



PUBLIC DISCLOSURE

September 30, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Citizens Bank, N.A.
Charter Number: 24571

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 **Citizens Bank, N.A.** (CBNA) 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 Outstanding performance in all rating areas.
- The Investment Test rating is based on Outstanding performance in all rating areas.
- The Service Test rating is based on the significant weighting of the Boston Multistate Combined Statistical Area (MCSA). Outstanding performance was noted in five rating areas, including the Boston MCSA and High Satisfactory performance was noted in five rating areas.

Flexible and Innovative Lending Products

The bank offered several qualified Community Reinvestment Act (CRA) affordable mortgage products during the evaluation period. Some of the more significant products and volume of originations include:

- **Destination Home Loan Program-** Proprietary first mortgage offering low- and moderate-income (LMI) borrowers flexible underwriting terms and no requirement for mortgage insurance. To help ensure responsible homeownership, there is a requirement for home buyer education. CBNA partners with U.S. Department of Housing and Urban Development (HUD) approved housing counseling agencies to provide this service. During the evaluation period, CBNA originated 636 loans for \$103

million in its full-scope assessment areas (AA or AAs).

- **Closing Cost/Down Payment Assistance** – Provides first time homebuyers, specifically LMI borrowers and/or property located in a LMI geography, with grant funds of 3 percent up to a maximum of \$2500 (no lien on property or repayment required) to be used towards down payment and/or closing costs. During the evaluation period, CBNA originated 603 loans for \$1.6 million in its full-scope AAs.
- **Fannie Mae HomeReady** - Designed for LMI borrowers, with expanded eligibility (up to 97 percent loan-to-value) for financing homes in low-income communities. HomeReady loans provide affordable conventional financing with low down payments, flexible source of funds, and innovative underwriting flexibilities. This product can be used in conjunction with the Citizens Bank Closing Cost/Down Payment Assistance Program. During the evaluation period, CBNA originated 475 loans for \$74.5 million in its full-scope AAs.
- **Home Improvement Loans** - CBNA offered two unique home improvement loans. The EZ and EE Loans were designed for LMI owner-occupied households or borrowers residing in LMI geographies. At least 50 percent of either loan has to be used for home improvement and the remainder can be used to pay off existing debt. Both programs offer loan sizes of \$1,000 - \$10,000 and the maximum debt-to-income ratio is 45 percent. Neither program requires a property appraisal or to be collateralized. During the evaluation period, CBNA originated 1,066 loans for \$9.1 million in its full-scope AAs.
- **FHA and VA Programs** – Federal Housing Authority (FHA) and U.S. Department of Veteran Affairs (VA) insured loans have more flexible lending criteria than conventional mortgage loans. HUD provided mortgage insurance for FHA loans, which enabled the bank to offer additional loan options to borrowers who may not have qualified for a conventional mortgage. During the evaluation period, CBNA originated 1,475 FHA loans for \$282.8 million and 432 VA loans for \$78.4 million in its full-scope AAs.

Flexible and Innovative Retail Service Products

- **VantageLink** – Introduced in 2017, the platform enables small businesses to quickly and easily apply online for loans and lines of credit up to \$150,000. In most cases customers are notified of the approval decisions the same business day, and loans are funded within three business days. VantageLink also incorporates a unique “second look” component.
- **Fee Free Cash Advance** - As a service to those living in and around the communities CBNA serves, every branch, regardless of income designation, provides fee free advances on government issued payment cards equipped with cash advance capability. The service is not limited to CBNA customers; rather it is available to any person who presents valid identification at the time of the cash advance request.

Branch Closings

The primary reasons for the substantial majority of branch closings were the financial performance of those branches and/or non-renewal of contract for in-store branches. The bank provided the required branch closing notification.

“Near to” branches

The bank provided account opening reports of branches located in middle- and upper-income branches that were one quarter of a mile from a low- or moderate-income tract to determine if the “near to” branch(es) provided additional accessibility to LMI persons. Where accessibility improved, it is noted in the respective rating area.

Branch Hours/Retail Products

Branch hours and retail product offerings are generally consistent throughout the bank’s AAs. Where substantial differences were noted, they are discussed in the appropriate rating area. Standard hours are 9 a.m. to 4 p.m., Monday through Thursday, 9 a.m. to 5 p.m. on Friday, and 9 a.m. to 12 p.m. for those branches with Saturday hours.

Other Information

AAs – The Office of the Comptroller of the Currency (OCC) determined that all AAs consisted of whole geographies and met the requirements of the regulation. The areas reasonably reflected the different trade areas that CBNA’s branches service and did not arbitrarily exclude any LMI areas.

Lending Gap Analysis – The OCC reviewed summary reports and maps, and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. The OCC did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Deposit Market Share - The OCC used summary deposit data reported to the Federal Deposit Insurance Corporation (FDIC) as of June 30, 2018, which was the most recent public data available during the evaluation period.

Lending in Assessment Area

An adequate percentage of the bank’s loans are in its AAs. The bank originated and purchased 50.3 percent of its total loans inside the bank’s AAs 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. It was noted that the bank engages in business indirect auto lending that is offered nationwide/outside of the bank’s traditional footprint, which had the effect of lowering the in/out performance ratio.

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	60,074	51.0	57,762	49.0	117,836	11,788,312	38.6	18,783,128	61.4	30,571,439
Small Business	30,889	48.9	32,231	51.1	63,120	1,677,647	50.8	1,621,920	49.2	3,299,567
Small Farm	0	0	0	0	0	0	0	0	0	0
Total	90,963	50.3	89,993	49.7	180,956	13,465,959	39.8	20,405,048	60.2	33,871,006

Description of Institution

CBNA is an interstate commercial bank headquartered in Providence, Rhode Island. CBNA is a wholly owned subsidiary of Citizens Financial Group. At December 31, 2018, CBNA was the 22nd largest U.S. bank based on asset size. Subsequent to the end of the evaluation period, Citizens Bank of Pennsylvania, a state-chartered affiliate bank, was merged into CBNA on January 3, 2019, adding over 340 branches and \$34 billion in assets to the national bank.

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, 2018, CBNA had 766 branch office locations and 1,244 ATMs (1,124 deposit taking) within its AAs. CBNA had ten rating areas that include eight state ratings and two MCSAs. The bank conducts operations in Rhode Island, Massachusetts, Connecticut, New Hampshire, Vermont, Delaware, New York, Michigan, and Ohio. At the request of the bank, community development (CD) investments made by CitizensOne CDC, a CBNA subsidiary, were considered in the evaluation.

The table below provides basic bank financial information as of the beginning of the first year (with the exception of Net Income) and end of the third year of the evaluation period:

Financial Information						
	1/1/2016			12/31/2018		
	Balance Sheet \$ (000s)	% of Total Loans		Balance Sheet \$ (000s)	% of Total Loans	% Growth/(Decline) in Period
Loan Mix						
Real Estate	32,944,559	41.3		41,085,692	41.2	+24.7
Commercial	21,936,021	27.5		30,270,665	30.3	+38.0
Individual	16,870,495	21.2		22,315,071	22.4	+32.3
Agricultural	0	0		0	0	0
All Other Loans and Leases	7,940,004	10.0		6,087,363	6.1	(-23.3)
Total Assets						
	108,064,717			129,426,633		+19.8
Total Deposits						
	77,576,145			93,888,356		+21.0
Net Income						
	881,152 (Year End 2016)			1,385,527		+57.2
Tier 1 Capital						
	10,754,020			11,994,323		+11.5

Source: FFIEC Call Reports

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 January 4, 2016.

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, 2016, to December 31, 2018.

In evaluating the bank's lending performance, the OCC reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under the CRA. All home mortgage products were reviewed, and conclusions reached in the aggregate. The bank made no reportable farm loans during the evaluation period.

Under the Lending Test, we performed separate analysis of 2016 data and 2017 to 2018 data, due to changes instituted by the 2015 American Community Survey (ACS), which updated income, population, and housing information. The ACS also resulted in changes to the income designations of some geographies. The changes became effective January 1, 2017.

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 MCSA, combined statistical area (CSA), or metropolitan statistical area (MSA) 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, except when part of a MCSA/CSA. 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 where applicable, multistate ratings.

The MCSA, CSA, and state ratings are based on performance in all bank AAs. The bank's performance in each year of the evaluation periods was weighted equally. The Boston MCSA rating area carried the greatest emphasis in the OCC's conclusions as this area represented CBNA's most significant market with approximately 62 percent of bank deposits, 45 percent of HMDA and small loans to businesses originated and purchased, and 46 percent of the branch network. Refer to the "Scope" section under each MCSA and State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

Multistate Consolidated Statistical Area Rating

Boston-Worcester-Providence-MA-RI-NH-CT Multistate Combined Statistical Area (Boston MCSA)

CRA rating for the Boston MCSA¹: 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 reflect excellent responsiveness to AA credit needs.
- Good geographic distribution of loans in its AA.
- Excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are readily accessible to geographies and individuals of different income levels.
- The bank is a leader in providing CD services.

Description of Institution's Operations in Boston MCSA

This AA consists of geographies in Massachusetts, New Hampshire, Connecticut, and Rhode Island and include a substantial portion of the Boston-Cambridge-Newton MA-NH MSA and the entire Barnstable Town MA MSA, Providence-Warwick RI-MA MSA, Worcester MA-CT MSA, and the Manchester-Nashua NH MSA. Within Massachusetts it includes Barnstable, Bristol, Essex, Middlesex, Norfolk, Sussex, and Worcester counties; in New Hampshire, Belknap, Hillsborough, Merrimack, Rockingham, and Strafford counties; in Connecticut, Windham county; and in Rhode Island, Bristol, Kent, Newport, Providence, and Washington counties.

This AA represents the largest retail market for the bank in terms of loans, deposits, and branches.

¹ 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.

CBNA had \$55.9 billion in deposits in the MCSA representing 61.9 percent of the bank's deposits. The local banking environment is highly competitive with 169 FDIC-insured institutions operating 2,441 branches. CBNA ranked third in deposit market share with 12.8 percent. The two banks ahead of CBNA are State Street Bank and Trust with 25.6 percent and Bank of America with 20.7 percent. CBNA operated 352 branches and 715 ATMs in the CSA, representing 46 percent of total branches and 57.5 percent of total ATMs.

The area poses a number of challenges to home mortgage lenders in the AA, including CBNA. The MCSA is a high-cost housing area, limiting access to affordable home ownership among LMI borrowers. The median housing value in the CSA is \$339,010 while the National Association of Realtors (NAR) 4Q2018 median sales price of a single-family home ranged from \$268,200 to \$460,300. One simplistic 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 4.5 percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$47,942 (or less than 50 percent of the FFIEC adjusted median family income in the AA) could afford a \$218,573 mortgage with a payment of \$1,198 per month; a moderate-income borrower earning \$76,708 (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$349,721 mortgage with a payment of \$1,918 per month.

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 MCSA, 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 middle- and upper-income tracts, the combined poverty level is 7 percent.

As part of the CRA evaluation, the OCC reviewed information from four community contacts made within the Boston MCSA to determine local economic conditions and community needs. These contacts included representatives from affordable housing organizations and community and economic development organizations. Needs identified include: affordable housing (including rental housing), financial education, small business loans (under \$50,000 and limited operating history), and low-cost deposit programs.

During the evaluation period, CBNA was recognized as a "Gold Tier Lender," the highest honor awarded by the Massachusetts Housing Partnership (MHP). 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 was bestowed this honor by MHP because of its steadfast support and commitment to the ONE Mortgage Program, which is designed to help LMI first time homebuyers achieve homeownership.

Boston MCSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Boston MCSA 2018						
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	574,907	7.3	15.3	39.8	36.9	0.6
Farms by Geography	14,141	2.5	10.2	46.5	40.7	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 MD		\$90,699	Median Gross Rent			\$1,134
Median Family Income MSA - 15764 Cambridge-Newton-Framingham, MA MD		\$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 MSA - 40484 Rockingham County-Strafford County, NH MD		\$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 Census and 2018 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>						

Scope of Evaluation in Boston MCSA

The Boston MCSA received a full-scope review. This AA carried significant weight in the overall bank rating as it accounted for nearly 62 percent of bank deposits, 45 percent of HMDA

and small loans to businesses during the evaluation period, and 46 percent of the bank's branch network.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN BOSTON MCSA

LENDING TEST

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

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

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs when considering the competition.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Boston MCSA	28,090	13,743	0	76	41,909

Dollar Volume of Loans (000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Boston MCSA	6,659,843	807,112	0	778,034	8,244,989

CBNA ranked third in deposits with 12.8 percent market share. In overall home mortgage lending, CBNA ranked first with 6.7 percent market share. Wells Fargo Bank ranked second with 4.9 percent market share, and Bank of America ranked third with 3.6 percent market share. There are 768 mortgage lenders in the AA, many without a depository presence. There are 169 depository institutions in the AA. In small loans to businesses, CBNA ranked eighth with a 2.8 percent market share. The top three lenders are significant business credit card lenders which had a combined market share of 43.8 percent. The lead lender was American Express with 24.9 percent market share, followed by Bank of America with 11 percent market share, and Citibank with 7.9 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the Boston MCSA 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 geographic distribution of home mortgage loans is good.

