34.8	17.8	0.5
Vacant Units by Geography	326,948	9.6	21.1	45.4	23.6	0.3
Businesses by Geography	802,600	7.4	15.7	39.4	36.9	0.6
Farms by Geography	19,144	3.3	10.8	46.6	39.2	0.1
Family Distribution by Income Level	1,972,895	22.8	16.5	20.0	40.7	0.0
Household Distribution by Income Level	3,075,450	26.0	14.7	16.6	42.6	0.0
Median Family Income MSA - 12700 Barnstable Town, MA MSA		\$80,751	Median Housing Value			\$339,010
Median Family Income MSA - 14454 Boston, MA		\$90,699	Median Gross Rent			\$1,134
Median Family Income MD - 15764 Cambridge-Newton-Framingham, MA		\$100,380	Families Below Poverty Level			7.7%
Median Family Income MSA - 31700 Manchester-Nashua, NH MSA		\$85,966				
Median Family Income MSA - 39300 Providence-Warwick, RI-MA MSA		\$73,950				
Median Family Income MD - 40484 Rockingham County-Strafford County, NH		\$90,150				
Median Family Income MSA - 49340 Worcester, MA-CT MSA		\$81,137				
Median Family Income Non-MSAs - NH		\$71,699				
<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 Boston CSA is a high-cost housing area, with high demand for housing and limited available inventory, which significantly limits access to affordable homeownership opportunities among LMI borrowers. The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The weighted average median family income for the Boston CSA was \$87,635. Based on this information, low-income families earned less than \$43,817 and moderate-income families earned less than \$70,108. The median housing value in the AA was \$339,010 while the National Association of Realtors (NAR) median sales price of a single-family home was \$491,900 in calendar year 2019 and increased to \$635,800 in the fourth quarter of 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$1,095 for a low-income borrower and \$1,752 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment,

homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,820. Low- and moderate-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was considered in our evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial wherewithal to qualify for a home loan than those with income above poverty. In the Boston CSA, the overall poverty level was 7.7 percent. However, in low-income tracts, the household poverty rate increases to 31 percent and in moderate-income tracts it increases to 17 percent. In MUI tracts, the combined poverty level was 7 percent.

In 2020, CBNA was recognized by the Massachusetts Housing Partnership (MHP) as the top ONE Mortgage Program lender. The MHP is a statewide public non-profit affordable housing organization that works in concert with the Governor and the Department of Housing and Community Development to help increase the supply of affordable housing in Massachusetts. CBNA originated 406 MHP loans, totaling \$134 million, during the evaluation period.

Economic Data

According to Moody's Analytics, the Boston, MA portion of the CSA is the business capital of New England. The area is home to several top colleges and universities and as such has a highly skilled and well-educated labor force with dynamic high-tech and biomedical research industries. The unemployment rate in January 2019 was 3.2 percent and peaked at 14.8 percent before declining through the rest of the evaluation period. Housing costs and business costs in the area are high. Major industries include education and health services, professional and business services, and financial services. Major employers in the area include Massachusetts General Hospital; University of Massachusetts; Stop and Shop Supermarkets; Steward Healthcare Systems; Boston University; and State Street Bank. According to the U.S. BLS, as of December 2021 the unemployment rate was 3.7 percent.

The Cambridge-Newton-Framingham, MA MD portion of the CSA has a large presence of biotech and high-tech firms that bolster high-wage employment. Like Boston, the area has a well-educated and highly skilled workforce given that it is home to both Harvard University and the Massachusetts Institute of Technology. Job growth in the area has been strong. Housing costs and the cost of doing business in this portion of the CSA are also high. Major industries include professional and business services; education and health services; and government. Major employers include Beth Israel Lahey Health, Harvard University, The TJX Co., and Massachusetts Institute of Technology. According to the U.S. BLS, as of December 2021 the unemployment rate was 4.3 percent.

The Providence-Warwick, RI MSA portion of the CSA has an economy that is advancing at a modest pace, with job growth generally in line with the regional and national averages. The metro area is closer to its pre-pandemic employment peak than the rest of the Northeast, albeit not as close as the nation. The housing market in the area is strong and the area benefits from its strong link to the Boston market and strong synergies among area hospitals, educational institutions, and research and development firms. Major industries include education and health services, government, and professional and business services. Major employers in the area include Life Span; Care New England; CVS Health Corp; Citizens Financial Group; General Dynamics Electric Boat; and Brown University. According to the U.S. BLS, as of December 2021 the unemployment rate was 5.1 percent.

The Barnstable, MA portion of the CSA has an economy that is regaining its footing following a summer slowdown. Barnstable has recovered more pandemic job losses than the state after suffering a larger initial contraction. The key leisure/hospitality industry is driving job gains, and payrolls are now above their pre-pandemic peak. The unemployment rate is moving sideways as the labor force rises in tandem with payrolls. The housing market is cooling as rapid price gains weigh on affordability and price out buyers. The area is an attractive tourist destination with proximity to greater Boston; however, living and business costs are higher than average, and the area relies on low-wage tourism and retail jobs to help fuel the job market. With one of the largest shares of older residents nationally, the area relies on the in-migration of young workers to propel labor force growth. However, prospects for attracting young workers are dismal due to high costs, which rank among the 10 highest in the region. In addition, potential residents also need to compete for housing against wealthy nonresidents who purchase vacation homes in the area resulting in less affordable housing than average. Major industries include leisure and hospitality; education and healthcare services; government; and retail trade. Major employers in the area include Cape Cod Healthcare; Woods Hole Oceanographic Institution; Steamship Authority; Cape Cod Community College; and Ocean Edge Resort and Golf Club. According to the U.S. BLS, as of December 2021 the unemployment rate was 5.7 percent.

The Worcester, MA portion of the CSA strengths include a significant presence of college and universities, low living costs for New England, and low employment volatility. Despite strength in the large manufacturing industry, recent gains in healthcare and leisure/hospitality were tepid while government and personal services shed staff. The housing market's performance is mixed as house price appreciation is faster than in the Northeast but slower than nationally. Major industries in the area include education and healthcare; government; professional and business services; and retail trade. Major employers in the area include UMass Memorial Healthcare; UMass Medical School; Reliant Medical Group; Saint Vincent Hospital; and MAPFRE USA Corp. According to the U.S. BLS, as of December 2021 the unemployment rate was 5.0 percent.

The Rockingham – Stafford, NH MD portion of the CSA has a strong economy. The area's strengths include lower tax rates than nearby Massachusetts; high educational attainment; positive net migration; and high median household income. The area is a bedroom community for Boston and Cambridge, Massachusetts, with median home prices about one third lower thus making it more affordable for workers from the Boston area to purchase a home. More than one-third of workers in the area commute to jobs outside the region. Major industries in the area include professional and business services; retail trade; and education and healthcare. Major employers in the area include Shaw's Supermarkets; Wentworth-Douglas Hospital; Genesis Healthcare; and SIG Sauer, Inc. According to the U.S. BLS, as of December 2021, the unemployment rate was 3.0 percent.

Community Contacts

A review was conducted of 11 community contacts completed during the evaluation period with organizations located throughout the CSA. The organizations contacted focused on areas such as affordable housing, small business development, and community services. The most prevalent need identified by most contacts was affordable housing. Contacts noted the high cost of housing throughout much of the area and the need to develop more affordable rental and homeownership options. High housing costs and lack of inventory are discouraging and/or preventing many LMI households from potential homeownership opportunities. Many locations in the CSA have significant numbers of unskilled workers in minimum wage jobs whose earnings are insufficient to cover the cost of housing. Additionally, high levels of student loan debt are preventing individuals from qualifying for mortgage loans. Contacts noted the need for commercial development financing to help spur economic development in the downtown or main street areas in several Worcester County localities. Many communities have growing elderly populations in need of affordable as well as accessible housing. Contacts also noted that the COVID-19 pandemic exacerbated food and housing insecurity issues among many LMI households. Credit and community development needs identified include:

- Affordable housing (both owner-occupied and rental)
- Affordable childcare
- Access to transportation services
- Gap financing for community development projects
- Loans for commercial development to revitalize downtown and main street areas
- Bilingual financial services assistance
- Financial education programing, including budgeting for seasonal workers
- Small business loans
- Home rehab funding to help elders age in place

The area was served by numerous non-profit organizations, community-based organizations, CDFIs, loan funds, economic development organizations, and CD organizations that provided opportunities to help meet community needs.

Scope of Evaluation in the Boston CSA

The Boston CSA received a full-scope review. The Boston CSA contributed significantly to the overall bank CRA ratings.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BOSTON CSA

LENDING TEST

The bank's performance under the Lending Test in the Boston CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Boston CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Boston CSA	67,484	43,517	395	111,396

Dollar Volume of Loans (\$000s)				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Boston CSA	17,244,946	2,652,687	1,627,458	21,525,091

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 12.4 percent. The bank ranked third among 150 depository financial institutions placing it in the top 2 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 5.1 percent based on the number of home mortgage loans originated or purchased. The bank ranked second among 812 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three competitors with a combined market share of 12.2 percent were Rocket Mortgage (5.8 percent), Guaranteed Rate, Inc. (3.6 percent), and JPMorgan Chase Bank, N.A. (2.8 percent).

According to peer small business data for 2020, the bank had a market share of 9.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked third out of 309 small business lenders, which placed it in the top 1 percent of lenders. The top three competitors with a combined market share of 30.4 percent were American Express National Bank (15 percent), Bank of America, N.A. (11.5 percent), and Eastern Bank (3.9 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's HMDA and small loans to businesses lending with available demographic information and aggregate lending data. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was near to the percentage of owner-occupied homes in those geographies and was below the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was near to both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the Boston CSA section of 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was near to the percentage of businesses in low-income geographies but approximated the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in moderate-income geographies and the aggregate distribution of loans.

Lending Gap Analysis

Examiners did not identify any conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate distribution of loans. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the Boston CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 7.1 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 395 CD loans totaling \$1.6 billion, which represented 18.7 percent of the allocated tier 1 capital. CD loans were primarily made for revitalization/stabilization purposes. By dollar volume, 27 percent of these loans funded affordable housing, 0.3 percent funded economic development, 45.9 percent funded revitalization and stabilization efforts, and 26.8 percent funded community services targeted to LMI individuals.

Examples of CD loans include:

- CBNA provided a \$40.7 million construction loan to support the replacement and modernization of 123 units of affordable housing in a moderate-income geography. The project included demolishing six existing buildings and the construction of 81 units in a combination of townhouse and midrise style buildings. In addition to the new construction, the project included the rehabilitation of 42 existing units in seven row house style buildings. The loan also utilized 4 percent LIHTC funding.
- CBNA provided a \$22.2 million loan to support construction of 60 new affordable housing units in a moderate-income geography. The development contained 16 units reserved for tenants at or below 30 percent AMI, 12 units reserved for tenants at or below 50 percent AMI, 23 units for tenants at or below 60

percent AMI, and nine units for tenants at or below 80 percent AMI. The project also used both 4 percent and 9 percent LIHTC funding.

- CBNA provided a \$8.6 million loan for the construction of 24 new affordable housing units and the rehabilitation of 23 existing affordable housing units. Of the 47 units in the development, 13 units will be offered to families with gross income at or below 30 percent AMI, 18 units to families at or below 50 percent AMI, 11 units offered to families at or below 60 percent AMI, and five units offered to families at or below 80 percent AMI.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 16,478 loans under flexible lending programs in the AA totaling \$4.7 billion. Program volumes included 226 DHM loans totaling \$66.7 million, 379 FHA loans totaling \$126.9 million, 14,959 FNMA loans totaling \$4.2 billion, 222 FNMA Home Ready loans totaling \$57.4 million, 51 GoalBuilder HELOCs totaling \$1.2 million, 406 MHP loans totaling \$134.4 million, 39 No Cost/Low-Cost refinance loans totaling \$3.1 million, and 196 VA loans totaling \$67.6 million.

The bank provided 216 CCA down payment grants totaling \$391,398 within the AA.

INVESTMENT TEST

The institution’s performance under the Investment Test in the Boston CSA is rated Outstanding.

Based on a full-scope review, the bank’s performance in the Boston CSA was excellent.

Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Boston CSA	592	596,107	476	493,771	1,068	100	1,089	100	63	246,268

* Prior Period Investments means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution’s financial reporting system.

The bank made 476 investments totaling \$493.8 million during the evaluation period, which included 256 qualifying grants and donations totaling \$8.6 million to approximately 113 organizations. The dollar volume of current- and prior-period investments represented 12.5 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 98.2 percent of investments supported affordable housing, 0.8 percent funded community services to LMI individuals, and 1 percent supported economic development. The institution made extensive use of innovative and/or complex investments to support CD initiatives. CBNA made 65 tax credit investments totaling \$428.1 million in the current period, including LIHTC and NMTC, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- CBNA invested \$17.8 million in a 76-unit LIHTC project in Roxbury, MA, addressing an identified need for affordable rental housing in the CSA. For the project, 53 of the units are dedicated to families earning less than 60 percent of the AMI, 19 workforce units for families earning up to 100 percent of AMI, and four units at the unrestricted market rate. The project also includes supportive services for the residents.
- A \$9.1 million LIHTC for the construction of 135 new units of affordable housing in the redevelopment of an existing affordable housing development in South Boston, MA.
- A \$7 million investment in a fund to support the continued revitalization of downtown St. Albans long-term housing and business plan. The project funded 169 rental assistance supported units, with total rent and utility costs not exceeding 30 percent of the occupant's income, and included exterior and interior upgrades as well as increased energy efficiency improvements.

SERVICE TEST

The bank's performance under the Service Test in the Boston CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Boston CSA was excellent.

Retail Banking Services

Distribution of Branch Delivery System												
Assessment Area	Deposits		Branches					Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography				
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	NA
Boston CSA	100.0	292	100.0	6.5	19.5	39.7	33.9	9.4	18.6	41.0	30.7	0.3

NA stands for not available.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA. CBNA's distribution of branches in low-income geographies was below, and in moderate-income geographies exceeded, the percentage of the population living within those geographies. Examiners gave positive consideration for 29 MUI branches located within one-quarter mile of a LMI geography, where the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AA.

CBNA had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. CBNA had 698 ATMs in the AA, 623 of which were deposit-taking. CBNA provided data that indicated 68.7 percent of households in low-income geographies, and 70.3 percent of households in moderate-income geographies used OLB and mobile banking services in the fourth quarter of 2021. This was an increase of 18.1 percent for households in low-income geographies, and an increase of 12.7 percent for households in moderate-income geographies, from the start of the evaluation period. ADS usage had a positive impact on the Service Test rating.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Boston CSA	7	67	-5	-11	-36	-8	0

NA stands for not available.

The bank's opening and closing of branches has generally not adversely affected accessibility of its delivery systems in LMI geographies and/or to LMI individuals. During the evaluation period, the bank closed 67 branches, five of which were in low-income geographies and 12 of which were in moderate-income geographies. The branch closures were a result of network optimization. CBNA also opened seven branches during the evaluation period, one of which was located in a moderate-income geography. Despite the large number of closures, the bank maintained an adequate distribution of branches in low-income geographies and an excellent distribution of branches in moderate-income geographies, while providing additional accessibility through ADS and adjacent MUI branches that serve LMI customers.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. CBNA maintained standard business hours and offered traditional banking products for all traditional branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday-Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for all 207 traditional standalone branch locations in the AA. Of these, 15 branches did not offer hours on Saturdays, four of which were in LMI geographies. The 80 in-store branch locations and one limited-service branch operated from 10:00 a.m. to 5:00 p.m. Monday-Friday and Saturdays from 10:00 a.m. to 3:00 p.m., with the exception of two in-store locations and the limited-service location whose hours were 9:00 a.m. to 4:00 p.m. Monday-Friday and Saturdays 9:00 a.m. to 12:00 p.m. CBNA also has two drive-thru locations in the AA that are open 24 hours a day. There are also two special purpose branches within the AA that have varying hours. CBNA generally made all services available at all branches with the exception of safe deposit boxes which were not available at 74.3 percent of branches in the AA, and night deposit services which were not available at 8.9 percent of branches in the AA.

Community Development Services

The bank was a leader in providing CD services.

Bank employees provided 2,822 qualified CD service activities to 202 organizations with 11,363 qualified hours within this AA during the evaluation period. Leadership was evident through board or committee participation in 1,237 of these activities with 93 employees providing 4,621 service hours. Citizens delivered 596 financial education sessions reaching 9,416 individuals. The bank's assistance was responsive to identified needs in the AA, particularly with financial education for LMI individuals and families/small business technical assistance.

Service activity examples during the evaluation period include:

- A CBNA director served on the board and committee of an organization providing 120 hours of financial expertise over the evaluation period. The organization provides healthy meal options to those in need in the AA. The meal services included food pantry shopping and other support services such as resources about housing, medical, and fuel assistance.

- A CBNA director served on a board of a club and provided 20 hours of service over the evaluation period. The mission of the club is to enable and inspire children and youth, especially those from diverse or difficult circumstances. The club works on breaking the cycle of poverty which means addressing structural issues that hold children back, including lack of access to educational programming, and lack of exposure to critical opportunities that develop their skills, talents, and passions.
- Employees provided 110 qualified hours of service to a nonprofit organization with a mission to provide access to land, education, and other resources necessary for people in the Greater Providence area to grow food in environmentally sustainable ways as a means to creating a food system where locally produced, affordable, and nutritious food is available to all. During the evaluation period, a member of executive management and three other colleagues served on fundraising and finance committees.

Multistate Metropolitan Statistical Area Rating

New York-Newark, NY-NJ-CT-PA (New York) CSA

CRA rating for the New York CSA⁴: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic and borrower distributions of lending were good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's retail delivery services were accessible to geographies and individuals of different incomes and the bank was a leader in providing CD services.

Description of Institution's Operations in the New York CSA

The bank delineated multiple AAs within the New York-Newark, NY-NJ-CT-PA (New York) CSA. These AAs consisted of geographies in Connecticut, New York, and Pennsylvania and included a portion of the New York-Newark-Jersey City, NY-NJ-PA MSA, and the entire Poughkeepsie-Newburgh-Middletown, NY, Kingston, NY, New Haven-Milford, CT, Bridgeport-Stamford-Norwalk, CT, and East Stroudsburg, PA MSAs. The OCC combined these bank-delineated AAs into a single AA (New York CSA) for analysis and presentation purposes. Refer to appendix A for a list of the counties reviewed.

The New York CSA was the seventh largest retail market for the bank based on deposits.

Citizens had \$6.3 billion in deposits in the New York CSA representing 4.1 percent of the bank's total deposits, as of June 30, 2021. As of December 31, 2021, the bank operated 28 branches and 39 ATMs, of which 38 were deposit-taking, within the rating area, representing 3 percent of total branches and 2.3 percent of total ATMs. The bank originated and purchased approximately \$5.5 billion in home mortgage and small business loans within the New York CSA, representing 10.6 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 83 FDIC-insured institutions operating 1,128 branches in the AAs. Citizens ranked ninth in deposit market share with 2 percent. The top three banks by deposit market share are Morgan Stanley Private Bank at 35.3 percent, JP Morgan Chase Bank, N.A. at 10 percent, and People's United Bank, N.A. at 6.8 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

⁴ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

The following table provides a summary of the demographics, including housing, business, and economic information for the New York CSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: New York CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	880	9.5	17.3	33.1	38.9	1.3
Population by Geography	3,847,647	8.3	17.2	34.2	40.0	0.3
Housing Units by Geography	1,556,916	8.1	18.4	35.9	37.5	0.0
Owner-Occupied Units by Geography	913,900	2.8	12.6	36.8	47.8	0.0
Occupied Rental Units by Geography	468,205	17.2	27.6	32.6	22.6	0.0
Vacant Units by Geography	174,811	11.2	24.6	40.3	23.8	0.0
Businesses by Geography	506,155	7.9	14.9	30.9	46.1	0.1
Farms by Geography	12,920	5.9	14.7	34.3	45.1	0.0
Family Distribution by Income Level	938,986	21.2	15.1	17.6	46.0	0.0
Household Distribution by Income Level	1,382,105	24.2	14.2	16.0	45.6	0.0
Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA		\$105,628	Median Housing Value			\$358,966
Median Family Income MSA - 20700 East Stroudsburg, PA MSA		\$66,783	Median Gross Rent			\$1,252
Median Family Income MSA - 28740 Kingston, NY MSA		\$74,546	Families Below Poverty Level			7.6%
Median Family Income MSA - 35084 Newark, NJ-PA		\$90,570				
Median Family Income MSA - 35300 New Haven-Milford, CT MSA		\$80,739				
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ		\$67,560				
Median Family Income MSA - 39100 Poughkeepsie-Newburgh-Middletown, NY MSA		\$85,780				
<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 New York CSA is a high-cost housing area, with high demand for housing and limited available inventory, which significantly limits access to affordable homeownership opportunities among LMI borrowers. The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The weighted average median family income for the New York CSA was \$83,619. Based on this information low-income families earned less than \$41,809 and moderate-income families earned less than \$66,895. The median housing value in the AA was \$358,966 while the NAR median sales price of a single-family home was \$386,500 in calendar year 2019 and increased to \$535,800 in the fourth quarter of 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$1,045 for a low-income borrower and \$1,672 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median

housing value would be \$1,919. Low- and moderate-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the New York CSA, the overall household poverty level was 7.6 percent.

Economic Data

According to Moody's Analytics, the New York CSA is struggling to close its gap with the nation. Lapsing pandemic-era restrictions have helped leisure/hospitality and healthcare rapidly gain ground, but the pivotal financial services industry is not recovering at the same pace. House price growth has slowed, as diminished demand begins to supplant a lack of inventory. The jobless rate is further above its pre-pandemic low than in any other economy with at least one million residents, even as the labor force shrinks. New York City, which is the center of the CSA, is the financial capital of the U.S., if not the world, making it vulnerable to market swings. The area has experienced persistent out-migration of residents since the start of the COVID-19 pandemic. The area's strengths include being the financial capital of the world, high per capita income and limited exposure to manufacturing, and strong international immigration. Weaknesses include high costs for taxes, housing, office rents, and energy, rapidly aging infrastructure, and troubled fiscal health made worse by population losses. Major employment industries include education and healthcare services, professional and business services, government, and financial activities. Major employers in the area include Montefiore Health System, Mount Sinai Health System, JP Morgan Chase, Bank of America, New York Presbyterian Healthcare, and NYU Langone Medical Center. According to the U.S. BLS, as of December 2021 the unemployment rate was 5.4 percent.

The Dutchess County, NY portion of the rating area is a bedroom community to New York City with lower living costs, a highly educated work force, and strong healthcare and university presence. However, the area is underperforming the already-weak Northeast. Once promising manufacturing has returned to its pre-pandemic decline, in contrast to the payroll growth seen in most of the U.S. On the upside, the area's jobless rate continues to inch further below its pre-pandemic levels even as the workforce grows. House price growth in the metro division has fallen below the New York average. The youth population in the area has been declining at an above average rate for nearly two decades, putting a dent in grade school enrollment and making it unlikely that hiring in K through 12 will support future payroll growth, thus putting the pressure on higher education. The area is home to Bard, Marist, and Vassar colleges, and as such boasts one of the nation's highest shares of employment at private colleges and universities. The return of students to campus has helped bolster payrolls, but the shrinking pool of college-age residents in the Northeast will increase competition among colleges and threaten future enrollment. Major industries are education and health services, government, and retail trade. Major employers in the area include NUVANCE Health, IBM, Vassar Brothers Medical Center, Bard College, and Mid-Hudson Regional Hospital. According to the U.S. BLS, as of December 2021 the unemployment rate was 2.6 percent.

The New Haven, CT portion of the rating area is rapidly losing momentum after recovering jobs at a faster clip than the U.S. Hiring in leisure/hospitality has picked up recently as the impact of the pandemic fades. The unemployment rate continues to trend lower, in line with the regional average. House price appreciation is decelerating more rapidly than it is nationally, partly because of increased out-migration, but a low inventory of homes is keeping upward pressure on prices. The area has lower business costs than New York City and Boston as well as a strong university concentration, led by Yale University. Record enrollment at Yale is leading the university to create new teaching and administrative positions. Growing enrollment will also boost the rental market in the area as a scarcity of on campus housing pushes more students to seek out apartments. Further, the

restart of in-person university events, which traditionally draw not just students but family members, will create positive spillover for consumer businesses. Major industries in the area include education and health services, government, and professional and business services. Major employers in the area include Yale New Haven Health System, Yale University, AT&T, Bozutto's Inc., and Southern Connecticut State University. According to the U.S. BLS, as of December 2021 the unemployment rate was 3.8 percent.

The Fairfield County, CT portion of the rating area has an economy that has slowed markedly. The area has recouped fewer pandemic-induced job losses and trails the nation's payroll recovery, partly because of the heavier losses it suffered in 2020. Recently, payroll growth has been supported by leisure/hospitality, but hiring by the pivotal finance sector has lost steam as growing economic uncertainty weighs on hedge funds. Joblessness is trending lower and remains in line with the regional average while labor force participation is rising, albeit only slightly. After growing at an above-average clip, house price appreciation is decelerating rapidly, driven by increased out-migration. The area is a global financial center with proximity to New York City and a highly educated labor force. Major industries in the area include education and health services, professional and business services, and retail trade. Major employers in the area include Sikorsky Aircraft Corp., Boehringer Ingelheim Corp, ASML US Inc., Ceci Brothers, and Deloitte. According to the BLS, as of December 2021 the unemployment rate was 3.9 percent.

Community Contacts

A review was conducted of 11 community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on areas such as affordable housing, small business and economic development, and community and social services. Contacts noted the need for affordable housing for both rental housing and homeownership. Many households are either housing insecure or housing stressed, where the cost of their housing is high compared to their income. The COVID-19 pandemic helped to drive up home prices and housing demand as wealthier families from the New York City area relocated to more suburban parts of the rating area for less housing congestion. Access to affordable housing has also been impacted by Air BNB and investor purchases taking many rental units off the market. Lack of affordable inventory, coupled with high taxes and utility costs are keeping LMI families as well as many lower middle-income families from purchasing a home. It is also preventing older residents from downsizing to smaller residences. In addition, high student loan debt is an impediment to homeownership. Contacts noted that many lower middle-class households are struggling to meet day-to-day living expenses and are living paycheck to paycheck. Despite the difficulties they endure, these households make too much money to qualify for state and federal subsidy programs. Contacts also noted the need for greater support for small businesses, particularly smaller minority-owned businesses. Many small businesses suffered during the pandemic and in many cases CARES Act funding was either insufficient or did not reach those businesses that needed funding the most. Contacts noted that financial institutions need to strengthen their relationships with the minority community to ensure that needs are being met. Credit and community development needs identified include:

- Technical assistance and financial education for small businesses
- Affordable rental and homeownership opportunities
- Affordable loans for first time homebuyers
- More efficient and less cumbersome grant making process from financial institutions
- Funding to help improve existing housing stock
- Support for funding for renewable energy

The area was served by numerous non-profit organizations, community-based organizations, CDFIs, loans funds, economic development organizations, and community development organizations that provided opportunities to help meet community needs.

Scope of Evaluation in the New York CSA

The New York CSA received a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NEW YORK CSA

LENDING TEST

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

Based on a full-scope review, the bank's performance in the New York CSA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
New York CSA	14,594	4,564	59	19,217

Dollar Volume of Loans (\$000s)				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
New York CSA	5,165,867	291,009	158,348	5,615,224

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 2 percent. CBNA ranked ninth among 83 depository financial institutions placing it in the top 11 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 3.9 percent based on the number of home mortgage loans originated or purchased. The bank ranked fifth among 829 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three lenders with a combined market share of 20.8 percent were Rocket Mortgage (6.4 percent), Wells Fargo Bank N.A. (6.8 percent), and JPMorgan Chase Bank, N.A. (7.6 percent).

According to peer small business data for 2020, the bank had a market share of 1.5 percent based on the number of small loans to businesses originated or purchased. The bank ranked 16th out of 321 small business lenders, which placed it in the top 5 percent of lenders. The top three lenders with a combined market share of 39 percent were American Express National Bank (17.8 percent), JPMorgan Chase Bank, N.A. (13.4 percent), and Bank of America, N.A. (7.8 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's HMDA and small loans to businesses lending with available demographic information and aggregate lending data. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans by all lenders. The percentage of home mortgage loans in moderate-income geographies was near to both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the New York CSA section of 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies but was near to the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in moderate-income geographies and the aggregate distribution of loans.

