



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

August 17, 2020

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Geddes Federal Savings and Loan Association  
Charter Number 705278

2208 W Genesee Street, Syracuse NY 13219

Office of the Comptroller of the Currency

5000 Brittonfield Parkway, Suite 102B, East Syracuse NY 13057

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

## Table of Contents

Overall CRA Rating.....	2
Description of Institution.....	3
Scope of the Evaluation.....	3
Discriminatory or Other Illegal Credit Practices Review.....	5
State Rating.....	6
State of New York .....	6
Community Development Test .....	10
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of MMSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

**The lending test is rated: Satisfactory**

**The community development test is rated: Satisfactory**

The major factors that support this rating include:

- The Lending Test rating is based on performance in the state of New York. The performance demonstrated a reasonable geographic distribution of loans to different income levels, a reasonable distribution of borrowers of different incomes, a more than reasonable loan-to-deposit ratio, and a substantial majority of lending within the assessment area (AA).
- The Community Development (CD) Test rating is based on performance in the state of New York. The performance demonstrated adequate responsiveness to CD needs through CD loans, qualified investments, and CD services.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio (LTD) is more than reasonable. Geddes' quarterly average LTD ratio for the period covering the evaluation period, January 1, 2017 through December 31, 2019, is 119.3 percent with a range between 115.3 percent and 123.1 percent. Three similarly situated Upstate New York savings banks had quarterly average LTD ratios during the period of 100.1, 103.9, and 126.1 percent. The bank's average LTD ratio was comparable with the savings banks used in our evaluation.

### Lending in Assessment Area

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

The bank originated and purchased 83.9 percent of its total loans inside its AA during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. The bank's level of lending within its AA was considered favorably within the analysis of geographic distribution of lending by income level of geography.

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	1,098	83.9	209	16.1	1,309	168,339	80.3	41,195	19.7	209,534
Total	1,098	83.9	209	16.1	1,309	168,339	80.3	41,195	19.7	209,534

## Description of Institution

Geddes Federal Savings & Loan Association (Geddes) is a federally chartered mutual savings bank headquartered in the Village of Solvay, New York, in Onondaga County. As of December 31, 2019, Geddes' assets totaled \$558.8 million with \$400 million in deposits, and \$90.8 million in tier 1 capital. Total loans of \$500.9 million consisted of \$498.9 million or 99.6 percent home mortgage loans, which aligns with the bank's strategic focus on residential mortgage lending.

Geddes operates in a single rating area, the state of New York. Within the state of New York, Geddes has designated a single AA, the Onondaga County MSA AA. The AA consists of Onondaga County in its entirety, which is a portion of the Syracuse, N.Y. MSA, MSA #45060. The AA does not arbitrarily exclude any low- or moderate-income geographies. Geddes has two branch locations, both located within its single AA. Geddes offers traditional banking products and services to customers throughout its market area with a strategic focus on home mortgage lending. Geddes operates in a competitive financial services market. Competitors include large banks, community banks, credit card companies, online mortgage lenders, and credit unions. Geddes does not have any legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period.

Geddes' prior Performance Evaluation dated February 24, 2017, resulted in a "Needs to Improve" rating based on a satisfactory Lending Test rating and a needs to improve Community Development Test rating.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period covered January 1, 2017, through December 31, 2019. The bank's primary product is home mortgage loans. Home mortgage loans include home purchase, home improvement, home mortgage refinance, and multi-family loans as reported on the Loan Application Register (LAR) required by the Home Mortgage Disclosure Act (HMDA). Geddes did not originate a sufficient number of small business or small farm loans to make their analysis meaningful; therefore, they are not included within the Lending Test. The evaluation period for CD loans, investments, and services is February 25, 2017 (which represents the end date of the prior evaluation) through December 31, 2019.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the coronavirus pandemic are not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. For Geddes, the overall rating is based solely on the state of New York.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, 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 AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## **State Rating State of New York**

**CRA rating for the State of New York<sup>1</sup>: Satisfactory**

**The Lending Test is rated: Satisfactory**

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

The major factors that support this rating include:

- A reasonable geographic distribution loans to geographies of different income levels.
- A reasonable distribution of loans to individuals of different income levels.
- An adequate responsiveness to CD needs in the state of New York through CD loans, qualified investments, and CD services.