2017 to 2018

The proportion of loans in low-income geographies approximated the proportion of owner-occupied homes in those geographies and was well below the aggregate distribution of loans. The proportion of loans in moderate-income geographies approximated the proportion of owner-occupied homes in those geographies and was below aggregate distribution of loans.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans in both low- and moderate-income geographies approximated both the proportion of owner-occupied home in those geographies and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the Boston MCSA 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. The geographic distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans in low-income geographies substantially met and in moderate-income geographies exceeded the proportion of businesses located in those geographies and exceeded the aggregate distribution of loans in both low- and moderate-income geographies.

2016

The proportion of loans in low-income geographies was below the proportion of businesses located in those geographies and approximated the aggregate distribution of loans. Performance in moderate-income geographies was consistent with 2017 to 2018.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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 Boston MCSA 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. The borrower distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans to low-income borrowers was below the proportion of low-income families within the CSA but exceeded the aggregate distribution of loans. The distribution is

good to low-income borrowers considering the performance relative to all lenders. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution of loans. The high housing cost, limited availability of housing that low-income borrowers can afford to acquire, and poverty levels within the MCSA constrain lending opportunities to low-income borrowers.

2016

The proportion of loans to low-income borrowers was well below the proportion of low-income families but exceeded the aggregate distribution of loans. Performance to moderate-income borrowers was consistent with 2017 to 2018.

Small Loans to Businesses

Refer to Table R in the Boston MCSA 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. The borrower distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans to small businesses approximated the percentage of small businesses in the CSA and significantly exceeded the aggregate distribution of loans. Performance is excellent when considering the competition from the larger financial institutions in the MCSA that dominate the market and originate small business loans through credit cards.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making CD loans.

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

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include many complex projects where the bank often acted in a leadership role. The dollar volume of CD lending represents 10.5 percent of allocated Tier 1 Capital. During the evaluation period, CBNA originated one letter of credit in the Boston MCSA for \$3.4 million meeting LMI community service needs.

Examples include:

- \$10 million loan for a 217-unit affordable housing development, with all units allocated to tenants earning less than 80 percent of the area median income (AMI).

- \$8.3 million in construction and term financing for a 96-unit affordable housing development, with the majority of units allocated to tenants earning less than 80 percent of the AMI.
- \$4 million working capital line of credit to a healthcare organization located in a low-income geography that provides health and social services to primarily LMI individuals. Sixty-six percent of the organization's client base are recipients of state-funded Medicaid assistance.
- \$32.5 million loan to refurbish a large blighted factory in a state designated Economic Target Area and state designated Economically Distressed Area. The loan created over 24,000 square feet of commercial space and 27 units of affordable housing. This loan was one of the first to utilize the Massachusetts Workforce housing funds and historical tax credits.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

The MHP One program is a portfolio loan program. Loans are provided to LMI first-time homebuyers by lowering the monthly costs of homeownership. The participating lender underwrites the mortgage loan for up to 97 percent of the purchase price. A portion of the interest costs for eligible borrowers is paid by public funds. The borrower does not pay mortgage insurance and public funds provide a loan loss reserve for participating lenders. Public entities, including the Commonwealth of Massachusetts, acting through the Department of Housing and Community Development, the MHP, and individual cities and towns contribute to the pool of public funds for the interest subsidy and loan loss reserve payments. During the evaluation period, the bank originated 242 loans totaling \$61.8 million.

CBNA participates in a Connecticut Housing Finance Authority (CHFA) mortgage program in Connecticut. The program features a below market interest rate, low down payment requirements and a down payment assistance loan. The borrowers must meet income limit requirements and the property must have a sales price not to exceed the CHFA limits. The loans are financed through the sale of tax-exempt bonds. CBNA originated two loans totaling \$196.3 thousand.

INVESTMENT TEST

The institution's performance under the Investment Test in the Boston MCSA is Outstanding.

Based on a full-scope review, the institution's performance in the Boston MCSA is excellent.

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

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Boston MCSA	174	\$354,225	692	\$450,911	866	100	\$805,136	100	66	\$231,302

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

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

The combined prior and current period dollar volume represents 10.8 percent of allocated Tier 1 Capital. The bank's investments consisted of low-income housing tax credits (LIHTCs), mortgage backed securities (MBSs), equity investments, and grants. Examples include:

- \$33.2 million purchase of LIHTCs for the housing authority's affordable housing/redevelopment initiative involving apartments in Boston (Lower Roxbury), MA. The housing development consists of 92 units including 43 subsidized with HUD Section 8 Housing Assistance Program (HAP) and 22 units to households earning up to 60 percent of AMI. Fifteen units will be designated workforce housing and 12 units are market rate. This first phase of the redevelopment was considered highly complex and utilized multiple debt and equity financing sources, including those from the Commonwealth of Massachusetts, the City of Boston, and HUD.
- \$17.8 million funded towards an \$18.2 million commitment in a national multi-investor LIHTC fund. The bank's investment in the fund was directed towards the development of a 193-unit affordable housing apartment building in Providence, RI.
- \$15 million funded towards a \$17.3 million proprietary LIHTC investment for the redevelopment of a vacant, historic mill building in Providence, RI into a total of 60 units of housing; seven units will be for tenants earning up to 50 percent of AMI, 47 will be for tenants earning up to 60 percent of AMI, and six units are market rent. The project was considered complex and utilized multiple debt and equity financing sources, including the state of Rhode Island and the City of Providence funds.

SERVICE TEST

The institution's performance under the Service Test in Boston MCSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Boston MCSA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the Boston MCSA.

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
Boston MCSA	100	352	100	7.1	19.3	42.9	30.4	9.4	18.6	41.0	30.7

The proportion of branches in low-income geographies is below the proportion of the low-income population in those geographies. The proportion of branches in moderate-income geographies exceeds the proportion of the moderate-income population in those geographies. The bank has 35 branches located in middle- and upper-income geographies that are within one quarter mile of low- and/or moderate-income geography, providing additional accessibility.

Access to retail banking services is further expanded through alternative delivery systems. Over the evaluation period, an average of 55 percent of customer households in low-income and 59 percent of customer households in moderate-income geographies utilized the bank's online/mobile banking platforms. The distribution of ATMs is excellent. The proportion of ATMs in low-income geographies is slightly below and in moderate-income geographies exceeds the proportion of population in those geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings		Net change in Location of Branches (+ or -)			
	# of Branch Openings	# of Branch Closings				
			Low	Mod	Mid	Upp
Boston MCSA	8	21	-2	-4	-4	-3

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. Despite the net closures in LMI geographies, the remaining branches were readily accessible to LMI geographies and individuals.

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. Branch operating hours are generally consistent throughout the Boston MCSA.

Community Development Services

CBNA is a leader in providing CD services in the Boston CSA.

During the evaluation period, 385 CBNA employees contributed 7,423 hours with 150 different organizations to provide CD services primarily targeted to LMI individuals. CD services also included participation on boards or committees of 86 CD organizations in the Boston CSA. Employees primarily provided financial literacy, mentoring, and technical assistance. Examples include:

- Bank employees facilitated 640 financial literacy sessions through the Money Smart Program, which is a comprehensive adult and youth financial education program delivered in several languages. The program covered banking products, importance of credit, and helping first time homebuyers with establishing a budget. More than 14,225 LMI individuals participated in the financial literacy sessions.
- Bank employees participated in 14 homebuyer training sessions through CBNA's partnership with Massachusetts Affordable Housing Alliance. More than 700 LMI individuals participated in the homebuyer training sessions, which teaches LMI individuals all of the steps involved in purchasing and owning a home. The partnership also resulted in originating 144 loans in 2018 under the MHP One Loan program.

Multistate Combined Statistical Area Rating

New York-Newark, NY-NJ-CT-PA Combined Statistical Area (New York MCSA)

CRA rating for the New York MCSA²: 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 reflect excellent responsiveness to AA credit needs.
- Adequate geographic distribution of loans in its AA.
- Good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are accessible to geographies and individuals of different income levels.
- The bank provides a significant level of CD services.

Description of Institution's Operations in New York MCSA

CBNA's AA consists of Dutchess, Orange and Westchester counties in New York, and Fairfield and New Haven counties in Connecticut.

CBNA had \$3.7 billion in deposits in the MCSA representing 4.1 percent of its deposits. CBNA ranked 12th in deposit market share with 1.8 percent. Major competitors include JPMorgan Chase, Peoples United Bank, Bank of America, N.A., Wells Fargo Bank, N.A., and Citibank, N.A. CBNA operated 27 branches and 37 ATMs in the MCSA, representing 3.5 percent of total branches and 3 percent of total ATMs.

The area poses a number of challenges to home mortgage lenders in the AA, including CBNA. The MCSA is a high-cost housing area, limiting access to affordable home ownership among LMI borrowers. The median housing value in the MCSA is \$373,639 while the NAR 4Q2018

² 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.

median sales price of a single-family home ranged from \$226,800 to \$406,100. One simplistic 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 4.5 percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$45,122 (or less than 50 percent of the FFIEC adjusted median family income in the AA) could afford a \$205,716 mortgage with a payment of \$1,128 per month; a moderate-income borrower earning \$72,196 (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$329,150 mortgage with a payment of \$1,805 per month.

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 New York MCSA, the overall poverty level was 7.6 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 middle- and upper-income tracts, the combined poverty level is 6 percent.

As part of the CRA evaluation, the OCC reviewed information from three community contacts made within the New York MCSA to determine local economic conditions and community needs. These contacts included representatives from affordable housing and small business organizations. Needs identified include: affordable housing, small dollar working capital loans, financial literacy, and support services for the homeless.

New York MCSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: NY MCSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	829	9.8	17.2	30.5	41.1	1.3
Population by Geography	3,623,134	8.4	17.9	30.1	43.2	0.3
Housing Units by Geography	1,437,771	8.5	18.6	31.8	41.1	0.0
Owner-Occupied Units by Geography	851,281	2.9	12.2	32.9	52.0	0.0
Occupied Rental Units by Geography	452,448	17.4	29.4	30.0	23.3	0.0
Vacant Units by Geography	134,042	14.2	23.0	31.2	31.6	0.1
Businesses by Geography	291,791	7.0	14.2	29.7	49.1	0.1
Farms by Geography	8,123	3.9	12.9	32.2	51.0	0.0
Family Distribution by Income Level	882,036	21.1	14.8	17.4	46.7	0.0
Household Distribution by Income Level	1,303,729	24.1	14.0	15.8	46.1	0.0
Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA		\$105,628	Median Housing Value			\$373,639
Median Family Income MSA - 20524 Dutchess County-Putnam County, NY MD		\$94,443	Median Gross Rent			\$1,259
Median Family Income MSA - 28740 Kingston, NY MSA		\$74,546	Families Below Poverty Level			7.6%
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 MD		\$72,047				
<i>Source: 2015 ACS Census and 2018 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>						

Scope of Evaluation in New York MCSA

The New York MCSA received a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK MCSA

LENDING TEST

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

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

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs, given competition within the market.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NY MCSA	3,681	2,140	0	6	5,827

Dollar Volume of Loans (000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NY MCSA	1,372,673	133,926	0	57,368	1,563,967

CBNA ranked 12th in deposits with 1.8 percent market share. In overall HMDA lending, CBNA ranked seventh with a 2.7 percent market share. There are 653 mortgage lenders in the AA, many without a depository presence. The leading lender in this market was Wells Fargo with 8.1 percent market share, followed by JP Morgan Chase with 6.7 percent, and Quicken Loans with 4.7 percent. In small loans to businesses, CBNA ranked 18th with a market share of 0.8 percent. The top three lenders were significant credit card lenders with a combined market share of 51.4 percent; American Express with 30 percent; Chase Bank USA, NA with 12.5 percent; and Citigroup with 8.9 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the New York MCSA 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 geographic distribution of home mortgage loans is adequate.

2017 to 2018

The proportion of loans in low-income geographies was below the proportion of owner-occupied homes in those geographies and was well below the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below both the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans.

2016

Performance in 2016 was inconsistent with 2017 to 2018. The proportion of loans in low-income geographies was significantly below the proportion of owner-occupied homes in those geographies and was well below the aggregate distribution of loans. The proportion of loans in moderate-income geographies was well below both the proportion 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 MCSA 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. The geographic distribution of small loans to businesses is good.

2017 to 2018

The proportion of loans in low-income geographies was below both the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies approximated the proportion of businesses located in those geographies and substantially met the aggregate distribution of loans.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans in low-income geographies was equal to the proportion of businesses located in those geographies and exceeded the aggregate distribution of loans. The proportion of loans in moderate-income geographies substantially met the proportion of businesses located in those geographies and exceeded the aggregate distribution of loans.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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 MCSA 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. The borrower distribution of home mortgage loans is adequate.