Lending Gap Analysis

Examiners did not identify any conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the New York CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate distribution of loans. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the New York CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of 4.3 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 59 CD loans totaling nearly \$158.3 million, which represented 22.8 percent of the allocated tier 1 capital. CD loans primarily supported job creation and revitalization/stabilization efforts. By dollar volume, 18.1 percent of these loans funded affordable housing, 4.3 percent funded economic development, 60.8 percent funded revitalization and stabilization efforts, and 16.9 percent funded community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- CBNA originated a \$8.2 million loan to support the construction of a five-story building with 81 mixed-income housing units. Of the 81 units, 64 units are reserved for low-income individuals and families earning at or below 60 percent of the AMI. The project was in a low-income census track and qualified for LIHTCs.
- CBNA originated a \$3 million loan to support the construction of 70 new units of housing including 50 affordable units and 20 units offered at market-rate. Of the 50 affordable units, 14 were reserved for residents at 25 percent of the AMI, 28 units were reserved for residents at 50 percent of the AMI, and eight units were reserved for residents at 80 percent of the AMI.
- CBNA originated a \$5 million line of credit to a CDFI that strives to deploy capital to low-income communities by providing below market rate capital in the form of loans to non-profit community-based organizations for the development of affordable housing in New England and the Mid-Atlantic States. Additionally, the bank made a \$500,000 equity equivalent investment to the organization.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 2,639 loans under flexible lending programs in the AA totaling \$847.9 million. Program volumes included five DHM loans totaling \$768,800, 83 FHA loans totaling \$29.6 million, 2,469 FNMA loans totaling \$796 million, 38 FNMA Home Ready loans totaling \$7.3 million, seven GoalBuilder HELOC loans totaling \$159,700, nine No Cost/Low-Cost Refinance Mortgage loans totaling \$963,734, and 28 VA loans totaling \$13.1 million.

The bank provided 10 CCA down payment grants totaling \$24,000 within the AA.

INVESTMENT TEST

The bank's performance under the Investment Test in the New York CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the New York CSA was excellent.

Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
New York CSA	77	50,215	87	43,477	164	100	93,692	100	1	762

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 87 investments totaling \$43.5 million during the evaluation period, which included 46 qualifying grants and donations totaling \$531,000 to approximately 21 organizations. The dollar volume of current- and prior- period investments represented 13.5 percent of allocated tier 1 capital.

The bank exhibited adequate responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing and economic development. By dollar volume, 98 percent of investments supported affordable housing, 1 percent funded community services to LMI individuals, and 1 percent supported economic development. The institution occasionally used innovative and/or complex investments to support CD initiatives. CBNA made one LIHTC investment in the current period totaling \$3.5 million, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- CBNA invested \$3.5 million in a 35-unit LIHTC project in New Haven, CT addressing an identified need for affordable rental housing in the CSA. The investment created 15 units of affordable housing.
- A \$13.7 million mortgage-backed security (MBS) investment in the Poughkeepsie-Newburg-Middletown area to provide one-to-four family affordable housing for LMI families.

- A \$35,000 investment in an economic development fund. The fund's mission is to strengthen neighborhood economies by providing flexible financing and technical support to businesses, community organizations, and community initiatives.

SERVICE TEST

The bank's performance under the Service Test in the New York CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the New York CSA was good.

Retail Banking Services

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches						Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
New York CSA	100.0	28	100.0	0.00	21.4	50.0	28.6	0.0	8.3	17.2	34.2	40.0	0.32

Totals may not equal 100.0 percent due to rounding.

NA stands for not available.

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA. There were no branches located in low-income geographies. CBNA's distribution of branches in moderate-income geographies exceeded the percentage of population living within those geographies. Examiners gave positive consideration for four MUI branches located within one-quarter mile of a LMI geography, where the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AA.

CBNA had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. CBNA had 39 ATMs in the AA, of which 38 were deposit-taking. CBNA provided data that indicated 62 percent of households in low-income geographies and 60.6 percent of households in moderate-income geographies used ADS in the fourth quarter of 2021. This was an increase of 31.9 percent and 20.9 percent, from the start of the evaluation period. ADS usage had a positive impact on the Service Test rating.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
New York CSA	1	4	0	-1	-2	0	0

NA stands for not available.

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank opened one branch in a middle-income geography and closed four branches, one of which was located within a moderate-income geography. The branch closure was a result of network optimization.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. CBNA generally maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday-Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for all 28 standalone branch locations in the AA. There were two branches located in middle-income geographies that did not have Saturday hours. CBNA generally made all services available at all branches with the exception of safe deposit boxes which were not available at 40 percent of the branches in the AA.

Community Development Services

The bank was a leader in providing CD services.

CBNA employees provided 1,105 hours of service to 27 CD organizations. During the evaluation period, service activities were responsive to CD needs, particularly related to financial literacy education, assistance with income tax preparation, and job training programs targeting LMI individuals. Citizens delivered 131 financial education sessions benefiting 2,411 individuals. Other services involved leadership, where eight employees served on the boards of seven local non-profit organizations. Service activity examples during the evaluation period include:

- An employee served on the board of an organization that provides eviction prevention services, emergency shelter, and supportive and affording housing to LMI families, for a total of 110 hours of service during the evaluation period.
- An employee served on the board of an organization that promotes financial independence, economic security, economic mobility, and asset-building to socio-economically disadvantaged women and their families, for a total of 75 hours of service during the evaluation period.
- Bank employees worked with local organizations to provide 250 hours of financial literacy education to students at school's serving LMI families.

Multistate Metropolitan Statistical Area Rating

Philadelphia-Reading-Camden, PA-NJ-DE-MD (Philadelphia) CSA

CRA rating for the Philadelphia CSA⁵: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was adequate and borrower distribution of lending was good.
- The bank's extensive use of innovative and/or flexible lending practices in meeting AA credit needs had a positive impact on the Lending Test rating.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's retail delivery services were readily accessible to geographies and individuals of different incomes, and the bank was a leader in providing CD services.

Description of Institution's Operations in the Philadelphia CSA

The bank's AA delineations within this area expanded with the merger of CBP on January 2, 2019. CBNA delineated three AAs within the Philadelphia-Reading-Camden, PA-NJ-DE-MD (Philadelphia) CSA. These AAs consisted of geographies in Pennsylvania and Delaware and included a substantial portion of the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA and the entire Dover, DE and Reading, PA MSAs. The OCC combined these bank-delineated AAs into a single AA (Philadelphia CSA) for analysis and presentation purposes. Refer to appendix A for the list of counties reviewed.

The Philadelphia CSA was CBNA's second largest rating area based on deposits.

CBNA had \$21 billion in deposits in the Philadelphia CSA representing 13.7 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated 166 branches and 276 ATMs, of which 261 were deposit-taking, within the rating area, representing 17.8 percent of total bank branches and 16 percent of total ATMs. The bank originated and purchased approximately \$8.4 billion in home mortgage and small business loans within the Philadelphia CSA representing 16.2 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 104 FDIC-insured institutions operating 1,590 branches in the AA. Citizens ranked eighth in deposit market share with 3.4 percent. The top three banks by deposit market share are Capital One, N.A. with 27.7 percent, TD Bank, N.A. with 26.8

⁵ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

percent, and Wells Fargo Bank, N.A. with 6.1 percent. In addition to FDIC-insured institutions, this area was served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following table provides a summary of the demographics, including housing, business, and economic information for the Philadelphia CSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Philadelphia CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,493	8.0	23.2	37.9	29.5	1.4
Population by Geography	6,161,776	7.5	21.9	39.6	30.7	0.3
Housing Units by Geography	2,495,446	7.6	22.8	39.2	30.2	0.2
Owner-Occupied Units by Geography	1,533,994	4.0	17.6	42.8	35.6	0.0
Occupied Rental Units by Geography	745,533	13.1	30.5	34.3	21.7	0.5
Vacant Units by Geography	215,919	14.6	33.1	31.3	20.7	0.2
Businesses by Geography	713,546	5.2	18.8	37.9	37.7	0.5
Farms by Geography	14,505	2.2	13.3	48.7	35.7	0.1
Family Distribution by Income Level	1,475,856	22.1	17.2	20.0	40.7	0.0
Household Distribution by Income Level	2,279,527	25.2	15.7	17.1	42.1	0.0
Median Family Income MSA - 15804 Camden, NJ		\$87,133	Median Housing Value			\$236,254
Median Family Income MSA - 20100 Dover, DE MSA		\$64,252	Median Gross Rent			\$1,040
Median Family Income MSA - 33874 Montgomery County-Bucks County-Chester County, PA		\$99,939	Families Below Poverty Level			9.5%
Median Family Income MSA - 37964 Philadelphia, PA		\$56,411				
Median Family Income MSA - 39740 Reading, PA MSA		\$67,696				
Median Family Income MSA - 48864 Wilmington, DE-MD-NJ		\$80,707				
<i>Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The weighted average median family income for the Philadelphia CSA was \$78,058. Based on this information low-income families earned less than \$39,029 and moderate-income families earned less than \$62,446. The median housing value in the AA was \$236,254 while the NAR median sales price of a single-family home was \$246,200 in calendar year 2019 and increased to \$306,600 in the fourth quarter of 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$975 for a low-income borrower and \$1,561 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a

home at the AA median housing value would be \$1,263. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Philadelphia CSA, the overall household poverty level was 9.5 percent.

Economic Data

According to Moody's Analytics, Philadelphia's economic recovery is moving at a solid pace. Healthcare has been expanding faster than in the state and the region. The area is a center of healthcare and medical research. It is home to several world class educational institutions and has a well-developed port and international airport. However, population growth has been anemic, and the area has prohibitive business taxes that push firms to the suburbs or nearby states. Employment rates of office workers in the area are below the prerecession peak and there is a shrinking cadre of knowledge industry workers. Major employment industries in the area include education and healthcare; professional and business services; and government. Major employers in the area include University of Pennsylvania Health System, Thomas Jefferson University and TJU Health System, Inc., Children's Hospital of Philadelphia, Comcast, and Drexel University. According to the U.S. BLS, as of December 2021 the unemployment rate was 5.7 percent.

The Camden, NJ portion of the CSA has strengths that include high industrial diversity with low costs; proximity to highways and waterways essential to trade; above-average educational attainment and very high housing affordability. Camden's economy is expanding with recent gains driven by professional and business services and healthcare. Single family house price appreciation is slowing as higher interest rates weaken demand. The area's weaknesses include high crime rates and a poor reputation; below-average productivity of workers; and is under-represented in prime- age workers. Major employment industries in the area include education and health services; professional and business services; government; and retail trade. The top employers in the area include Virtua Health, McGuire-Dix Air Force Base, Cooper Health System, and TD Bank Corp. According to the U.S BLS, as of December 2021 the unemployment rate was 4.1 percent.

The Delaware portion of the CSA consists of Kent and New Castle Counties. The area's strengths include low business costs, a healthy business climate, valuable financial services jobs, and stability from Dover Air Force Base and state government employment. The state recently passed a capital infrastructure bill which should lead to an increase in construction payrolls. Housing inventories in the Dover area are low with homes often selling above asking price, however, the housing market is expected to slow with rising interest rates. In the Wilmington area, house price appreciation will outpace the U.S. rate and while demand will soften as mortgage rates rise, above-average population growth in the Wilmington area will maintain upward pressure on prices. Major employment industries include government, education and health, professional and business services, and financial services. Major employers include Christiana Care Health Systems, JP Morgan Chase, Bank of America, and Dover Air Force Base. According to the U.S BLS, as of December 2021 the unemployment rate was 4.2 percent.

Community Contacts

A review was conducted of 10 community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on areas such as affordable housing, workforce development, small business financing and support, and financial capability. Several contacts noted the challenges faced by individuals as well as small businesses during the COVID-19 pandemic. Restaurants, childcare facilities, and healthcare focused businesses struggled. Many businesses had to get innovative or

change their business model to keep their doors open (restaurants shifting to delivery or outdoor dining for example). Many professional services employees are still working from home or are only coming into the office a few days a week. This has impacted service industry employees who have fewer customers to serve and as a result are seeing their work hours and thus income reduced. Contacts noted that during the pandemic many small and minority-owned businesses were not able to access PPP loans which might have helped sustain their businesses. Contacts also noted how gentrification in certain communities was leading to increased housing costs for LMI households as well as rents for small business owners. Many small businesses do not own the space from which their businesses operate and when their leases come up for renewal, landlords are increasing the rent to levels that are unaffordable to existing tenants. Contacts noted that there has been an increase in the number of micro and small businesses as individuals look for new income sources. These entities need technical assistance as well as start-up capital. Contacts noted that housing values are increasing in many communities yet consumers with credit challenges were not able to take advantage of record low interest rates to refinance. Foreclosures are still an issue in some New Jersey communities. Other needs identified include:

- Foreclosure prevention and eviction support services
- Flexible mortgage products for first time homebuyers
- Home rehabilitation loans, particularly for low and moderate-income senior homeowners
- Affordable housing (both rental and owner-occupied)
- Funding for housing counseling, budgeting, and credit counseling programs
- Equity capital for small businesses
- Start-up capital and funding for early-stage companies
- Unrestricted grant funding for non-profit organizations

The area was served by numerous non-profit organizations, community-based organizations, CDFIs, loans funds, economic development organizations, and community development organizations that provided opportunities to help meet community needs.

Scope of Evaluation in the Philadelphia CSA

The Philadelphia CSA received a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PHILADELPHIA CSA

LENDING TEST

The bank's performance under the Lending Test in the Philadelphia CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Philadelphia CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Philadelphia CSA	33,634	18,427	137	52,198

Dollar Volume of Loans (\$000s)				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Philadelphia CSA	\$7,234,249	\$1,130,651	\$555,644	\$8,920,544

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 3.4 percent. The bank ranked eighth among 104 depository financial institutions placing it in the top 8 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 4.1 percent based on the number of home mortgage loans originated or purchased. The bank ranked third among 902 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three other lenders with a combined market share of 14.5 percent were Rocket Mortgage (6.3 percent), Wells Fargo Bank, N.A. (5.4 percent), and PennyMac Loan Services, LLC (2.8 percent).

According to peer small business data for 2020, the bank had a market share of 5.6 percent based on the number of small loans to businesses originated or purchased. The bank ranked fifth out of 331 small business lenders, which placed it in the top 2 percent of lenders. The top three lenders with a combined market share of 30.2 percent were American Express National Bank (15.6 percent), Wells Fargo Bank, N.A. (7.3 percent), and TD Bank, N.A. (7.3 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. For this analysis, examiners compared the bank's HMDA and small loans to businesses lending with available demographic information and aggregate lending data. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied homes in those geographies and was below the aggregate distribution of loans. The percentage of home mortgage loans in those geographies was below the percentage of owner-occupied homes in moderate-income geographies and was near to the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the Philadelphia CSA section of 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in both low- and moderate-income geographies was near to the percentage of businesses in those geographies and exceeded the aggregate distribution of loans.

Lending Gap Analysis

Examiners did not identify any conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of loans. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of 7.2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 137 CD loans totaling \$555.6 million, which represented 23.8 percent of the allocated tier 1 capital. CD loans primarily supported affordable housing and economic development. By dollar volume, 36.8

percent of these loans funded affordable housing, 35.1 percent funded economic development, 23.7 percent funded revitalization and stabilization efforts, and 4.4 percent funded community services targeted to LMI individuals.

Examples of CD loans include:

- CBNA originated a \$16.3 million loan to support construction of 96 new units of affordable housing for LMI seniors. Six of the units were reserved for tenants at or below 20 percent of AMI, three units for tenants at or below 30 percent AMI, 32 units for tenants at or below 50 percent AMI, and 55 units for tenants at or below 60 percent AMI. The project also used both 4 percent and 9 percent LIHTCs.
- CBNA originated a \$14.6 million loan to rehabilitate and preserve two historic factory buildings into mixed-income housing. The loan created 71 housing units, 59 of which were targeted for families and/or individuals earning at or below 60 percent AMI. Four units were targeted to families or individual earning less than 20 percent AMI, 32 units to families or individuals earning less than 50 percent AMI, and 23 units to families or individual earning less than 60 percent AMI. The remaining 12 units were at market rents.
- CBNA originated a \$9.5 million construction loan to create 68 units of affordable senior housing. Five of the units were for tenants at or below 20 percent AMI, four units for tenants at or below 30 percent AMI, 25 units for tenants at or below 50 percent AMI, and 34 units for tenants at or below 60 percent AMI. Additionally, CBNA made a \$12.7 million LIHTC equity investment in the project.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 7,583 loans under flexible lending programs in the AA totaling \$1.8 billion. Program volumes included 346 DHM loans totaling \$76.4 million, 300 FHA loans totaling \$63.1 million, 6,516 FNMA loans totaling \$1.6 billion, 235 FNMA Home Ready loans totaling \$45.1 million, 56 GoalBuilder HELOCs totaling \$1.1 million, 30 No Cost/Low-Cost refinance loans totaling \$2 million, and 100 VA loans totaling \$28.3 million.

The bank provided 287 CCA down payment grants totaling \$781,600 within the AA.

INVESTMENT TEST

The institution's performance under the Investment Test in the Philadelphia CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Philadelphia CSA was excellent.

Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Philadelphia CSA	174	80,241	232	156,822	406	100	237,063	100	14	100,565

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 232 investments totaling \$156.8 million during the evaluation period, which included 187 qualifying grants and donations totaling \$3.9 million to approximately 84 organizations. The dollar volume of current- and prior- period investments represented 10.2 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 97.5 percent of investments supported affordable housing, 1.1 percent funded community services to LMI individuals, and 1.4 percent supported economic development. The institution made significant use of innovative and/or complex investments to support CD initiatives. CBNA made 14 LIHTC investments in the current period totaling \$138.5 million, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- A \$10 million investment in a multi-investor LIHTC fund to support a 60-unit LIHTC project in Kennett Square, PA addressing an identified need for affordable rental housing in the CSA.
- A \$17.9 million investment in a two-part LIHTC in Woodlyn, PA to provide new construction units for affordable senior housing. The project includes 39-units being financed with a 9 percent tax credit and 57 senior units being financed with a 4 percent tax credit. It is a complex investment which includes debt and equity components.
- Grants totaling \$150,000 to a local organization that alleviates the root cause of poverty by preparing at-risk youth to enter the workforce. This grant funded a citywide effort to address skill gaps in low- and moderate-income young people.

SERVICE TEST

The bank's performance under the Service Test in the Philadelphia CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Philadelphia CSA was excellent.

Retail Banking Services

Distribution of Branch Delivery System													
Assessment Area	Deposits		Branches						Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Philadelphia CSA	100.0	166	100.0	4.8	15.7	42.2	37.4	0.0	7.5	21.9	39.6	30.7	0.3

Totals may not equal 100.0 percent due to rounding.
NA stands for not available.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA. CBNA's distribution of branches in low-income geographies was below, and in moderate-income geographies was near to, the percentage of the population living within those geographies. Examiners gave positive consideration for 22 MUI branches located within one-quarter mile of a LMI geography, where the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AA.

CBNA had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. CBNA had 276 ATMs in the AA, 261 of which were deposit-taking. CBNA provided data that indicated 60.1 percent of households in low-income geographies, and 63.4 percent of households in moderate-income geographies used OLB and mobile banking services in the fourth quarter of 2021. This was an increase of 28.5 percent for households in low-income geographies, and an increase of 18.9 percent for households in moderate-income geographies, from the start of the evaluation period. ADS usage had a positive impact on the Service Test rating.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Philadelphia CSA	7	23	0	-3	-8	-5	0

NA stands for not available.

The bank's opening and closing of branches has not adversely affected accessibility of its delivery systems in LMI geographies and/or to LMI individuals. During the evaluation period, the bank closed 23 branches, two of which were in low-income geographies and five of which were in moderate-income geographies. The branch closures were a result of network optimization. CBNA also opened seven branches during the evaluation period, two of which were in low-income geographies and two of which were in moderate-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. CBNA maintained standard business hours and offered traditional banking products for all traditional branch locations in the AA. CBNA generally maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday-Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for all 121 traditional standalone branches in the AA. Of these, three branches did not offer hours on Saturdays, one of which was in a LMI geography. The 40 in-store branch locations and two limited-service branches kept standard hours of 10:00 a.m. 5:00 p.m. Monday-Friday and Saturdays from 10:00 a.m. to 3:00 p.m. CBNA also has three special purpose branches within the AA that have varying hours and are not open on Saturdays. CBNA generally made all services available at all branches with the exception of safe deposit boxes

which were not available at 50 percent of branches in the AA, and night deposit services which were not available at 25.7 percent of branches in the AA.

Community Development Services

The bank was a leader in providing CD services.

CBNA employees provided 1,291 qualified CD service activities to approximately 120 organizations with 4,236 qualified hours within this AA during the evaluation period. Leadership was evident through board or committee participation in 157 of these activities with 27 employees providing 570 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with financial education for LMI individuals and families and through small business technical assistance.

Service activity examples during the evaluation period include:

- CBNA employees supported and participated in a variety of financial education initiatives. Over the evaluation period, CBNA provided 553 instances of its financial literacy program Money Smart to 80 organizations throughout the AA by conducting financial education workshops benefiting over 11,000 LMI individuals.
- Two employees provided 49 service hours during the evaluation period by serving on the board of a nonprofit that provides assistance to small businesses and CD projects. The nonprofit is required to provide at least 60 percent of its lending and technical assistance activity to underserved populations. The nonprofit defines underserved populations as those that include women and minority led companies; low-income borrowers; businesses and other organizations that serve low-income populations; or businesses and organizations located in low-income communities.

Multistate Metropolitan Statistical Area Rating

Youngstown-Warren, OH-PA (Youngstown) CSA

CRA rating for the Youngstown CSA⁶: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was adequate and borrower distribution of lending was excellent.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's retail delivery services were reasonably accessible to geographies and individuals of different incomes and the bank provided an adequate level of CD services.

Description of Institution's Operations in the Youngstown CSA

The bank's AA delineations within this area expanded into Pennsylvania with the merger of CBP on January 2, 2019, and created the multistate rating area for the bank. CBNA delineated two AAs in the Youngstown-Warren, OH-PA (Youngstown) CSA. These AAs consisted of geographies in Ohio and Pennsylvania and included the entire Youngstown-Warren-Boardman, OH-PA MSA and one non-MSA county in Ohio. The OCC combined these bank-delineated AAs into a single AA (Youngstown CSA) for analysis and presentation purposes. Refer to appendix A for the list of counties reviewed.

The Youngstown CSA was CBNA's 12th largest rating area based on deposits.

CBNA had \$376 million in deposits in the Youngstown CSA, representing 0.3 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated five branches and eight ATMs, all of which were deposit-taking, within the rating area, representing 0.5 percent of total branches and 0.5 percent of total ATMs. The bank originated and purchased approximately \$186 million in home mortgage and small business loans within the Youngstown CSA representing 0.4 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 19 FDIC-insured institutions operating 176 branches in the AA. Citizens ranked eighth in deposit market share with 2.5 percent. The top three banks by deposit market share are The Huntington National Bank with 26.9 percent; Premier Bank with 13 percent; and The Farmers National Bank of Canfield with 13 percent. In addition to FDIC-insured institutions, this area was served by several credit unions, mortgage lenders and brokers, and money service businesses.

⁶ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

The following table provides a summary of the demographics, including housing, business, and economic information for the Youngstown CSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Youngstown CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	179	12.3	19.0	49.7	19.0	0.0
Population by Geography	662,230	7.3	14.2	55.1	23.4	0.0
Housing Units by Geography	305,573	7.9	15.3	54.3	22.5	0.0
Owner-Occupied Units by Geography	191,735	4.3	11.5	57.6	26.6	0.0
Occupied Rental Units by Geography	80,516	12.4	21.9	49.8	15.9	0.0
Vacant Units by Geography	33,322	17.6	21.4	46.3	14.6	0.0
Businesses by Geography	40,527	6.9	11.6	49.4	32.2	0.0
Farms by Geography	1,719	1.8	5.4	62.9	29.8	0.0
Family Distribution by Income Level	175,118	20.5	18.5	20.8	40.2	0.0
Household Distribution by Income Level	272,251	23.9	16.2	18.1	41.8	0.0
Median Family Income MSA - 49660 Youngstown-Warren-Boardman, OH-PA MSA		\$55,174	Median Housing Value			\$99,189
Median Family Income Non-MSAs - OH		\$55,785	Median Gross Rent			\$627
			Families Below Poverty Level			12.4%
<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 OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The weighted average median family income for the Youngstown CSA was \$55,256. Based on this information, low-income families earned less than \$27,628 and moderate-income families earned less than \$44,204. The median housing value in the AA was \$99,189 while the NAR median sales price of a single-family home was \$102,600 in calendar year 2019 and increased to \$136,400 in the fourth quarter of 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$690 for a low-income borrower and \$1,105 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$532. Housing was generally affordable to low- and moderate-income borrowers in the Youngstown CSA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Youngstown CSA, the overall household poverty level was 12.4 percent.

Economic Data

According to Moody’s Analytics, Youngstown’s economy is struggling. The area relies heavily on manufacturing which creates greater exposure to job losses. In addition, the population in the area has been declining for decades and educational attainment is low with the percentage of residents with a bachelor’s degree almost a third less than the national average. The area’s strengths include a large healthcare industry and a highly affordable and undervalued housing market. More than 20 percent of the local population is 65 or older, with that number expected to increase to 25 percent of the population by 2024. This aging demographic will drive the need for healthcare services. Manufacturing also plays a significant role in the area’s economy. The share of jobs in the steel industry is 20 times that of the U.S. and the industry is a key source of high-wage jobs. Major industries include education and health services, government, retail trade, and manufacturing. Major employers in the area include Mercy Health, Windsor House, Youngstown Air Reserve Station, Steward Valley Care Health System, and Youngstown State University. According to the U.S. BLS as of December 2021, the unemployment rate in the area was 4.5 percent.

Community Contacts

A review was conducted of four community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on areas such as community and economic development, affordable housing, and social service needs. Contacts noted that the Mahoning County area has one of the highest rates of children living in poverty in the state and many families remain in a cycle of generational poverty. There is a need for jobs that pay a living wage. Low-income households are struggling and have difficulties meeting basic living expenses; however, their incomes are just above qualifying thresholds for government subsidy programs. Many households suffer from food insecurity due to high grocery prices or lack of access to grocery stores with quality affordable food. There is a need for support for emergency food pantries. In the Mercer County portion of the AA, it was noted that many industries are still trying to recover from the COVID-19 pandemic with the hardest hit industries being agriculture, retail, hospitality, and manufacturing. The area is experiencing economic decline due to an aging population and a younger population that is moving out of the area. With the aging population there is a need for affordable elder housing as well as access to rehabilitation loans for elderly homeowners looking to age in place. Other identified needs in the area include:

- Affordable quality rental housing and housing for purchase
- Transitional housing for returning citizens
- Access to reliable transportation
- Access to affordable healthcare services
- Affordable childcare
- Low-cost home rehabilitation loans
- General operating support for community-based and non-profit organizations
- Volunteers to provide financial education and support Volunteer Income Tax Assistance (VITA) programs

The area was served by several non-profit organizations, community-based organizations, economic development organizations, and social service organizations that provide opportunities to help meet community needs.

Scope of Evaluation in the Youngstown CSA

The Youngstown CSA received a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE YOUNGSTOWN CSA

LENDING TEST

The bank's performance under the Lending Test in the Youngstown CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Youngstown CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Youngstown CSA	1,347	594	2	1,943

Dollar Volume of Loans (\$000s)				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Youngstown CSA	152,789	33,422	6,509	192,720

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 2.5 percent. The bank ranked eighth among 19 depository financial institutions placing it in the top 43 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 2.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked 11th among 388 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top three lenders with a combined market share of 27.1 percent were The Huntington National Bank (11.9 percent), Seven Seventeen Credit Union (7.7 percent), and Rocket Mortgage (7.5 percent).

According to peer small business data for 2020, the bank had a market share of 2.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked 12th out of 125 small business lenders, which placed it in the top 10 percent of lenders. The top three lenders with a combined market share of 34 percent were The Huntington National Bank (14.8 percent), First National Bank of Pennsylvania (9.6 percent), and Farmers National Bank (9.6 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. For this analysis, examiners compared the bank's HMDA and small loans to businesses lending with available demographic information and aggregate lending data. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was poor.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied homes in those geographies but was near to the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied homes in those geographies but was near to the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the Youngstown CSA section of 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in both low- and moderate-income geographies exceeded both the percentage of businesses and the aggregate distribution of loans in those geographies.

Lending Gap Analysis

Examiners did not identify any conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was near to the percentage of low-income families but exceeded the aggregate distribution of loans. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the Youngstown CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 4.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank’s percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution’s level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made two CD loans totaling \$6.5 million, which represented 15.6 percent of the allocated tier 1 capital. Both loans funded economic development activities as they were PPP loans that assisted small businesses that were adversely impacted by the COVID-19 pandemic.

Product Innovation and Flexibility

The bank made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 292 loans under flexible lending programs in the AA totaling \$33.8 million. Program volumes included three DHM loans totaling \$232,052, 18 FHA loans totaling \$2.1 million, 243 FNMA loans totaling \$29.3 million, 15 FNMA Home Ready loans totaling \$1.2 million, four GoalBuilder HELOC loans totaling \$57,000, two No Cost/Low-Cost Refinance Mortgage loans totaling \$166,626, and seven VA loans totaling \$801,471.

The bank provided nine CCA down payment grants totaling \$18,300 within the AA.

INVESTMENT TEST

The institution’s performance under the Investment Test in the Youngstown CSA is rated Outstanding.

Based on a full-scope review, the bank’s performance in the Youngstown CSA was excellent.

Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Youngstown CSA	11	666	17	4,196	28	100	4,862	100	1	2,690

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 17 investments totaling \$4.2 million during the evaluation period, which included 10 qualifying grants and donations totaling \$82,000 to approximately five organizations. The dollar volume of current- and prior- period investments represented 11.6 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 98.1 percent of investments supported affordable housing, 1.6 percent funded community services to LMI individuals, and 0.3 percent supported economic development. The institution occasionally used innovative or complex investments to support CD initiatives. CBNA made one LIHTC investment in the current period, totaling \$3.1 million, which is generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- CBNA invested \$3.1 million with a multi-investor LIHTC fund for a 123-unit project in Sharon, PA, addressing an identified need for affordable rental housing in the CSA.
- A \$30,000 investment in a community service agency to improve living conditions in the CSA through neighborhood stabilization, economic development, and planning. At least 85 percent of the individuals served by the investment are LMI individuals.
- A \$30,000 investment in a community service agency to support ending hunger in the CSA. The programs support programs for LMI seniors, children, and families in the CSA.

SERVICE TEST

The bank’s performance under the Service Test in the Youngstown CSA is rated Low Satisfactory.

Based on a full-scope review, the bank’s performance in the Youngstown CSA was adequate.

Retail Banking Services

Distribution of Branch Delivery System													
Assessment Area	Deposits			Branches					Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Youngstown CSA	100.0	5	100.0	0.0	0.0	40.0	60.0	0.0	7.3	14.2	55.1	23.4	0.0

Totals may not equal 100.0 percent due to rounding.
NA stands for not available.

Delivery systems were reasonably accessible to portions of the AA, particularly LMI geographies and/or LMI individuals. CBNA’s did not have any branches in either low- or moderate-income geographies. Examiners gave positive consideration since all five branches were located within one-quarter mile of a LMI geography and the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AAs.

CBNA had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. CBNA had eight ATMs in the AA, all of which were deposit-taking. CBNA provided data that indicated 66.5 percent of households in low-income geographies and 64.6 percent of households in moderate-income

geographies used ADS in the fourth quarter of 2021. This was an increase of 33.8 percent for low-income geographies and an increase of 18.2 percent for moderate-income geographies. ADS usage had a positive impact on the Service Test rating.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Youngstown CSA	0	3	0	0	-3	0	0

NA stands for not available.

The institution’s opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. There were no openings or closings in LMI geographies. CBNA closed three branches in middle-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. CBNA maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. CBNA generally maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday-Friday, and Saturdays from 9:00 a.m. to 12:00 p.m. One branch was closed on Saturday.

Community Development Services

The bank provided an adequate level of CD services.

CBNA employees provided 24 qualified CD service activities to four organizations totaling 91 hours within this AA during the evaluation period. Service activities were responsive to CD needs, particularly related to financial education. Leadership was evident through board or committee participation in 16 of these activities with two employees providing 70 service hours.

The following are examples of CD services provided in this AA:

- A bank employee served on the board of an organization that provides housing options for domestic violence victims as well as emergency housing for homelessness prevention, for a total of 10 hours of service during the evaluation period.
- Citizens delivered 14 financial education sessions that benefited 340 low- and moderate-income individuals during the evaluation period.

State Rating

State of Connecticut

CRA rating for the State of Connecticut⁷: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was adequate and borrower distribution of lending was good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's retail delivery services were accessible to geographies and individuals of different incomes and the bank was a leader in providing CD services.

Description of Institution's Operations in Connecticut

The bank delineated two AAs within the state of Connecticut, both of which formed a portion of the Hartford-East Hartford, CT CSA. These AAs consisted of a portion Hartford-East Hartford-Middletown, CT MSA and the entire Norwich-New London, CT MSA. The OCC combined these bank-delineated AAs into a single AA (Hartford CSA) for analysis and presentation purposes. Refer to appendix A for the list of counties reviewed.

The state of Connecticut was the bank's eighth largest rating area.

Hartford CSA

Citizens had \$2.2 billion in deposits in the Hartford CSA representing 1.4 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated 18 branches and 29 ATMs, all of which were deposit-taking, within the rating area, representing 1.9 percent of total branches and 1.7 percent of total ATMs. The bank originated and purchased approximately \$1.4 billion in home mortgage and small business loans within the Hartford CSA representing 2.7 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 32 FDIC-insured institutions operating 369 branches in the AA. Citizens ranked sixth in deposit market share with 3.5 percent. The top three banks by deposit market share are Bank of America, N.A. with 45.6 percent, People's United Bank, N.A. with 11.7

⁷ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

percent, and Webster Bank, N.A. with 8 percent. In addition to FDIC-insured institutions, this area was served by several credit unions, mortgage lenders and brokers, and money service businesses.

The following table provides a summary of the demographics, including housing, business, and economic information for the Hartford CSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Hartford CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	327	15.9	15.0	37.3	30.0	1.8
Population by Geography	1,335,293	13.4	14.5	38.7	32.9	0.4
Housing Units by Geography	570,873	13.9	14.9	39.9	31.4	0.0
Owner-Occupied Units by Geography	344,499	4.3	10.9	43.9	41.0	0.0
Occupied Rental Units by Geography	174,475	30.3	22.5	32.8	14.3	0.0
Vacant Units by Geography	51,899	22.1	16.1	36.7	25.0	0.0
Businesses by Geography	155,277	11.4	12.8	39.8	35.7	0.2
Farms by Geography	4,558	4.3	8.5	42.3	44.9	0.0
Family Distribution by Income Level	339,626	22.8	16.9	20.4	39.9	0.0
Household Distribution by Income Level	518,974	26.0	15.0	17.4	41.6	0.0
Median Family Income MSA - 25540 Hartford-East Hartford-Middletown, CT MSA		\$88,016	Median Housing Value			\$240,182
Median Family Income MSA - 35980 Norwich-New London, CT MSA		\$82,349	Median Gross Rent			\$1,011
			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 OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The weighted average median family income for the Hartford CSA was \$86,872. Based on information low-income families earned less than \$43,436 and moderate-income families earned less than \$69,497. The median housing value in the AA was \$240,182 while the NAR median sales price of a single-family home was \$237,300 in calendar year 2019 and increased to \$295,00 at the fourth quarter of 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$1,085 for a low-income borrower and \$1,737 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,289. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Hartford CSA, the overall household poverty level was 8 percent.

Economic Data

According to Moody’s Analytics, the Hartford area has a well-educated workforce and above-average wages; lower living and business costs than in Boston and New York and housing that is affordable. The area’s weaknesses include exposure to job losses in state government, negative net migration, and high energy costs. As the state capital, the area has an above-average reliance on government jobs. The number of recent retirements by state employees are nearly twice as high as in the previous three years due largely to a more stringent pension plan set to take effect in 2022. In addition, a tight labor market combined with high inflation has made it more challenging to recruit new workers for government jobs as people seek more lucrative employment in the private sector. The area has an above-average reliance on manufacturing bolstered by the presence of jet engine maker Pratt & Whitney. The area also has a significant financial service industry with the presence of several large insurance companies. House price appreciation remains elevated due to low inventory but is decelerating more rapidly than it is nationally as persistent out migration is curbing demand. Major employment industries include education and health services; government; and professional and business services. Major employers include Hartford Healthcare, Pratt & Whitney/United Technologies, University of Connecticut, and The Traveler Cos., Inc. According to the U.S. BLS as of December 2021 the unemployment rate was 4.1 percent.

Community Contacts

A review was conducted of five community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on areas such as community and economic development, affordable housing, social service needs, and local government. Contacts noted that it is difficult for smaller non-profits to obtain credit or get bankers to serve on their boards and there is a need for greater support of minority and women-owned businesses. The area has an aging housing stock, and many homeowners need energy assistance funding to both heat and weatherize their homes. Contacts noted that many low-income individuals need hands-on financial coaching and access to affordable bank accounts. Contacts would like to see more financial institutions participate in Bank On initiatives. Contacts also indicated that the area needs large-scale redevelopment projects to help spur economic growth and job creation. Other identified needs in the area include:

- Small Business Loans
- Employment Training
- Funding to support credit repair and credit building programs
- Financial Education
- Access to affordable bank accounts
- Access to affordable child-care services
- Access to affordable and reliable transportation options.

The area was served by several non-profit organizations, community-based organizations, economic development organizations, and social service organizations that provide opportunities to help meet community needs.

Scope of Evaluation in Connecticut

The Hartford CSA received a full-scope review. This was the bank’s only AA in the state of Connecticut.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CONNECTICUT

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Hartford CSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% of Rating Area Loans	% of Rating Area Deposits
Hartford CSA	5,787	2,700	23	8,510	100	100

Dollar Volume of Loans (\$000s)						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% of Rating Area Loans	% of Rating Area Deposits
Hartford CSA	1,217,508	158,407	54,511	1,430,426	100	100

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 3.5 percent. The bank ranked sixth among 32 depository financial institutions placing it in the top 19 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 3.5 percent based on the number of home mortgage loans originated or purchased. The bank ranked second among 540 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three competitors with a combined market share of 13.1 percent were Rocket Mortgage (7.2 percent), Liberty Bank (3 percent), and Wells Fargo Bank, N.A. (2.9 percent).

According to peer small business data for 2020, the bank had a market share of 3.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked ninth out of 188 small business lenders, which placed it in the top 5 percent of lenders. The top three lenders with a combined market share of 33.7 percent were American Express National Bank (12.6 percent), Webster Bank, NA (10.6 percent), and Bank of America, N.A. (10.5 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. For this analysis, examiners compared the bank's HMDA and small loans to businesses lending data with available demographic information and aggregate lending data. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in both low- and moderate-income geographies was below both the percentage of owner-occupied homes and the aggregate distribution of loans in those geographies.

Small Loans to Businesses

Refer to Table Q in the state of Connecticut section of 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in those geographies but approximated the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was well below both the percentage of businesses in those geographies and the aggregate distribution of loans.

Lending Gap Analysis

Examiners did not identify any conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of loans. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the state of Connecticut section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of 3.7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 23 CD loans totaling nearly \$54.5 million, which represented 22.6 percent of the allocated tier 1 capital. CD loans primarily supported economic development activities. By dollar volume, 3.4 percent of these loans funded affordable housing that provided 150 affordable housing units, 84.6 percent funded economic development, and 12 percent funded revitalization and stabilization efforts.

Examples of CD loans include:

- CBNA originated a \$6.5 million loan to a water purification and distribution plant to provide clean water to over 60 towns containing both LMI residents and LMI areas throughout the state of Connecticut. The loan meets identified needs in the CSA by supporting improvements to the area's essential infrastructure.
- CBNA originated a \$1.5 million bridge loan to support the rehabilitation of 150 affordable housing units in Hartford, CT. The funds were used to fully rehabilitate the units into safe and healthy standards.
- CBNA originated a \$226,400 loan to a CDFI that supports affordable housing initiatives in underserved communities. The loan will allow the non-profit to increase their impact in underserved communities and expand their reach.

Product Innovation and Flexibility

The bank made use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 1,026 loans under flexible lending programs in the AA totaling \$225.4 million. Program volumes included 18 DHM loans totaling \$3.4 million, 45 FHA loans totaling \$10.1 million, 894 FNMA loans totaling \$199.3 million, 47 FNMA Home Ready loans totaling \$8.1 million, one GoalBuilder HELOC loans totaling \$25,000, five No Cost/Low-Cost Refinance Mortgage loans totaling \$458,200, and 16 VA loans totaling \$4.1 million.

The bank provided 31 CCA down payment grants totaling \$171,000 within the AA.

INVESTMENT TEST

The bank's performance under the Investment Test in the State of Connecticut is rated Outstanding.

Based on a full-scope review, the bank's performance in the Hartford CSA was excellent.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Hartford CSA	41	35,253	50	25,897	91	100	61,150	100	5	13,795

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 50 investments totaling \$25.9 million during the evaluation period, which included 28 qualifying grants and donations totaling \$394,000 to approximately 12 organizations. The dollar volume of current- and prior- period investments represented 25.3 percent of allocated tier 1 capital.

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 98.5 percent of investments supported affordable housing, 0.5 percent funded community services to LMI individuals and 1 percent supported economic development. The bank made significant use of innovative and/or complex investments to support CD initiatives. CBNA made five LIHTCs investments in the current period totaling \$21.5 million, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- CBNA invested \$5.7 million in a 32-unit LIHTC project in the Asylum Hill neighborhood in Hartford, CT addressing an identified need for affordable rental housing in the CSA.
- CBNA invested \$6.9 million in a multi-investor LIHTC fund for a 121-unit affordable housing project in New London, CT, addressing an identified need for affordable rental housing.
- CBNA invested \$100,000 in an economic development fund. The fund's mission is to strengthen neighborhood economies by providing flexible financing and technical support to businesses, community organizations, and community initiatives.

SERVICE TEST

The bank's performance under the Service Test in Connecticut is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Hartford CSA was good.

Retail Banking Services

Distribution of Branch Delivery Systems													
Assessment Area	Deposits % of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Branches					Population				
				Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Hartford CSA	100.0	18	100.0	11.1	5.6	38.9	44.4	0.0	13.4	14.6	38.7	32.9	0.4

Totals may not equal 100.0 percent due to rounding.

NA stands for not available.

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. CBNA's distribution of branches in low-income geographies was near-to, and in moderate-income geographies was well below, the percentage of the population living within those geographies.

CBNA had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. CBNA had 29 ATMs in the AA, all of which were deposit-taking. CBNA provided data that indicated 65.9 percent of households in low-income geographies and 63.1 percent of households in moderate-income geographies used OLB and mobile banking services in the fourth quarter of 2021. This was an increase of 22.7 percent for households in low-income geographies and 25.2 percent for households in moderate-income geographies from the start of the evaluation period. ADS usage had a positive impact on the Service Test rating.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Hartford CSA	1	5	-1	0	-3	0	0

NA stands for not available.

The institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank closed five branches. Two branches were closed in low-income geographies due to network optimization and one was opened in a low-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AA, particularly LMI geographies and/or individuals. CBNA maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday-Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for all 10 traditional standalone branches in the AA. CBNA made all services available at all branches with the exception of safe deposit boxes which were not available at 30 percent of the branches in the AA and one branch did not offer night deposit services.

Community Development Services

The institution provided an adequate level of CD services.

CBNA employees provided 443 hours of service to 13 CD organizations. During the evaluation period, service activities were responsive to CD needs, particularly related to financial literacy, income tax return preparation and job training programs targeting LMI individuals. Other services involved leadership, where three employees served on the board of five local non-profit organizations.

Service activity examples during the evaluation period include:

- An employee served on the board of an organization providing meals to those in poverty living in the community, for a total of 54 hours of service during the evaluation period.
- Bank employees provided 96 hours of financial literacy education to local programs targeting LMI families. This included 46 financial education sessions that benefited 594 individuals.

State Rating

State of Delaware

CRA rating for the State of Delaware⁸: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic and borrower distributions of lending were good.
- The bank originated few, if any, CD loans.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's retail delivery services were accessible to geographies and individuals of different incomes, but the bank provided few, if any, CD services.

Description of Institution's Operations in Delaware

The bank delineated one AA in the state of Delaware that included a portion of the Salisbury, DE MSA. Refer to appendix A for the list of counties reviewed.

The state of Delaware was the bank's smallest rating area based on deposits.

Salisbury MSA

Citizens had \$263 million in deposits in the Salisbury MSA, representing 0.2 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated two branches and five ATMs, all of which were deposit taking, within the rating area, representing 0.2 percent of total branches and 0.3 percent of total ATMs. The bank originated and purchased approximately \$366 million in home mortgage and small business loans within the Salisbury MSA, representing 0.5 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 18 FDIC-insured institutions operating 68 branches in the AA. Citizens ranked eighth in deposit market share with 0.3 percent. Discover Bank is the significant market leader with 93 percent of area deposits. Rounding out the top three institutions are, Manufacturers and Traders Trust Company with 1.6 percent market share, and PNC Bank, N.A. with 1.5 percent market share. In addition to FDIC-insured institutions, this area is served by several credit unions, mortgage lenders and brokers, and money service businesses.

⁸ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

The following table provides a summary of the demographics, including housing, business, and economic information for the Salisbury MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Salisbury MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	54	0.0	9.3	64.8	24.1	1.9
Population by Geography	207,302	0.0	10.1	76.4	13.5	0.0
Housing Units by Geography	127,680	0.0	6.5	65.1	28.4	0.0
Owner-Occupied Units by Geography	62,989	0.0	6.5	77.0	16.4	0.0
Occupied Rental Units by Geography	18,194	0.0	16.2	69.1	14.7	0.0
Vacant Units by Geography	46,497	0.0	2.5	47.5	50.0	0.0
Businesses by Geography	17,572	0.0	8.4	71.0	20.6	0.0
Farms by Geography	918	0.0	7.3	82.6	10.1	0.0
Family Distribution by Income Level	55,052	20.1	18.2	21.2	40.4	0.0
Household Distribution by Income Level	81,183	22.0	16.8	18.7	42.4	0.0
Median Family Income MSA - 41540 Salisbury, MD-DE MSA		\$63,091	Median Housing Value			\$300,388
			Median Gross Rent			\$971
			Families Below Poverty Level			8.8%
<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 OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on information in the above table, low-income families earned less than \$31,545 and moderate-income families earned less than \$50,472. The median housing value in the AA was \$300,388. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$788 for a low-income borrower and \$1,261 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,613. Low- and moderate-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Salisbury MSA, the overall household poverty level was 8.8 percent.

Economic Data

According to Moody's Analytics, the Salisbury area's strengths include a low cost of living for the northeast, popularity among tourists and retirees, and a single-family housing market that is undervalued. The area's weaknesses include a heavy reliance on tourism and consumer-facing industries; below-average per capita income; and very few high-wage jobs. The area has one of the highest concentrations of leisure and hospitality jobs in the U.S. and the second highest in the Northeast due to its beaches and central location on the east coast.

The area's share of food manufacturing jobs is among the highest in the country because of processors locating near the large cluster of chicken farms near the Delmarva Peninsula. Job growth in healthcare is accelerating because of the large and growing number of residents over age 65. Major employment industries include leisure and hospitality, education and health services, government, and retail trade. Major employers in the area include Peninsula Regional Medical Center, Beebe Medical Center, Salisbury University, Perdue Farms, and Walmart. According to the U.S. BLS as of December 2021 the unemployment rate in the area was 5.1 percent.

Community Contacts

A review was conducted of two community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on affordable housing and economic development/small business. Contacts noted that the western portion of Sussex County is agricultural, while the economy in the eastern portion of the county is driven by the service industry and tourism due to its many beaches. Affordable housing is more accessible in the western portion of the county so many lower-wage workers will live in this portion of the county and commute to the eastern portion of the county for work. However, high transportation and commuting costs make it challenging for workers to meet basic living expenses since the jobs are low wage. Access to affordable housing is an increasing need because of the booming tourism economy that attracts both tourists and seasonal workers. Access to affordable rental housing is also an issue. Contacts also noted that many businesses focused on the hospitality and retail service industries permanently closed during the pandemic which left many people out of work and struggling financially. Other identified needs in the area include:

- Affordable rental and owner-occupied housing
- Grant funding to support small businesses
- Access to capital for small businesses

The area was served by several non-profit organizations, community-based organizations, economic development organizations, and social service organizations that provide opportunities to help meet community needs.

Scope of Evaluation in Delaware

The Salisbury MSA received a full-scope review. This was the bank's only AA in the state of Delaware.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DELAWARE

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salisbury MSA was good.

Lending Activity

Lending levels reflected an excellent responsiveness to AA credit needs.

Number of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% of Rating Area Loans	% of Rating Area Deposits
Salisbury MSA	1,283	454	0	1,737	100	100

Dollar Volume of Loans (\$000s)						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% of Rating Area Loans	% of Rating Area Deposits
Salisbury MSA	345,961	20,564	0	366,525	100	100

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 0.3 percent. The bank ranked eighth among 18 depository financial institutions placing it in the top 45 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 2.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked eighth among 445 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders with a combined market share of 15.9 percent were Rocket Mortgage (6.6 percent), Wells Fargo Bank, N.A. (6.1 percent), and NVR Mortgage Finance, Inc. (3.2 percent).

According to peer small business data for 2020, the bank had a market share of 3.2 percent based on the number of small loans to businesses originated or purchased. The bank ranked 11th out of 103 small business lenders, which placed it in the top 11 percent of lenders. The top three lenders with a combined market share of 35 percent were American Express National Bank (13.9 percent), M&T Bank (12.5 percent), and PNC Bank, N.A. (8.6 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited good geographic distribution of loans in its AA. There were no low-income geographies in this AA, so the analysis focused on performance in the moderate-income geographies. For this analysis, examiners compared the bank's HMDA and small loans to businesses lending data with available demographic information and aggregate lending data. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in moderate-income geographies but exceeded the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the state of Delaware section of 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

The percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in moderate-income geographies but was near to the aggregate distribution of loans.

Lending Gap Analysis

Examiners did not identify any conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate distribution of loans. The percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families but exceeded the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the state of Delaware section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of 5.7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

Community Development Lending

The bank has made few, if any, CD Loans. CBNA did not originate any CD loans in the Salisbury MSA. This had a negative impact but did not result in a change to the overall High Satisfactory rating in the AA.

Product Innovation and Flexibility

The bank made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 325 loans under flexible lending programs in the AA totaling \$86.7 million. Program volumes included one DHM loan totaling \$305,550, five FHA loans totaling \$1.1 million, 314 FNMA loans totaling \$83.6 million, one FNMA Home Ready loans totaling \$241,000, and four VA loans totaling \$1.4 million.

INVESTMENT TEST

The institution's performance under the Investment Test in the State of Delaware is rated Outstanding.

Based on a full-scope review, the bank's performance in the Salisbury MSA was excellent.

Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investments, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Salisbury MSA	14	2,314	3	2,527	17	100	4,841	100	1	233

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made three investments totaling \$2.5 million during the evaluation period and no qualifying grants or donations. The dollar volume of current- and prior- period investments represented 16.6 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 100 percent of investments supported affordable housing. The institution occasionally uses innovative and/or complex investments to support CD initiatives. CBNA made one LIHTC investment in the current period, totaling \$2 million.

Examples of CD investments in the AA include:

- CBNA invested \$2 million in a multi-investor LIHTC fund in Georgetown, DE for a 123-unit affordable housing project addressing an identified need for affordable rental housing in the MSA.
- CBNA invested in a \$298,000 MBS within the Salisbury MSA to provide one-to-four family affordable housing for LMI families.

SERVICE TEST

The bank's performance under the Service Test in Delaware is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salisbury MSA was good.

Retail Banking Services

Distribution of Branch Delivery System														
Assessment Area	Deposits	Branches							Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	
Salisbury MSA	100.0	2	100.0	0.0	50.0	50.0	0.0	0.0	0.0	0.0	10.1	76.4	13.5	0.0

**Totals may not equal 100.0 percent due to rounding.

***NA stands for not available.

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA when considering the limited number of branches within the AA and the impact of ADS on accessibility. CBNA's distribution of branches in moderate-income geographies exceeded the percentage of the population living within that geography. There were no low-income geographies within the AA.

CBNA had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. CBNA had five ATMs in the AA, all of which were deposit-taking. Two of the ATMs are in moderate-income geographies. CBNA provided data that indicated 62.2 percent of households in moderate-income geographies used OLB and mobile banking services in the fourth quarter of 2021. This was an increase of 14.5 percent for households in moderate-income geographies, from the start of the evaluation period. ADS usage had a positive impact on the Service Test rating.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Salisbury MSA	0	2	0	0	-2	0	0

**NA stands for not available.

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank closed two branches, none of which were in LMI geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. CBNA maintained standard business hours from 9:00 a.m. to 4:00 p.m. Monday-Friday, and Saturdays from 9:00 a.m. to 12:00

p.m. and offered traditional banking products at the two branches in the AA. CBNA made all services available at both branches.

Community Development Services

The bank provides few, if any, CD services. CBNA did not provide any CD services in the Salisbury MSA during the evaluation period.

State Rating

State of Massachusetts

CRA rating for the State of Massachusetts⁹: Outstanding,

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was excellent, and the borrower distribution of lending was good.
- The bank was a leader in making CD Loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's retail delivery services were readily accessible to geographies and individuals of different incomes and the bank was a leader in providing CD services.

Description of Institution's Operations in Massachusetts

The bank delineated three AAs within the state of Massachusetts. They included the entire Springfield, MA MSA, the entire Pittsfield, MA MSA, and Nantucket County in the MA Non-MSA AA because of one deposit-taking ATM. Operations within other geographies delineated within Massachusetts are included in the analysis of the Boston CSA. Refer to appendix A for the list of counties reviewed.

The state of Massachusetts represented CBNA's 11th largest rating area based on deposits.

The bank had \$693.8 million in deposits, representing 0.5 percent of the bank's total domestic deposits as of June 30, 2021. CBNA operated 17 branches and 25 ATMs, of which 24 were deposit taking, in the rating area, representing 1.8 percent of total branches and 1.5 percent of total ATMs. The combined areas were served by 25 FDIC-insured banks operating 249 branches. CBNA ranked 14th with 2.6 percent market share. The top three banks and their market share were Berkshire Bank (12.6 percent), TD Bank, N.A. (12.6 percent), and Bank of America, N.A. (10.4 percent). During the evaluation period, the bank originated and purchased nearly \$743 million, or 1.4 percent of its total dollar volume of home mortgage loans and small loans to businesses in the combined areas.

⁹For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Springfield MSA

The Springfield MSA AA was comprised of Franklin, Hamden, and Hampshire Counties in Massachusetts.

Citizens had \$626.2 million in deposits in the Springfield MSA representing 0.4 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated 16 branches and 22 ATMs, of which 21 are deposit-taking, within the rating area, representing 1.7 percent of total branches and 1.3 percent of total ATMs. The bank originated and purchased approximately \$468.3 million in home mortgage and small business loans within the Springfield MSA during the evaluation period, representing 0.9 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 18 FDIC-insured institutions operating 196 branches in the AA. Citizens ranked 13th in deposit market share with 2.9 percent. The top three banks by deposit market share are Bank of America, N.A. with 12.8 percent, TD Bank, N.A. with 12.3 percent, and Peoples Bank with 11 percent. In addition to FDIC-insured institutions, this area was served by several credit unions, mortgage lenders and brokers, and money service businesses.

The following table provides a summary of the demographics, including housing, business, and economic information for the Springfield MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Springfield MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	157	15.9	15.3	33.1	33.1	2.5
Population by Geography	699,944	13.3	14.8	34.2	35.1	2.6
Housing Units by Geography	288,606	12.8	15.4	37.2	34.4	0.1
Owner-Occupied Units by Geography	168,524	4.3	12.0	38.7	45.0	0.0
Occupied Rental Units by Geography	97,209	26.4	20.4	35.1	17.9	0.3
Vacant Units by Geography	22,873	17.9	19.6	35.4	26.8	0.4
Businesses by Geography	51,398	12.9	14.4	33.0	39.0	0.7
Farms by Geography	1,833	2.6	5.7	39.0	52.8	0.0
Family Distribution by Income Level	167,860	24.2	16.1	18.5	41.2	0.0
Household Distribution by Income Level	265,733	26.9	14.7	15.9	42.4	0.0
Median Family Income MSA - 44140 Springfield, MA MSA		\$67,203	Median Housing Value			\$210,226
			Median Gross Rent			\$857
			Families Below Poverty Level			11.5%

*Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(* The NA category consists of geographies that have not been assigned an income classification.*

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. Based on information in the above table, low-income families earned less than \$33,601 and moderate-income families earned less than \$53,762. The median housing value in the AA is \$210,226 while the NAR median sales price of a single-family home was \$229,000 in calendar year 2019 and increased to \$290,600 at the fourth quarter of 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$840 for a low-income borrower and \$1,344 for a

moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,129. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Springfield MSA, the overall household poverty level was 11.5 percent.

Economic Data

According to Moody's Analytics, the Springfield area's strengths include affordable housing for New England, stability from a large healthcare presence, and below average employment volatility. However, the area is underrepresented in high tech, has persistent out-migration of skilled youth, and low labor force participation. The area's economy is behind the state of Massachusetts and national peers. The area has added jobs more slowly than the state and the nation as net hiring in healthcare and personal services has decelerated and finance and leisure/hospitality have shed jobs. The unemployment rate is dropping but is still higher than the state and the nation. The insurance industry, which has been a major employer in the area, has been in a long-term decline and employment has dropped by more than 30 percent since 2000 despite gains statewide and nationally. The area also has an outsize reliance on higher education as it is the home of many public and private colleges and universities, including the state's flagship public university UMass Amherst. The housing market is also under performing and house price gains are weaker than in Massachusetts as a whole and the nation. Major employment industries include education and healthcare, government, and retail trade. Major employers include Baystate Health, MassMutual Financial Group, Smith & Wesson, and General Dynamics Advanced Info Systems. According to the U.S. BLS, as of December 2021 the unemployment rate was 4.8 percent.