---

<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

## Description of Institution's Operations in New York

Geddes has designated a single AA located in the state of New York, the Onondaga County MSA AA. The AA consists of Onondaga County in its entirety, which is a portion of the Syracuse, N.Y. MSA, MSA #45060.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Onondaga County MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	140	16.4	14.3	35.7	30.0	3.6
Population by Geography	468,304	13.2	11.8	37.9	35.3	1.8
Housing Units by Geography	203,956	12.7	13.6	38.9	33.5	1.3
Owner-Occupied Units by Geography	120,529	3.8	8.7	44.8	42.6	0.2
Occupied Rental Units by Geography	64,112	24.8	21.8	30.8	19.0	3.5
Vacant Units by Geography	19,315	28.5	16.5	29.1	24.7	1.1
Businesses by Geography	27,821	10.4	9.8	39.7	37.0	3.1
Farms by Geography	807	2.9	4.8	44.9	46.5	1.0
Family Distribution by Income Level	112,623	20.9	16.2	19.9	43.1	0.0
Household Distribution by Income Level	184,641	24.9	14.9	16.8	43.4	0.0
Median Family Income MSA - 45060 Syracuse, NY MSA		\$68,468	Median Housing Value			\$130,362
			Median Gross Rent			\$781
			Families Below Poverty Level			10.5%
<i>Source: 2015 ACS and 2018 D&amp;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>						

Geddes operates two branch locations within the AA. The Solvay headquarters location houses a branch, the bank's mortgage center, and administrative offices. The bank has one additional branch located approximately 15 miles across town in Manlius, New York. Both locations have drive-through facilities and 24-hour automated teller machines (ATMs). Additionally, during the evaluation period, the bank partnered with Allpoint Network to provide Geddes' customers with surcharge-free access to Allpoint ATMs throughout the United States (approximately 55 thousand as of the evaluation). The institution also offers account access alternatives including, bank by mail, debit cards, online banking with bill-pay systems, and mobile banking.

Geddes offers traditional banking products and services to customers throughout its AA. As noted above, banking activities primarily focus on home mortgage lending. In addition to traditional home mortgage financing, the bank offers the GeddeStart home purchase mortgage program in response to recognized credit needs of the AA. The program provides special financing terms to low- and moderate-income individuals for the acquisition of homes in low- and moderate-income geographies within Onondaga County. Specifically, the program provides financing up to \$125 thousand with a three percentage down payment, no private mortgage insurance requirement and a half-percent reduction in the rate for 30-year term and quarter-percent reduction in the rate for 20- and 25-year term mortgages.



Geddes will also pay the mortgage tax and attorneys' fees, up to \$1600 for eligible first time homebuyers. During the evaluation period, 17 mortgages totaling \$1.5 million have been originated, five each in 2017 and 2018, and seven in 2019.

Geddes faces competition for deposit and loan customers. As of June 30, 2019, there were 15 FDIC-insured institutions in the AA. These financial institutions had 111 offices in the AA, with deposits totaling \$10.7 billion. Geddes ranked seventh with a 3.9 percent deposit market share. The deposit market in the AA is dominated by four large national banks whose combined market share totals 71.7 percent; specifically, M&T Bank (29.0 percent), KeyBank, N.A. (21.7 percent), Bank of America (10.5 percent), and JP Morgan Chase (10.5 percent). Geddes ranked seventh in the AA in overall HMDA market share with 3.3 percent, per the 2019 Peer Mortgage Data.

The overall economy in the AA was stable over the evaluation period. According to the U.S. Bureau of Labor Statistics (BLS), the unemployment rate in Onondaga County remained relatively consistent during the evaluation period at 4.1 percent as of December 2019, 3.8 percent as of December 2018 and 4.5 percent as of December 2017. The unemployment rate in the AA was above the overall state of New York unemployment rate for 2019 which averaged 3.9 percent; and below the overall state of New York unemployment rate for 2018 and 2017 which averaged 4.0 percent and 4.6 percent respectively. The largest employers in the AA were Upstate University Health System, Syracuse University, St. Joseph's Hospital Health Center, Wegmans, and Crouse Hospital.