2017 to 2018

The proportion of loans to low-income borrowers was significantly below the proportion of low-income families, but substantially met the aggregate distribution of loans. Considering CBNA's performance relative to all lenders, the distribution is adequate to low-income borrowers. The proportion of loans to moderate-income borrowers was equal to the proportion of moderate-income families and approximated the aggregate distribution of loans. The high housing cost,

the limited availability of housing that low-income borrowers can afford to acquire, and poverty levels within the MCSA constrained the lending opportunities to low-income borrowers.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans to low-income borrowers was significantly below the proportion of low-income families and well below the aggregate distribution of loans. The proportion of loans to moderate-income borrowers was well below both the proportion of moderate-income families and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the New York MCSA 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. The borrower distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans to small businesses exceeded the percentage of small businesses in the MCSA and significantly exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making CD loans.

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.

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include complex projects where the bank often acted in a leadership role. By dollar volume, 91.6 percent of these loans provide the primary benefit of affordable housing to LMI individuals (669 units created or rehabilitated), and 8.4 percent fund community services. The dollar volume of CD lending represents 11.7 percent of allocated Tier 1 Capital. Examples include:

- \$38 million loan for land acquisition to create a 102-unit affordable housing development in Stamford, CT. The project also utilized LIHTC financing.
- \$13.3 million loan for the rehabilitation of a 167-unit affordable housing development, with all units allocated to tenants earning less than 80 percent of the AMI. The development is located in White Plains, NY.

- \$3.6 million SBA 504 loan to purchase a warehouse and wholesale facilities for a local, bulk grocery provider. The building is located in The Bronx, NY and in a Historically Underutilized Business zone.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

CBNA participates in the State of New York Mortgage Agency (SONYMA) program that assists with the purchase of a home in the state of New York. The program features a below-market interest rate, low down payment requirements, no points, and no prepayment penalties. All SONYMA loans are financed through the sale of tax-exempt bonds, requiring borrowers to meet household income and purchase price limits. During the evaluation period CBNA originated 16 SONYMA loans totaling \$1.9 million.

INVESTMENT TEST

The institution's performance under the Investment Test in the New York MCSA is Outstanding.

Based on a full-scope review, the institution's performance in the New York MCSA is excellent.

CBNA has an excellent level of qualified CD investment and grants, often in a leadership position.

CBNA exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

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 MCSA	31	\$61,352	66	\$32,531	97	100	\$93,883	100	6	\$22,892

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

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

The combined prior and current period dollar volume represents 19.2 percent of allocated Tier 1 Capital. The bank's investments targeted affordable housing, a primary need in the AA. The investments focused on LIHTCs, MBSs, equity investments, and grants. Examples include:

- \$14.8 million proprietary LIHTC fund for the acquisition and rehabilitation of 167-units in White Plains, Westchester County, NY. The project will set aside 145 units for tenants with incomes at or below 60 percent of AMI.
- \$5.6 million of a \$5.8 million commitment in a \$188 million multi-investor LIHTC fund. The investment was directed towards the second phase development of a 111-unit affordable housing apartment building in New Haven, CT.
- \$2.9 million of a \$3 million commitment in a \$171.5 million multi-investor LIHTC fund. The investment was directed toward the development of an 81-unit affordable housing apartment building in Meriden, CT.

SERVICE TEST

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

Based on a full-scope review, the institution's performance in the New York MCSA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

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
New York MCSA	100.0	27	100.0	0.0	22.2	48.2	29.6	8.4	17.9	30.1	43.2

No branches were located in low-income geographies. The distribution of branches in moderate-income geographies was excellent. The distribution of branches in moderate-income geographies exceeded the percentage of the population in moderate-income geographies. Within the AA, the bank had four branches in middle- and upper-income geographies that were within one quarter of a mile of LMI geographies. While those adjacent branches provided LMI individuals and individuals in LMI geographies additional access to the bank's retail banking services, it was not significant enough to affect the overall conclusion.

The bank provided additional access to retail banking services through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 41 percent of customer households in low-income geographies utilized the bank's digital banking platforms. This usage percentage was higher at 49 percent for households in moderate-income geographies. In addition, the bank operated 34 deposit taking ATMs in the New York MCSA. ATM availability was poor in low-

income geographies and excellent in moderate-income geographies. The percentage of ATMs in low-income geographies was well below the percentage of the population in low-income geographies and the percentage of ATMs in moderate-income geographies exceeded the percentage of the population in moderate-income geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
New York MCSA	1	5	0	-2	-3	+1

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. Despite the net closures in moderate-income geographies, the remaining branches remained accessible in moderate-income geographies and to LMI individuals.

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. Branch operating hours were generally consistent throughout the New York MCSA.

Community Development Services

The bank provides a significant level of CD services.

CBNA employees provided 841 hours of services through participation with 15 CD organizations. During the evaluation period, 66 CBNA employees in the New York MCSA participated in CD services, primarily involved in providing financial literacy and education to LMI students and individuals and individuals located in LMI geographies. Other services involved providing board leadership on six boards for local non-profit organizations, participating in homebuyer’s workshops, and offering technical support for local non-profit organizations. Examples include:

- Bank employees facilitated financial literacy sessions through the Money Smart Program. More than 2,000 LMI individuals participated in the financial literacy sessions.
- Bank employees provided homebuyer financial education classes that assisted 173 potential LMI homebuyers.

State Rating

State of Connecticut

CRA rating for the State of Connecticut³: 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 reflect good responsiveness to AA credit needs.
- Adequate geographic distribution of loans in its AA.
- Excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are accessible to geographies and individuals of different income levels.
- The bank provides an adequate level of CD services.

Description of Institution's Operations in Connecticut

CBNA's delineated AA within Connecticut includes Hartford and Middlesex counties within the Hartford-West Hartford-East Hartford MSA and the Norwich-New London MSA in its entirety which consists of New London County. Operations within other counties in Connecticut are included in either the Boston MCSA or New York MCSA rating areas.

CBNA had \$1.8 billion in deposits in the state, which represents 2 percent of the bank's total deposits. Major competitors include Bank of America, Liberty Bank, Peoples United Bank, United Bank, and Webster Bank. CBNA operated 22 branches and 29 ATMs representing 2.9 percent of total branches and 2.3 percent of total ATMs.

As part of the CRA evaluation, the OCC reviewed information from two community contacts made within the CSA to determine local economic conditions and community needs. These

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

contacts indicated a need for small dollar loans, consumer credit loans, and debt consolidation loans.

Hartford CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Hartford CSA 2018						
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	101,486	10.3	12.0	40.7	36.7	0.3
Farms by Geography	3,197	3.3	7.8	42.7	46.2	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-West Hartford-East Hartford, 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 Census and 2018 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>						

Scope of Evaluation in Connecticut

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CONNECTICUT

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Hartford CSA	1,433	1,465	0	5	2,903

Dollar Volume of Loans (000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Hartford CSA	287,681	80,999	0	51,525	420,142

CBNA ranked eighth in deposits with a 3.7 percent market share. Bank of America ranked first in deposits with 41.9 percent market share. In overall home mortgage lending, CBNA ranked seventh with a 2.8 percent market share. There are 463 mortgage lenders in the AA, many without a depository presence. There are 34 depository institutions in the AA. The leading lender in this market was Wells Fargo with 4.9 percent market share, followed by Webster Bank with 3.7 percent, and Quicken Loans with 3.4 percent. In small loans to businesses, CBNA ranked 14th with 1.6 percent market share. The top three lenders with a combined market share of 40.3 percent were American Express with 20.6 percent, US Bank with 10.5 percent, and Bank of America with 9.2 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

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. The geographic distribution of home mortgage loans is poor.

2017 to 2018

The proportion of loans in low-income geographies was below both the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies was well below the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies was significantly below both the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below the proportion of owner-occupied homes in those geographies and the approximated the aggregate distribution of loans.

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. The geographic distribution of small loans to businesses is adequate.

2017 to 2018

The proportion of loans in both low- and moderate-income geographies was below both the proportion of businesses located in those geographies and the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies was significantly below both the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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 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. The borrower distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans to low-income borrowers was below the proportion of low-income families within the AA but exceeded the aggregate distribution of loans. Considering the higher performance relative to all lenders, the distribution is good to low-income borrowers. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

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. The borrower distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans to small businesses exceeded both the percentage of small businesses in the CSA and the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making CD loans.

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.

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include complex projects where the bank often acted in a leadership role. The dollar volume of CD lending represents 21.6 percent of allocated Tier 1 Capital. Examples include:

- \$20.5 million loan to finance a property in Manchester, CT that led to the creation of 100 jobs for individuals earning below 60 percent of the AMI.
- \$950 thousand in term financing to a Community Development Financial Institution (CDFI) for a loan pool to create 400 units of affordable rental housing for LMI individuals in Connecticut.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

CBNA participates in the CHFA mortgage program described earlier under the Boston MCSA rating area. During the evaluation period, CBNA originated 35 CHFA totaling \$4 million.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

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

CBNA exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

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	22	25,655	46	30,609	68	100	56,264	100	6	12,679

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

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

The combined prior and current period dollar volume represents 23.6 percent of allocated Tier 1 Capital. CD investments helped finance the development or preservation of over 550 units of affordable housing.

- Three investments totaling \$6.4 million in a multi-investor LIHTC fund. The investments helped to fund affordable housing apartment complexes in West Hartford (72 units), Suffield (48 units), and Middletown (32 units).
- \$5.3 million investment in a multi-investor LIHTC fund. The investment helped to fund the development of an apartment complex in Glastonbury. The complex is a 72-unit affordable housing development for senior citizens. Eligible households have an annual income at or below 60 percent AMI.
- \$1.4 million preferred stock investment in a CDFI. The investment was directed towards the development of 396-unit affordable housing complex in East Hartford.

SERVICE TEST

The institution's performance under the Service Test in the state of Connecticut is rated High Satisfactory.

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

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

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
Hartford CSA	100.0	22	100.0	13.6	4.5	45.5	36.4	13.4	14.5	38.7	32.9

The distribution of branches was excellent in low-income geographies and poor in moderate-income geographies. The percentage of branches in low-income geographies exceeded the percentage of the population in low-income geographies. The percentage of branches in moderate-income geographies was well below the percentage of the population in moderate-income geographies. The bank had no branches in middle- and upper-income geographies that were close enough to LMI geographies to provide additional access to retail banking services in LMI geographies or to LMI individuals.

The bank provided additional access to retail banking services through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 53 percent of customer households in low-income geographies utilized the bank’s digital banking platforms. This usage percentage was slightly higher at 55 percent for households in moderate-income geographies. The bank operated 29 deposit taking ATMs in the Hartford CSA. ATM availability was excellent in low-income geographies and good in moderate-income geographies. The percentage of ATMs in low-income geographies exceeded the percentage of the population in low-income geographies. The percentage of ATMs in moderate-income geographies was below the percentage of the population in moderate-income geographies. The bank had other ATMs in the Hartford CSA that do not accept deposits, but were available for cash withdrawals, money transfers, and balance inquiries during the operating hours of the business where the ATM was located.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Hartford CSA	0	5	0	0	-4	-1

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. The bank closed five branches. The five closures were in middle- and upper-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.

Community Development Services

The bank provides an adequate level of CD services.

CBNA employees provided 525 hours of services through participation with 11 organizations that meet the definition of CD. During the evaluation period, 45 CBNA employees in the CSA provided 115 CD services and 10 economic development activities throughout the CSA. Services primarily involve providing financial literacy, Volunteer Income Tax Assistance (VITA) tax assistance, and job placement assistance for LMI individuals located in LMI geographies. Other services involved providing board leadership for local non-profit organizations, assisting with economic development of neighborhoods, and offering technical support for local non-profit organizations. Examples include:

- Small business workshop sessions with CBNA board members and Small Business Relationship Managers.
- Bank employees provided financial literacy training through the Connecticut Money School program.

State Rating

State of Delaware

CRA rating for the State of Delaware⁴: 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 reflect excellent responsiveness to AA credit needs.
- Good geographic distribution of loans in its AA.
- Excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are readily accessible to geographies and individuals of different income levels.
- The bank provides a low level of CD services.

Description of Institution's Operations in Delaware

CBNA has two delineated AAs within Delaware. The Philadelphia CSA consists of New Castle County within the Philadelphia-Camden-Wilmington MMSA and Kent County within the Dover, DE MSA. The Salisbury MSA AA consists of Sussex County.

CBNA had \$1.1 billion in deposits in the state, which represented 1.3 percent of total deposits. Major competitors include PNC Bank, N.A., TD Bank, N.A., Wells Fargo Bank, N.A., and Wilmington Savings Fund Society, F.S.B. CBNA operated 23 branches and 35 ATMs representing 3 percent of total branches and 2.8 percent of total ATMs.

As part of the CRA evaluation, the OCC reviewed information from two community contacts made within the AA to determine local economic conditions and community needs.