Community Contacts

A review was conducted of four community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on affordable housing, community development and economic development/small business. Contacts described the Franklin County portion of the AA as more rural, while Hampshire County could be considered more suburban and Hampden County the most populated. A high percentage of people in Hampden and Hampshire Counties live in poverty and are struggling. Springfield and Holyoke, which are in Hampden County have many extremely low-income households that struggle with high housing costs in relation to their income. Many households have issues with both housing insecurity as well as food insecurity. A large percentage of rental units in Springfield have some type of subsidy. The area has an older housing stock that needs repair. There is a need for low-cost funding for rehab assistance for homeowners. Contacts noted that many low-income and minority households do not have a banking relationship and that area financial institutions should consider partnering with local community organizations to help reach these individuals. Many local businesses are having difficulty attracting and retaining qualified skilled workers, which can hinder economic growth in the area. There is a need for workforce development training to help create a pool of qualified workers. Other identified needs include:

- Financial education and coaching for low-income housing
- Support for neighborhood revitalization efforts
- Safe, decent, and affordable rental housing
- Support for afterschool and youth programs

- Rehabilitation of foreclosed and vacant properties to reduce blight
- Small business lending programs that support job creation and business growth
- Access to credit for new businesses and businesses with lower credit scores

The area was served by several non-profit organizations, community-based organizations, community development entities, economic development organizations, and social service organizations that provide opportunities to help meet community needs.

Scope of Evaluation in Massachusetts

The Springfield MSA AA received a full-scope review. This AA accounted for 90 percent of the deposits and 63 percent of the bank's lending in the state during the evaluation period. The Pittsfield MSA and MA Non-MSA AAs received limited-scope reviews.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Springfield MSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Springfield MSA	2,606	1,053	4	3,663	87.0	90.2
Pittsfield MSA	190	94	0	284	6.7	9.8
MA Non-MSA	194	72	0	266	6.3	0.0
Total	2,990	1,219	4	4,213	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

Dollar Volume of Loans* (\$000s)						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Springfield MSA	416,721	51,619	5,875	474,215	63.3	90.2
Pittsfield MSA	42,225	4,325	0	46,550	6.2	9.8
MA Non-MSA	225,583	2,512	0	228,095	30.5	0.0
Total	684,529	58,456	5,875	748,860	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 2.9 percent. The bank ranked 13th among 18 depository financial institutions placing it in the top 73 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 3.8 percent based on the number of home mortgage loans originated or purchased. The bank ranked second among 413 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three competitors with a combined market share of 13.2 percent were Rocket Mortgage (6.9 percent), Polish National Credit Union (3.2 percent), and Freedom Mortgage Corporation (3.1 percent).

According to peer small business data for 2020, the bank had a market share of 3.2 percent based on the number of small loans to businesses originated or purchased. The bank ranked 11th out of 113 small business lenders, which placed it in the top 10 percent of lenders. The top three lenders with a combined market share of 31.1 percent were American Express National Bank (13.6 percent), Westfield Bank (10.8 percent), and Bank of America, N.A. (6.7 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA. For this analysis, examiners compared the bank's HMDA and small loans to businesses lending data with available demographic information and aggregate lending data. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the state of Massachusetts section of 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in both low- and moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans.

Lending Gap Analysis

Examiners did not identify any conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of loans. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the state of Massachusetts section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of 7.6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made four CD loans totaling nearly \$5.9 million, which represented 8.5 percent of the allocated tier 1 capital. CD loans primarily supported economic development activities. By dollar volume, 42.6 percent of CD loans funded affordable housing and 57.5 percent funded economic development.

Examples of CD loans include:

- CBNA originated a \$2.5 million loan to a non-profit organization to fund the creation of six units of affordable housing. The units are reserved for households with incomes at or below 80 percent of the AMI.

- CBNA originated a \$1.2 million PPP loan to a local power company to ensure employees received paychecks during the COVID-19 pandemic.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 1,024 loans under flexible lending programs in the AA totaling \$204.3 million. Program volumes included 64 DHM loans totaling \$12.3 million, 114 FHA loans totaling \$23.9 million, 548 FNMA loans totaling \$109.3 million, 61 FNMA Home Ready loans totaling \$17.8 million, nine GoalBuilder HELOC loans totaling \$183,150, 204 MHP loans totaling \$42.4 million, two No Cost/Low-Cost Refinance Mortgage loans totaling \$175,000, and 22 VA loans totaling \$5.3 million.

The bank provided 99 CCA down payment grants totaling \$160,800 within the AA.

Conclusions for Areas Receiving a Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Pittsfield MSA and MA Non-MSA AAs was weaker than the bank's overall performance under the Lending Test in the full-scope area. In the Pittsfield MSA, weaker performance was due to a lack of CD loans. In the MA Non-MSA AA, weaker performance was due to weaker borrower distribution and a lack of CD loans. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

Refer to Tables O through R in the state of Massachusetts section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the State of Massachusetts is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Springfield MSA was excellent.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Springfield CSA	11	25,104	19	6,927	30	76.9	32,031	91.2	3	3,503
Pittsfield MSA	6	1,683	3	1,424	9	23.1	3,107	8.8	1	835
MA Non-MSA	0	0	0	0	0	0	0	0	0	0
Total	17	26,787	22	8,351	39	100	35,138	100	4	4,338

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

** Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

*** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The bank made 19 investments totaling \$6.9 million during the evaluation period, which included 11 qualifying grants and donations totaling \$356,000 to five organizations. The dollar volume of current- and prior-period investments represented 46.1 percent of allocated tier 1 capital.

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 94.9 percent of investments supported affordable housing, 4.8 percent funded community services to LMI individuals, and 0.4 percent supported economic development. The bank occasionally used innovative and/or complex investments to support CD initiatives. CBNA made four LIHTC investments in the current period totaling \$5.4 million, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- CBNA invested \$4.0 million in a multi-investor LIHTC fund for a 329-unit project in Springfield, MA, addressing an identified need for affordable rental housing in the CSA. Upon completion 35 units will be rented to families earning up to 30 percent of the AMI, 289 units will be rented to families earning up to 60 percent of the AMI, and 22 units will be rented at market rate.
- CBNA invested \$412,000 in a multi-investor fund in Holyoke, MA for a 127-unit LIHTC project addressing an identified need for affordable rental housing.
- CBNA provided grants totaling \$170,000 to an organization that provides support to individuals entering the workforce and provides first-time homebuying seminars. The grants were earmarked for financial education in the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Pittsfield MSA was consistent with the bank's overall performance under the Investment Test in the full-scope area. Investment Test performance in the MA Non-MSA AA was weaker than the bank's overall performance under the Investment Test in the full-scope area due to a lower volume of qualified CD investments. Performance in the limited-scope areas had minimal effect on the overall Investment Test rating.

SERVICE TEST

The bank's performance under the Service Test in Massachusetts is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Springfield MSA was excellent.

Retail Banking Services

Distribution of Branch Delivery System*													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Springfield MSA	90.3	16	94.1	12.5	31.3	37.5	18.8	0.0	13.3	14.8	34.2	35.1	2.6
Pittsfield MSA	9.7	1	5.8	0.0	0.0	100	0.0	0.0	8.4	11.4	50.5	29.7	0.0
MA Non-MSA	0.0	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	72.7	27.3	0.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Totals may not equal 100.0 percent due to rounding.

NA stands for not available.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. CBNA's distribution of branches in low-income geographies was near-to the percentage of the population living within those geographies. CBNA's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners gave positive consideration for one MUI branch located within one-quarter mile of a LMI geography, where the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AA.

CBNA had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. CBNA had 22 ATMs in the AA, of which 21 were deposit-taking. CBNA provided data that indicated 70.6 percent of households in low-income geographies and 69.2 percent of households in moderate-income geographies used OLB and mobile banking services in the fourth quarter of 2021. This was an increase of 30.4 percent for households in low-income geographies, and 23.3 percent for households in moderate-income geographies, from the start of the evaluation period. ADS usage had a positive impact on the Service Test rating.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Springfield MSA	0	4	0	-2	-2	0	0
Pittsfield MSA	0	2	0	-1	0	-1	0
MA Non-MSA	0	0	0	0	0	0	0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

NA stands for not available.

The bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank did not open any branches and closed four branches. Two of the closed branches were located in moderate-income geographies. The branch closures were a result of network optimization.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AA, particularly LMI geographies and/or individuals. CBNA maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday-Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for the five standalone branches in the AA. CBNA maintained standard branch hours from 10:00 a.m. to 5:00

p.m. Monday-Friday and Saturdays from 10:00 a.m. to 3:00 p.m. for the 11 in-store branch locations. CBNA made all services available at all branches, with the exception of safe deposit boxes which we not available at all eleven in-store branch locations or 69 percent of the branches in the AA, and night deposit services which were not offered at one in-store branch location.

Community Development Services

The bank was a leader in providing CD services.

CBNA employees provided 615 hours of service to 13 CD organizations. During the evaluation period, service activities were responsive to CD needs, particularly related to technical assistance to financial literacy programs targeting LMI individuals. Other services involved leadership, where four employees served on the board of three local non-profit organizations. Service activity examples during the evaluation period include:

- An employee served on the board of an organization providing low-cost medical, dental, and pharmaceutical services in the AA, for a total of 170 hours of service during the evaluation period.
- Bank employees provided over 217 hours of financial literacy and education to local programs targeting LMI families. This included 55 financial education sessions that benefited 1,065 individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Pittsfield MSA AA was weaker than the bank's performance in the full-scope area due to weaker branch distribution. Evaluation under the Service Test in the MA non-MSA AA was not applicable as the bank did not operate any branches in the AA. Performance in the limited-scope areas had minimal effect on the overall Service Test rating.

State Rating

State of Michigan

CRA rating for the State of Michigan: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic and borrower distributions of lending were good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's retail delivery services were readily accessible to geographies and individuals of different incomes, and the bank was a leader in providing CD services.

Description of Institution's Operations in Michigan

CBNA delineated four AAs in Michigan. These AAs included a portion of the Detroit-Warren-Dearborn, MI MSA, the entire Ann Arbor MI MSA, a portion of the Lansing-East Lansing, MI MSA (Lansing MSA), and the entire Saginaw, MI MSA. The OCC combined the bank-delineated Detroit-Warren-Dearborn, MI MSA AA and the Ann Arbor MI MSA AA into the Detroit-Warren-Ann Arbor, MI CSA (Detroit CSA) for analysis and presentation purposes. Refer to appendix A for a list of the counties reviewed.

The state of Michigan was CBNA's sixth largest rating area based on deposits.

The bank had \$6.8 billion in deposits, representing 4.5 percent of the bank's total domestic deposits as of June 30, 2021. CBNA operated 70 branches and 116 ATMs, of which 102 were deposit-taking, in the rating area, representing 7.4 percent of total branches and 6.7 percent of total ATMs. The combined areas were served by 56 FDIC-insured banks operating 1,016 branches. CBNA ranked eighth with 3.1 percent market share. The top three banks and their market share were JPMorgan Chase Bank, N.A. (29.8 percent), Comerica Bank (16.6 percent), and Bank of America, N.A. (13.3 percent). During the evaluation period, the bank originated and purchased \$3.4 billion, or 6.7 percent of its total dollar volume of home mortgage loans and small loans to businesses in the combined areas.

Detroit CSA

The Detroit CSA AA contained four of the six counties comprising the Detroit-Warren-Dearborn, MI MSA and the entire Ann Arbor, MI MSA.

Citizens had \$6.7 billion deposits in the Detroit CSA representing 4.4 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated 68 branches and 112 ATMS, of which 98 were deposit-taking, within the rating area, representing 7.2 percent of total branches and 6.5 percent of total ATMs. The bank originated and purchased approximately \$3.4 billion in home mortgage and small business loans within the Detroit CSA during the evaluation period, representing 6.5 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 46 FDIC-insured institutions operating 903 branches in the AA. Citizens ranked eighth in deposit market share with 3.2 percent. The top three banks by deposit market share are JP Morgan Chase Bank, N.A. with 30.7 percent, Comerica Bank with 17.1 percent, and Bank of America, N.A. with 13.7 percent. In addition to FDIC-insured institutions, this area was served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following table provides a summary of the demographics, including housing, business, and economic information for the Detroit CSA.

Assessment Area: Detroit CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,327	13.9	24.0	31.0	28.8	2.2
Population by Geography	4,401,844	10.8	22.0	33.7	33.0	0.5
Housing Units by Geography	1,932,371	12.5	23.7	33.1	30.3	0.5
Owner-Occupied Units by Geography	1,155,379	6.2	18.2	36.6	38.9	0.1
Occupied Rental Units by Geography	548,811	19.8	30.6	30.2	18.5	0.9
Vacant Units by Geography	228,181	26.9	34.8	21.9	15.1	1.2
Businesses by Geography	380,426	7.8	19.3	31.1	40.7	1.0
Farms by Geography	8,078	5.2	15.7	42.1	36.6	0.3
Family Distribution by Income Level	1,092,901	22.7	16.4	18.7	42.2	0.0
Household Distribution by Income Level	1,704,190	25.1	15.4	16.7	42.8	0.0
Median Family Income MSA - 11460 Ann Arbor, MI MSA		\$87,331	Median Housing Value			\$135,491
Median Family Income MSA - 19804 Detroit-Dearborn-Livonia, MI		\$52,733	Median Gross Rent			\$881
Median Family Income MSA - 47664 Warren-Troy-Farmington Hills, MI		\$76,739	Families Below Poverty Level			12.6%
<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 OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The weighted average median family income for the Detroit CSA was \$66,484. Based on this information low-income families earned less than \$33,242 and moderate-income families earned less than \$53,187. The median housing value in the AA was \$135,491, while the NAR median sales price of a single-family home was \$195,800 in calendar year 2019 and increased to \$240,800 in the fourth of quarter 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$831 for a low-income borrower and \$1,329 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a

home at the AA median housing value would be \$727. Housing is generally affordable for low- and moderate-income borrowers in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Detroit CSA, the overall household poverty level was 12.6 percent.

Economic Data

According to Moody's Analytics, the Detroit area's strengths include a concentration of auto industry headquarters, production and research, and development; high housing affordability; and being well-positioned for growth in green and advanced manufacturing. However, the area struggles with below average quality of life, including a high crime rate and eroding infrastructure; a challenging fiscal situation in the city of Detroit; and persistent out-migration. Economic recovery in the area is inconsistent. Manufacturing accounts for an above-average share of jobs and nearly two-thirds of durable manufacturing payrolls are in transportation equipment production. The area is particularly vulnerable to global supply chain issues brought on by the COVID-19 pandemic, including the persistent chip shortage which impacts vehicle production. The healthcare industry is struggling largely due to labor shortages as nurses and other healthcare workers are quitting at record high rates. However, the demand for healthcare services continues to increase with the area having a larger than average population of residents aged 65 and above. The area continues to lose population and this out-migration in the area will be among the steepest in the nation in the coming years. Major employment industries include professional and business services, education and health services, and manufacturing. Major employers include General Motors Corp, Ford Motor Co., University of Michigan, Chrysler Group LLC, and Beaumont Health System. According to the U.S. BLS, as of December 2021 the unemployment rate was 4.2 percent.

Community Contacts

A review was conducted of five community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on affordable housing, economic development/small business, and social and community services. Contacts noted that many Detroit neighborhoods are underinvested. Homes do not appraise well resulting in high loan-to-value loans that increase loan costs for borrowers. Contacts noted that within the Washtenaw County portion of the AA many service workers reside in the eastern portion of the county, which is more affordable, and then commute for work. Ann Arbor is in the central portion of the county and has a growing job market and highly skilled workforce. The Oakland County portion of the AA saw economic conditions deteriorate during the pandemic. Unemployment increased and many businesses faced hiring difficulties due to safety concerns around COVID. Contacts noted numerous credit and community developments needs in the area including:

- Commercial real estate funding
- Workforce housing
- Small dollar loans for existing businesses
- Loans for small business start-ups
- Technical assistance and counseling for small businesses
- Workforce development training
- Funding to support general operations for non-profit organizations
- Grant funding to support housing rehab
- Access to safe affordable housing
- Access to reliable transportation

- Support for educational programing to assist people in obtaining high school diploma
- Emergency utility assistance

The area was served by several non-profit organizations, community-based organizations, community development entities, economic development organizations, and social service organizations that provide opportunities to help meet community needs.

Scope of Evaluation in Michigan

The Detroit CSA received a full-scope review. This area accounted for 98 percent of the deposits and 97 percent of the bank's lending in the state of Michigan during the evaluation period. The Lansing MSA and Saginaw MSA AAs received limited-scope reviews.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

LENDING TEST

The bank's performance under the Lending Test in Michigan is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Detroit CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Detroit CSA	16,195	9,215	34	25,444	96.6	98.0
Lansing MSA	435	156	0	591	2.2	1.1
Saginaw MSA	180	126	0	306	1.2	0.9
Total	16,810	9,497	34	26,341	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

Dollar Volume of Loans* (\$000s)						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	%Rating Area Loans	%Rating Area Deposits
Detroit CSA	2,815,438	537,589	95,315	3,448,342	97.5	98
Lansing MSA	57,593	7,779	0	65,372	1.8	1
Saginaw MSA	19,852	4,153	0	24,005	0.7	1
Total	2,892,883	549,521	95,315	3,537,719	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 3.2 percent. The bank ranked eighth among 46 depository financial institutions placing it in the top 18 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 2.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked sixth among 711 home mortgage lenders in the

AA, which placed it in the top 1 percent of lenders. The top three lenders with a combined market share of 30.6 percent were Rocket Mortgage (15.8 percent), United Wholesale Mortgage (10.9 percent), and JPMorgan Chase Bank, N.A. (3.9 percent).

According to peer small business data for 2020, the bank had a market share of 4.5 percent based on the number of small loans to businesses originated or purchased. The bank ranked seventh out of 254 small business lenders, which placed it in the top 3 percent of lenders. The top three lenders with a combined market share of 38 percent were JPMorgan Chase Bank, N.A. (15.1 percent), American Express National Bank (14.4 percent), and Bank of America, N.A. (8.5 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's HMDA and small loans to businesses lending data with available demographic information and aggregate lending data. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied homes in low-income geographies but exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in moderate-income geographies but exceeded the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the state of Michigan section of 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies approximated the percentage of businesses in low-income geographies and exceeded the aggregate distribution of loans. The bank's percentage of small loans to businesses in moderate-income geographies exceeded both the percentages of businesses in moderate-income geographies and the aggregate distribution of loans.

Lending Gap Analysis

Examiners did not identify any conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of loans. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of 7.7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 34 CD loans totaling nearly \$95.3 million, which represented 12.8 percent of the allocated tier 1 capital. CD loans were primarily made for economic development purposes. By dollar volume, 33.4 percent of these loans funded affordable housing, 64.7 percent funded economic development, and 1.9 percent funded revitalization and stabilization efforts.

Examples of CD loans include:

- CBNA originated a \$12.8 million loan for substantial renovations of a 198-unit senior affordable housing complex. Of the 198 units, 10 were reserved for tenants at or below 40 percent of the AMI, 50 units for tenants at or below 50 percent of AMI, and 138 units for tenants at or below 60 percent of the AMI. This

initiative met a significant need for senior citizens in the community and supported a local government's goal to preserve and create affordable housing. This project qualified for LIHTCs.

- CBNA originated a \$6.5 million loan to a nonprofit organization for the rehabilitation of 153 units of affordable housing in the AA, with 39 units having 15-year HUD vouchers. The organization seeks to connect affordable housing residents to resources in an effort to break generational poverty and other current social issues.
- CBNA originated a \$5 million economic development loan to support a local grocery store to expand its operation, refinance existing debt, and make physical improvements to its warehouse facility. The grocery store provides food and jobs to the surrounding LMI communities which were severely impacted by the COVID-19 pandemic and supply chain issues.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 4,670 loans under flexible lending programs in the AA totaling \$896.2 million. Program volumes included 38 DHM loans totaling \$5.9 million, 113 FHA loans totaling \$20.1 million, 4,267 FNMA loans totaling \$832.9 million, 151 FNMA Home Ready loans totaling \$22 million, 25 GoalBuilder HELOC loans totaling \$472,025, 11 No Cost/Low-Cost Refinance Mortgage loans totaling \$718,825, and 60 VA loans totaling \$14.2 million.

The bank provided 150 CCA down payment grants totaling \$685,200 within the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Lansing MSA and Saginaw MSA AAs was weaker than the bank's overall performance under the Lending Test in the full-scope area. In the Lansing MSA, weaker performance was due to the lack of CD lending. In the Saginaw MSA, weaker performance was due to weaker geographic distribution and lack of CD loans. Performance in the limited-scope areas had minimal effect on the overall Service Test rating.

Refer to Tables O through R in the state of Michigan section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in State of Michigan is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Detroit CSA was excellent.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Detroit CSA	78	40,680	96	65,118	174	92.1	105,798	92.5	6	35,985
Lansing MSA	2	6,404	6	1,014	8	4.2	7,418	6.5	1	428
Saginaw MSA	2	268	5	841	7	3.7	1,109	1.0	1	416
Total	84	47,352	107	67,080	189	100	114,325	100	8	36,829

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

** Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

*** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 96 investments totaling \$65.1 million during the evaluation period, which included 60 qualifying grants and donations totaling \$1.4 million to approximately 29 organizations. The dollar volume of current- and prior- period investments represented 14.2 percent of allocated tier 1 capital.

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 97.8 percent of investments supported affordable housing, 1.2 percent funded community services to LMI individuals and 1.0 percent supported economic development. The bank made occasional use of innovative and/or complex investments to support CD initiatives. CBNA made eight LIHTC investments in the current period totaling \$53.7 million, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- CBNA invested \$12.7 million in a multi-investor LIHTC fund in Detroit, MI for a new 44-unit construction project which will provide housing to the homeless population in the CSA, addressing an identified need for affordable rental housing. Upon completion all units will be reserved for households earning less than 60 percent of the AMI. The units are primarily targeted to chronically homeless individuals.
- CBNA invested in a \$12.9 million multi-investor fund for a 199-unit LIHTC project in the Cass Park Historic District of Detroit, MI, addressing an identified need for affordable rental housing.
- CBNA donated \$95,000 to a community service agency to support ending hunger in the CSA. The agency's programs provide support services for LMI seniors, children, and families in the CSA.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Lansing MSA and Saginaw MSA AAs was consistent with the bank's overall performance under the Investment Test in the full-scope area. Performance in the limited-scope areas supported the overall Investment Test rating.

SERVICE TEST

The bank's performance under the Service Test in Michigan is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Detroit CSA was excellent.

Retail Banking Services

Distribution of Branch Delivery System*													
Assessment Area	Deposits	# of Bank Branches	% of Rated Area Branches in AA	Branches					Population				
	% of Rated Area Deposits in AA			Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Detroit CSA	98.0	68	97.1	5.9	23.5	30.9	39.7	0.0	10.8	22.0	33.7	33.0	0.6
Lansing MSA	1.1	1	1.4	0.0	0.0	100.0	0.0	0.0	8.3	23.9	38.3	24.1	5.4
Saginaw MSA	1.0	1	1.4	0.0	0.0	100.0	0.0	0.0	11.2	12.5	50.5	25.8	0.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Totals may not equal 100.0 percent due to rounding.

NA stands for not available.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. CBNA's distribution of branches in low-income geographies was below, and in moderate-income geographies, exceeded, the percentage of the population living within those geographies. Examiners gave positive consideration for two MUI branches located within one-quarter mile of a LMI geography, where the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AA.

CBNA had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. CBNA had 112 ATMs in the AA, 98 of which were deposit-taking. CBNA provided data that indicated 65.8 percent of households in low-income geographies, and 66.6 percent of households in moderate-income geographies used OLB and mobile banking services in the fourth quarter of 2021. This was an increase of 28.1 percent for households in low-income geographies, and an increase of 20.1 percent for households in moderate-income geographies, from the start of the evaluation period. ADS usage had a positive impact on the Service Test rating.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Detroit CSA	3	19	0	-4	-6	-6	0
Lansing MSA	0	1	0	0	0	-1	0
Saginaw MSA	0	0	0	0	0	0	0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

NA stands for not available.

The institution's opening and closing of branches has not adversely affected accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank closed 19 branches, six of which were located in moderate-income geographies. The branch closures were a result of network optimization. CBNA also opened three branches during the evaluation period, two of which were located in moderate-income geographies. The branch network remains readily accessible to geographies and individuals of different income levels despite the branch closures while ADS and adjacent MUI branches continue to provide additional accessibility.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. CBNA maintained

standard business hours and offered traditional banking products for all traditional branch locations in the AA. CBNA generally maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday-Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for all 57 traditional standalone branch locations. Two branches did not offer hours on Saturdays, one of which was located in a LMI geography. CBNA generally maintained standard branch hours for the 10 in-store branch locations and one limited-service branch, from 10:00 a.m. to 5:00 p.m. Monday-Friday and Saturdays from 10:00 a.m. to 3:00 p.m. One in-store location maintained hours from 9:00 a.m. to 4:00 p.m. Monday-Friday and Saturdays 9:00 a.m. to 12:00 p.m. CBNA generally made all services available at all branches with the exception of safe deposit boxes which were not available at 89.7 percent of branches in the AA, and night deposit services which were not available at 27.9 percent of branches in the AA.

Community Development Services

The bank was a leader in providing CD services.

CBNA employees provided 2,099 hours of service to 28 CD organizations. During the evaluation period, service activities were responsive to CD needs, particularly related to financial literacy and income tax return preparation targeting LMI individuals. Other services involved leadership, where five employees served on the board of five local non-profit organizations. Service activity examples during the evaluation period include:

- An employee served on the board of an organization that provides emergency shelter, meals and case managers for homeless individuals and families, for a total of 12 hours of service during the evaluation.
- Bank employees contributed 118 hours of technical assistance to a local organization, providing free income tax return preparation services targeting low- and moderate-income individuals.
- Bank employees delivered at least 487 hours of financial literacy and educational programming targeting low- and moderate-income individuals in cooperation with 14 local organizations. Citizens delivered 207 financial education sessions benefiting 3,846 individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Lansing MSA and Saginaw MSA AAs was weaker than the bank's overall performance in the full-scope area due to poorer branch distributions. Performance in the limited-scope areas had minimal effect on the overall Service Test rating.

State Rating

State of New Hampshire

CRA rating for the State of New Hampshire¹⁰: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic and borrower distributions of lending were good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's retail delivery services were readily accessible to geographies and individuals of different incomes.

Description of Institution's Operations in New Hampshire

CBNA delineated one AA in New Hampshire which consists of multiple, contiguous non-MSA counties (NH Non-MSA AA). Operations and performance in other New Hampshire counties are included in the Boston CSA rating. Refer to appendix A for a list of counties reviewed.

The state of New Hampshire was CBNA's 10th largest rating area based on deposits.

Citizens had \$946.5 million in deposits in the NH Non-MSA AA representing 0.6 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated nine branches and 13 ATMs, of which all were deposit-taking, within the rating area, representing one percent of total branches and 0.8 percent of total ATMs. The bank originated and purchased approximately \$334.2 million in home mortgage and small business loans within the NH Non MSA during the evaluation period, representing 0.7 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 20 FDIC-insured institutions operating 112 branches in the AA. Citizens ranked third in deposit market share with 9.5 percent. The top two banks by deposit market share are TD Bank, N.A. with 14.6 percent, and Mascoma Bank with 13.9 percent. In addition to FDIC-insured institutions, this area is served by several credit unions, mortgage lenders, and mortgage brokers.

¹⁰ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

NH Non-MSA

The following table provides a summary of the demographics, including housing, business, and economic information for the NH Non-MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: NH Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	67	1.5	22.4	62.7	13.4	0.0
Population by Geography	288,289	1.4	19.7	64.3	14.5	0.0
Housing Units by Geography	170,248	1.1	20.6	65.7	12.6	0.0
Owner-Occupied Units by Geography	85,377	1.0	19.7	66.2	13.1	0.0
Occupied Rental Units by Geography	33,120	2.1	23.3	62.1	12.5	0.0
Vacant Units by Geography	51,751	0.7	20.3	67.2	11.8	0.0
Businesses by Geography	28,975	0.8	19.8	63.1	16.3	0.0
Farms by Geography	1,268	0.3	16.5	69.1	14.1	0.0
Family Distribution by Income Level	75,449	21.3	20.1	22.2	36.3	0.0
Household Distribution by Income Level	118,497	25.1	17.9	19.0	38.0	0.0
Median Family Income Non-MSAs - NH		\$71,699	Median Housing Value			\$203,917
			Median Gross Rent			\$891
			Families Below Poverty Level			6.5%

*Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.*

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The median family income for the AA was \$71,699. Based on this information, low-income families earned less than \$35,849 and moderate-income families earned less than \$57,359. The median housing value in the AA is \$203,917. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$896 for a low-income borrower and \$1,433 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,095. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the NH Non-MSA AA, the overall household poverty level was 6.5 percent.