The OCC contacted a local CD organization that focuses on the improvement of the housing stock in low and moderate-income areas of Onondaga County, with a focus within the City of Syracuse. The organization works to fulfill its mission through the purchase, rehab, and sale of properties to low- and moderate-income purchasers, financing of home improvement loans and the provision of grants to low- and moderate-income borrowers, and financial literacy classes. The organization's Chief Executive Officer (CEO) reports credit needs are home improvement and purchase money mortgage loans for low- and moderate-income borrowers. The housing stock in the area is old with potentially hazardous conditions such as lead paint and asbestos. The result is a pressing credit need in home improvement loans to remediate critical safety concerns such as lead, asbestos, sewer or water issues, or roof damage that, if not fixed make the properties unsafe and uninhabitable. As noted, the CEO also reports that there is a need for purchase money mortgages. Four local financial institutions have begun purchasing these seasoned loans, providing liquidity back to the organization.

## **Scope of Evaluation in New York**

A full-scope review of the Onondaga County MSA AA was performed. This is the bank's only AA and where its main office and branch are located. The bank's primary product is home mortgage lending. The bank did not originate a sufficient number of small business or small farm loans to make their analysis meaningful, therefore, they were excluded from analysis.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK**

### **LENDING TEST**

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

## **Conclusions for (Area/Areas) Receiving (a Full-Scope Review/Full-Scope Reviews)**

Based on a full-scope review, the bank's lending performance in the state of New York is reasonable.

### **Distribution of Loans by Income Level of the Geography**

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

#### ***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.

The distribution of home mortgage loans to low-income geographies is below the percentage of owner-occupied housing units within those geographies, but near to the aggregate industry distribution percentage. Per the 2015 ACS data, there are only 4,580 owner-occupied housing units located within low-income geographies in the AA. As of the 2019 Peer Mortgage data, 72 lenders were competing for home mortgage loans within these geographies, with the market dominated by a large credit union and three large financial institutions holding a combined market share of over 36 percent. Despite the level of competition and its limited branch network, Geddes ranked within the first quartile (18<sup>th</sup>) in market share for lending to low-income borrowers. The distribution to moderate-income geographies is somewhat below both the percentage of owner-occupied housing units within those geographies and the aggregate industry distribution percentage.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to individuals of different income levels given the product lines offered by the bank.

#### ***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 bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to low-income borrowers is well below the percentage of low-income families in the AA and below the aggregate industry distribution percentage; but is reasonable when considering the level of competition and the affordability of home financing for low-income families in the AA. The distribution to moderate-income borrowers is near to the percentage of moderate-income families in the AA and below the aggregate industry distribution percentage.

The December 31, 2019, updated median housing sales price in the MSA per Realtor.com was \$153 thousand. Values rose sharply during the evaluation period, up 15 percent from \$133 thousand in January 2017, increasing the challenge for low-income borrowers to qualify for a home mortgage financing. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making less

than \$39,750 per year (or less than 50 percent of the 2019 FFIEC adjusted median family income in the AA) could afford a mortgage payment of \$994 per month. However, within the state of New York property taxes are higher than those in most of the country. The effective tax rate in Onondaga County is 2.8 percent. This results in a monthly real estate tax payment of \$345 on a property valued at \$153,000, which when considered, illustrate that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,116 (\$821 principal and interest and \$345 taxes). Additionally, these calculations are based upon the 2019 FFIEC adjusted median family income for the entire Syracuse, N.Y. MSA, MSA #45060, while the AA is comprised solely of Onondaga County. The income level within the county is significantly less than that of the entire MSA. The 2019 ACS Census one year survey reported the median income within the county to be \$61,577, approximately \$18,000 less than that of the Syracuse, N.Y. MSA, MSA #45060 and \$10,531 less than that of the state of New York overall. When considering the income level of the county, the maximum monthly principal and interest payment for a low-income borrower drops to \$770.

In conjunction with the affordability issue, the level of competition from FDIC-insured institutions, credit unions, and mortgage lenders within the AA, makes it difficult to originate loans to low-income borrowers. There is a relatively strong level of competition for low- and moderate-income borrowers in the AA. The top five lenders dominate the market with more than 40 percent combine market share of both low- and moderate-income borrowers. Specifically, for low-income borrowers, the top five lenders held 45.7 percent of the market with Empower Federal Credit Union (Empower), M&T Bank, Quicken Loans, Wells Fargo Bank, N.A. (Wells), and Community Bank N.A. holding approximately 25.0, 7.5, 5.2, 4.5, and 3.5 percent respectively. In the market for moderate-income borrowers, the top five lenders held 41.1 percent of the market with Empower, M&T Bank, Wells, Paragon Homme Loans, and KeyBank N.A. holding approximately 20.8, 6.0, 5.4, 4.6, and 4.4 percent respectively. Despite the level of competition and Geddes' limited branch network, per the 2019 Peer Mortgage Data, Geddes ranked 13<sup>th</sup> in market share (among 82 lenders) for lending to low-income borrowers and 14<sup>th</sup> (among 2,629 lenders) for lending to moderate-income borrowers in the AA.