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

Philadelphia CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Philadelphia CSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	164	5.5	26.8	43.3	22.6	1.8
Population by Geography	719,152	3.7	23.3	47.3	25.7	0.0
Housing Units by Geography	286,736	4.0	24.2	47.1	24.7	0.0
Owner-Occupied Units by Geography	181,860	1.7	19.2	48.8	30.3	0.0
Occupied Rental Units by Geography	80,979	7.8	33.4	44.0	14.8	0.0
Vacant Units by Geography	23,897	8.2	31.1	44.7	15.9	0.0
Businesses by Geography	49,492	4.3	25.6	45.0	25.0	0.0
Farms by Geography	1,441	1.1	15.6	58.8	24.4	0.0
Family Distribution by Income Level	175,255	20.9	17.6	21.0	40.4	0.0
Household Distribution by Income Level	262,839	23.7	16.3	18.4	41.6	0.0
Median Family Income MSA - 20100 Dover, DE MSA		\$64,252	Median Housing Value			\$236,054
Median Family Income MSA - 48864 Wilmington, DE-MD-NJ MD		\$80,707	Median Gross Rent			\$1,029
			Families Below Poverty Level			8.0%
<i>Source: 2015 ACS Census and 2018 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>						

Scope of Evaluation in Delaware

The Philadelphia CSA received a full-scope review. This area accounted for the large majority of loans, deposits, and branches within the state. The Salisbury MSA received a limited-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DELAWARE**LENDING TEST**

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs when considering competition and the bank's market presence.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Philadelphia CSA	1,214	723	0	5	1,942	71.4	78.3
Salisbury MSA	480	298	0	0	778	28.6	21.7

Dollar Volume of Loans* (000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State*	%State Deposits
Philadelphia CSA	220,821	35,835	0	17,460	274,116	64.9	78.3
Salisbury MSA	137,072	11,377	0	0	148,449	35.1	21.7

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

CBNA ranked 14th in deposits with 0.3 percent market share. In overall home mortgage lending, CBNA ranked 11th with 2.9 percent market share. There are 410 mortgage lenders in the AA, many without a depository presence. There are 36 depository institutions in the AA. The leading lender in this market was Wells Fargo with 7 percent market share followed by Lakeview Loan Servicing with 4.9 percent, and Wilmington Savings Society with 4 percent. In small loans to businesses, CBNA ranked 16th with 1.6 percent market share. The top three lenders with a combined market share of 39 percent were American Express with 20.2 percent, PNC Bank with 10.4 percent, and Chase Bank USA with 8.3 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

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. The geographic distribution of home mortgage loans is good.

2017 to 2018

The proportion of loans in low-income geographies was significantly below the proportion of owner-occupied homes in those geographies and was well below the aggregate distribution of loans. The proportion of loans in moderate-income geographies approximated the proportion of owner-occupied homes in those geographies and substantially met the aggregate distribution of loans. The AA contained a limited number of low-income geographies. More emphasis was placed on performance in the moderate-income geographies.

2016

Performance was consistent with 2017 to 2018.

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. The geographic distribution of small loans to businesses was adequate.

2017 to 2018

The proportion of loans in low-income geographies was below both the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below the proportion of businesses located in those geographies and approximated the aggregate distribution of loans. The AA contained a limited number of low-income geographies. More emphasis was placed on performance in the moderate-income geographies.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans in low-income geographies was significantly below both the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

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 bank's home mortgage loan originations and purchases. The borrower distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans to low-income borrowers was below the proportion of low-income families within the AA but significantly exceeded the aggregate distribution of loans. When considering the lending constraints within the CSA, due to high housing costs and the limited availability of housing that low-income borrowers can afford to acquire, the distribution is good to low-income borrowers. The proportion of loans to moderate-income borrowers significantly exceeded the proportion of moderate-income families and exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

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 bank's origination and purchase of small loans to businesses. The borrower distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans to small businesses exceeded the percentage of small businesses in the CSA and significantly exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making CD loans.

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.

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include complex projects where the bank acted in a leadership role. The dollar volume of CD lending represents 14.7 percent of allocated Tier 1 Capital.

Examples include:

- \$11.8 million construction loan to rehabilitate a 108-unit affordable housing development targeted to low-income seniors in Newark, DE. Residents must earn 50 percent or below the AMI. The project financing also utilized LIHTC.
- \$2 million loan to a CDFI that engages in affordable housing development in the AA.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Salisbury MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area. Both geographic and borrower distribution was weaker. The weaker performance did not impact the overall Lending Test rating.

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

INVESTMENT TEST

The bank's performance under the Investment Test in Delaware is rated Outstanding.

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

Conclusions for Area Receiving a Full-Scope Review

CBNA has an excellent level of qualified CD investment and grants, often in a leadership position.

CBNA exhibits excellent responsiveness to credit and community economic development needs. The bank makes limited use of innovative and/or complex investments to support CD initiatives.

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	24	5,058	26	2,021	50	79.4	7,079	69.9	0	0
Salisbury MSA	4	1,020	9	2,033	13	20.6	3,053	30.1	0	0

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

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

The combined prior and current period dollar volume represents 6 percent of allocated Tier 1 Capital. Most of the investments included pass through MBS that helped finance mortgages to low- and moderate-income borrowers.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Salisbury MSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The institution's performance under the Service Test in the state of Delaware is rated Outstanding.

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

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

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
Philadelphia CSA	78.3	19	85.2	5.3	21.0	47.4	26.3	3.7	23.3	47.3	25.7
Salisbury MSA	21.7	4	14.8	0.0	25.0	75.0	0.0	0.0	10.1	76.4	13.5

The distribution of branches was excellent in LMI geographies. The percentage of branches in both low- and moderate-income geographies exceeded the population in those geographies. Within the Philadelphia CSA, the bank had two branches in moderate- and upper-income geographies that were located within one quarter of a mile of LMI geographies. These adjacent branches provided LMI individuals and individuals in LMI geographies additional access to the bank's retail banking services.

Access to retail banking services was further expanded through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 49 percent of customer households in low-income geographies utilized the bank's digital banking platforms to access banking services. In moderate-income geographies, utilization of the bank's digital platforms increased to an average of 57 percent of customer households. The bank operated 22 deposit-taking ATMs in the Philadelphia CSA. ATM availability was excellent in LMI geographies. The percentage of the bank's ATMs in LMI geographies exceeded the percentage of the population in those geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Philadelphia CSA	1	1	0	0	+1	-1
Salisbury MSA	0	0	0	0	0	0

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. The bank closed one branch in an upper-income geography and opened one branch 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 LMI geographies and/or individuals. In-store branches located in ACME grocery stores were open 10:00 am to 7:00 pm Monday through Friday, 10:00 am to 4:00 pm Saturday, and 11:00 am to 3:00 pm Sunday.

Community Development Services

The bank provides a low level of CD services.

CBNA employees provided 84 hours through participation with seven organizations that meet the definition of CD. During the evaluation period, seven CBNA employees in the CSA provided 25 CD services in the CSA. Services primarily involved providing financial literacy for LMI individuals located in LMI geographies. Other services involved providing board leadership for local non-profit organizations and offering technical support for local non-profit organizations. Examples include:

- Through a CDFI, the bank supports small business and CD for LMI individuals in LMI geographies in the CSA.
- Bank employees provided financial literacy to over 200 LMI individuals through the Money Smart Program.

Based on a limited-scope review, the bank's performance under the Service Test in the Salisbury MSA is consistent with the bank's overall performance under the Service Test in the state of Delaware.

State Rating

State of Massachusetts

CRA rating for the State of Massachusetts⁵: 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 reflect excellent responsiveness to AA credit needs.
- Excellent geographic distribution of loans in its AA.
- Excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are readily accessible to geographies and individuals of different income levels.
- The bank provides a significant level of CD services.

Description of Institution's Operations in Massachusetts

CBNA has two AAs within Massachusetts. They include the Springfield CSA and the Pittsfield MSA in their entirety. Operations within other geographies delineated within Massachusetts are included in the analysis of the Boston MCSA.

CBNA maintains approximately \$619 million in deposits in Massachusetts, representing approximately 0.7 percent of the bank's total deposits. Primary competitors include Berkshire Bank, TD Bank, N.A., and Bank of America, N.A. CBNA operated 23 branches and 25 ATMs representing 3 percent of total branches and 2 percent of total ATMs.

As part of the CRA evaluation, the OCC reviewed information from two community contacts made within the AA to determine local economic conditions and community needs. Identified needs were workforce development training and financial education for both individuals and small businesses.

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

Springfield CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Springfield CSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	157	15.9	15.9	35.0	30.6	2.5
Population by Geography	699,944	13.3	15.5	35.4	33.3	2.6
Housing Units by Geography	288,606	12.8	16.1	38.5	32.5	0.1
Owner-Occupied Units by Geography	168,524	4.3	12.7	40.3	42.7	0.0
Occupied Rental Units by Geography	97,209	26.4	21.1	35.6	16.6	0.3
Vacant Units by Geography	22,873	17.9	20.1	36.9	24.8	0.4
Businesses by Geography	40,773	12.9	15.2	34.7	36.5	0.8
Farms by Geography	1,503	1.9	6.0	44.2	47.6	0.2
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		\$67,381	Median Housing Value			\$210,226
Median Family Income Non-MSAs – MA		\$73,868	Median Gross Rent			\$857
			Families Below Poverty Level			11.5%
<i>Source: 2015 ACS Census and 2018 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>						

Scope of Evaluation in Massachusetts

The Springfield CSA was selected for a full-scope review. This area accounts for a substantial majority of the deposits, lending, and branches within Massachusetts. The Pittsfield MSA received a limited-scope review.

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 Areas Receiving Full-Scope Reviews

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

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Springfield CSA	1,307	534	0	3	1,853	92.3	89.5
Pittsfield MSA	95	60	0	0	155	7.7	10.5

Dollar Volume of Loans (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans*	% State Deposits
Springfield CSA	186,295	23,119	0	23,778	233,192	93.3	89.5
Pittsfield MSA	14,332	2,340	0	0	16,672	6.7	10.5

CBNA ranked 13th in deposits with 3.3 percent market share. In overall home mortgage lending, CBNA ranked first with 4.4 percent market share, followed by Quicken Loans with 4.2 percent and Peoples Bank with 4.1 percent. There are 335 mortgage lenders in the AA, many without a depository presence. There are 20 depository institutions in the AA. In small loans to businesses, CBNA ranked 13th with 1.6 percent market share. The top three lenders with a combined market share of 37.3 percent were American Express with 17.6 percent, Citigroup with 10.9 percent, and Capital One with 8.8 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

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. The geographic distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans in both low-and moderate-income geographies significantly exceeded both the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

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. The geographic distribution of small loans to businesses is adequate.

2017 to 2018

The proportion of loans in low-income geographies is well below both the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies approximated the proportion of businesses located in those geographies and exceeded the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below both the proportion of businesses located in those geographies and the aggregate distribution of loans.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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 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. The borrower distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans to low-income borrowers is below the proportion of low-income families but significantly exceeded the aggregate distribution of loans. Considering the higher performance relative to all lenders, the distribution is good to low-income borrowers. The proportion of loans to moderate-income borrowers significantly exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

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. The borrower distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans to small businesses exceeded the percentage of small businesses in the CSA and significantly exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making CD loans.

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.

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include complex projects where the bank often acted in a leadership role. CBNA's originations of CD loans represents 32.3 percent of allocated Tier 1 Capital. Examples include:

- \$10 million and \$9.5 million loans for adaptive reuse of a former police academy in Agawam, MA into 51 units of affordable housing for formerly homeless veterans. The project also utilized various state funding sources and both federal and state LIHTC. One of the loans bridged the funding of the LIHTC equity investment.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

CBNA offers the MHP One program described earlier under the Boston CSA rating area. During the evaluation period, CBNA originated 73 MHP loans totaling \$10.7 million.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Pittsfield MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area. Both geographic and borrower distribution were weaker than the overall performance, but still considered good. The weaker performance did not impact 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 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 CSA is excellent.

CBNA has an excellent level of qualified CD investment and grants, often in a leadership position.

CBNA exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives.

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	8	23,543	22	21,196	30	81.1	44,739	97.5	4	5,461
Pittsfield MSA	4	576	3	589	7	18.9	1,165	2.5	1	49

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

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

The combined prior and current period dollar volume represents 60.8 percent of allocated Tier 1 Capital. The CD investments helped finance the development or preservation of over 568 units of affordable housing. Examples include:

- \$7.3 million funded of a \$13.3 million commitment in a proprietary LIHTC fund to help finance the project described under Community Development Loans within Massachusetts.
- \$2.8 million funded of a \$3 million commitment in a multi-investor LIHTC fund to assist in the rehabilitation of affordable housing projects in Westfield, Chicopee, Holyoke, and Springfield with a total of 384 units of 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 Pittsfield MSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The institution's performance under the Service Test in the state of Massachusetts is rated Outstanding.