Economic Data

According to Moody's Analytics, the state of New Hampshire is in recovery. The state has low taxes with a stable property tax base, a highly skilled workforce, high per capita income with a low poverty rate, and lower employment volatility. In comparison to the rest of the region or country, New Hampshire has added jobs faster

and regained 75 percent of jobs lost during the first year of the COVID-19 pandemic. Most industries have returned to pre-pandemic employment levels with transportation and professional services seeing significant growth. Major employment industries include healthcare and social assistance, government, retail trade, and accommodation and food service. Manufacturing remains strong, with pharmaceutical and defense manufacturers operating in the state. The state expects to attract additional tourism given early pandemic precautions and restrictions have been largely eliminated. Increased demand for vacation homes could result in worker shortages as hospitality workers may be priced out of the homebuying market. Like the rest of the country, the state has seen substantial increases in home prices driven by increased levels of remote work, fewer sellers, and historically low interest rates. Home building has increased to meet demand. The largest employers in the state include Dartmouth Hitchcock Medical Center, BAE Systems, Hannaford Bros. Co., and Fidelity Investments. According to the U.S. BLS, the December 2021 unemployment rate was 2.5 percent for Carroll County, 2.7 percent for Cheshire County, 3.1 percent for Coos County, 2.2 percent for Grafton County, and 2.2 percent for Sullivan County. The state-wide unemployment rate was 2.4 percent.

Community Contacts

A review was conducted of three community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on affordable housing and economic development. In addition, a review was conducted of the North Country Comprehensive Economic Development Strategy covering the years 2018 through 2022. Contacts noted that the area has many low-wage jobs making housing costs unaffordable for workers in these jobs. Local zoning codes make it difficult to develop affordable housing. The rate of homeownership in the area is relatively high at 72 percent and the area has a relatively low percentage of multi-family dwellings. Most of the area is rural and private sector developers do not have a lot of interest in doing large scale projects in these areas, instead focusing on southern N.H. which has better proximity to Boston. The area has a lack of natural gas infrastructure and fuel-oil is the primary heating source. Many residents in the far northern part of the area suffer from food insecurity due to a lack of access to full-service grocery stores. Many areas also lack access to fast, reliable broadband services. Identified needs include funding to support energy efficiency and weatherization programs; safe, decent, and affordable housing, particularly for low-income households and elderly residents; and rehab loans for older properties.

The area was served by a limited number of non-profit organizations, economic development organizations, and social service organizations that provide opportunities to help meet community needs.

Scope of Evaluation in New Hampshire

The NH Non-MSA AA received a full-scope review. This was the bank's only AA in the state of New Hampshire.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW HAMPSHIRE

LENDING TEST

The bank's performance under the Lending Test in New Hampshire is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the NH Non-MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% of Rating Area Loans	% of Rating Area Deposits
NH Non-MSA	1,690	829	3	2,522	100	100

Dollar Volume of Loans (\$000s)						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% of Rating Area Loans	% of Rating Area Deposits
NH Non-MSA	219,077	43,147	9,390	343,614	100	100

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 9.5 percent. The bank ranked third among 20 depository financial institutions placing it in the top 15 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 4.9 percent based on the number of home mortgage loans originated or purchased. The bank ranked third among 377 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three competitors with a combined market share of 19 percent were Rocket Mortgage (9.5 percent), Mascoma Bank (5.4 percent), and CMG Mortgage Inc. (4.1 percent).

According to peer small business data for 2020, the bank had a market share of 6.2 percent based on the number of small loans to businesses originated or purchased. The bank ranked fourth out of 106 small business lenders, which placed it in the top four percent of lenders. The top three lenders with a combined market share of 34.5 percent were Mascoma Bank (14.7 percent), American Express National Bank (12.8 percent), and TD Bank, N.A. (7 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's HMDA and small loans to businesses lending data with available demographic information and aggregate lending data. Examiners placed more emphasis on moderate-income geographies due to the higher percentage of owner-occupied housing units and businesses in those geographies. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was significantly below both the percentage of owner-occupied homes in low-income geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was near to the percentage of owner-occupied homes in moderate-income geographies and exceeded the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the state of New Hampshire section of 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies approximated both the percentage of businesses in low-income geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in moderate-income geographies and the aggregate distribution of loans.

Lending Gap Analysis

Examiners did not identify any conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of loans. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the state of New Hampshire section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of 6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distributions of small loans to businesses.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made three CD loans totaling nearly \$9.4 million, which represented 8.9 percent of the allocated tier 1 capital. All CD loans supported economic development activities.

An example of a CD community loan includes a CBNA originated \$6.4 million PPP loan to an area hospital to ensure 542 LMI employees received paychecks during the COVID-19 pandemic. These employees earned an average annual salary of \$46,223, which was less than 80 percent of the AMI. The hospital serves as an essential community facility, providing medical care and related services to residents.

Product Innovation and Flexibility

The bank made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 455 loans under flexible lending programs in the AA totaling \$95.9 million. Program volumes included one DHM loan totaling \$178,286, six FHA loans totaling \$1.1 million, 423 FNMA loans totaling \$90.9 million, 10 FNMA Home Ready loans totaling \$1.3 million, one GoalBuilder HELOC loan totaling \$25,000, four No Cost/Low-Cost Refinance Mortgage loans totaling \$277,000, and 10 VA loans totaling \$2.3 million.

The bank provided seven CCA down payment grants totaling \$18,500 within the AA.

INVESTMENT TEST

The bank's performance under the Investment Test in the State of New Hampshire is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the NH Non-MSA AA was excellent.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
NH Non-MSA	1	1,582	18	9,237	19	100	10,819	100	2	2,523

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 18 investments totaling \$9.2 million during the evaluation period, with no qualifying grants or donations. The dollar volume of current- and prior- period investments represented 10.3 percent of allocated tier 1 capital.

The bank exhibited good responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 100.0 percent of investments supported affordable housing. The bank occasionally used innovative and/or complex investments to support CD initiatives. CBNA made two LIHTC investments in the current period totaling \$5.6 million, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- CBNA invested \$2.0 million with a multi-investor LIHTC fund for a project with 23-units in Hanover, NH, addressing an identified need for affordable rental housing. The units are subsidized under Section 8 and available to residents earning less than 50 percent of the AMI.
- CBNA invested \$3.6 million in a multi-investor fund in Hanover, NH for an 18-unit LIHTC project addressing an identified need for affordable rental housing.

SERVICE TEST

The bank’s performance under the Service Test in New Hampshire was rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the NH Non-MSA AA was excellent.

Retail Banking Services

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
NH Non-MSA	100.0	9	100.0	0.0	22.2	55.6	22.2	0.0	1.4	19.7	64.3	14.5	0.0

**Totals may not equal 100.0 percent due to rounding.

***NA stands for not available.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution’s AA. CBNA’s distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. There were no bank branches located in low-income geographies; however, examiners considered that the percentage of the population within low-income geographies was less than 2 percent. As such, examiners weighted the bank’s performance in moderate-income geographies more heavily.

CBNA had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. CBNA had 13 ATMs in the AA, all of which were deposit-taking. CBNA provided data that indicated 64.4 percent of households in moderate-income geographies used OLB and mobile banking services in the fourth

quarter of 2021. This was an increase of 4.3 percent for households in moderate-income geographies, from the start of the evaluation period. ADS had a positive impact on the service test rating.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
NH Non-MSA	0	2	0	-1	-1	0	0

**NA stands for not available.

The institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. CBNA closed two branches, one of which was in a moderate-income geography. The branch closure in the moderate-income geography was a result of network optimization.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. CBNA maintained standard business hours and offered traditional banking products at all branch locations in the AA. CBNA generally maintained standard branch hours for the nine branch locations from 9:00 a.m. to 4:00 p.m. Monday-Friday and Saturdays from 9:00 a.m. to 12:00 p.m. One branch located in a moderate-income geography did not offer Saturday hours. CBNA made all services available at all branches, with the exception of one branch not offering safe deposit services and one branch not offering night deposit services.

Community Development Services

CBNA provided an adequate level of CD services.

CBNA employees provided board participation in four nonprofit organizations with four employees providing approximately 290 board service hours.

The following was an example of CD services provided in this AA:

- An employee served as a board member for an organization involved in promoting community development and affordable housing.

State Rating

State of New York

CRA rating for the State of New York¹¹: Outstanding,

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic and borrower distributions of lending were good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's retail delivery services were reasonably accessible to geographies and individuals of different incomes and the bank provided a relatively high level of CD services.

Description of Institution's Operations in New York

CBNA delineated multiple AAs in the state including a portion of the Albany-Schenectady-Troy, NY MSA, a portion of the Glen Falls, NY MSA, a portion of the Binghamton, NY MSA, the entire Buffalo-Cheektowaga, NY MSA (Buffalo MSA), the entire Ithaca, NY MSA, a portion of the Rochester, NY MSA, a portion of the Syracuse, NY MSA, the entire Utica-Rome, NY MSA, and two non-MSA AAs each comprised of one county. The OCC combined four bank-delineated AAs to form two CSA AAs for analysis and presentation purposes. The Albany-Schenectady-Troy, NY MSA and Glen Falls, NY MSA AAs were combined into the Albany-Schenectady, NY CSA (Albany CSA) and the Ithaca, NY MSA AA was combined with one non-MSA AA into the Ithaca-Cortland, NY CSA (Ithaca CSA). The remaining non-MSA county AA was reviewed as the NY Non-MSA AA. Operations within other counties in New York were included in the New York CSA rating area. Refer to appendix A for a list of counties reviewed.

The state of New York was CBNA's fifth largest rating area based on deposits.

The bank had \$7.6 billion in deposits, representing 5 percent of the bank's total domestic deposits as of June 30, 2021. CBNA operated 97 branches and 127 ATMs, of which 124 were deposit-taking, within the rating area, representing 10.3 percent of total branches and 7.4 percent of ATMs. The combined areas were served by 53 FDIC-insured banks operating 1,049 branches. CBNA ranked fourth with 4.8 percent market share. The top three banks and their market share were Manufacturers and Traders Trust Company (M&T Bank), with 37.4 percent, KeyBank, N.A. with 18.9 percent, and Bank of America, N.A. with 6.2 percent. During the evaluation

¹¹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

period, the bank originated or purchased nearly \$3 billion, or 5.8 percent of its total dollar volume of home mortgage loans and small loans to businesses in the combined areas.

Buffalo MSA

The Buffalo MSA AA was comprised of Erie and Niagara counties in New York.

CBNA had \$2.2 billion in deposits in the Buffalo MSA representing 1.4 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated 38 branches and 50 ATMs, of which 48 were deposit-taking, within the AA, representing four percent of total branches and 2.9 percent of total ATMs. The bank originated and purchased approximately \$1.1 billion in home mortgage and small business loans within the Buffalo CSA during the evaluation period, representing 2.2 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 18 FDIC-insured institutions operating 245 branches in the AA. Citizens ranked sixth in deposit market share with 3.1 percent. The top three banks by deposit market share are M&T Bank with 63 percent, KeyBank N.A. with 14.3 percent, and HSBC Bank USA, N.A. with 5.4 percent. In addition to FDIC-insured institutions, this area is served by several credit unions, mortgage lenders and brokers, and money service businesses.

The following table provides a summary of the demographics, including housing, business, and economic information for the Buffalo MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Buffalo MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	299	15.4	18.1	39.8	23.4	3.3
Population by Geography	1,135,734	12.7	13.5	40.0	32.5	1.3
Housing Units by Geography	519,952	14.3	15.0	40.6	29.9	0.2
Owner-Occupied Units by Geography	311,183	6.9	11.4	43.8	37.9	0.0
Occupied Rental Units by Geography	159,470	23.9	19.7	37.1	18.9	0.4
Vacant Units by Geography	49,299	29.7	22.7	32.0	15.1	0.5
Businesses by Geography	91,398	10.5	12.2	35.6	37.7	4.0
Farms by Geography	2,345	3.8	4.9	45.9	44.1	1.3
Family Distribution by Income Level	284,789	22.2	16.6	20.3	40.9	0.0
Household Distribution by Income Level	470,653	25.9	15.3	16.5	42.3	0.0
Median Family Income MSA - 15380 Buffalo-Cheektowaga, NY MSA		\$67,108	Median Housing Value			\$125,586
			Median Gross Rent			\$726
			Families Below Poverty Level			10.7%
<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 OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The median family income for the Buffalo MSA was \$67,108. Based on this information low-income families earned less than \$33,554 and moderate-income families earned less than \$53,686. The median housing

value in the AA was \$125,586 while the NAR median sales price of a single-family home was \$160,900 in calendar year 2019 and increased to \$216,700 in the fourth quarter of 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$838 for a low-income borrower and \$1,342 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$674. Housing is generally affordable to low- and moderate-income borrowers in the AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Buffalo CSA, the overall household poverty level was 10.7 percent.

Economic Data

According to Moody's Analytics, the Buffalo area's strengths include high housing affordability and consistently low foreclosures, tourist attractions, including Niagara Falls, and low business costs. However, the area faces long term population losses driven by the cold climate and economic decline and is vulnerable to international shocks due to trade and tourism linkages. The area is New York's worst-performing large metro area. Goods producers are performing well but most service industries are trailing the national pace, while the public sector and education and healthcare continue to struggle. The area has a sizable banking and insurance presence, which has driven aggressive hiring for banking and financial technology roles. Price growth in the Buffalo housing market has been strong since the pandemic began due to reduced out-migration of residents and lack of inventory. However, rising home prices are impacting affordability and turning the area into New York's most overvalued large market. This is increasing the risk of a near-term correction. Major employment industries include education and health services, government, and professional and business services. Major employers in the area include Kaleida Health, M&T Bank, Catholic Health, and University at Buffalo. According to the U.S. BLS, as of December 2021, the unemployment rate in the area was 3.5 percent.

Community Contacts

A review was conducted of two community contacts completed during the examination period with organizations located throughout the area. The contacts consisted of listening sessions with representatives of multiple organizations focused on affordable housing, small business development/economic development, financial literacy/asset development, employment and work force development, neighborhood revitalization, and advocacy for LMI populations and geographies. Contacts noted that residents on the east side of Buffalo continue to struggle with high unemployment rates and low-wage jobs. There is a need for job training programs to help people access higher paying jobs. There is also a lack of access to traditional financial services and grocery stores in this area. Contacts noted that the east side of Buffalo has faced decades of disinvestment. Many black-owned businesses lack pre-existing relationships with banks making it difficult to obtain loans. There is a need for community literacy within the banking industry so that financial institutions can fully understand the needs of the communities they are supposed to serve. Contacts also noted that while housing in Buffalo is generally affordable, the quality of some of the housing is old and substandard. Other identified needs include:

- Technical assistance for small business
- Increased financing for community development, such as mixed-income housing in low- and moderate-income neighborhoods

- Support for job training/workforce development programs
- Financial literacy/asset development
- Rehab assistance for owners of older housing units
- Credit builders programming
- Safe and affordable transactional and savings accounts
- Access to capital for entrepreneurs/small business owners.

The area was served by several non-profit organizations, community-based organizations, community development entities, economic development organizations, and social service organizations that provide opportunities to help meet community needs.

Scope of Evaluation in New York

The Buffalo MSA received a full-scope review. This area accounted for 29 percent of the bank's deposits and 38 percent of the bank's lending in the state during the evaluation period. The remaining AAs received limited-scope reviews.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Buffalo MSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Buffalo MSA	7,641	3,293	8	10,942	39.5	29.1
Albany CSA	3,342	2,090	13	5,445	19.7	32.9
Binghamton MSA	470	399	4	873	3.2	3.5
Ithaca CSA	202	94	1	297	1.1	0.8
Rochester MSA	4,828	1,897	10	6,735	24.3	24.2
Syracuse MSA	1,396	935	2	2,333	8.4	5.8
Utica MSA	547	316	3	866	3.1	2.8
NY Non-MSA	156	48	0	204	0.7	0.9
Total	18,582	9,072	41	27,695	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

Dollar Volume of Loans* (\$000s)						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Buffalo MSA	1,008,502	134,176	19,650	1,162,328	36.8	29.1
Albany CSA	573,292	100,413	79,511	753,216	23.9	32.9
Binghamton MSA	51,957	13,403	16,952	82,312	2.6	3.5
Ithaca CSA	32,912	3,558	1,808	38,278	1.2	0.8
Rochester MSA	655,257	69,546	45,059	769,862	24.4	24.2
Syracuse MSA	193,554	47,210	3,392	244,156	7.7	5.8
Utica MSA	67,295	12,276	3,677	83,248	2.6	2.8
NY Non-MSA	21,268	1,119	0	22,387	0.8	0.9
Total	2,604,037	381,701	170,049	3,155,787	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 3.1 percent. The bank ranked sixth among 18 depository financial institutions placing it in the top 34 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 7.3 percent based on the number of home mortgage loans originated or purchased. The bank ranked fourth among 291 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders with a combined market share of 32 percent were M&T Bank (12.6 percent), Rocket Mortgage (10.5 percent), and KeyBank N.A. (8.9 percent).

According to peer small business data for 2020, the bank had a market share of 6.5 percent based on the number of small loans to businesses originated or purchased. The bank ranked sixth out of 137 small business lenders, which placed it in the top 5 percent of lenders. The top three lenders with a combined market share of 43.2 percent were M&T Bank (19.3 percent), KeyBank N.A. (13.2 percent), and American Express National Bank (10.7 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's HMDA and small loans to businesses lending data with available demographic information and aggregate lending data. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied homes in low-income geographies but exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies approximated the percentage of owner-occupied homes in moderate-income geographies and exceeded the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the state of New York section of 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in low-income geographies but was near to the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in moderate-income geographies and exceeded the aggregate distribution of loans.

Lending Gap Analysis

Examiners did not identify any conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate distribution of loans. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of 8.9 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made eight CD loans totaling nearly \$19.7 million, which represented 8 percent of the allocated tier 1 capital. CD loans primarily supported affordable housing. By dollar volume, 56.5 percent of CD loans funded affordable housing, 37.4 percent funded economic development, and 6.1 percent funded community services targeted to LMI individuals.

Examples of CD loans include:

- CBNA originated a \$11.1 million loan to support the construction of 46 units of affordable senior housing. Fourteen units are reserved for tenants at or below 30 percent AMI, 29 units are reserved for tenants at or below 50 percent of AMI, and three units are reserved for tenants at or below 60 percent AMI. The bank utilized LIHTCs for this loan.
- CBNA originated a \$1.2 million loan to a non-profit organization to renovate, upgrade, and expand one of their buildings. The organization provides services to recently released incarcerated persons to help them transition out of prison and back into the community.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 1,827 loans under flexible lending programs in the AA totaling \$297 million. Program volumes included 48 DHM loans totaling \$6.1 million, 104 FHA loans totaling \$16.4 million, 1,445 FNMA loans totaling \$224.2 million, 155 FNMA Home Ready loans totaling \$19.6 million, 18 GoalBuilder HELOC loans totaling \$386,250, 10 No Cost/Low-Cost Refinance Mortgage loans totaling \$712,122, and 47 VA loans totaling \$9.2 million.

The bank provided 121 CCA down payment grants totaling \$305,200 within the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Rochester MSA, Albany CSA, Binghamton MSA, Ithaca CSA, Syracuse MSA, Utica MSA, and the NY Non-MSA AAs was consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance in the limited-scope areas supported the overall Lending Test rating.

Refer to Tables O through R in the state of New York section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in State of New York is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Buffalo MSA was excellent.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Buffalo MSA	60	14,720	55	21,900	115	28.3	36,620	17.8	2	11,278
Albany CSA	100	30,154	49	52,820	149	36.7	82,974	40.3	4	44,284
Binghamton MSA	22	895	8	2,553	30	7.4	3,449	1.7	1	1,135
Ithaca CSA	4	275	2	342	6	1.5	617	0.3	0	0
Rochester MSA	20	25,003	37	29,594	57	14.0	54,597	26.5	3	16,730
Syracuse MSA	28	6,430	11	3,407	39	9.6	9,837	4.8	2	1,734
Utica MSA	1	1,656	5	16,116	6	1.5	17,772	8.6	4	9,075
NY Non-MSA	0	0	4	324	4	1.0	324	0.2	0	0
Total	235	79,133	171	127,056	406	100	206,190	100	16	84,236

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

** Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

*** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 55 investments totaling \$21.9 million during the evaluation period, which included 30 qualifying grants and donations totaling \$246,000 to 12 organizations. The dollar volume of current- and prior-period investments represented 14.9 percent of allocated tier 1 capital.

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 98.9 percent of investments supported affordable housing, 0.7 percent funded community services to LMI individuals and 0.4 percent supported economic development. The bank occasionally used innovative and/or complex investments to support CD initiatives. CBNA made two LIHTC investments in the current period totaling \$17.4 million, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- CBNA invested \$11.4 million with a multi-investor LIHTC fund for a project in Buffalo, NY with 46 units of affordable senior housing, addressing an identified need for affordable rental housing.
- CBNA invested \$6 million in a 52-unit LIHTC project in North Tonawanda, NY to rehabilitate a school into housing, addressing an identified need for affordable rental housing. The project commits to reserving 100 percent of the units to tenants earning up to 30 percent, 50 percent, and 60 percent of AMI, respectively. The project also provides benefits for disabled individuals in the community with 12 of the units reserved for individuals with disabilities.
- CBNA provided three grants totaling \$25,000 to fund a housing organization to support financial education. The receiving organization provided homebuyer education, general financial education, and affordable rental housing search assistance to over 734 households.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Albany CSA, Binghamton MSA, Ithaca CSA, Rochester MSA, Syracuse MSA, and Utica MSA AAs was consistent with the bank's overall performance under the Investment Test in the full-scope area. The bank's performance under the Investment Test in the NY Non-MSA AA was weaker than the bank's overall performance under the Investment Test in the full-scope area due to a lower volume of CD investments. Performance in the limited-scope areas had minimal effect on the overall Investment Test rating.

SERVICE TEST

The bank's performance under the Service Test in New York is rated High Satisfactory. Performance in the limited-scope areas had a positive effect on the overall Service Test rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Buffalo MSA was adequate.

Retail Banking Services

Distribution of Branch Delivery System*													
Assessment Area	Deposits	# of Bank Branches	Branches						Population				
	% of Rated Area Deposits in AA		% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Buffalo MSA	29.0	38	39.2	5.3	5.3	50.0	36.8	2.6	12.7	13.5	40.0	32.5	1.3
Albany CSA	32.9	22	22.7	13.6	13.6	27.3	45.5	0.0	6.7	16.2	52.8	23.5	0.9
Binghamton MSA	3.5	3	3.1	33.3	33.3	33.3	0.0	0.0	8.1	16.0	51.5	24.4	0.0
Ithaca CSA	0.8	2	2.1	0.0	50.0	0.0	50.0	0.0	0.0	13.4	56.9	25.7	3.9
Rochester MSA	24.2	24	24.7	8.3	12.5	50.0	29.2	0.0	9.6	14.2	45.3	30.0	1.0
Syracuse MSA	5.8	5	5.2	0.0	0.0	40.0	60.0	0.0	11.4	13.1	40.6	33.4	1.5
Utica MSA	2.8	3	3.1	0.0	0.0	66.7	0.0	33.3	11.7	10.2	53.0	23.3	1.8
NY Non- MSA	0.9	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.8	71.2	18.9	5.2

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Totals may not equal 100.0 percent due to rounding.

NA stands for not available.

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AA. CBNA's distribution of branches in both low-income and moderate-income geographies was well below the percentage of the population living in those geographies. Examiners gave positive consideration for five MUI branches located within one-quarter mile of LMI geographies, where the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AA.

CBNA had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. CBNA had 39 ATMs in the AA, of which 38 were deposit-taking. CBNA provided data that indicated 70.1 percent of households in low-income geographies and 71.8 percent of households in moderate-income geographies used OLB and mobile banking services in the fourth quarter of 2021. This was an increase of 22.7

percent for household in low-income geographies and 15.2 percent for households in moderate-income geographies from the start of the evaluation period. ADS usage had a positive impact on the Service Test rating.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Buffalo MSA	1	4	0	0	-3	0	0
Albany CSA	1	4	-1	0	-2	0	0
Binghamton MSA	0	1	0	0	0	-1	0
Ithaca CSA	0	0	0	0	0	0	0
Rochester MSA	0	1	0	0	-1	0	0
Syracuse MSA	0	1	0	0	-1	0	0
Utica MSA	0	0	0	0	0	0	0
NY Non- MSA	0	2	0	0	-2	0	0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** NA stands for not available.

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank opened one middle-income branch and closed four branches in middle-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AA, particularly LMI geographies and/or individuals. CBNA maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. CBNA generally maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday-Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for the 17 standalone branch locations. One branch in a MUI geography did not have Saturday hours. CBNA maintained standard branch hours from 10:00 a.m. to 5:00 p.m. Monday-Friday and Saturdays from 10:00 a.m. to 3:00 p.m. for the 21 in-store branch locations. CBNA generally made all services available at all branches with the exception of safe deposit services which were not available at 68.4 percent of branches in the AA, and night deposits which were not available at 52.6 percent of branches in the AA.

Community Development Services

The institution provided a relatively high level of CD services.

CBNA employees provided 709 hours of service to 18 CD organizations. During the evaluation period, service activities were responsive to CD needs, particularly related to technical assistance to financial literacy, tax preparation, and job training programs targeting LMI individuals. Other services involved leadership, where seven employees served on the boards of 11 local non-profit organizations. Service activity examples during the evaluation period include:

- An employee served on the board of for an organization whose mission is to empower economically disadvantaged people through economic development, community development, and education, for a total of 43 hours of service during the evaluation period.
- Bank employees provided 52 hours of technical assistance to a local organization that provides free tax help targeting LMI individuals and persons with disabilities.

- Bank employees contributed 71 hours of technical assistance to two organizations providing workforce development programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Albany CSA, Binghamton MSA, Ithaca CSA, and Rochester MSA AAs was stronger than the bank's overall performance in the full-scope area due to better branch distributions. Performance in the NY Non-MSA, Syracuse MSA, and Utica MSA AAs was weaker than the bank's performance under the Service Test in the full-scope area due to poorer branch distributions. Performance in the limited-scope areas had a positive effect on the overall Service Test rating.

State Rating

State of Ohio

CRA rating for the State of Ohio¹²: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was adequate and borrower distributions of lending was excellent.
- The bank has made a relatively high level of CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's retail delivery services were accessible to geographies and individuals of different incomes and the bank was a leader in providing CD services.

Description of Institution's Operations in Ohio

CBNA delineated multiple AAs in Ohio. These AAs included a portion of the Akron, OH MSA, the entire Cleveland-Elyria, OH MSA, a portion of the Canton-Massillon, OH MSA, a portion of the Toledo, OH MSA, and two non-contiguous, non-MSA counties.

The OCC combined the Akron, OH MSA AA, the Cleveland-Elyria, OH MSA AA, and the Canton-Massillon, OH MSA AA into the Cleveland-Akron-Canton, OH CSA (Cleveland CSA) for analysis and presentation purposes. One non-MSA county was reviewed as part of the Youngstown CSA, as noted above. The remaining non-MSA county was reviewed as the OH non-MSA AA. Refer to appendix A for a list of the counties reviewed.

The state of Ohio was CBNA's fourth largest rating area based on deposits.

The bank had \$12.9 billion in deposits, representing 8.4 percent of the bank's total domestic deposits as of June 30, 2021. CBNA operated 84 branches and 132 ATMs, all of which were deposit-taking, in the rating area, representing 8.9 percent of total branches and 7.7 percent of total ATMs. The combined areas were served by 56 FDIC-insured banks operating 967 branches. CBNA ranked fourth with 9.2 percent market share. The top

¹² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

three banks and their market share were KeyBank, N.A., with 23.5 percent, The Huntington National Bank with 18.4 percent, and PNC Bank, N.A. with 11.5 percent. During the evaluation period, the bank originated and purchased \$2.5 billion, or 4.9 percent of its total dollar volume of home mortgage loans and small loans to businesses in the combined areas.

Cleveland CSA

The Cleveland CSA AA was comprised of the entire Cleveland, OH MSA and contained one of the two counties in the Akron, OH MSA and one of the two counties in the Canton, OH MSA.

CBNA had \$12 billion deposits in the Cleveland CSA representing 7.9 percent of the bank's total deposits. As of December 31, 2021, the bank operated 74 branches and 113 ATMs, all of which were deposit-taking, within the rating area, representing 7.9 percent of total branches and 6.6 percent of total ATMs. The bank originated and purchased approximately \$21 billion in home mortgage and small business loans within the Cleveland CSA during the evaluation period, representing 6.5 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 42 FDIC-insured institutions operating 805 branches in the AA. Citizens ranked fourth in deposit market share with 9.7 percent. The top three banks by deposit market share are KeyBank, N.A. with 24.8 percent, The Huntington National Bank with 17.9 percent, and PNC Bank, N.A. with 11.9 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following table provides a summary of the demographics, including housing, business, and economic information for the Cleveland CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cleveland CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	859	18.2	21.7	35.0	23.6	1.5
Population by Geography	2,981,309	11.7	19.2	37.8	31.0	0.3
Housing Units by Geography	1,366,824	13.4	21.2	37.3	27.7	0.5
Owner-Occupied Units by Geography	803,026	6.3	15.8	41.5	36.2	0.1
Occupied Rental Units by Geography	415,869	21.9	28.9	32.6	15.6	1.0
Vacant Units by Geography	147,929	27.7	28.8	27.3	15.0	1.1
Businesses by Geography	228,456	9.0	15.6	35.4	39.0	1.0
Farms by Geography	5,860	4.1	10.9	44.6	40.2	0.1
Family Distribution by Income Level	758,197	22.2	17.0	19.9	41.0	0.0
Household Distribution by Income Level	1,218,895	25.5	15.5	17.0	42.0	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$65,716	Median Housing Value			\$135,332
Median Family Income MSA - 15940 Canton-Massillon, OH MSA		\$59,302	Median Gross Rent			\$751
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$65,821	Families Below Poverty Level			11.3%

Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(* The NA category consists of geographies that have not been assigned an income classification.