### **Responses to Complaints**

The bank did not receive any complaints related to CRA lending performance in this rating area.

## **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test in the state of New York is rated Satisfactory.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

## Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Onondaga County MSA AA	2	100.0	1,000	100.0

Geddes demonstrated adequate responsiveness to community development needs through community development loans. Community development lending consisted of two loans totaling \$1.0 million, both to an organization dedicated to providing opportunities for affordable housing to low- and moderate-income individuals which is an identified credit need in the AA.

## Number and Amount of Qualified Investments

The Qualified Investment Table, shown below, set forth the information and data used to evaluate the bank's level of qualified CD investments. These tables include all CD investment, including prior period investments that remain outstanding as of the examination date.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Onondaga County MSA AA	0	0	81	2,086	81	100.0	2,086	100.0	0	0

\* 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.

Geddes demonstrated adequate responsiveness to community development needs through qualified investments and grants. During the evaluation period, Geddes purchased six qualified investments totaling \$1.96 million, consisting of a capital investment of \$500 thousand in a fund dedicated to financing the purchase and improvement of affordable housing; and five municipal bond investments whose purpose are the revitalization and capital improvement of facilities and essential services within the city of Syracuse and the Village of Solvay, which contain the majority of the low- and moderate-income census tracts in the AA. The bank also made 75 donations totaling \$125.6 thousand to organizations dedicated to supporting affordable housing for low- or moderate-income individuals, provided community services to low- and moderate-income individuals, and contributed to the revitalization or stabilization of low- and moderate-income geographies within the bank's AA.

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

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

Geddes demonstrated an adequate level of community development service activity responsive to community development needs in the AA, given the asset size, limited branch presence, and limited number of employees of the institution. Bank employees serve on the Boards of Directors or Board Loan Committees of seven organizations that provide CD services in the AA, providing approximately 689 hours of service during the evaluation period. The CD organizations are centered around affordable housing and community service. Additionally, the bank provided financial literacy classes to schools in the AA, including those in low- and moderate-income areas. The lesson plans provide information on budgeting, spending, and savings goals.

## 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 MSA(s) and non-MSA(s) 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.”

<b>Time Period Reviewed:</b>	01/01/17 to 12/31/19	
<b>Bank Products Reviewed:</b>	Home mortgage loans Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>New York</b>		
Onondaga County MSA AA	Full Scope	Onondaga County

## Appendix B: Summary of MMSA and State Ratings

---

RATINGS		Geddes Federal Savings & Loan Association		
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating	
Geddes	Satisfactory	Satisfactory	Satisfactory	
MMSA or State:				
Onondaga County MSA AA	Satisfactory	Satisfactory	Satisfactory	

(\*) The Lending Test and Community Development Test carry equal weight 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 low- and moderate-income areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.



**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

**Moderate-Income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## Appendix D: Tables of Performance Data

---

### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> 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.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																<b>2017-2019</b>		
	<b>Total Home Mortgage Loans</b>			<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>		
Assessment Area	#	\$	% 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
Onondaga County MSA AA	1,098	168,338	100.0	3.8	2.2	2.4	8.7	6.6	8.3	44.8	30.6	44.2	42.6	59.9	45.0	0.2	0.7	0.2
<b>Total</b>	1,098	168,338	100.0	3.8	2.2	2.4	8.7	6.6	8.3	44.8	30.6	44.2	42.6	59.9	45.0	0.2	0.7	0.2

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																<b>2017-2019</b>		
	<b>Total Home Mortgage Loans</b>			<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>		
Assessment Area	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Onondaga County MSA AA	1,098	168,338	100.0	20.9	6.3	10.3	16.2	15.0	22.3	19.9	20.4	22.2	43.1	57.3	33.2	0.0	0.6	12.0
<b>Total</b>	1,098	168,338	100.0	20.9	6.3	10.3	16.2	15.0	22.3	19.9	20.4	22.2	43.1	57.3	33.2	0.0	0.6	12.0

*Source: 2015 ACS Census; 01/01/2017 - 01/31/2019 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0*