Based on a full-scope review, the institution's performance in the Springfield CSA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

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
Springfield CSA	89.5	20	87.0	10.0	35.0	40.0	15.0	13.3	15.5	35.4	33.3
Pittsfield MSA	10.5	3	13.0	0.0	33.3	33.3	33.3	8.4	11.4	50.5	29.7

The distribution of branches was good in low-income geographies and excellent in moderate-income geographies. The distribution of branches in low-income geographies was below the percentage of the population in low-income geographies, while the distribution in moderate-income geographies exceeded the percentage of the population in moderate-income geographies. Within the Springfield CSA, CBNA had one branch located in a middle-income geography that was within one quarter of a mile of a low-income geography. This branch helped to provide LMI individuals and individuals in the moderate-income geography additional access to the bank's retail banking services. Considering the additional accessibility provided by adjacent branches, the bank's service delivery systems are readily accessible.

Access to retail banking services was further expanded through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 54 percent of customer households in low-income geographies utilized the bank's digital banking platforms to access banking services. In moderate-income geographies, utilization of the bank's digital platforms increased to an average of 56 percent of customer households. The bank operated 21 deposit-taking ATMs in the Springfield CSA. ATM availability was poor in low-income geographies and excellent in moderate-income geographies. The percentage of the bank's ATMs in low-income geographies was well below the percentage of the population in those geographies. The percentage of ATMs in moderate-income geographies exceeded the percentage of the population in those geographies.

The bank did not open or close branches in the Springfield CSA during the evaluation period.

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. In-store branches located in Stop & Shop grocery stores were open 10:00 am to 7:00 pm Monday through Friday, 10:00 am to 5:00 pm Saturday, and 11:00 am to 3:00 pm Sunday.

Community Development Services

The bank provides a significant level of CD services.

CBNA employees provided 467 hours of services to nine organizations that meet the definition of CD. During the evaluation period, 30 CBNA employees in the CSA provided 142 CD services throughout the CSA. Services primarily involved providing financial literacy and education to LMI students and individuals in LMI geographies. Other services involved providing leadership on three boards of local non-profit organizations and offering technical support for local non-profit organizations. Examples include:

- Employees provided financial literacy education to over 5,000 LMI individuals.
- Employees provided homebuyer financial education classes that assisted 75 potential homebuyers.

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 is weaker than the bank's overall performance under the Service Test in the state of Massachusetts. Performance is weaker in the Pittsfield MSA primarily due to the bank's limited presence. The bank has only three branches and three ATMs in the AA, which are located in moderate-, middle-, and upper-income geographies comprising nearly 92 percent of the AA's population.

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: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- Excellent geographic distribution of loans in its AA.
- Excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are accessible to geographies and individuals of different income levels.
- The bank is a leader in providing CD services.

Description of Institution's Operations in Michigan

CBNA has delineated three AAs within Michigan; Detroit CSA consisting of the Ann Arbor and Monroe MSAs in their entirety and a portion of the Detroit-Warren-Dearborn MSA consisting of Livingston, Macomb, Oakland, and Wayne Counties; Lansing CSA consisting of Lansing-East Lansing MSA and the non-metro Shiawassee County; and Saginaw MSA.

Within the state, CBNA held \$5.7 billion in deposits representing 6.3 percent of the bank's total deposits. CBNA ranked ninth with 2.6 percent market share. Major competitors include JP Morgan Chase Bank, N.A., Comerica, Bank of America, N.A., PNC Bank N.A., and Flagstar Bank, F.S.B. CBNA operated 87 branches and 103 ATMs representing 13 percent of total branches and 8.3 percent of total ATMs.

As part of the CRA evaluation, the OCC reviewed information from two community contacts made within the Detroit CSA to determine local economic conditions and community needs. Identified needs include safe, affordable housing, affordable childcare, financial education, and homeowner education. It was also identified that nearly 40 percent of Detroit residents do not have in-home internet service.

Detroit CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Detroit CSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,366	13.6	23.8	32.1	28.3	2.2
Population by Geography	4,552,280	10.4	21.7	34.9	32.4	0.5
Housing Units by Geography	1,995,774	12.1	23.4	34.3	29.7	0.5
Owner-Occupied Units by Geography	1,201,916	5.9	17.9	38.1	37.9	0.1
Occupied Rental Units by Geography	560,840	19.4	30.5	30.9	18.3	0.9
Vacant Units by Geography	233,018	26.4	34.4	22.9	15.0	1.2
Businesses by Geography	265,993	7.5	19.2	32.6	39.5	1.2
Farms by Geography	6,796	4.5	13.9	46.5	34.9	0.3
Family Distribution by Income Level	1,134,134	22.6	16.5	18.9	42.1	0.0
Household Distribution by Income Level	1,762,756	25.0	15.4	16.8	42.8	0.0
Median Family Income MSA - 11460 Ann Arbor, MI MSA		\$87,331	Median Housing Value			\$135,470
Median Family Income MSA - 19804 Detroit-Dearborn-Livonia, MI MD		\$52,733	Median Gross Rent			\$880
Median Family Income MSA - 33780 Monroe, MI MSA		\$67,811	Families Below Poverty Level			12.4%
Median Family Income MSA - 47664 Warren-Troy-Farmington Hills, MI MD		\$76,739				
<i>Source: 2015 ACS Census and 2018 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>						

Scope of Evaluation in Michigan

The Detroit CSA received a full-scope review. This AA accounted for the substantial majority of the deposits, lending, and branches within the state. The Lansing CSA and Saginaw MSA 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 is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs, when considering competition and the bank's market presence.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Detroit CSA	6,317	3,566	0	7	9,890	96.0	97.8
Lansing CSA	176	75	0	0	251	2.4	1.4
Saginaw MSA	56	107	0	0	163	1.6	0.8

Dollar Volume of Loans* (000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State*	%State Deposits
Detroit CSA	849,754	210,807	0	43,962	1,104,523	97.2	97.8
Lansing CSA	21,232	3,504	0	0	24,736	2.2	1.4
Saginaw MSA	4,562	2,121	0	0	6,683	0.6	0.8

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

CBNA ranked eighth in deposits with a 4 percent market share. In overall home mortgage lending, CBNA ranked eighth with 2.9 percent market share. There are 635 mortgage lenders in the AA, many without a depository presence. There are 48 depository institutions in the AA. The leading lender was Quicken Loans with 9.4 percent market share, followed by JP Morgan Chase with 6.3 percent, and Wells Fargo with 4.9 percent. In small loans to businesses, CBNA ranked 12th with a market share of 1.6 percent. The top three lenders with a combined market share of 45.7 percent were American Express with 22.4 percent, Chase Bank USA with 12.9 percent, and Citigroup with 10.4 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state 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. The geographic distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans in low-income geographies was below the proportion of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans. The

proportion of loans in moderate-income geographies approximated the proportion of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans. Vacant and blighted homes within the CSA constrained lending opportunities to LMI borrowers. Performance is excellent when considering the depressed real estate value and disrepair of homes in these geographies.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans in low-income geographies was well below the proportion of owner-occupied homes in those geographies and significantly exceeded the aggregate distribution of loans. The proportion of loans in moderate-income geographies approximated the proportion of owner-occupied homes in those geographies and significantly 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. The geographic distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans in low-income geographies substantially met the proportion of businesses located in those geographies and exceeded the aggregate distribution of loans. The proportion of loans in moderate-income geographies exceeded the proportion of businesses located in those geographies and exceeded the aggregate distribution of loans.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans in low-income geographies was significantly below the proportion of businesses located in those geographies and was well below the aggregate distribution of loans. The proportion of loans in moderate-income geographies was consistent with 2017 to 2018.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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 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. The borrower distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans to low-income borrowers was below the proportion of low-income

families within the AA but significantly exceeded the aggregate distribution of loans. Considering the higher performance relative to all lenders, the distribution is good to low-income borrowers. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution of loans. Homes with negative equity and poverty levels within the CSA constrained lending opportunities to low-income borrowers.

2016

Performance was consistent with 2017 to 2018.

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. The borrower distribution of small loans to businesses was excellent.

2017 to 2018

The proportion of loans to small businesses substantially met the percentage of small businesses in the CSA and significantly exceeded the aggregate distribution of loans. Performance is excellent when considering the competition from the larger financial institutions in the CSA that dominate the market and originate small business loans through credit cards.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making CD loans.

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.

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include complex projects where the bank often acted in a leadership role. The dollar volume represents 5.9 percent of allocated Tier 1 Capital. During the evaluation period, CBNA originated one letter of credit in the Detroit CSA for \$1.3 million which assisted in the creation of 80 units of affordable housing for LMI individuals. Examples include:

- \$21.9 million in construction and term financing for an 80-unit multifamily affordable housing development in Detroit, MI, with 61 units allocated to tenants earning less than 60 percent of the AMI. Thirty-nine units will be public housing units, 22 units are for HUD Section 8 housing, and 19 units are market rate.

- \$12.2 million loan to renovate an apartment complex in Detroit, MI and create 72 units of affordable housing. Project financing also utilized LIHTC.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Lansing CSA and Saginaw MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area as a result of weaker geographic distribution of loans. The weaker performance did not impact the overall Lending 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 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 is excellent.

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

CBNA exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives.

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	80	46,989	65	40,493	145	91.8	87,482	91.7	5	31,002
Lansing CSA	6	6,973	2	560	8	5.0	7,533	7.9	1	288
Saginaw MSA	2	76	3	356	5	3.2	432	0.4	0	0

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

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

The combined prior and current period dollar volume represents 11.8 percent of allocated Tier 1 Capital. The CD investments helped finance the development or preservation of over 850 units of affordable housing.

- \$13.3 million funded commitment to a proprietary LIHTC fund for development of an 80-unit senior housing complex in Detroit. Sixty-one units will be restricted to households with incomes of 60 percent of AMI or less and 19 units will be at market rate. Additionally, 39 of the units will be subject to a HUD rental assistance contract for an initial term of 40 years.
- \$13.2 million funded of a \$13.5 million commitment to a proprietary LIHTC fund. The investment preserves 157 units of affordable housing in Detroit.
- \$3 million equity equivalent investment in a \$42.9 million multi-bank/investor loan fund to help rehabilitate homes within the City of Detroit. Deeply distressed real estate values and lack of conventional financing has led to blight in much of the city.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Investment Test in the Lansing CSA and Saginaw MSA is consistent with the bank’s overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The institution’s performance under the Service Test in the state of Michigan is rated High Satisfactory.

Based on a full-scope review, the institution’s performance in the Detroit CSA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution’s AA.

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
Detroit CSA	97.8	84	86.6	4.7	22.6	32.1	40.5	10.4	21.7	34.9	32.4
Lansing CSA	1.4	2	2.3	0.0	0.0	50.0	50.0	9.0	21.1	35.1	29.4
Saginaw MSA	0.8	1	1.1	0.0	0.0	100.0	0.0	11.2	12.5	50.5	25.8

The distribution of branches was poor in low-income geographies and excellent in moderate-income geographies. The distribution of branches in low-income geographies was well below the percentage of the population in those geographies. The distribution in moderate-income geographies exceeded the percentage of the population in those geographies. CBNA had seven branches located in middle- and upper-income census tracts that were within one quarter of a mile of LMI census tracts. One of those branches was adjacent to a low-income geography. These branches provided LMI individuals and individuals in LMI geographies additional access to the bank’s retail banking services. Considering the additional accessibility provided by adjacent branches, the bank’s service delivery systems are accessible.

Access to retail banking services was further expanded through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 51 percent of customer households in low-income geographies utilized the bank’s digital banking platforms to access banking services. In moderate-income geographies, utilization of the bank’s digital platforms increased to an average of 54 percent of customer households. The bank operated 98 deposit-taking ATMs in the Detroit CSA. ATM accessibility was adequate in low-income geographies and excellent in moderate-income geographies. The percentage of the bank’s ATMs in low-income geographies was below the percentage of the population in those geographies and the percentage of ATMs in moderate-income geographies exceeded the percentage of the population in those geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Detroit CSA	6	14	+1	-2	-3	-4
Lansing CSA	0	2	0	-1	-1	0
Saginaw MSA	0	0	0	0	0	0

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.

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. In-store branches located in Kroger grocery stores were open 10:30 am to 6:30 pm Monday through Thursday, 10:30 am to 7:00 pm Friday, 11:00 am to 4:00 pm Saturday, and 11:00 am to 3:00 pm Sunday.

Community Development Services

The bank is a leader in providing CD services.

CBNA employees provided 1,995 hours of CD services to 21 different organizations that meet the definition of CD. During the evaluation period, 68 CBNA employees in the CSA provided

over 300 services targeted to LMI individuals and small businesses. Services primarily involved providing VITA tax assistance, financial literacy and education to LMI students and individuals located in LMI geographies. Services also involved providing leadership on seven boards of local non-profit organizations, assisting with economic development of neighborhoods, and offering technical support for local non-profit organizations. Examples include:

- Employees provided financial literacy training to over 7,000 LMI individuals.
- Bank employees provided financial education to youth and adults through a workforce development program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Lansing CSA and Saginaw MSA is weaker than the bank's overall performance under the Service Test in the state of Michigan. Performance is weaker primarily due to the bank's limited presence. The bank has only two branches and four ATMs in the Lansing CSA and one branch and one ATM in the Saginaw MSA. The branches and ATMs were located in middle- and upper-income geographies. The middle- and upper-income geographies comprised 64.5 percent of the Lansing CSA population and 76.3 percent of the Saginaw MSA population. The weaker performance did not impact the overall performance.