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The weighted average median family income for the Cleveland CSA was \$65,152. Based on this information low-income families earned less than \$32,576 and moderate-income families earned less than \$52,121. The median housing value in the AA was \$135,332 while the NAR median sales price of a single-family home was \$164,100 in calendar year 2019 and increased to \$195,700 in the fourth quarter of 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$814 for a low-income borrower and \$1,303 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$726. Housing is generally affordable for low- and moderate-income borrowers in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Cleveland CSA, the overall household poverty level was 11.3 percent.

Economic Data

According to Moody's Analytics, the Cleveland area's strengths include manufacturing infrastructure and specialized factory labor, and world class clinical and research healthcare institutions. However, the area has weak demographics with persistent out-migration and a high foreclosure inventory. The area's recovery is on the upswing and payroll employment has recouped about 80 percent of its pandemic related losses driven by gains in professional and business services, consumer industries, the public sector, and other services. Industrial production is high even as industry employment remains below pre-pandemic levels. Healthcare has been sluggish and demographic challenges, including out-migration, have stymied a full recovery of the labor force. Supply chain challenges, which have led to a shortage of semiconductors, has weighed heavily on local auto manufacturers and steel production. White collar services are anticipated to remain on an upward trajectory. Local business costs have been declining in recent years and remain below the national average. The share of the population that holds a bachelor's degree has been trending upward and local educational institutions, including Case Western Reserve and Cleveland State University, are registering students in record numbers with white collar firms hiring recent graduates. Major employment industries include education and health services, professional and business services, and government. Major employers include Cleveland Clinic Foundation, University Hospitals, U.S. Office of Personnel Management, and Minute Men Companies. According to the U.S. BLS, as of December 2021 the unemployment rate was 4.6 percent.

The Summit County portion of the AA contains the city of Akron, the fifth largest city in Ohio. Akron's strengths include below average exposure to COVID-19, relatively low business and living costs, and a prime location for staffing business outsourcing and human resources support roles. However, per capita income is below average, there are few jobs in high value-added services, and the area has weak migration trends and a shrinking population. Job growth in the area has trailed that of the region and the U.S. for two years. Manufacturing is an economic driver in the area. A large part of the manufacturing base is closely tied to vehicle production, which saw payrolls trend lower due to chip shortages that weighed on production and hiring. There has been a mild upswing in single-family permitting, but house price appreciation is cooling more than elsewhere as demand is below average. Major employment industries in the area include education and health services, professional and business services, and government. Major employers include Summa Health System, Akron Children's Hospital, Cleveland Clinic, and Minute Men HR Management Services. According to the U.S. BLS, as of December 2021 the unemployment rate was 3.7 percent.

Community Contacts

A review was conducted of four community contacts completed during the examination period with organizations located throughout the area. The organizations contacted focus on affordable housing, economic development, and financial literacy/asset development. Contacts noted that foreclosures are still an issue. The area has an older housing stock with many dwellings passed down from generation to generation. A lot of homes in low-income areas have not been adequately maintained and need repair. There are also some neighborhoods (in Akron for example) that have a number of vacant and abandoned homes. There is a digital divide in Akron as several neighborhoods lack highspeed broadband which means residents are unable to access online banking or other online programs and services. Many low-income households are housing cost burdened and there is a lack of safe and affordable housing in many areas. Low-income residents need better access to community service programs focused on education, health, security, and fair housing. Other identified needs include:

- Financial education and technical assistance for small businesses
- Affordable rental housing
- Non-tax credit investment in affordable housing
- Greater flexibility in mortgage lending
- Funding for home repairs and modifications
- Access to capital for small businesses and small farms
- Programs that will improve access to credit for people with weak credit histories

The area was served by several non-profit organizations, community-based organizations, community development entities, economic development organizations, and social service organizations that provide opportunities to help meet community needs.

Scope of Evaluation in Ohio

The Cleveland CSA received a full-scope review. This area accounted for 93 percent of deposits and nearly 87 percent of lending in the state during the evaluation period. The Toledo MSA and OH Non-MSA AAs received limited-scope reviews.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

The bank's performance under the Lending Test in the state of Ohio is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cleveland CSA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans*						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Cleveland CSA	13,281	7,705	36	21,022	86.8	93.5
Toledo MSA	2,221	723	0	2,944	12.2	0.7
OH Non-MSA	174	89	0	263	1.0	5.8
Total	15,676	8,517	36	24,229	100.0	100.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

Dollar Volume of Loans* (\$000s)						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% Ratings Area Loans	% Rating Area Deposits
Cleveland CSA	1,814,343	366,444	98,236	2,279,023	87.1	93.5
Toledo MSA	283,585	30,487	0	314,072	12.0	0.7
OH Non-MSA	16,125	8,029	0	24,154	0.9	5.8
Total	2,114,053	404,960	98,236	2,617,249	100.0	100.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 9.7 percent. The bank ranked fourth among 42 depository financial institutions placing it in the top 10 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 3.4 percent based on the number of home mortgage loans originated or purchased. The bank ranked sixth among 650 home mortgage lenders in the AA, which placed it in the top one percent of lenders. The top three lenders with a combined market share of 24.4 percent were The Huntington National Bank (9.8 percent), Rocket Mortgage (8.4 percent), and Third Federal Savings and Loan (6.2 percent).

According to peer small business data for 2020, the bank had a market share of 6 percent based on the number of small loans to businesses originated or purchased. The bank ranked sixth out of 220 small business lenders, which placed it in the top 3 percent of lenders. The top three lenders with a combined market share of 37 percent were The Huntington National Bank (15.3 percent), American Express National Bank (11.5 percent), and JPMorgan Chase Bank, N.A. (10.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA. For this analysis, examiners compared the bank's HMDA and small loans to businesses lending data with available demographic information and aggregate lending data. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied homes in low-income geographies and was near to the aggregate distribution of

loans. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in moderate-income geographies and was near to the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the state of Ohio section of 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in both low- and moderate-income geographies was near to the percentage of businesses in those geographies and exceeded the aggregate distribution of loans.

Lending Gap Analysis

Examiners did not identify any conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of loans. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of 8.2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

Community Development Lending

The bank has made a relatively high level of CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 36 CD loans totaling nearly \$98.2 million, which represented 7.3 percent of the allocated tier 1 capital. CD loans primarily supported economic development activities. By dollar volume, 25.5 percent of CD loans funded affordable housing, 65.7 percent funded economic development, and 8.8 percent funded community services targeted to LMI income individuals.

Examples of CD loans include:

- CBNA originated a \$10.8 million loan to a non-profit organization to support the creation of 62 units of affordable housing in a low-income tract. Of the 62 units, six units will be restricted to residents with income of 30 percent AMI, 32 units will be restricted to residents with income of 50 percent AMI, 19 units will be restricted to 60 percent AMI, and five units will be restricted to 80 percent AMI. Additionally, seven of the 50 percent AMI units will also operate under the HUD Section 811 program as subsidized units targeting disabled renters.
- CBNA originated \$4 million in loans to a CDFI that focuses on economic development and community revitalization. The organization is a leading microloan intermediary and a certified Community Development Corporation.
- CBNA originated a \$1.8 million loan to fund the rehabilitation of 270 units of affordable housing for seniors and people with disabilities located in a historic mixed-use property.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 4,011 loans under flexible lending programs in the AA totaling \$618.1 million. Program volumes included 72 DHM loans totaling \$9.9 million, 251 FHA loans totaling \$33.7 million, 3,350 FNMA loans totaling \$534.3 million, 211 FNMA Home Ready loans totaling \$24.5 million, 36 GoalBuilder HELOC loans totaling \$702,273, nine No Cost/Low-Cost Refinance Mortgage loans totaling \$548,900, and 82 VA loans totaling \$14.5 million.

The bank provided 157 CCA down payment grants totaling \$501,600 within the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in both the Toledo MSA and the OH Non-MSA AAs was weaker than the bank's overall performance in the full-scope area due to weaker borrower distributions and a lack of CD lending. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

Refer to Tables O through R in the state of Ohio section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in the state of Ohio is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cleveland CSA was excellent.

Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments*										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cleveland CSA	290	78,717	133	60,595	423	87.2	139,312	91.8	5	28,506
Toledo MSA	18	6,307	42	5,882	60	12.4	12,189	8.0	0	0
OH Non-MSA	0	0	2	287	2	0.4	287	0.2	0	0
Total	308	85,024	177	66,764	485	100	151,788	100	5	28,506

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

** Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

*** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 133 investments totaling \$60.6 million during the evaluation period, which included 89 qualifying grants and donations totaling \$1.6 million to approximately 36 organizations. The dollar volume of current- and prior- period investments represented 10.4 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 97.3 percent of investments supported affordable housing, 1.4 percent funded community services to LMI individuals, and 1.3 percent supported economic development. The institution occasionally used innovative and/or complex investments to support CD initiatives. CBNA made five LIHTC investments in the current period totaling \$45 million, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- CBNA invested \$17.2 million with a multi-investor LIHTC fund for the rehabilitation and construction of 505-units in Euclid, OH. The project will provide affordable housing to the senior citizen population in the CSA, addressing an identified need for affordable rental housing. All units are rent restricted for households earning up to 60 percent of the AMI. Also, a project-based Section 8 Housing Assistance Payment (HAP) contract is in process for 353 of the units.

- Investment in a \$12.4 million new construction project for a 62-unit LIHTC project in Elyria, OH, addressing an identified need for affordable rental housing. Rent and income restrictions include up to 30 percent, 50 percent, and 60 percent of AMI, respectively.
- Investment in a \$10.3 million new construction LIHTC project consisting of 52 units in Cleveland, OH, addressing an identified need for affordable rental housing. The rents are restricted for households earning up to 60 percent of the AMI.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Investment Test in the Toledo MSA was consistent with the bank’s overall performance under the Investment Test in the full-scope area. The bank’s performance under the Investment Test in the Ohio non-MSA AA was weaker than the bank’s overall performance under the Investment Test in the full-scope area due to a lower volume of qualified CD investments. Performance in the limited-scope areas had minimal effect on the overall Investment Test rating.

SERVICE TEST

The bank’s performance under the Service Test in Ohio is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Cleveland CSA was good.

Retail Banking Services

Distribution of Branch Delivery System*													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Cleveland CSA	93.4	74	88.1	8.1	13.5	48.7	29.7	0.0	11.7	19.2	37.8	31.0	0.3
Toledo CSA	0.7	9	10.7	11.1	11.1	44.4	33.3	0.0	14.2	15.7	38.7	30.4	1.0
OH Non-MSA	5.8	1	1.2	0.0	0.0	0.0	100.0	0.0	3.0	33.5	49.3	14.1	0.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

**Totals may not equal 100.0 percent due to rounding.

***NA stands for not available.

Service delivery systems were accessible to geographies and individuals of different income levels in the institution’s AA. CBNA’s distribution of branches in low-income geographies was below, and in moderate-income geographies, was near to, the percentage of the population living within those geographies. Examiners gave positive consideration for seven MUI branches located within one-quarter mile of a LMI geography, where the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AA.

CBNA had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. CBNA had 113 ATMs in the AA, all of which were deposit-taking. CBNA provided data that indicated 63.1 percent of households in low-income geographies, and 64.7 percent of households in moderate-income geographies used OLB and mobile banking services in the fourth quarter of 2021. This was an increase of 20.2 percent for households in low-income geographies, and an increase of 14.3 percent for households in moderate-

income geographies, from the start of the evaluation period. ADS usage had a positive impact on the Service Test rating.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Cleveland CSA	1	6	-1	-1	-1	-1	-1
Toledo MSA	0	4	0	-1	-3	-1	0
OH Non-MSA	0	3	-1	-2	-1	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

**NA stands for not available.

The institution's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed six branches, one of which was located in a low-income geography and one of which was located in a moderate-income geography. The branch closures were a result of network optimization. CBNA also opened one branch during the evaluation period, which was located in a middle-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. CBNA maintained standard business hours and offered traditional banking products for all traditional branch locations in the AA. CBNA generally maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday-Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for the 66 traditional standalone branch locations. Three branches did not offer hours on Saturdays, two of which were in LMI geographies. CBNA maintained branch hours for the six in-store branch locations and two limited-service branch locations from 10:00 a.m. to 5:00 p.m. or 9:00 a.m. to 4:00 p.m. Monday-Friday and Saturdays from 10:00 a.m. to 3:00 p.m. or 9:00 a.m. to 12:00 p.m. CBNA generally made all services available at all branches with the exception of safe deposit boxes which were not available at 75.7 percent of branches in the AA, and night deposit services which were not available at 17.6 percent of branches in the AA.

Community Development Services

The bank was a leader in providing CD services.

CBNA employees provided 1,774 hours of service to 40 CD organizations. During the evaluation period, service activities were responsive to CD needs, particularly related to affordable housing targeting LMI individuals and financial education. Citizens delivered 265 financial education sessions that benefited over 5,409 individuals. Other services involved leadership, where 11 employees served on the board of 12 local non-profit organizations. Service activity examples during the evaluation period include:

- Two employees provided 16 hours of financial expertise through the delivery of seven homebuyer education workshops to a nonprofit HUD-approved housing and financial counseling agency. The nonprofit programs offered include pre- and post-home purchase counseling, homebuyer education, rental assistance, foreclosure prevention counseling, and property tax counseling.
- Multiple employees provided 514 service hours to three related community development organizations that provide financial education and literacy and career readiness programming to at-risk youth. Additionally, two employees served on the boards of these organizations.

- Bank employees served on boards or committees for 12 community development organizations, totaling 363 hours of service during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the OH Non-MSA and Toledo CSA AAs was weaker than the bank's overall performance in the full-scope area due to poorer branch distributions. Performance in the limited-scope areas had minimal effect on the overall Service Test rating.

State Rating

State of Pennsylvania

CRA rating for the State of Pennsylvania¹³: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, both the overall geographic distributions of lending were excellent and borrower distributions of lending were good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's retail delivery services were readily accessible to geographies and individuals of different incomes and the bank was a leader in providing CD services.

Description of Institution's Operations in Pennsylvania

Pennsylvania became a new rating area for CBNA with the merger of CBP on January 2, 2019. CBNA delineated multiple AAs in Pennsylvania, including the entire Altoona, PA MSA, the entire Erie, PA MSA, a portion of the Harrisburg-Carlisle, PA MSA, the entire Lancaster, PA MSA, a portion of the Pittsburgh, PA MSA, a portion of the Scranton-Wilkes-Barre, PA MSA (Scranton MSA), the entire State College, PA MSA, the entire York-Hanover, PA MSA, and several non-contiguous, non-MSA county AAs.

The OCC combined several of these bank-delineated AAs at the CSA level for presentation and analysis purposes. The Harrisburg-Carlisle, PA MSA AA and York-Hanover, PA MSA were combined to form the Harrisburg-York-Lebanon, PA CSA AA (Harrisburg CSA). The Erie, PA MSA AA and one non-MSA county were combined to form the Erie-Meadville, PA CSA AA (Erie CSA). The Pittsburgh, PA MSA and two non-MSA counties were combined to form the Pittsburgh-New Castle-Weirton, PA CSA AA (Pittsburgh CSA). Additionally, the remaining non-MSA counties were combined for analysis and presentation purposes as the PA Non-MSA AA.

Operations within other counties in Pennsylvania are included in either the New York CSA, Philadelphia CSA, or Youngstown CSA. Refer to appendix A for a list of counties reviewed.

The state of Pennsylvania was CBNA's third largest rating area based on deposits.

¹³ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

CBNA had nearly \$15 billion in deposits, representing 9.8 percent of the bank's total domestic deposits as of June 30, 2021, in the state of Pennsylvania. CBNA operated 143 branches and 238 ATMs, of which 215 were deposit-taking, in the rating area, representing 15.2 percent of total branches and 13.8 percent of total ATMs. The combined areas were served by 102 FDIC-insured banks operating 1,573 branches. CBNA ranked fifth with 5.2 percent market share. The top three banks and their market share were PNC Bank, N.A. with 35.9 percent, The Bank of New York Mellon with 12 percent, and BNY Mellon, N.A. with 8 percent. During the evaluation period, the bank originated and purchased \$5.6 billion, or 10.8 percent of its total dollar volume of home mortgage loans and small loans to businesses in the combined areas

Pittsburgh CSA

The Pittsburgh CSA AA was comprised of seven of the eight counties in the Pittsburgh, PA MSA, and the non-MSA counties of Lawrence and Indiana.

Citizens had \$11.7 billion in deposits in the Pittsburgh CSA representing 7.7 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated 104 branches and 181 ATMs, of which 165 were deposit-taking, within the rating area, representing 11.0 percent of total branches and 10.5 percent of total ATMs. The bank originated and purchased approximately \$3.7 billion in home mortgage and small business loans within the Pittsburgh CSA representing 7.1 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 51 FDIC-insured institutions operating 761 branches in the AA. Citizens ranked fourth in deposit market share with 5.41 percent. The top three banks by deposit market share are PNC Bank, N.A. with 41.6 percent, The Bank of New York Mellon with 16.4 percent, and BNY Mellon, N.A. with 10.9 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders and brokers, and money service businesses.

The following table provides a summary of the demographics, including housing, business, and economic information for the Pittsburgh CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Pittsburgh CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	726	8.4	21.5	46.6	21.3	2.2
Population by Geography	2,401,132	4.9	17.0	50.6	26.8	0.7
Housing Units by Geography	1,121,093	5.7	19.1	50.6	24.4	0.2
Owner-Occupied Units by Geography	703,419	2.6	14.5	53.8	29.1	0.0
Occupied Rental Units by Geography	304,602	10.7	26.3	45.3	17.4	0.4
Vacant Units by Geography	113,072	11.9	28.5	45.0	14.1	0.4
Businesses by Geography	237,337	4.9	14.2	43.2	36.7	0.9
Farms by Geography	5,871	2.0	10.8	59.7	27.4	0.1
Family Distribution by Income Level	622,989	20.5	17.3	20.6	41.6	0.0
Household Distribution by Income Level	1,008,021	24.7	15.4	17.0	42.8	0.0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$69,624	Median Housing Value			\$137,239
Median Family Income Non-MSAs - PA		\$56,172	Median Gross Rent			\$754
			Families Below Poverty Level			8.3%
<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 OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The weighted average median family income for the Pittsburgh CSA was \$68,679. Based on this information low-income families earned less than \$34,339 and moderate-income families earned less than \$54,943. The median housing value in the AA was \$137,239. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$858 for a low-income borrower and \$1,373 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$737. Housing is generally affordable for low- and moderate-income borrowers in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Pittsburgh CSA, the overall household poverty level was 8.3 percent.

Economic Data

According to Moody's Analytics, Pittsburgh's strengths include top education and research institutions, a skilled and highly educated labor force, low cost of living compared to other areas in the northeast, and low employment volatility. The area's weaknesses include aging infrastructure and weak population trends.

Although job growth in the area has picked up, the area's recovery has been underwhelming. Recent job gains have been driven by a rebound in manufacturing, which has offset weaknesses in other industries such as education and healthcare. Labor shortages are impacting healthcare as local providers seek to replace fatigued nurses and other staff. Pittsburgh has evolved into an emerging technology hub which will keep white collar industries on an upward trend. However, weak population trends will limit the pool of available workers and prevent more robust growth. Soaring energy prices have kick-started job growth in mining and extraction. Strength in mining and manufacturing will offset softness in construction, which will face headwinds as the housing market cools amid rising mortgage rates. Major employment industries include education and health services, professional and business services, and retail trade. Major employers include UPMC Health System, Highmark, Inc., University of Pittsburgh, and The PNC Financial Services Group. According to the U.S. BLS, as of December 2021 the unemployment rate in the area was 4.5 percent.

Community Contacts

A review was conducted of five community contacts completed during the examination period with organizations located throughout the area. The organizations contacted focus on areas such as affordable housing, economic development, and advocacy for LMI individuals and communities. Contacts noted that the COVID-19 pandemic seemed to create an uptick in the number of entrepreneurial start-ups. People have been starting businesses to either supplement income or create a new income source due to lost employment. This new activity has created a need for funding for entrepreneurs and other small business start-ups. In many parts of the AA, housing costs are outpacing household income, and many low-income households are housing cost burdened. Affordable housing is a need for many different constituencies including low-income households, elders, and persons with disabilities. There is also increasing demand for single family homes. Contacts noted that the farming communities in the rural portions of the AA are struggling. There is a need for small farm loans as very few banks offer this type of financing. Contacts also noted that the area has an aging population and that the current housing stock does not adequately meet their needs. There is a need to create more elder housing. In addition, contacts indicated that more needs to be done to help attract and retain younger residents and families. This includes creating affordable housing that is attractive to young families. Contacts further indicated that housing for low-income families and individuals should be deconcentrated away from low-income communities, thus providing these households with access to amenities that may allow for increased opportunities for economic mobility. Other needs identified include:

- Funding for home repair, rehabilitation, and modification
- Affordable workforce housing
- Loan products for people with blemished credit histories
- Down payment assistance programs for LMI homebuyers
- Small dollar loan products
- Affordable car loan products for low-income borrowers
- Support for programs that provide home care services for elders
- More financial institutions offering Small Business Administration loan programs

The area was served by numerous non-profit organizations, community-based organizations, CDFIs, loans funds, economic development organizations, and community development organizations that provide opportunities to help meet community needs.

Scope of Evaluation in Pennsylvania

The Pittsburgh CSA received a full-scope review. This AA accounted for 78 percent of deposits and 66 percent of lending in the state during the evaluation period. The remaining AAs received limited-scope reviews.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

LENDING TEST

The bank's performance under the Lending Test in Pennsylvania is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsburgh CSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans*						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Pittsburgh CSA	18,854	8,492	64	27,410	66.9	78.5
Altoona MSA	587	214	3	804	2.0	1.7
Erie CSA	1,060	579	8	1,647	4.0	3.4
Harrisburg CSA	4,069	947	6	5,022	12.3	7.0
Lancaster MSA	1,515	573	4	2,092	5.1	2.3
Scranton MSA	1,342	811	2	2,155	5.3	3.7
State College MSA	1,107	265	2	1,374	3.4	2.6
PA Non-MSA	334	116	0	450	1.1	0.8
Total	28,868	11,997	89	40,954	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

Dollar Volume of Loans* (\$000s)						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Pittsburgh CSA	3,111,512	555,224	169,852	3,836,588	66.1	78.5
Altoona MSA	71,609	13,648	4,778	90,035	1.6	1.7
Erie CSA	134,378	44,836	20,060	199,274	3.4	3.4
Harrisburg CSA	767,967	57,023	29,895	854,885	14.7	7.0
Lancaster MSA	276,090	25,506	6,227	307,823	5.3	2.3
Scranton MSA	164,750	35,571	8,241	2,08,562	3.6	3.7
State College MSA	244,564	15,270	3,171	263,005	4.5	2.6
PA Non-MSA	37,737	4,757	0	42,494	0.7	0.8
Total	4,808,607	751,835	242,224	5,802,666	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 5.4 percent. The bank ranked fourth among 51 depository financial institutions placing it in the top 8 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 7.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked first among 678 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three competitors with a combined market share of 16.5 percent were Rocket Mortgage (5.9 percent), PNC Bank N.A. (5.8 percent), and Dollar Bank, N.A. (4.8 percent).

According to peer small business data for 2020, the bank had a market share of 8 percent based on the number of small loans to businesses originated or purchased. The bank ranked fourth out of 203 small business lenders, which placed it in the top 2 percent of lenders. The top three lenders with a combined market share of 37.8 percent were PNC Bank N.A. (17.4 percent), American Express National Bank (11 percent), and First National Bank of PA (9.4 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. For this analysis, examiners compared the bank's HMDA and small loans to businesses lending data with available demographic information and aggregate lending data. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

The bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied homes in low-income geographies but exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in moderate-income geographies but exceeded the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the state of Pennsylvania section of 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

The bank's percentage of small loans to businesses in low-income geographies was near to the percentage of businesses in low-income geographies and exceeded the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies approximated both the percentage of businesses in moderate-income geographies and the aggregate distribution of loans.

Lending Gap Analysis

Examiners did not identify any conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was near to the percentage of low-income families and exceeded the aggregate distribution of loans. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of 6.2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 64 CD loans totaling nearly \$169.9 million, which represented 13 percent of the allocated tier 1 capital. CD loans primarily supported economic development activities. By dollar volume, 30.3 percent of CD loans funded affordable housing and 69.7 percent funded economic development.

Examples of CD loans include:

- CBNA originated a \$14.5 million loan to a construction company to finance the rehabilitation of a 191-unit senior housing facility with 151 affordable units. A total of 21 units are targeted for tenants at or below 20 percent AMI, 78 units for tenants at or below 50 percent of AMI, and 52 units for tenants at or below 60

percent AMI. Forty units are considered market rate. Section 8 HAP contracts will support 99 of the affordable units.

- CBNA originated a \$9.2 million loan to support the acquisition and rehabilitation of 10 two-story affordable housing buildings with 101 affordable housing units. A LIHTC was used to provide six units for families with incomes under 20 percent AMI; 46 units for families with incomes less than 50 percent AMI; and 49 units to families with incomes less than 60 percent AMI.
- CBNA originated a \$9.9 million loan to support the construction of 44 new affordable housing units. LIHTCs were used for 38 units for qualified persons who earn less than 60 percent AMI. The remaining units are listed at market rate.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 3,635 loans under flexible lending programs in the AA totaling \$661.5 million. Program volumes included 147 DHM loans totaling \$19.7 million, 198 FHA loans totaling \$27.9 million, 3,012 FNMA loans totaling \$580.2 million, 142 FNMA Home Ready loans totaling \$18.5 million, 54 GoalBuilder HELOC loans totaling \$1.1 million, 17 No Cost/Low-Cost Refinance Mortgage loans totaling \$1.1 million, and 65 VA loans totaling \$12.9 million.

The bank provided 188 CCA down payment grants totaling \$472,000 within the AA.

Conclusions for Areas Receiving a Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Altoona MSA, Erie CSA, Harrisburg CSA, Lancaster MSA, Scranton MSA, State College MSA, and PA Non-MSA AAs was consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance in the limited-scope areas supports the overall Lending Test rating.

Refer to Tables O through R in the state of Pennsylvania section of Appendix D for the facts and data that support these conclusions

INVESTMENT TEST

The bank's performance under the Investment Test in the State of Pennsylvania is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsburgh CSA was excellent.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Pittsburgh CSA	9	65,284	108	74,555	117	33.6	139,838	64.3	9	47,429
Altoona MSA	5	273	7	951	12	3.5	1,224	0.6	0	0
Erie CSA	18	20,381	11	3,238	29	8.3	23,619	10.9	2	1,070
Harrisburg CSA	35	2,859	38	9,399	73	21.0	12,258	5.6	2	1,112
Lancaster MSA	26	5,006	16	2,951	42	12.1	7,957	3.7	0	0
Scranton MSA	5	10,528	29	14,562	34	9.8	25,090	11.5	1	9,383
State College MSA	16	2,372	12	2,769	28	8.1	5,141	2.4	1	132
PA Non-MSA	12	665	1	1,644	13	3.7	2,309	1.1	1	218
Total	126	107,368	222	108,427	348	100	217,436	100	16	59,126

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

** Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

*** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made 108 investments totaling \$74.6 million during the evaluation period, which included 79 qualifying grants and donations totaling \$1.6 million to approximately 40 organizations. The dollar volume of current- and prior- period investments represented 10.7 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 98 percent of investments supported affordable housing, 1.2 percent funded community services to LMI individuals, and 0.9 percent supported economic development. The institution made extensive use of innovative and/or complex investments to support CD initiatives. CBNA made nine LIHTC investments in the current period totaling \$69.8 million, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- CBNA invested \$12.6 million in a multi-investor LIHTC fund for a new construction project for 44 units in Zelenople, PA, addressing an identified need for affordable rental housing. The units are available to individuals and families with three units restricted to tenants at 20 percent of AMI; three units restricted to tenants at 30 percent of AMI; 17 units restricted to tenants at 50 percent of AMI; and 14 units restricted to tenants at 60 percent of AMI. The remaining seven units will be market rate units.
- CBNA invested \$11.8 million in a multi-investor 68-unit LIHTC project to provide affordable housing in Pittsburgh, PA, addressing an identified need for affordable rental housing.
- CBNA invested \$10.9 million in a multi-investor LIHTC fund for a 47-unit project to provide affordable housing in Greensburg, PA, addressing an identified need for affordable rental housing.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Erie CSA, Harrisburg CSA, Lancaster MSA, Scranton MSA, State College MSA and the PA Non-MSA AAs was consistent with the bank's overall performance under the Investment Test in the full-scope area. The bank's performance under the Investment Test in the Altoona MSA was weaker than the bank's overall performance

under the Investment Test in the full-scope area due to a lower volume of qualified CD investments. Performance in the limited-scope areas had minimal effect on the overall Investment Test rating.