State Rating

State of New Hampshire

CRA rating for the State of New Hampshire⁶: 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 reflect excellent responsiveness to AA credit needs.
- Excellent geographic distribution of loans in its AA.
- Good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are readily accessible to geographies and individuals of different income levels.
- The bank provides a low level of CD services.

Description of Institution's Operations in New Hampshire.

CBNA has delineated one AA in New Hampshire consisting of the non-MSA counties Carroll, Cheshire, Coos, Grafton, and Sullivan. Operations and performance in Belknap, Hillsborough, Merrimack, Rockingham, and Strafford Counties are included in the Boston CSA rating.

Within the state, CBNA held \$778 million in deposits representing approximately one percent of total deposits. Major competitors include TD Bank, Mascoma Bank, and Northway Bank. CBNA had 11 branches and 15 ATMs representing 1.4 percent of total branches and 1.2 percent of total ATMs.

As part of the CRA evaluation, the OCC reviewed information from two community contacts made within the state to determine local economic conditions and community needs. Identified needs include technical and financial education for small businesses and entrepreneurs, workforce development programs, and affordable childcare.

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

NH Non-MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: NH Non-MSA 2018						
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	19,944	0.9	20.8	62.9	15.5	0.0
Farms by Geography	853	0.5	16.4	68.6	14.5	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%
<i>Source: 2015 ACS Census and 2018 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>						

Scope of Evaluation in New Hampshire

The NH Non-MSA received a full-scope review. In evaluating geographic distribution of loans, more weight was placed on performance in the moderate-income geographies given there was one low-income geography as a result of the 2015 ACS. In 2016, there were no low-income geographies.

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 is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs, when considering competition and the bank's market presence.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NH Non-MSA	878	479	0	1	1,358

Dollars of Loans (000's)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NH Non-MSA	132,722	23,850	0	33,800	190,372

CBNA ranked third in deposits with 10.9 percent market share. In overall home mortgage lending, CBNA ranked first with 7.3 percent market share followed by Quicken Loans with 6.5 percent and Wells Fargo with 5.1 percent. This is a highly competitive market with 324 home lenders, many without a depository presence. There are 20 depository institutions in the AA. In small loans to businesses, CBNA ranked 12th with a market share of 2.6 percent. The top three lenders with a combined market share of 41.5 percent were American Express with 18.5 percent, Citigroup with 12.4 percent, and Capital One with 10.6 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

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. The geographic distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans in low-income geographies exceeded the proportion of owner-occupied homes in those geographies and significantly exceeded the aggregate distribution of loans. The proportion of loans in moderate-income geographies approximated the proportion of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

2016

Performance was inconsistent with 2017 to 2018 as the proportion of loans in moderate-income geographies exceeded the proportion of owner-occupied homes in those geographies. The aggregate distribution of loans was consistent.

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. The geographic distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans in low-income geographies was below the proportion of businesses located in those geographies and significantly exceeded the aggregate distribution of loans. The proportion of loans in moderate-income geographies exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans in moderate-income geographies substantially met the proportion of businesses located in those geographies and approximated the aggregate distribution of loans.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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. The borrower distribution of home mortgage loans is good.

2017 to 2018

The proportion of loans to low-income borrowers was below the proportion of low-income families but significantly exceeded the aggregate distribution of loans. Considering the higher performance relative to all lenders, the distribution is good to low-income borrowers. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans to low-income borrowers was well below the proportion of low-income families and significantly exceeded the aggregate distribution of loans. The proportion of loans to moderate-income borrowers was below the proportion of moderate-income families and substantially met 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. The borrower distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans to small businesses exceeded the percentage of small businesses in the CSA and significantly exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making CD loans.

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.

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made one CD loan totaling \$33.8 million during the evaluation period. The loan was used to create a mall in a moderate-income geography that will provide LMI job creation. This was a complex project where the bank acted in a leadership role. The dollar volume of CD lending represents 32.7 percent of allocated Tier 1 Capital.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

The bank's performance under the Investment 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 is excellent.

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

CBNA exhibits excellent responsiveness to credit and community economic development needs. The bank makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

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	2,031	6	9,359	7	100	11,390	100	3	8,134

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

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

The combined prior and current period dollar volume represents 11 percent of allocated Tier 1 Capital. The investments helped finance the development or preservation of 191 units of affordable housing in the New Hampshire Non-MSA market.

- \$5.3 million funded of a \$5.6 million commitment in a multi-investor LIHTC fund. The investment helped to rehabilitate a 42-unit low-income senior housing development in Berlin, NH. The development is subsidized by HUD Section 8 rental assistance payments.
- \$3 million funded commitment in a multi-investor LIHTC fund. The investment assisted in the development of a 29-unit affordable housing complex in Lebanon, NH.

SERVICE TEST

The institution's performance under the Service Test in the state of New Hampshire is rated Outstanding.

Based on a full-scope review, the institution's performance in the NH Non-MSA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

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
NH Non-MSA	100.0	11	100.0	0.0	27.3	54.6	18.2	1.4	19.7	64.3	14.5

No branches were located in low-income geographies; however, there is only one low-income geography, which contained 1.4 percent of the AA population. The distribution of branches was excellent in moderate-income geographies. The distribution of branches in moderate-income geographies exceeded the percentage of the population in moderate-income geographies. None of the branches in middle- and upper-income geographies were located close enough to LMI geographies to provide additional accessibility to LMI individuals or individuals residing in LMI geographies.

Access to retail banking services was further expanded through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 58 percent of customer households in moderate-income geographies utilized the bank’s digital banking platforms to access banking services. No usage data was available for households in low-income geographies. The bank operated 15 deposit-taking ATMs in the NH Non-MSA. The percentage of the bank’s ATMs in moderate-income geographies exceeded the percentage of the population in those geographies. The bank had other ATMs in the NH Non-MSA that do not accept deposits, but were available for cash withdrawals, transfers, and balance inquiries during the operating hours of the business where the ATM was located.

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

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. Despite the branch closure in a moderate-income geography, the remaining branches remained readily accessible in moderate-income geographies and to LMI individuals.

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.

Community Development Services

The bank provides a low level of CD services.

CBNA employees provided 22 hours of services to two organizations that meet the definition of CD. During the evaluation period, two CBNA employees in the NH Non-MSA provided seven community service activities. Services primarily involved providing financial literacy, mentoring for LMI students and individuals located in LMI geographies, and providing VITA tax assistance. Other services involved providing homebuyer education classes.

State Rating

State of New York

CRA rating for the State of New York⁷: 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 reflect good responsiveness to AA credit needs.
- Good geographic distribution of loans in its AA.
- Excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are accessible to geographies and individuals of different income levels.
- The bank provides a significant level of CD services.

Description of Institution's Operations in New York

CBNA has eight delineated AAs in the state; Albany CSA (Albany, Fulton, Montgomery, Rensselaer, Saratoga, Schenectady, and Warren counties), Binghamton MSA (Broome county), Buffalo MSA (Eire and Niagara counties), Ithaca CSA (Cortland and Tompkins counties), Rochester MSA (Livingston, Monroe, Ontario, and Wayne counties), Syracuse MSA (Madison and Onondaga counties), Utica-Rome MSA (Herkimer and Oneida counties), and NY Non-MSA (Chautauqua, Chenango, Otsego, and Sullivan counties).

The bank had \$9.4 billion in deposits representing approximately one percent of total deposits. Major competitors include Manufacturers and Traders Bank, Key Bank, and Bank of America, N.A. CBNA operated 108 branches and 131 ATMs representing 14.1 percent of total branches and 10.5 percent of total ATMs.

⁷ The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

As part of the CRA evaluation, the OCC reviewed information from four community contacts made within the Albany and Rochester AAs to determine local economic conditions and community needs. These contacts indicated the need for affordable housing, workforce development programs, literacy programs, small size business loans, and quality credit counseling.

Albany CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Albany NY CSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	260	9.2	18.5	51.5	19.6	1.2
Population by Geography	1,015,498	7.0	16.5	53.1	22.6	0.8
Housing Units by Geography	469,676	7.9	17.4	54.1	20.5	0.1
Owner-Occupied Units by Geography	263,093	2.9	12.4	58.4	26.3	0.0
Occupied Rental Units by Geography	139,094	14.9	25.3	45.1	14.6	0.2
Vacant Units by Geography	67,489	13.4	20.6	55.8	9.8	0.4
Businesses by Geography	60,237	10.4	12.4	52.2	24.6	0.4
Farms by Geography	1,951	1.5	8.7	69.5	20.2	0.1
Family Distribution by Income Level	244,436	20.5	17.4	22.0	40.1	0.0
Household Distribution by Income Level	402,187	24.3	15.5	18.7	41.5	0.0
Median Family Income MSA - 10580 Albany-Schenectady-Troy, NY MSA		\$81,103	Median Housing Value			\$188,471
Median Family Income MSA - 24020 Glens Falls, NY MSA		\$64,495	Median Gross Rent			\$894
Median Family Income Non-MSAs – NY		\$59,570	Families Below Poverty Level			8.1%
<i>Source: 2015 ACS Census and 2018 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>						

Rochester MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Rochester MSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	256	17.2	16.4	39.5	23.8	3.1
Population by Geography	1,015,765	9.6	14.2	45.3	30.0	1.0
Housing Units by Geography	441,366	10.2	15.2	46.5	28.1	0.1
Owner-Occupied Units by Geography	270,466	3.6	11.3	50.6	34.5	0.0
Occupied Rental Units by Geography	134,252	20.7	21.6	38.4	19.2	0.1
Vacant Units by Geography	36,648	20.3	19.8	45.8	14.0	0.1
Businesses by Geography	54,656	9.5	13.5	43.6	33.2	0.3
Farms by Geography	2,052	1.7	8.4	63.4	26.4	0.0
Family Distribution by Income Level	251,478	21.6	16.9	19.8	41.6	0.0
Household Distribution by Income Level	404,718	24.2	16.0	17.3	42.5	0.0
Median Family Income MSA - 40380 Rochester, NY MSA		\$67,757	Median Housing Value			\$132,133
			Median Gross Rent			\$817
			Families Below Poverty Level			10.3%
<i>Source: 2015 ACS Census and 2018 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>						

Scope of Evaluation in New York

The Albany CSA and Rochester MSA received full-scope reviews based on the level of deposits held and volume of loans originated during the evaluation period. The Albany CSA received greater weight based on the level of deposits held. 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 Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance is excellent in both the Albany CSA and the Rochester MSA.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Albany CSA	1,361	911	0	8	2,280	19.7	50.9
Rochester MSA	1,892	933	0	5	2,830	24.5	17.6
Binghamton MSA	179	169	0	0	348	3.0	3.0
Buffalo MSA	3,323	985	0	3	4,311	37.3	20.1
Ithaca MSA	71	73	0	0	144	1.3	0.6
Syracuse MSA	429	486	0	1	916	7.9	3.5
Utica-Rome	197	207	0	1	405	3.5	2.2
NY Non-MSA	207	114	0	1	322	2.8	2.1

Dollar Volume of Loans (000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State*	%State Deposits
Albany CSA	200,283	42,843	0	64,704	307,830	24.3	50.9
Rochester MSA	198,927	37,114	0	88,961	325,002	25.6	17.6
Binghamton MSA	15,841	6,800	0	0	22,641	1.8	3.0
Buffalo MSA	367,225	40,857	0	20,766	428,848	33.8	20.1
Ithaca MSA	8,776	4,552	0	0	13,328	1.1	0.6
Syracuse MSA	45,889	18,277	0	30,235	94,401	7.5	3.5
Utica-Rome	17,458	6,714	0	10,295	34,467	2.7	2.2
NY Non-MSA	25,312	5,317	0	10,000	40,629	3.2	2.1

Albany CSA

Lending levels reflect good responsiveness to AA credit needs. CBNA ranked second in deposits with 14.7 percent market share. In overall home mortgage lending, CBNA ranked 11th with a 3.1 percent market share. There are 298 mortgage lenders in the AA, many without a depository presence. There are 25 depository institutions in the AA. The leading lender in this market was Homestead Funding with 9 percent market share, followed by SEFCU Services, LLC with 7.5 percent, and Wells Fargo with 6.9 percent. In small loans to businesses, CBNA ranked ninth with 2 percent market share. The top three lenders with a combined market share of 41.5 percent were American Express with 21.8 percent, Chase Bank USA with 10.6 percent, and Capital One with 9.1 percent.

Rochester MSA

Lending levels reflect good responsiveness to AA credit needs. CBNA ranked fifth in deposits with 9.2 percent market share. In overall home mortgage lending, CBNA ranked fifth with 4.3 percent market share. There are 238 mortgage lenders in the AA, many without a depository presence. There are 19 depository institutions in the AA. The leading lender in this market was ESL Federal Credit Union with 17.4 percent market share, followed by Wells Fargo with 7.4 percent, and Premium Mortgage Corp. with 5.9 percent. In small loans to businesses, CBNA ranked 12th with a market share of 2 percent. The three leading lenders with a combined market share of 36.4 percent were American Express with 17.2 percent, Chase Bank USA with 11.3 percent, and Capital One with 7.9 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA. The geographic distribution of home mortgage loans is excellent and small loans to businesses is good.

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 geographic distribution of home mortgage loans is excellent.

Albany CSA

2017 to 2018

The proportion of loans in both low-and moderate-income geographies exceeded both the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies was below the proportion of owner-occupied homes in those geographies but exceeded the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below both the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans.

Rochester MSA

2017 to 2018

The proportion of loans in both low-and moderate-income geographies exceeded both the proportion of owner-occupied homes in those geographies and the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

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. The geographic distribution of small loans to businesses is good.

Albany CSA

2017 to 2018

The proportion of loans in low-income geographies was below the proportion of businesses located in those geographies and approximated the aggregate distribution of loans. The proportion of loans in moderate-income geographies approximated both the proportion of businesses located in those geographies and the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies was well below the proportion of businesses located in those geographies and below the aggregate distribution of loans.

Rochester MSA

2017 to 2018

The proportion of loans in low-income geographies exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below the proportion of businesses located in those geographies but approximated the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies approximated the proportion of businesses located in those geographies but exceeded the aggregate distribution of loans. The proportion of loans in moderate-income geographies was consistent with 2017 to 2018.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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 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. The borrower distribution of home mortgage loans is excellent.

Albany CSA2017 to 2018

The proportion of loans to low-income borrowers approximated the proportion of low-income families within the AA but significantly exceeded the aggregate distribution of loans. Considering the higher performance relative to all lenders, the distribution is excellent to low-income borrowers. The proportion of loans to moderate-income borrowers significantly exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2016

The proportion of loans to low-income borrowers was below the proportion of low-income families within the AA but exceeded the aggregate distribution of loans. Performance to moderate-income borrowers was consistent with 2017 to 2018.

Rochester MSA2017 to 2018

The proportion of loans to low-income borrowers approximated the proportion of low-income families within the AA but significantly exceeded the aggregate distribution of loans. Considering the higher performance relative to all lenders, the distribution is excellent to low-income borrowers. The proportion of loans to moderate-income borrowers significantly exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

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. The borrower distribution of small loans to businesses is excellent.

Albany CSA

2017 to 2018

The proportion of loans to small businesses exceeded the percentage of small businesses in the AA and significantly exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Rochester MSA

2017 to 2018

The proportion of loans to small businesses exceeded the percentage of small businesses in the AA and significantly exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making CD loans.

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.

Albany CSA

The bank is a leader in making CD loans. CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include many complex projects where the bank often acted in a leadership role. The dollar volume of CD lending represents 10.2 percent of allocated Tier 1 Capital. During the evaluation period, CBNA originated one letter of credit in the Albany CSA for \$16.2 million, which supported the creation of 158 units of affordable housing for LMI individuals. The letter of credit provided credit enhancement to the tax-exempt bonds issued by the NY State Housing Finance Agency. Examples of CD loans include:

- \$12 million loan for the purchase of a vacant school building in a Historically Underutilized Business Zone located in a low-income geography. This allowed a charter school to double its enrollment and provide educational services to LMI individuals free of charge.
- \$3 million loan for a school building expansion project in a low-income geography.
- \$9.1 million in construction and term financing for a 61-unit affordable housing development. All units are for tenants earning less than 50 percent of the AMI.

Rochester MSA

The bank is a leader in making CD loans.

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include complex projects where the bank often acted in a leadership role. During the evaluation period, CBNA originated one letter of credit in the Rochester MSA for \$8 million, to back construction of 83 units of affordable housing for LMI individuals. Examples include:

- \$10.5 million construction financing to create a 54-unit affordable housing development targeted to low-income seniors in a low-income geography. LIHTC and HTC were also used in financing this project.
- \$8.6 million construction financing for a 60-unit affordable housing development, with over 50 percent of the units targeted to low-income seniors with special needs.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

CBNA participates in the SONYMA program described earlier under the NY CSA rating area. During the evaluation period, CBNA originated three SONYMA loans totaling \$312 thousand.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Binghamton MSA, Buffalo MSA, Ithaca CSA, Syracuse MSA, and Utica MSA is consistent with the bank's overall performance under the Lending Test in the full-scope areas. Based on a limited-scope review, the bank's performance under the Lending Test in the NY Non-MSA is weaker than the bank's overall performance under the Lending Test in the full-scope areas and considered good. This weaker performance did not impact 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 New York is rated Outstanding.

Conclusions for Areas Receiving Full Scope Reviews.

Based on full scope reviews, the bank's performance in the Albany CSA and Rochester MSAs is excellent.

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

The bank exhibits excellent responsiveness to credit and community economic development needs and makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Albany CSA	13	24,339	109	31,686	122	37.2	56,025	34.0	2	13,441
Binghamton MSA	11	994	14	1,296	25	7.6	2,290	1.4	0	0
Buffalo MSA	29	9,162	64	27,653	93	28.4	36,815	22.3	3	14,979
Ithaca CSA	2	176	1	133	3	0.9	309	0.2	0	0
NY Non-MSA	1	1,414	0	0	1	0.3	1,414	0.9	0	0
Rochester MSA	17	17,980	32	33,839	49	14.9	51,819	31.4	9	10,256
Syracuse MSA	8	8,372	22	2,885	30	9.1	11,257	6.8	0	0
Utica-Rome MSA	2	3,658	3	1,703	5	1.5	5,361	3.2	2	1,317

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

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

Albany CSA

In the Albany CSA, the combined prior and current period dollar volume represents 8.8 percent of allocated Tier 1 Capital. The bank's investments targeted affordable housing, a primary need in the AA. The investments focused on LIHTC, MBS, equity investments and grants. Examples include:

- Funded \$7.9 million commitment in a proprietary LIHTC fund to develop a 158-unit apartment complex in Saratoga Springs. The tax credit units are restricted to families earning 50 and 60 percent of the AMI. Ten units are also set aside through the Empire State Supportive Housing Initiative for persons age 18-24 who are aging out of foster care, chronically homeless, are disabled, or have been a victim of human trafficking.
- Funded \$7.7 million of \$8.5 million commitment in a multi-investor LIHTC fund to develop a 112-unit affordable housing development in Saratoga Springs.

Rochester MSA

In the Rochester MSA, the combined prior and current period dollar volume represents 23.5 percent of allocated Tier 1 Capital. The bank's investments targeted affordable housing, a primary need in the AA. The investments focused on LIHTCs, equity investments and grants.

Examples include:

- Funded \$5.8 million of \$6.2 million commitment in a multi-investor LIHTC fund. The investment was directed towards the development of a 104-unit affordable housing complex in Ontario, NY.
- Funded \$3.8 million of a \$5.6 million commitment in a multi-investor LIHTC fund. The investment was directed toward the development of an 88-unit affordable housing apartment building in Geneva, NY.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Binghamton, Buffalo, Syracuse and Utica MSAs is consistent with the bank's overall performance under the Investment Test in the full-scope areas. The bank's performance under the Investment Test in the Ithaca CSA and NY Non-Metro AA is weaker than the bank's overall performance under the Investment Test in the full-scope areas due to a lower level of investments.

SERVICE TEST

The institution's performance under the Service Test in the state of New York is rated High Satisfactory.

Based on full-scope reviews, the institution's performance in the Albany CSA is excellent and the performance in the Rochester MSA is good. Performance in limited-scope AAs adversely affected the overall rating.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA(s).

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
Albany CSA	50.9	25	23.1	16.0	12.0	32.0	40.0	7.0	16.5	53.1	22.6
Rochester MSA	17.6	25	23.1	8.0	12.0	52.0	28.0	9.6	14.2	45.3	30.0
Binghamton MSA	3.0	4	3.7	25.0	25.0	25.0	25.0	8.1	16.0	51.5	24.4
Buffalo MSA	20.1	41*	38.0	4.9	4.9	53.7	34.1	12.7	13.5	40.0	32.5
Ithaca MSA	0.6	2	1.9	0.0	50.0	0.0	50.0	0.0	13.4	56.9	25.7
Syracuse MSA	3.5	6	5.6	0.0	0.0	50.0	50.0	11.4	13.1	40.6	33.4
Utica-Rome MSA	2.2	3*	2.8	0.0	0.0	66.6	0.0	11.7	10.2	53.0	23.3
NY Non-MSA	2.1	2	1.9	0.0	0.0	100.0	0.0	1.7	12.0	75.5	9.8

*One branch in each AA is located in a N/A designated geography.

Albany CSA

Service delivery systems are readily accessible to geographies and individuals of different income levels in the Albany CSA. The distribution of branches was excellent in low-income geographies and good in moderate-income geographies. The distribution of branches in low-income geographies exceeded the percentage of the population in those geographies and was below the percentage of the population in moderate-income geographies. Within the CSA, CBNA had three branches located in middle- and upper-income geographies that were within one quarter of a mile of LMI geographies. While these adjacent branches provided LMI individuals and individuals in LMI census tracts additional access to the bank's retail banking services, they had no impact on the overall conclusion.

Access to retail banking services was further expanded through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 53 percent of customer households in low-income geographies utilized the bank's digital banking platforms to access banking services. In moderate-income geographies, utilization of the bank's digital platforms increased to an average of 58 percent of customer households. The bank operated 27 deposit-taking ATMs in the CSA. ATM availability was excellent in LMI geographies. The percentage of the bank's ATMs in low-income census tracts exceeded the percentage of the population in low-income census tracts while the percentage of ATMs in moderate-income census tracts was slightly below the percentage of the population in moderate-income census tracts.

Rochester MSA

Service delivery systems are accessible to geographies and individuals of different income levels in the Rochester MSA. The distribution of branches was good in LMI geographies. The distribution of branches in LMI geographies was below the percentage of the population in LMI

geographies. CBNA had no branches located in middle- and upper-income census tracts that were within one quarter of a mile of LMI census tracts that could have provided additional access to retail banking services.

Access to retail banking services was enhanced through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 46 percent of customer households in low-income geographies utilized the bank's digital banking platforms to access banking services. In moderate-income geographies, utilization of the bank's digital platforms increased to an average of 51 percent of customer households. The bank also operated 24 deposit-taking ATMs in the Rochester MSA. ATM availability was adequate in low-income geographies and good in moderate-income geographies. The percentage of the bank's ATMs in low-income geographies was well-below the percentage of the population in those geographies and was below the percentage of the population in moderate-income geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Albany CSA	1	5	-1	0	-3	0
Rochester MSA	1	10	-1	-3	-5	0
Binghamton MSA	0	2	-1	-1	0	0
Buffalo	1*	1*	0	0	0	0
Ithaca CSA	0	0	0	0	0	0
Syracuse MSA	0	3	0	-1	-1	-1
Utica-Rome MSA	0	0	0	0	0	0
NY Non-MSA	0	5	0	-1	-3	-1

*Branch opened or closed in a N/A designated geography.

Albany CSA

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. Despite the net closure of one branch in a low-income geography, the remaining branches remained readily accessible in LMI geographies and to LMI individuals.

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. In-store branches located in Hannaford grocery stores were typically open 10:00 am to 7:00 pm Monday through Friday, 10:00 am to 4:00 pm Saturday, and 11:00 am to 3:00 pm Sunday. The branch located in the Starbucks downtown had expanded hours. The branch, located in a low-income census tract, opened 7:30 am to 5:00 pm Monday through Thursday and 7:30 am to 6:00 pm Friday.

Rochester MSA

The bank's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened one branch and closed ten branches that comprised a net closure of one branch in a low-income census tract, a net closure of three branches in moderate-income census tracts, and a net closure of five branches in middle-income census tracts. The net closures in LMI geographies reduced the accessibility of the bank's retail banking services in LMI geographies and to LMI individuals.

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. In-store branches located in Tops super markets were typically open 10:00 am to 7:00 pm Monday through Friday, 10:00 am to 4:00 pm Saturday, and 11:00 am to 3:00 pm Sunday. The branch located in the Starbucks had expanded hours. The branch was open from 7:30 am to 7:00 pm Monday through Saturday and 8:00 am to 5:00 pm Sunday.

Community Development Services

Albany CSA

The bank provides a significant level of CD services.

CBNA employees provided 425 hours of CD services to 10 organizations that meet the definition of CD. During the evaluation period, 27 CBNA employees in the CSA provided 125 CD services throughout the CSA. Services primarily involved providing financial literacy and education to LMI students and individuals located in LMI geographies. Other services involved providing leadership on six boards of local non-profit organizations, helping with job placement assistance and offering technical support for local non-profit organizations.

Examples include:

- Bank employees provided financial literacy training to over 1,950 LMI individuals.
- Bank employees provided first time homebuyer education to over 200 LMI individuals.

Rochester MSA

The bank provides a significant level of CD services.