SERVICE TEST

The bank's performance under the Service Test in State of Pennsylvania is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsburgh CSA was excellent.

Retail Banking Services

Distribution of Branch Delivery System*													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Pittsburgh CSA	78.5	104	72.7	5.8	12.5	46.2	34.6	1.0	4.9	17.0	50.6	26.8	0.7
Altoona MSA	1.7	3	2.1	0.0	0.0	100.0	0.0	0.0	6.0	11.3	74.9	8.6	0.0
Erie CSA	3.4	8	5.6	25.0	0.0	37.5	37.5	0.0	8.4	11.3	55.3	24.4	0.6
Harrisburg CSA	7.0	10	7.0	10.0	10.0	80.0	0.0	0.0	7.2	12.3	58.5	21.3	0.6
Lancaster MSA	2.3	5	3.5	0.0	0.0	60.0	40.0	0.0	4.3	10.6	73.6	11.6	0.0
Scranton MSA	3.7	8	5.6	0.0	12.5	37.5	50.0	0.0	3.4	21.6	50.5	24.0	0.6
State College MSA	2.6	3	2.1	0.0	0.0	0.0	66.7	33.3	3.3	20.9	40.6	22.9	12.2
PA Non-MSA	0.8	2	1.4	0.0	50.0	50.0	0.0	0.0	0.0	17.9	82.1	0.0	0.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

**Totals may not equal 100.0 percent due to rounding.

***NA stands for not available.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. CBNA's distribution of branches in low-income geographies exceeded, and in moderate-income geographies was near-to the percentage of the population living within those geographies. Examiners gave positive consideration for 10 MUI branches located within one-quarter mile of a LMI geography, where the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AA.

CBNA had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. CBNA had 181 ATMs in the AA, 165 of which were deposit-taking. CBNA provided data that indicated 61.7 percent of households in low-income geographies, and 65.2 percent of households in moderate-income geographies used OLB and mobile banking services in the fourth quarter of 2021. This was an increase of 13.1 percent for households in low-income geographies, and an increase of 11.4 percent for households in moderate-income geographies, from the start of the evaluation period. ADS usage had a positive impact on the Service Test rating.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Pittsburgh CSA	4	19	-2	-1	-8	-4	0
Altoona MSA	0	2	0	-1	-1	0	0
Erie CSA	0	1	-1	0	0	0	0
Harrisburg CSA	0	3	0	-1	-1	-1	0
Lancaster MSA	0	1	0	-1	0	0	0
Scranton MSA	0	1	-1	0	0	0	0
State College MSA	0	1	0	-1	0	0	0
PA Non-MSA	0	0	0	0	0	0	0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

***NA stands for not available.

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems in LMI geographies and/or to LMI individuals. During the evaluation period, the bank closed 19 branches, three of which were in low-income geographies and two of which were in moderate-income geographies. The branch closures were a result of network optimization. CBNA also opened four branches during the evaluation period, one located in a low-income geography, and one located in a moderate-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. CBNA maintained standard business hours and offered traditional banking products for all traditional branch locations in the AA. CBNA generally maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday-Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for the 48 traditional standalone branch locations. Of these, 18 branches did not offer hours on Saturdays, five of which were in LMI geographies. The bank maintained branch hours for the 47 in-store branch locations and seven limited-service branches from 10:00 a.m. to 5:00 p.m. Monday-Friday and Saturdays from 10:00 a.m. to 3:00 p.m. Four limited-service branches held hours from 9:00 a.m. to 4:00 p.m. Monday-Friday and Saturdays 9:00 a.m. to 12:00 p.m. Two limited-service branches did not offer hours on Saturdays. CBNA also has two drive-thru branches within the AA that are open 24 hours a day. CBNA generally made all services available at all branches with the exception of safe deposit boxes which were not available at 63.5 percent of the branches in the AA, and night deposit services which were not available at 33.7 percent of branches in the AA.

Community Development Services

The bank was a leader in providing CD services.

CBNA employees provided 2,111 hours of service to 54 CD organizations. During the evaluation period, service activities were responsive to CD needs, particularly related to technical assistance to financial literacy and financial education targeting LMI individuals. Citizens delivered 132 financial education sessions benefiting 3,925 individuals. Service activity examples during the evaluation period include:

- An employee served on the board for an organization that was founded to revitalize the distressed commercial core and residential enclaves of East Liberty. The employee volunteered for 173 total hours during the evaluation period.

- Bank employees contributed 112 hours in technical assistance to a local organization, that supports financial stability and provides opportunities for residents by originating interest-free loans.
- Bank employees contributed 88 hours to an organization that cultivates an environment for the region's diverse entrepreneurs and small businesses. Employees provided small business financial education sessions to current and prospective small businesses.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Altoona MSA, Erie CSA, Harrisburg CSA, Lancaster MSA, Scranton MSA, and State College MSA AAs was weaker than the bank's overall performance in the full-scope area due to poorer branch distributions. The bank's performance under the Service Test in the PA Non-MSA AA was consistent with the bank's overall performance in the full-scope area. Performance in the limited-scope areas had minimal effect on the overall Service Test rating.

State Rating

State of Vermont

CRA rating for the State of Vermont: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- Based on the data in the tables and performance context considerations discussed below, the overall geographic distribution of lending was excellent and borrower distributions of lending was good.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- Qualified investments were effective and responsive in addressing community credit needs. The bank made an excellent level of qualified investments, grants, and donations.
- The bank's retail delivery services were readily accessible to geographies and individuals of different incomes and the bank provided an adequate level of CD services.

Description of Institution's Operations in Vermont

CBNA delineated two AAs within the state of Vermont including a portion of the Burlington-South Burlington-Barre, VT CSA (Burlington CSA) and the VT Non-MSA AA, which included multiple contiguous, non-MSA counties. Refer to appendix A for a list of the counties reviewed.

The state of Vermont was CBNA's ninth largest rating area based on deposits.

The bank had \$958 million in deposits, representing 0.6 percent of the bank's total domestic deposits as of June 30, 2021. CBNA operated 11 branches and 13 ATMs, of which all were deposit-taking, in the rating area, representing 1.2 percent of total branches and 0.8 percent of total ATMs. The combined areas were served by 23 FDIC-insured banks operating 180 branches. CBNA ranked sixth with 6.1 percent market share. The top three banks and their market share were People's United Bank, N.A. with 28 percent, TD Bank, N.A. with 22.1 percent, and Community Bank, N.A. with 8.6 percent. During the evaluation period, the bank originated and purchased \$427.8 million, or 0.8 percent of its total dollar volume of home mortgage loans and small loans to businesses in the combined areas.

Burlington CSA

The Burlington CSA AA was comprised of two of the three counties in the Burlington-South Burlington, VT MSA and the non-MSA county of Washington.

Citizens had \$509 million in deposits in the Burlington CSA representing 0.3 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated six branches and six ATMs, all of

which were deposit taking, within the rating area, representing 0.6 percent of total branches and 0.3 percent of ATMs. The bank originated and purchased approximately \$229.2 million in home mortgage and small business loans within the Burlington CSA during the evaluation period, representing 0.4 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 15 FDIC-insured institutions operating 89 branches in the AA. Citizens ranked sixth in deposit market share with 5.3 percent. The top three banks by deposit market share are People’s United Bank, N.A. with 30.1 percent, TD Bank, N.A. with 27.8 percent, and Northfield Savings Bank with 10.5 percent. In addition to FDIC-insured institutions, this area is served by several credit unions, mortgage lenders and brokers, and money service businesses.

The following table provides a summary of the demographics, including housing, business, and economic information for the Burlington CSA.

Assessment Area: Burlington MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	64	1.6	15.6	59.4	21.9	1.6
Population by Geography	267,261	1.2	14.4	62.5	21.9	0.0
Housing Units by Geography	118,989	1.1	15.0	62.1	21.8	0.0
Owner-Occupied Units by Geography	73,126	0.8	8.8	66.1	24.3	0.0
Occupied Rental Units by Geography	33,569	2.0	29.9	55.6	12.4	0.0
Vacant Units by Geography	12,294	0.6	11.0	56.0	32.5	0.0
Businesses by Geography	35,279	0.7	17.7	56.4	25.0	0.1
Farms by Geography	1,539	0.4	8.5	67.4	23.7	0.0
Family Distribution by Income Level	65,084	19.3	17.1	22.9	40.7	0.0
Household Distribution by Income Level	106,695	23.1	15.5	18.5	42.9	0.0
Median Family Income MSA - 15540 Burlington-South Burlington, VT MSA		\$82,811	Median Housing Value			\$254,020
Median Family Income Non-MSAs - VT		\$64,849	Median Gross Rent			\$1,031
			Families Below Poverty Level			6.3%

*Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.*

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The weighted average median family income for the AA was \$77,479. Based on this information, low-income families earned less than \$38,739 and moderate-income families earned less than \$61,983. The median housing value in the AA was \$254,020 while the NAR median sales price of a single-family home was \$308,300 in calendar year 2019 and increased to \$402,700 in the fourth quarter of 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant’s income. The calculated maximum affordable monthly mortgage payment was \$968 for a low-income borrower and \$1,549 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,364. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Burlington CSA, the overall household poverty level was 6.3 percent.

Economic Data

According to Moody's Analytics, the Burlington area's strengths include a highly educated workforce, the presence of high-tech jobs and entrepreneurial activity, and access to skiing and scenery that boosts quality of life and draws tourists. However, the area is far from other big cities, has high travel costs, and low birthrates that foster weak population growth. The area's economy is falling further behind the northeast. The area has recouped a smaller share of pandemic related job losses than the region. Leisure and hospitality payrolls are about 20 percent below pre-pandemic levels. Employment in manufacturing is a few percentage points below its pre-pandemic levels. Cross border travel between Vermont and Canada is improving with the reopening of the Canadian border in late 2021. This action, along with the full reopening of the area's ski resorts should provide a lift to tourism. Burlington is closer to Montreal, Ottawa, and Quebec City in Canada than it is to any major U.S. market. The technology industry is growing rapidly. The area has a young, educated population tied to the University of Vermont. An increasing number of high-paying technology jobs will help keep income growth elevated. House price appreciation is strong but trails the state average, and permit issuance is trending higher. Major employment industries include education and health services, government, and professional and business services. Major employers include The University of Vermont Medical Center, University of Vermont, GlobalFoundries, and Shaw's Supermarkets. According to the U.S. BLS, as of December 2021 the unemployment rate was 2 percent.

Community Contacts

A review was conducted of two community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on affordable housing and economic development. Contacts noted that Vermont is a rural state, however most of the investment takes place in Burlington which is urbanized. There is a need for more bank investment in rural areas. Contacts noted that the labor force is declining, and the population is aging. Population trends represent a barbell, with a high concentration of people in their twenties at one end and older people who are either retired or close to retirement age at the other end. Contacts noted that the Church Street Marketplace, a pedestrian mall in Burlington is a hub for small businesses while the Old North End neighborhood is an area with many small businesses with minority owners. Many of these businesses need capital to help them grow and remain sustainable. Other needs identified include:

- Access to credit for micro-businesses with five or fewer employees
- Funding, including flexible credit products and technical assistance for start-up small businesses
- Affordable housing for low-income households
- Elderly and assisted living housing
- Capital to support development activities in rural communities

The area was served by several non-profit organizations, community-based organizations, community development entities, economic development organizations, and social service organizations that provide opportunities to help meet community needs.

Scope of Evaluation in Vermont

The Burlington CSA received a full-scope review. This AA accounted for 53.1 percent of deposits and 53.6 percent of lending in the state during the evaluation period. The VT Non-MSA AA received a limited-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VERMONT

LENDING TEST

The bank's performance under the Lending Test in Vermont is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Burlington MSA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans*						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Burlington MSA	847	783	3	1,633	52.1	53.2
VT Non-MSA	886	615	3	1,504	47.9	46.8
Total	1,733	1,398	6	3,137	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

Dollar Volume of Loans* (\$000s)						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% Rating Area Loans	% Rating Area Deposits
Burlington MSA	189,913	39,285	5,712	234,910	53.8	53.2
VT Non-MSA	167,597	31,011	3,214	201,822	46.2	46.8
Total	357,510	70,296	8,926	436,732	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 5.3 percent. The bank ranked sixth among 15 depository financial institutions placing it in the top 40 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 2.8 percent based on the number of home mortgage loans originated or purchased. The bank ranked eighth among 206 home mortgage lenders in the AA, which placed it in the top 4 percent of lenders. The top three lenders with a combined market share of 37.6 percent were New England Federal Credit Union (25.7 percent), Rocket Mortgage (6.2 percent), and Vermont Federal Credit Union (5.7 percent).

According to peer small business data for 2020, the bank had a market share of 4.9 percent based on the number of small loans to businesses originated or purchased. The bank ranked sixth out of 103 small business lenders, which placed it in the top 6 percent of lenders. The top three lenders with a combined market share of 40.3 percent were Northfield Savings Bank (14.7 percent), People's United Bank, N.A. (13.4 percent), and American Express National Bank (12.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA. For this analysis, examiners compared the bank's HMDA and small loans to businesses lending data with available demographic information and aggregate lending data. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied homes in low-income geographies and equaled the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies approximated the percentage of owner-occupied homes in moderate-income geographies and was near to the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the state of Vermont section of 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

The bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in low-income geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was near to both the percentage of businesses in moderate-income geographies and the aggregate distribution of loans.

Lending Gap Analysis

Examiners did not identify any conspicuous or unexplained gaps in lending in low- and moderate-income geographies. The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

The bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of loans. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and approximated the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the state of Vermont section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of 3.8 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distributions of small loans to businesses.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made three CD loans totaling \$5.7 million, which represented 10.1 percent of the allocated tier 1 capital. By dollar volume, 100 percent of these loans funded economic development activities.

Examples of CD loans include:

- CBNA originated two PPP loans totaling \$4.6 million to an installer of residential solar power systems. These loans ensured employees received a paycheck during the COVID-19 pandemic.

Product Innovation and Flexibility

The bank made limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank originated or purchased 185 loans under flexible lending programs in the AA totaling \$44.9 million. Program volumes included one FHA loan totaling \$225,834, 183 FNMA loans totaling \$44.5 million, and one FNMA Home Ready loan totaling \$173,000.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the VT Non-MSA was consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance in the limited-scope area supports the overall Lending Test rating.

Refer to Tables O through R in the state of Vermont section of Appendix D for the facts and data that support these conclusions

INVESTMENT TEST

The bank's performance under the Investment Test in the State of Vermont is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Burlington MSA was excellent.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Burlington CSA	4	6,998	9	4,084	13	38.2	11,082	59.2	4	1,003
VT Non-MSA	14	4,636	7	3,010	21	61.8	7,646	40.8	3	371
Total	18	11,634	16	7,094	34	100	18,728	100	7	1,003

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

** Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

*** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank made nine investments totaling \$4.1 million during the evaluation period, which included eight qualifying grants and donations totaling \$84,000 to four organizations. The dollar volume of current- and prior-period investments represented 19.6 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 97.9 percent of investments supported affordable housing, 2.0 percent funded community services to LMI individuals, and 0.1 percent supported economic development. The institution made significant use of innovative and/or complex investments to support CD initiatives. CBNA made four LIHTCs in the current period totaling \$4 million, which are generally more complex and require more expertise to execute.

Examples of CD investments in the AA include:

- CBNA invested \$2.0 million with a multi-investor LIHTC fund for a rehabilitation construction project for 30-units in St. Albans, VT, addressing an identified need for affordable rental housing.
- CBNA invested \$1.5 million with a multi-investor for a 60-unit LIHTC project in Burlington, VT, addressing an identified need for affordable rental housing. The project is a scattered site syndication of three distinct legacy tax credit partnerships.
- CBNA provided a \$54,000 grant to a community service agency to support ending hunger in the CSA. The programs support programs for LMI seniors, children, and families in the CSA.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the VT Non-MSA was consistent with the bank's overall performance under the Investment Test in the full-scope area. Performance in the limited-scope area supports the overall Investment Test rating.

SERVICE TEST

The bank's performance under the Service Test in Vermont is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Burlington CSA was excellent.

Retail Banking Services

Distribution of Branch Delivery System*													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Burlington CSA	53.2	6	54.5	0.0	33.3	50.0	16.7	0.0	1.2	14.4	62.5	21.9	0.0
VT Non-MSA	46.9	5	45.5	0.0	40.0	60.0	0.0	0.0	0.0	8.3	78.9	12.8	0.0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

**Totals may not equal 100.0 percent due to rounding.

***NA stands for not applicable.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. CBNA's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. There were no bank branches located in low-income geographies; however, examiners considered that the percentage of the population within low-income geographies was less than 2 percent. As such, examiners weighted the bank's performance in moderate-income geographies more heavily.

CBNA had several ADS including ATMs, telephone banking, OLB, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. CBNA had six ATMs in the AA, all of which were deposit-taking. CBNA provided data that indicated 33.3 percent of households in low-income geographies and 72.4 percent of households in moderate-income geographies used OLB and mobile banking services in the fourth quarter of 2021. There was no increase in usage for households in low-income geographies and a 7.0 percent increase in usage for households in moderate-income geographies, from the start of the evaluation period. ADS usage had a positive impact on the Service Test rating.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Burlington MSA	0	1	0	0	0	-1	0
VT Non- MSA	0	1	0	0	0	-1	0

* The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

**NA stands for not applicable.

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individual. During the evaluation period, the bank did not open any branches and closed one branch in an upper income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AA, particularly LMI geographies and/or to LMI individuals. CBNA maintained standard business hours and offered traditional banking products and services at all branch locations in the AA. CBNA generally maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday-Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for the six standalone branch locations. One branch located in an upper-income geography did not have Saturday hours. CBNA made all services available at all branches with the exception of safe deposit boxes which were not available at two of the branches in the AA.

Community Development Services

The institution provided an adequate level of CD services.

CBNA employees provided 126 hours of service to seven CD organizations. During the evaluation period, service activities were responsive to CD needs, particularly related to financial literacy programs targeting LMI individuals. Other services involved leadership activities, where two employees served on the board of two local non-profit organizations. Service activity examples during the evaluation period include:

- Bank employees served on the board of two organizations providing childcare and youth programming services to predominately LMI families, for a total of 45 hours of service during the evaluation period.
- Bank employees provided 72 hours of financial literacy education in cooperation with local programs targeting LMI families.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the VT non-MSA AA was consistent with the bank's overall performance in the full-scope area. Performance in the limited-scope area supports the overall Service Test rating.

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, small business loans, Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
CitizensOne Community Development Corporation	Subsidiary	CD Investments
Citizens Charitable Foundation	Subsidiary	CD Donations and Grants
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information -Whole Counties
MMSA		
Boston-Worcester-Providence, MA-RI-NH-CT (Boston) CSA	Full-scope	CT: Windham MA: Barnstable, Bristol, Essex, Middlesex, Norfolk, Plymouth, Suffolk, Worcester NH: Hillsborough, Rockingham, Strafford, Belknap, Merrimack RI: Bristol, Kent, Newport, Providence, Washington
New York-Newark, NY-NJ-CT-PA (New York) CSA	Full-scope	CT: Fairfield, New Haven, NY: Dutchess, Orange, Ulster, Westchester PA: Monroe, Pike
Philadelphia-Reading-Camden, PA-NJ-DE-MD (Philadelphia) CSA	Full-scope	DE: New Castle, Sussex NJ: Burlington, Camden PA: Berks, Bucks, Chester, Delaware, Montgomery, Philadelphia
Youngstown-Warren, OH-PA (Youngstown) CSA	Full-scope	OH: Columbiana, Mahoning, Trumbull PA: Mercer
State		
Connecticut		
Hartford-East Hartford, CT CSA	Full-scope	Hartford, Middlesex, New London
Delaware		
Salisbury, MD-DE MSA	Full-scope	Sussex
Massachusetts		
Pittsfield, MA MSA	Limited-scope	Berkshire
Springfield, MA MSA	Full-scope	Franklin, Hampden, Hampshire
MA Non-MSA	Limited-scope	Nantucket
Michigan		
Detroit-Warren-Ann Arbor, MI CSA (Detroit CSA),	Full-scope	Livingston, Macomb, Oakland, Washtenaw, Wayne
Lansing-East Lansing, M MSA	Limited-scope	Ingham, Shiawassee
Saginaw, MI MSA	Limited-scope	Saginaw
New Hampshire		
NH Non-MSA	Full-scope	Carroll, Cheshire, Coos, Grafton, Sullivan
New York		
Albany-Schenectady, NY CSA	Limited-scope	Albany, Fulton, Montgomery, Rensselaer, Saratoga, Schenectady, Warren
Binghamton, NY MSA	Limited-scope	Broome
Buffalo-Cheektowaga, NY MSA	Full-scope	Erie and Niagara Counties

Ithaca-Cortland, NY CSA	Limited-scope	Cortland, Tompkins
Rochester, NY MSA	Limited-scope	Livingston, Monroe, Ontario, Wayne
Syracuse, NY MSA	Limited-scope	Madison, Onondaga
Utica-Rome, NY MSA	Limited-scope	Herkimer, Oneida
NY Non-MSA	Limited-scope	Ostego County
Ohio		
Cleveland-Akron-Canton, OH CSA	Full-scope	Cuyahoga, Geauga, Lake, Lorain, Medina, Summit, Stark
Toledo, OH MSA	Limited-scope	Lucas, Wood
OH Non-MSA	Limited-scope	Scioto
Pennsylvania		
Altoona, PA MSA	Limited-scope	Blair
Erie-Meadville, PA CSA	Limited-scope	Erie, Crawford
Harrisburg-York-Lebanon, PA CSA	Limited-scope	Cumberland, Dauphin, York
Lancaster, PA MSA	Limited-scope	Lancaster
Pittsburgh-New Castle-Weirton, PA-OH-WV CSA	Full-scope	Allegheny, Armstrong, Beaver, Butler, Washington, Westmoreland, Indiana, Lawrence
Scranton--Wilkes-Barre, PA MSA	Limited-scope	Lackawanna, Luzerne
State College, PA MSA	Limited-scope	Centre
PA Non-MSA	Limited-scope	Mifflin, Venango
Vermont		
Burlington-South Burlington, VT CSA	Full-scope	Chittenden, Franklin, Washington
VT Non-MSA	Limited-scope	Addison, Bennington, Rutland, Windham, Windsor

Appendix B: Summary of MMSA and State Ratings

RATINGS CITIZENS BANK, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Citizens Bank, N.A.	Outstanding	Outstanding	Outstanding	Outstanding
MMSA or State:				
Boston CSA	Outstanding	Outstanding	Outstanding	Outstanding
New York CSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Philadelphia CSA	Outstanding	Outstanding	Outstanding	Outstanding
Youngstown CSA	Outstanding	Outstanding	Low Satisfactory	Outstanding
Connecticut	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Delaware	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Massachusetts	Outstanding	Outstanding	Outstanding	Outstanding
Michigan	Outstanding	Outstanding	Outstanding	Outstanding
New Hampshire	Outstanding	Outstanding	Outstanding	Outstanding
New York	Outstanding	Outstanding	High Satisfactory	Outstanding
Ohio	Outstanding	Outstanding	High Satisfactory	Outstanding
Pennsylvania	Outstanding	Outstanding	Outstanding	Outstanding
Vermont	Outstanding	Outstanding	Outstanding	Outstanding

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are

classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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 income that is less than 50 percent of the area median income. or a median family income that is less than 50 percent of the area median income, in the case of a geography.

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.

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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 loans are treated the same 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		
Boston CSA	67,484	17,244,946	100.0	509,056	3.2	2.9	4.0	13.7	12.0	14.0	46.4	41.6	44.5	36.5	43.3	37.4	0.1	0.1	0.1		
Total	67,484	17,244,946	100.0	509,056	3.2	2.9	4.0	13.7	12.0	14.0	46.4	41.6	44.5	36.5	43.3	37.4	0.1	0.1	0.1		

*Source: 2015 ACS; 01/01/2019 - 12/31/2019 Bank Data, 2019 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		
Boston CSA	67,484	17,244,946	100.0	509,056	22.8	8.4	5.4	16.5	19.8	18.2	20.0	24.4	23.2	40.7	44.6	38.9	0.0	2.9	14.2		
Total	67,484	17,244,946	100.0	509,056	22.8	8.4	5.4	16.5	19.8	18.2	20.0	24.4	23.2	40.7	44.6	38.9	0.0	2.9	14.2		

*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	
Boston CSA	43,517	2,652,687	100.0	246,152	7.4	6.8	7.1	15.7	16.5	15.2	39.4	39.4	40.2	36.9	36.9	37.0	0.6	0.4	0.5	
Total	43,517	2,652,687	100.0	246,152	7.4	6.8	7.1	15.7	16.5	15.2	39.4	39.4	40.2	36.9	36.9	37.0	0.6	0.4	0.5	

*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	
Boston CSA	43,517	2,652,687	100.0	246,152	87.3	75.1	35.3	4.7	17.8	8.0	7.1	
Total	43,517	2,652,687	100.0	246,152	87.3	75.1	35.3	4.7	17.8	8.0	7.1	

*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 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	
New York CSA	14,594	5,165,867	100.0	167,416	2.8	3.4	3.1	12.6	11.2	12.3	36.8	30.7	35.9	47.8	54.6	48.6	0.0	0.0	0.0	
Total	14,594	5,165,867	100.0	167,416	2.8	3.4	3.1	12.6	11.2	12.3	36.8	30.7	35.9	47.8	54.6	48.6	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	
New York CSA	14,594	5,165,867	100.0	167,416	21.2	6.3	4.8	15.1	16.7	16.1	17.6	19.6	20.7	46.0	55.1	46.4	0.0	2.4	12.0	
Total	14,594	5,165,867	100.0	167,416	21.2	6.3	4.8	15.1	16.7	16.1	17.6	19.6	20.7	46.0	55.1	46.4	0.0	2.4	12.0	

*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 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	
New York CSA	4,564	291,009	100.0	132,884	7.9	6.3	7.1	14.9	15.8	13.0	30.9	42.3	31.6	46.1	35.5	48.2	0.1	0.1	0.1	
Total	4,564	291,009	100.0	132,884	7.9	6.3	7.1	14.9	15.8	13.0	30.9	42.3	31.6	46.1	35.5	48.2	0.1	0.1	0.1	

*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		
New York CSA	4,564	291,009	100.0	132,884	90.1	79.2	38.8	3.3	16.5	6.6	4.3		
Total	4,564	291,009	100.0	132,884	90.1	79.2	38.8	3.3	16.5	6.6	4.3		

*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 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		
Philadelphia CSA	33,634	7,234,249	100.0	330,147	4.0	2.0	2.4	17.6	14.5	15.6	42.8	39.4	43.0	35.6	44.1	39.1	0.0	0.0	0.0		
Total	33,634	7,234,249	100.0	330,147	4.0	2.0	2.4	17.6	14.5	15.6	42.8	39.4	43.0	35.6	44.1	39.1	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		
Philadelphia CSA	33,634	7,234,249	100.0	330,147	22.1	11.9	7.1	17.2	21.0	17.7	20.0	23.5	21.2	40.7	41.5	35.9	0.0	2.2	18.0		
Total	33,634	7,234,249	100.0	330,147	22.1	11.9	7.1	17.2	21.0	17.7	20.0	23.5	21.2	40.7	41.5	35.9	0.0	2.2	18.0		

*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 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
Philadelphia CSA	18,427	1,130,651	100.0	167,929	5.2	4.4	4.0	18.8	17.3	16.2	37.9	38.1	40.2	37.7	39.7	39.3	0.5	0.5	0.4
Total	18,427	1,130,651	100.0	167,929	5.2	4.4	4.0	18.8	17.3	16.2	37.9	38.1	40.2	37.7	39.7	39.3	0.5	0.5	0.4

*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	
Philadelphia CSA	18,427	1,130,651	100.0	167,929	89.9	75.0	39.6	3.6	17.8	6.4	7.2	
Total	18,427	1,130,651	100.0	167,929	89.9	75.0	39.6	3.6	17.8	6.4	7.2	

*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 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		
Youngstown CSA	1,347	152,789	100.0	24,120	4.3	0.8	0.9	11.5	6.5	7.0	57.6	63.8	59.2	26.6	28.9	33.0	0.0	0.0	0.0		
Total	1,347	152,789	100.0	24,120	4.3	0.8	0.9	11.5	6.5	7.0	57.6	63.8	59.2	26.6	28.9	33.0	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		
Youngstown CSA	1,347	152,789	100.0	24,120	20.5	12.8	8.0	18.5	24.2	21.3	20.8	25.2	22.5	40.2	34.7	33.2	0.0	3.0	15.1		
Total	1,347	152,789	100.0	24,120	20.5	12.8	8.0	18.5	24.2	21.3	20.8	25.2	22.5	40.2	34.7	33.2	0.0	3.0	15.1		

*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			
Youngstown CSA	594	33,422	100.0	11,885	6.9	7.1	6.3	11.6	12.0	9.7	49.4	51.2	47.6	32.2	29.8	36.4	0.0	0.0	0.0			
Total	594	33,422	100.0	11,885	6.9	7.1	6.3	11.6	12.0	9.7	49.4	51.2	47.6	32.2	29.8	36.4	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		
Youngstown CSA	594	33,422	100.0	11,885	81.4	77.6	39.0	5.8	17.5	12.8	4.9		
Total	594	33,422	100.0	11,885	81.4	77.6	39.0	5.8	17.5	12.8	4.9		

*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 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	% 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			
Hartford CSA	5,787	1,217,508	100.0	4.3	3.0	4.6	10.9	8.3	10.1	43.9	41.2	42.4	41.0	47.5	43.0	0.0	0.0	0.0			
Total	5,787	1,217,508	100.0	4.3	3.0	4.6	10.9	8.3	10.1	43.9	41.2	42.4	41.0	47.5	43.0	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	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate			
Hartford CSA	5,787	1,217,508	100.0	22.8	11.3	9.3	16.9	23.2	22.2	20.4	25.0	22.5	39.9	37.6	30.6	0.0	3.0	15.5			
Total	5,787	1,217,508	100.0	22.8	11.3	9.3	16.9	23.2	22.2	20.4	25.0	22.5	39.9	37.6	30.6	0.0	3.0	15.5			

*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	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate			
Hartford CSA	2,700	158,407	100.0	11.4	9.6	9.9	12.8	7.1	12.2	39.8	43.2	41.0	35.7	39.7	36.8	0.2	0.3	0.2			
Total	2,700	158,407	100.0	11.4	9.6	9.9	12.8	7.1	12.2	39.8	43.2	41.0	35.7	39.7	36.8	0.2	0.3	0.2			

*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		
Hartford CSA	2,700	158,407	100.0	38,800	87.7	80.6	38.0	3.8	15.6	8.5	3.7		
Total	2,700	158,407	100.0	38,800	87.7	80.6	38.0	3.8	15.6	8.5	3.7		

*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 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			
Salisbury MSA	1,283	345,961	100.0	23,086	0.0	0.0	0.0	6.5	4.8	3.6	77.0	67.7	69.2	16.4	27.4	27.2	0.0	0.0	0.0			
Total	1,283	345,961	100.0	23,086	0.0	0.0	0.0	6.5	4.8	3.6	77.0	67.7	69.2	16.4	27.4	27.2	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			
Salisbury MSA	1,283	345,961	100.0	23,086	20.1	5.5	3.9	18.2	15.5	12.1	21.2	20.6	16.8	40.4	57.0	50.3	0.0	1.5	17.0			
Total	1,283	345,961	100.0	23,086	20.1	5.5	3.9	18.2	15.5	12.1	21.2	20.6	16.8	40.4	57.0	50.3	0.0	1.5	17.0			

*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 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	
Salisbury MSA	454	20,564	100.0	5,831	0.0	0.0	0.0	8.4	6.6	7.3	71.0	76.4	69.4	20.6	17.0	23.3	0.0	0.0	0.0	
Total	454	20,564	100.0	5,831	0.0	0.0	0.0	8.4	6.6	7.3	71.0	76.4	69.4	20.6	17.0	23.3	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		
Salisbury MSA	454	20,564	100.0	5,831	86.6	83.0	38.4	3.8	11.2	9.6	5.7		
Total	454	20,564	100.0	5,831	86.6	83.0	38.4	3.8	11.2	9.6	5.7		

*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 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		
MA Non-MSA	194	225,583	6.5	1,293	0.0	0.0	0.0	0.0	0.0	0.0	71.5	74.7	72.7	28.5	25.3	27.3	0.0	0.0	0.0		
Pittsfield MSA	190	42,225	6.4	4,922	3.1	4.2	3.8	10.2	8.9	7.9	55.5	45.8	52.5	31.2	41.1	35.8	0.0	0.0	0.0		
Springfield MSA	2,606	416,721	87.2	27,076	4.3	8.7	5.9	12.0	20.1	13.5	38.7	33.4	37.2	45.0	37.8	43.4	0.0	0.0	0.0		
Total	2,990	684,528	100.0	33,291	4.1	7.9	5.3	11.6	18.1	12.1	42.1	36.9	40.9	42.3	37.2	41.6	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		
MA Non-MSA	194	225,583	6.5	1,293	12.6	1.0	1.4	12.7	2.1	4.9	15.0	8.2	9.2	59.7	87.6	69.5	0.0	1.0	15.0		
Pittsfield MSA	190	42,225	6.4	4,922	21.3	9.5	9.0	17.6	24.7	18.6	20.5	20.0	19.6	40.6	42.1	39.4	0.0	3.7	13.5		
Springfield MSA	2,606	416,721	87.2	27,076	24.2	13.0	6.2	16.1	29.4	22.5	18.5	24.7	23.3	41.2	28.2	31.5	0.0	4.8	16.5		
Total	2,990	684,528	100.0	33,291	23.6	12.0	6.4	16.3	27.3	21.2	18.8	23.3	22.2	41.3	32.9	34.2	0.0	4.4	16.0		

*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 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			
MA Non-MSA	72	2,512	5.9	1,624	0.0	0.0	0.0	0.0	0.0	0.0	69.3	54.2	68.5	30.7	45.8	31.5	0.0	0.0	0.0			
Pittsfield MSA	94	4,325	7.7	2,500	14.2	10.6	12.1	6.5	3.2	6.6	41.8	54.3	42.2	37.4	31.9	39.0	0.0	0.0	0.0			
Springfield MSA	1,053	51,619	86.4	15,339	12.9	16.9	12.9	14.4	17.8	13.9	33.0	31.0	32.3	39.0	34.3	40.7	0.7	0.1	0.2			
Total	1,219	58,456	100.0	19,463	12.6	15.4	11.8	12.3	15.6	11.8	36.2	34.1	36.6	38.3	34.8	39.7	0.5	0.1	0.1			

*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		
MA Non-MSA	72	2,512	5.9	1,624	91.3	95.8	24.4	3.5	4.2	5.1	0.0		
Pittsfield MSA	94	4,325	7.7	2,500	84.5	83.0	37.0	4.7	14.9	10.8	2.1		
Springfield MSA	1,053	51,619	86.4	15,339	85.0	79.5	34.3	4.7	12.9	10.3	7.6		
Total	1,219	58,456	100.0	19,463	85.2	80.7	33.8	4.6	12.6	10.2	6.7		

*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 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		
Detroit CSA	16,195	2,815,438	96.3	235,234	6.2	2.7	2.6	18.2	13.8	12.9	36.6	34.1	37.9	38.9	49.3	46.5	0.1	0.1	0.1		
Lansing MSA	435	57,593	2.6	15,167	4.1	4.8	3.7	22.1	16.6	20.1	46.9	51.7	45.6	26.6	26.9	30.4	0.2	0.0	0.2		
Saginaw MSA	180	19,852	1.1	6,467	7.8	0.0	1.4	9.6	0.0	3.8	54.8	84.4	58.5	27.8	15.6	36.3	0.0	0.0	0.0		
Total	16,810	2,892,883	100.0	256,868	6.1	2.7	2.7	18.1	13.8	13.1	38.1	35.1	38.9	37.6	48.4	45.3	0.1	0.1	0.1		

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		
Detroit CSA	16,195	2,815,438	96.3	235,234	22.7	12.0	9.5	16.4	20.5	19.5	18.7	24.9	23.0	42.2	40.2	35.7	0.0	2.3	12.4		
Lansing MSA	435	57,593	2.6	15,167	23.4	17.2	11.0	17.1	24.4	23.4	19.7	23.7	23.0	39.8	32.0	29.9	0.0	2.8	12.6		
Saginaw MSA	180	19,852	1.2	6,467	21.2	12.8	8.1	17.1	24.4	21.4	20.7	27.2	23.5	41.0	34.4	35.7	0.0	1.5	11.3		
Total	16,810	2,892,883	100.0	256,868	22.7	12.2	9.5	16.4	20.6	19.8	18.9	24.9	23.0	42.0	40.0	35.3	0.0	2.3	12.4		

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	
Detroit CSA	9,215	537,589	97.0	105,700	7.8	7.5	7.0	19.3	21.4	19.0	31.1	29.5	30.6	40.7	40.9	42.3	1.0	0.7	1.0	
Lansing MSA	156	7,779	1.6	4,846	9.6	3.8	10.9	24.0	29.5	22.5	31.1	46.8	29.7	31.6	18.6	35.3	3.6	1.3	1.6	
Saginaw MSA	126	4,153	1.3	2,468	6.7	0.8	5.1	11.7	4.0	10.0	52.5	91.3	52.7	29.1	4.0	32.2	0.0	0.0	0.0	
Total	9,497	549,521	100.0	113,014	7.9	7.4	7.1	19.4	21.3	19.0	31.7	30.6	31.1	39.9	40.0	41.8	1.2	0.7	1.0	

*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		
Detroit CSA	9,215	537,589	97.0	105,700	87.2	73.0	41.3	4.9	19.3	7.9	7.7		
Lansing MSA	156	7,779	1.6	4,846	82.6	77.6	41.8	5.1	14.1	12.3	8.3		
Saginaw MSA	126	4,153	1.3	2,468	78.9	80.2	37.2	6.3	15.1	14.8	4.8		
Total	9,497	549,521	100.0	113,014	86.7	73.2	41.3	4.9	19.2	8.4	7.7		

*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 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			
NH Non MSA	1,690	291,077	100.0	13,441	1.0	0.2	0.6	19.7	17.2	16.0	66.2	68.6	68.0	13.1	14.0	15.5	0.0	0.0	0.0			
Total	1,690	291,077	100.0	13,441	1.0	0.2	0.6	19.7	17.2	16.0	66.2	68.6	68.0	13.1	14.0	15.5	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			
NH Non MSA	1,690	291,077	100.0	13,441	21.3	11.7	5.7	20.1	21.6	17.2	22.2	21.8	21.7	36.3	42.2	43.2	0.0	2.7	12.3			
Total	1,690	291,077	100.0	13,441	21.3	11.7	5.7	20.1	21.6	17.2	22.2	21.8	21.7	36.3	42.2	43.2	0.0	2.7	12.3			

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	
NH Non MSA	829	43,147	100.0	6,578	0.8	0.7	0.6	19.8	20.7	18.6	63.1	62.1	64.2	16.3	16.4	16.6	0.0	0.0	0.0	
Total	829	43,147	100.0	6,578	0.8	0.7	0.6	19.8	20.7	18.6	63.1	62.1	64.2	16.3	16.4	16.6	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		
NH Non MSA	829	43,147	100.0	6,578	85.9	79.3	33.6	4.3	14.7	9.8	6.0		
Total	829	43,147	100.0	6,578	85.9	79.3	33.6	4.3	14.7	9.8	6.0		

*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 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	
Buffalo MSA	7,641	1,008,502	43.6	39,359	6.9	4.4	4.0	11.4	10.9	9.4	43.8	40.4	43.8	37.9	44.3	42.8	0.0	0.0	0.1	
Albany CSA	3,422	581,296	19.9	41,350	2.9	2.6	2.8	12.4	15.0	12.3	58.4	52.3	57.1	26.3	30.2	27.8	0.0	0.1	0.0	
Binghamton MSA	470	51,957	2.5	5,217	3.4	3.6	3.1	12.1	16.0	12.3	58.1	49.6	54.9	26.3	30.9	29.7	0.0	0.0	0.0	
Ithaca CSA	202	32,912	1.1	3,308	0.0	0.0	0.0	10.1	14.9	9.5	68.6	63.4	67.1	21.2	21.8	22.7	0.1	0.0	0.7	
Rochester MSA	4,828	655,257	25.9	41,143	3.6	3.5	2.9	11.3	13.3	10.4	50.6	42.4	48.5	34.5	40.9	38.2	0.0	0.0	0.0	
Syracuse MSA	1,396	193,554	8.2	17,840	3.2	2.6	2.4	10.3	12.3	9.4	47.3	43.4	45.4	39.0	41.6	42.8	0.1	0.2	0.1	
Utica MSA	547	67,295	2.9	8,335	5.0	7.9	4.1	7.2	11.9	7.1	60.0	53.2	54.2	27.8	27.1	34.6	0.0	0.0	0.0	
NY Non MSA	156	21,267	0.8	1,502	0.0	0.0	0.0	2.9	5.8	3.3	82.3	76.3	73.7	14.5	17.9	22.9	0.2	0.0	0.1	
Total	18,662	2,612,040	100.0	158,054	4.2	3.7	3.1	11.1	12.5	10.3	52.1	44.5	50.3	32.6	39.3	36.2	0.0	0.0	0.1	

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			
Buffalo MSA	7,641	1,008,502	40.9	39,359	22.2	11.6	7.8	16.6	23.8	20.8	20.3	27.0	23.1	40.9	35.6	34.1	0.0	2.1	14.2			
Albany CSA	3,422	581,296	18.3	41,350	20.5	12.2	8.2	17.4	24.6	22.1	22.0	25.8	24.3	40.1	31.6	33.6	0.0	5.8	11.8			
Binghamton MSA	470	51,957	2.5	5,217	22.6	17.9	7.4	17.6	24.9	19.7	21.0	25.1	22.7	38.8	25.7	34.2	0.0	6.4	16.1			
Ithaca CSA	202	32,912	1.1	3,308	20.0	6.9	6.8	16.2	25.2	19.3	21.7	25.7	24.0	42.1	36.6	39.8	0.0	5.4	10.1			
Rochester MSA	4,828	655,257	25.9	41,143	21.6	13.4	9.4	16.9	24.3	22.2	19.8	25.0	22.6	41.6	34.1	33.1	0.0	3.3	12.6			
Syracuse MSA	1,396	193,554	7.5	17,840	20.7	10.9	8.4	16.6	24.0	20.6	20.2	24.8	23.1	42.5	36.7	36.0	0.0	3.6	11.9			
Utica MSA	547	67,295	3.5	8,335	22.0	13.7	8.5	16.9	28.2	19.6	21.5	23.8	24.4	39.6	31.3	36.4	0.0	6.5	11.1			
NY Non MSA	156	21,267	0.8	1,502	19.1	10.9	5.8	19.1	25.0	18.9	21.5	19.2	22.2	40.3	40.4	43.3	0.0	4.5	9.7			
Total	18,662	2,612,040	100.0	158,054	21.4	12.3	8.4	16.9	24.3	21.3	20.7	25.8	23.4	40.9	34.2	34.3	0.0	3.4	12.7			

*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	
Buffalo MSA	3,293	134,176	36.1	26,144	10.5	8.4	9.0	12.2	11.5	11.2	35.6	36.4	36.3	37.7	42.5	40.7	4.0	1.1	2.8	
Albany CSA	2,134	102,791	23.4	21,550	12.2	10.6	8.8	12.5	10.3	11.9	49.6	50.6	52.0	25.5	28.4	27.0	0.3	0.1	0.3	
Binghamton MSA	399	13,403	4.4	2,972	11.7	15.5	11.6	14.3	15.5	14.8	54.8	51.6	56.8	19.1	17.3	16.8	0.0	0.0	0.0	
Ithaca CSA	94	3,558	1.0	2,542	0.0	0.0	0.0	13.3	17.0	13.0	52.5	54.3	53.3	32.3	28.7	31.6	1.9	0.0	2.0	
Rochester MSA	1,897	69,546	20.8	21,854	9.9	11.3	8.5	12.8	11.9	10.8	41.8	38.6	42.8	35.3	38.1	37.8	0.2	0.1	0.1	
Syracuse MSA	935	47,210	10.3	10,860	9.4	7.5	7.9	10.7	11.2	10.0	39.0	46.4	41.3	38.4	33.5	38.0	2.5	1.4	2.7	
Utica MSA	316	12,276	3.5	4,539	12.7	11.1	12.2	12.8	17.4	12.2	46.7	53.5	44.7	26.3	16.8	29.2	1.4	1.3	1.7	
NY Non MSA	48	1,119	0.5	805	0.0	0.0	0.0	9.6	4.2	9.6	62.0	85.4	68.9	28.0	10.4	21.5	0.4	0.0	0.0	
Total	9,116	384,079	100.0	91,266	10.4	9.7	8.6	12.3	11.7	11.3	43.2	42.9	44.0	32.5	35.1	34.7	1.6	0.6	1.4	

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
Buffalo MSA	3,293	134,176	36.1	26,144	84.7	80.3	38.5	5.0	10.8	10.3	8.9
Albany CSA	2,134	102,791	23.4	21,550	85.5	81.0	34.0	4.1	12.5	10.4	6.5
Binghamton MSA	399	13,403	4.4	2,972	82.5	85.2	34.7	5.1	7.3	12.4	7.5
Ithaca CSA	94	3,558	1.0	2,542	83.7	85.1	33.5	4.3	7.4	12.0	7.4
Rochester MSA	1,897	69,546	20.8	21,854	85.5	80.8	32.3	4.8	10.4	9.8	8.9
Syracuse MSA	935	47,210	10.3	10,860	83.5	81.0	34.3	5.2	12.5	11.2	6.5
Utica MSA	316	12,276	3.5	4,539	83.0	83.2	32.4	4.9	8.9	12.1	7.9
NY Non MSA	48	1,119	0.5	805	82.6	89.6	31.3	3.8	2.1	13.6	8.3
Total	9,116	384,079	100.0	91,266	84.7	81.0	34.8	4.7	11.0	10.6	8.0

*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 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	
Cleveland CSA	13,281	1,814,343	84.7	149,903	6.3	2.9	3.4	15.8	11.8	12.6	41.5	41.1	41.4	36.2	44.1	42.5	0.1	0.0	0.0	
OH Non MSA	174	16,125	1.1	2,043	0.6	0.0	0.1	28.6	20.1	21.0	54.5	48.9	55.0	16.4	31.0	23.9	0.0	0.0	0.0	
Toledo MSA	2,221	283,585	14.2	22,484	7.4	2.4	2.1	13.1	9.0	8.3	42.9	42.8	41.5	36.6	45.7	48.0	0.0	0.0	0.0	
Total	15,676	2,114,052	100.0	174,430	6.3	2.8	3.2	15.7	11.5	12.2	42.0	41.4	41.6	35.8	44.2	43.0	0.1	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	
Cleveland CSA	13,281	1,814,343	84.7	149,903	22.2	12.5	9.3	17.0	22.9	19.5	19.9	24.7	21.6	41.0	36.6	35.1	0.0	3.3	14.5	
OH Non MSA	174	16,125	1.1	2,043	29.3	14.4	7.8	15.4	19.0	17.6	18.3	28.7	22.0	37.0	37.4	32.6	0.0	0.6	20.0	
Toledo MSA	2,221	283,585	14.2	22,484	23.8	12.1	7.2	16.4	22.9	19.3	19.3	23.6	22.6	40.5	37.9	38.9	0.0	3.5	12.0	
Total	15,676	2,114,052	100.0	174,430	22.6	12.5	9.0	16.8	22.8	19.5	19.8	24.6	21.7	40.8	36.8	35.5	0.0	3.3	14.3	

*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			
Cleveland CSA	7,705	366,444	90.5	69,062	9.0	8.5	7.9	15.6	14.6	13.8	35.4	35.8	34.4	39.0	40.4	43.1	1.0	0.7	0.8			
OH Non MSA	89	8,029	1.0	985	14.1	22.5	18.0	29.2	33.7	28.8	40.2	16.9	34.1	16.5	27.0	19.1	0.0	0.0	0.0			
Toledo MSA	723	30,487	8.5	8,885	13.6	13.0	11.8	11.1	14.8	10.9	36.4	40.9	34.9	38.9	31.3	42.4	0.1	0.0	0.0			
Total	8,517	404,960	100.0	78,932	9.7	9.0	8.5	15.2	14.8	13.6	35.6	36.0	34.5	38.7	39.5	42.7	0.8	0.6	0.7			

*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		
Cleveland CSA	7,705	366,444	90.5	69,062	83.5	77.6	46.2	6.0	14.2	10.5	8.2		
OH Non MSA	89	8,029	1.0	985	79.4	55.1	32.4	5.4	39.3	15.1	5.6		
Toledo MSA	723	30,487	8.5	8,885	80.3	77.7	42.9	6.5	13.0	13.1	9.3		
Total	8,517	404,960	100.0	78,932	83.0	77.4	45.7	6.1	14.4	10.9	8.2		

*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%*

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
Altoona MSA	587	71,609	2.0	4,205	3.1	2.4	2.2	9.0	9.2	8.1	77.6	72.2	76.0	10.2	16.2	13.8	0.0	0.0	0.0
Eire MSA	1,060	134,378	3.7	10,877	3.9	2.0	2.0	7.5	6.6	6.8	61.0	57.5	56.3	27.7	34.0	34.9	0.0	0.0	0.0
Harrisburg CSA	4,069	767,967	14.1	53,270	3.1	1.5	2.9	9.7	8.5	8.5	62.5	55.9	59.9	24.7	34.1	28.7	0.0	0.0	0.0
Lancaster MSA	1,515	276,090	5.2	24,681	1.6	1.5	2.2	8.8	8.7	10.3	76.1	72.1	72.6	13.5	17.6	14.9	0.0	0.0	0.0
PA Non MSA	334	37,737	1.2	2,386	0.0	0.0	0.0	13.0	12.0	11.0	87.0	88.0	89.0	0.0	0.0	0.0	0.0	0.0	0.0
Pittsburgh CSA	18,854	3,111,512	65.3	112,201	2.6	1.5	1.3	14.5	11.9	10.7	53.8	46.6	48.8	29.1	40.0	39.2	0.0	0.0	0.0
Scranton MSA	1,342	164,750	4.6	18,458	1.7	1.5	1.6	15.1	15.3	14.3	55.0	39.6	50.3	28.2	43.6	33.7	0.0	0.0	0.1
State College MSA	1,107	244,564	3.8	5,658	0.0	0.0	0.0	16.0	16.3	15.7	51.7	36.4	46.1	31.5	46.7	36.9	0.8	0.6	1.4
Total	28,868	4,808,604	100.0	231,736	2.5	1.5	1.8	12.5	11.3	10.3	59.3	49.9	55.2	25.6	37.3	32.6	0.0	0.0	0.1

*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	
Altoona MSA	587	71,609	2.0	4,205	19.9	14.0	9.9	18.7	27.3	20.1	21.9	24.0	21.3	39.5	29.6	32.7	0.0	5.1	16.0	
Eire MSA	1,060	134,378	3.7	10,877	20.9	12.9	6.4	17.9	26.3	18.3	21.1	23.4	22.5	40.0	33.5	39.5	0.0	3.9	13.3	
Harrisburg CSA	4,069	767,967	14.1	53,270	19.6	11.9	7.8	18.2	23.8	19.2	22.0	25.1	22.1	40.2	36.6	32.7	0.0	2.6	18.2	
Lancaster MSA	1,515	276,090	5.2	24,681	18.3	7.5	7.0	19.2	21.4	21.2	23.1	29.3	24.0	39.4	38.6	33.7	0.0	3.2	14.0	
PA Non MSA	334	37,737	1.2	2,386	21.5	17.4	8.4	20.8	27.2	20.6	23.0	22.5	23.3	34.7	31.1	34.3	0.0	1.8	13.4	
Pittsburgh CSA	18,854	3,111,512	65.3	112,201	20.5	13.3	8.5	17.3	22.8	17.8	20.6	23.2	21.1	41.6	38.2	37.5	0.0	2.4	15.1	
Scranton MSA	1,342	164,750	4.6	18,458	21.5	12.7	8.2	17.5	22.9	18.2	20.5	24.1	20.3	40.5	37.3	34.3	0.0	3.1	19.0	
State College MSA	1,107	244,564	3.8	5,658	19.6	10.5	7.1	18.5	20.6	17.2	21.5	25.7	23.8	40.3	40.8	40.2	0.0	2.4	11.7	
Total	28,868	4,808,604	100.0	231,736	20.2	12.7	8.1	17.9	23.1	18.6	21.2	24.0	21.7	40.7	37.7	35.8	0.0	2.6	15.8	

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		
Altoona MSA	214	13,648	1.8	2,191	7.3	5.1	6.0	8.7	8.9	7.2	76.1	83.6	77.1	7.9	2.3	9.6	0.0	0.0	0.0		
Eire MSA	579	44,836	4.8	6,250	12.4	15.9	11.2	10.9	8.6	10.2	52.4	46.3	53.1	24.3	29.2	25.5	0.0	0.0	0.0		
Harrisburg CSA	947	57,023	7.9	18,067	7.5	5.6	6.0	14.4	14.9	12.4	56.4	60.1	58.5	21.7	19.4	23.1	0.0	0.0	0.0		
Lancaster MSA	573	25,506	4.8	13,189	4.1	8.7	3.7	11.0	12.4	10.6	72.4	64.0	73.5	12.4	14.8	12.2	0.0	0.0	0.0		
PA Non MSA	116	4,757	1.0	1,311	0.0	0.0	0.0	18.6	34.5	17.5	81.4	65.5	82.5	0.0	0.0	0.0	0.0	0.0	0.0		
Pittsburgh CSA	8,492	555,224	70.8	54,000	4.9	4.5	4.2	14.2	13.5	13.7	43.2	42.5	44.5	36.7	38.8	37.1	0.9	0.7	0.5		
Scranton MSA	811	35,571	6.8	10,745	2.9	3.5	2.6	20.2	19.0	18.7	50.0	41.9	50.5	24.8	33.2	26.6	2.1	2.5	1.6		
State College MSA	265	15,270	2.2	2,635	1.6	0.0	0.2	18.3	17.0	17.5	38.5	35.8	41.9	31.9	31.7	29.6	9.6	15.5	10.9		
Total	11,997	751,835	100.0	108,388	5.4	5.1	4.6	14.4	13.9	13.4	51.0	45.9	52.5	28.3	34.1	28.9	0.9	1.0	0.7		

*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
Altoona MSA	214	13,648	1.8	2,191	83.7	78.0	42.6	5.0	16.4	11.2	5.6
Eire MSA	579	44,836	4.8	6,250	83.5	69.3	40.4	5.6	27.1	11.0	3.6
Harrisburg CSA	947	57,023	7.9	18,067	86.1	81.2	40.9	4.0	14.9	9.9	3.9
Lancaster MSA	573	25,506	4.8	13,189	88.1	84.8	47.1	4.5	11.7	7.4	3.5
PA Non MSA	116	4,757	1.0	1,311	81.3	82.8	34.8	4.6	12.1	14.1	5.2
Pittsburgh CSA	8,492	555,224	70.8	54,000	86.1	75.4	42.0	4.4	18.4	9.5	6.2
Scranton MSA	811	35,571	6.8	10,745	86.4	86.1	31.9	4.0	9.6	9.6	4.3
State College MSA	265	15,270	2.2	2,635	85.1	81.5	41.6	3.9	12.1	11.0	6.4
Total	11,997	751,835	100.0	108,388	86.1	77.0	41.3	4.4	17.4	9.6	5.6

*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 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	
Burlington MSA	847	189,913	48.9	13,622	0.8	1.1	1.1	8.8	8.6	10.0	66.1	55.4	63.0	24.3	34.9	25.9	0.0	0.0	0.0	
VT Non MSA	886	167,597	51.1	8,741	0.0	0.0	0.0	5.7	4.9	3.9	81.1	80.2	80.7	13.2	14.9	15.5	0.0	0.0	0.0	
Total	1,733	357,510	100.0	22,363	0.4	0.5	0.7	7.3	6.7	7.6	73.4	68.1	69.9	18.9	24.7	21.8	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	
Burlington MSA	847	189,913	48.9	13,622	19.3	7.8	6.5	17.1	20.0	20.2	22.9	24.3	23.6	40.7	46.6	39.0	0.0	1.3	10.6	
VT Non MSA	886	167,597	51.1	8,741	19.5	8.2	5.0	17.8	19.0	15.5	22.3	22.8	18.9	40.5	48.3	49.7	0.0	1.7	10.8	
Total	1,733	357,510	100.0	22,363	19.4	8.0	5.9	17.4	19.4	18.4	22.6	23.5	21.8	40.6	47.5	43.2	0.0	1.5	10.7	

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			
Burlington MSA	783	39,285	56.0	7,201	0.7	1.3	0.6	17.7	15.6	16.9	56.4	52.9	52.7	25.0	30.1	29.5	0.1	0.1	0.3			
VT Non MSA	615	31,011	44.0	5,897	0.0	0.0	0.0	9.5	14.3	7.9	77.6	69.6	77.4	12.8	16.1	14.7	0.0	0.0	0.0			
Total	1,398	70,296	100.0	13,098	0.4	0.7	0.3	14.1	15.0	12.9	65.7	60.2	63.8	19.7	24.0	22.8	0.1	0.1	0.2			

*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		
Burlington MSA	783	39,285	56.0	7,201	87.8	84.8	31.6	4.2	11.4	8.0	3.8		
VT Non MSA	615	31,011	44.0	5,897	87.3	83.1	32.1	4.0	13.0	8.7	3.9		
Total	1,398	70,296	100.0	13,098	87.6	84.0	31.8	4.1	12.1	8.3	3.9		

*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%*