CBNA employees provided 471 hours of CD services to 15 different organizations that meet the definition of CD. During the evaluation period, 20 CBNA employees in the MSA provided 141 CD services throughout the MSA. Services primarily involved providing financial literacy and education to LMI students and individuals located in LMI geographies. Other services involved providing board leadership at nine local non-profit organizations, assisting with workforce development, and offering technical support for local non-profit organizations.

Examples include:

- Bank employees provided financial literacy training to over 1,600 LMI individuals.
- Providing lending and financial education for affordable housing to 30 individuals.

Based on limited-scope reviews, the bank's performance under the Service Test in the Binghamton MSA and Ithaca MSA is stronger than the bank's overall performance under the Service Test in the state of New York. Performance is stronger primarily due to the greater accessibility of retail banking services in LMI geographies relative to the distribution of the population in LMI geographies. Performance in the Buffalo MSA, Syracuse MSA, Utica-Rome MSA, and NY Non-MSA is weaker than the bank's overall High Satisfactory performance under the Service Test in the state of New York. Performance is weaker primarily due the lower accessibility of the bank's retail banking services in LMI geographies relative to the distribution of the population in LMI geographies. The weaker performance in the limited-scope AAs adversely affected the overall conclusion.

State Rating

State of Ohio

CRA rating for the State of Ohio: **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 reflect good responsiveness to AA credit needs.
- Adequate geographic distribution of loans in its AA.
- Excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are accessible to geographies and individuals of different income levels.
- The bank is a leader in providing CD services.

Description of Institution's Operations in Ohio

CBNA has four delineated AAs in Ohio consisting of a portion of the Cleveland CSA, a portion of the Toledo MSA, the Youngstown CSA, and the Non-MSA area of Scioto County. The bank had \$10.4 billion in deposits representing 11.5 percent of the bank's total deposits. Major competitors include The Huntington National Bank, Key Bank, N.A, Fifth Third Bank, and PNC Bank, N.A. CBNA operated 100 branches and 138 ATMs representing 13.1 percent of the bank's total branches and 11.1 percent of ATMs.

As part of the CRA evaluation, the OCC reviewed information from two community contacts made within the Cleveland CSA to determine local economic conditions and community needs. These organizations indicated needs include home improvement loans, micro loans to small businesses, technical assistance to small businesses, and capacity building for non-profits.

Cleveland CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cleveland CSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	915	17.2	21.4	37.2	22.8	1.4
Population by Geography	3,235,903	11.0	18.8	40.4	29.5	0.3
Housing Units by Geography	1,474,728	12.5	20.9	39.7	26.5	0.5
Owner-Occupied Units by Geography	870,774	5.8	15.6	44.0	34.4	0.1
Occupied Rental Units by Geography	445,889	20.6	28.5	34.7	15.3	0.9
Vacant Units by Geography	158,065	26.4	28.2	29.8	14.6	1.0
Businesses by Geography	204,832	8.1	15.1	37.9	38.0	0.8
Farms by Geography	5,798	3.3	9.7	50.2	36.7	0.1
Family Distribution by Income Level	823,449	22.0	17.0	20.1	40.9	0.0
Household Distribution by Income Level	1,316,663	25.4	15.6	17.1	42.0	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$65,716	Median Housing Value			\$135,281
Median Family Income MSA - 15940 Canton-Massillon, OH MSA		\$59,302	Median Gross Rent			\$753
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$65,821	Families Below Poverty Level			11.3%
Median Family Income Non-MSAs – OH		\$56,217				
<i>Source: 2015 ACS Census and 2018 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>						

Scope of Evaluation in Ohio

The Cleveland CSA received a full-scope review. This area represented 91.3 percent of deposits, 80.2 percent of lending and 80 percent of branches within the state. The Toledo, Youngstown, and Ohio 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 Ohio is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Cleveland CSA	6,376	2,474	0	10	8,860	82.2	90.8
Toledo MSA	873	262	0	0	1,135	10.5	6.5
Youngstown CSA	477	196	0	0	673	6.2	1.8
OH Non-MSA	95	19	0	0	114	1.1	0.9

Dollar Volume of Loans (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans*	%State Deposits
Cleveland CSA	757,663	119,849	0	94,105	971,617	87.1	90.8
Toledo MSA	76,910	11,534	0	0	88,444	7.9	6.5
Youngstown CSA	37,993	9,416	0	0	47,409	4.3	1.8
OH Non-MSA	6,376	1,707	0	0	8,083	0.7	0.9

CBNA ranked fourth in deposits with a 10.5 percent market share. In overall home mortgage lending, CBNA ranked sixth with a 3.6 percent market share. Competition is strong. There are 542 mortgage lenders in the AA, many without a depository presence. There are 50 depository institutions in the AA. The top lender in this market was The Huntington National Bank with a 14.0 percent market share, followed by Third Federal Savings and Loan with 8 percent, and Wells Fargo with 5 percent. In small loans to businesses, CBNA ranked 12th with 1.7 percent market share. The top three lenders with a combined market share of 44.2 percent were American Express with 17.9 percent, PNC Bank with 14.9 percent, and Chase Bank USA with 11.5 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

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. The geographic distribution of home mortgage loans is good.

2017 to 2018

The proportion of loans in both low- and moderate-income geographies was below the proportion of owner-occupied homes in those geographies but significantly exceeded the aggregate distribution of loans in low-income geographies and exceeded the aggregate distribution of loans in moderate-income geographies.

2016

Performance in low-income geographies was consistent with 2017 to 2018. The proportion of loans in moderate-income geographies exceeded both the proportion 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 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. The geographic distribution of small loans to businesses good.

2017 to 2018

The proportion of loans in low-income geographies approximated both the proportion of businesses located in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below the proportion of businesses located in those geographies and approximated the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies was below the proportion of businesses located in those geographies and approximated the aggregate distribution of loans. The proportion of loans in moderate-income geographies approximated the proportion of businesses located in those geographies and exceeded the aggregate distribution of loans.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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. The borrower distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans to low-income borrowers approximated the proportion of low-income families within the AA but significantly exceeded the aggregate distribution of loans. The

proportion of loans to moderate-income borrowers significantly exceeded the proportion of moderate-income families and exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

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. The borrower distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans to small businesses met the percentage of small businesses in the CSA and significantly exceeded the aggregate distribution of loans.

2016

The proportion of loans to small businesses substantially met the percentage of small businesses in the CSA and significantly exceeded the aggregate distribution of loans.

Community Development Lending

The bank is a leader in making CD loans.

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.

CBNA demonstrated excellent responsiveness to CD lending needs and opportunities. CD loans include many complex projects where the bank often acted in a leadership role. The dollar volume of CD lending represents 7.5 percent of allocated Tier 1 Capital. Examples include:

- \$21.5 million loan to rehab 143 units of senior affordable housing. All of the units are under HUD/HAP Section 8 contracts. Additionally, this transaction utilized other financing including LIHTCs from the Ohio Housing Finance Agency.
- \$10 million construction financing for 194 units of affordable housing. The property is located within Cleveland's designated "Community Reinvestment Area" where the city is targeting development to serve LMI individuals.
- \$2 million revolving line of credit to fund a non-profit loan fund that assists small businesses within the state of Ohio, including the Cleveland CSA.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Ohio Non-Metro, Toledo MSA, and the Youngstown CSA is weaker than the bank's overall performance under the Lending Test in the full-scope area. For the Youngstown CSA, the bank's geographic distribution was weaker, but still considered adequate. This weaker performance did not impact 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 bank's performance under the Investment Test in Ohio is Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Conclusions for the Area Receiving a Full-Scope Review.

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

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

The bank exhibits excellent responsiveness to credit and community economic development needs. CBNA makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

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	46	59,338	327	74,185	373	88.4	133,524	87.9	4	\$39,612
Toledo MSA	4	7,360	28	6,427	32	7.6	13,787	9.1	1	\$1,720
Youngstown CSA	5	1,945	12	2,661	17	4.0	4,605	2.8	1	\$559
Ohio Non-Metro	0	0	0	0	0	0	0	0	0	\$0

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

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

The combined prior and current period dollar volume represents 10.6 percent of allocated Tier 1 Capital. The bank's investments targeted affordable housing, a primary need in the AA. The investments focused on LIHTCs, MBS, equity investments, and grants. Examples include:

- \$22.1 funded commitment in a proprietary LIHTC fund consisting of a 143-unit senior housing complex in Cleveland. The project involved multiple layers of financing including private, state, and federal sources.
- Funded \$14.4 million of a \$15.2 million commitment in a proprietary LIHTC fund. The investment created 59 units of affordable housing serving seniors and persons with developmental disabilities with incomes of 30 percent, 50 percent, and 60 percent or less of AMI. The project involved multiple layers of financing through federal, state, and county funding as well as CBNA construction loan and equity bridge loan.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the bank's performance under the Investment Test in the Toledo and Youngstown MSAs is consistent with the bank's overall performance under the Investment Test in the Cleveland CSA. The bank's performance in the Ohio Non-MSA is weaker than the bank's overall performance under the Investment Test in the full-scope area as a result of no investments. The weaker performance did not impact the overall rating.

SERVICE TEST

The institution's performance under the Service Test in the state of Ohio is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Cleveland CSA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
		# 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	
Cleveland CSA	90.8	80*	80.0	8.8	13.8	46.3	30.0	11.0	18.8	40.4	29.5
Toledo MSA	6.5	13	13.0	7.7	15.4	53.8	23.1	14.2	15.7	38.7	30.4
Youngstown CSA	1.8	4	4.0	0.0	0.0	50.0	50.0	7.8	14.8	53.1	24.3
OH Non-MSA	0.9	3	3.0	67.7	0.0	0.0	33.3	3.0	33.5	49.3	14.1

*One branch in a N/A designated geography.

The distribution of branches was good in LMI geographies. The distribution of branches in low-income geographies was below the percentage of the population in low-income geographies and the distribution of branches in moderate-income geographies was below the percentage of the population in moderate-income geographies. Within the CSA, CBNA had eight branches located in middle- and upper-income census tracts that were within one quarter of a mile of LMI census tracts. While these adjacent branches provided LMI individuals and individuals in LMI census tracts additional access to the bank's retail banking services, they had no significant impact on the overall conclusion.

Access to retail banking services was further expanded through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 48 percent of customer households in low-income geographies utilized the bank's digital banking platforms to access banking services. In moderate-income geographies, utilization of the bank's digital platforms increased to an average of 54 percent of customer households. The bank operated 113 deposit-taking ATMs in the Cleveland CSA. ATM availability was good in LMI geographies. The percentage of the bank's ATMs in LMI census tracts were below the percentages of the population in LMI census tracts.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Cleveland CSA	4*	11*	-1	-2	-5	+1
Toledo MSA	1	4	0	0	-3	0
Youngstown CSA	0	2	0	0	-2	0
OH Non-MSA	0	0	0	0	0	0

*Branch opened and closed in N/A designated geography.

The bank's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened four branches and closed eleven branches that comprised a net closure of one branch in a low-income census tract, two branches in moderate-income census tracts, five branches in middle-income census tracts, and one net opening in an upper-income census tract. The closures in LMI geographies reduced the accessibility of the bank's retail banking services in LMI geographies and to LMI individuals.

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. In-store branches located in ACME grocery stores were typically open 10:30 am to 6:30 pm Monday through Thursday, 10:30 am to 7:00 pm Friday, 11:00 am to 4:00 pm Saturday, and 11:00 am to 3:00 pm Sunday.

Community Development Services

The bank is a leader in providing CD services.

CBNA employees provided 1,379 hours of CD services to 36 different organizations that meet the definition of CD. During the evaluation period, 75 CBNA employees provided 291 CD services throughout the CSA. Services primarily involved providing VITA tax assistance and financial literacy education to LMI students and individuals located in LMI geographies. Other services involved providing board leadership at 12 local non-profit organizations, assisting with economic development of neighborhoods, and offering technical support for local non-profit organizations. Examples include:

- Bank employees provided financial literacy training to over 4,200 LMI individuals.
- Job readiness education provided to over 300 youth in LMI communities.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Toledo MSA is consistent with the bank's overall High Satisfactory performance under the Service Test in the state of Ohio. Performance in the Ohio Non-MSA is stronger than the bank's overall High Satisfactory performance under the Service Test in the state of Ohio. Despite only having three branches in the Ohio Non-MSA, two of the branches were in low-income geographies where only approximately 3 percent of the population resides. Performance in the Youngstown CSA is weaker than the bank's overall High Satisfactory performance under the Service Test in the state of Ohio. Performance is weaker primarily due the lower accessibility of the bank's retail banking services in LMI geographies relative to the distribution of the population in LMI geographies. While the bank only had four branches in the Youngstown CSA, none of the branches were in LMI geographies where approximately 22.6 percent of the population resides. The weaker performance did not impact the overall 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 reflect excellent responsiveness to AA credit needs.
- Excellent geographic distribution of loans in its AA.
- Excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- Excellent level of qualified CD investment and grants and exhibits excellent responsiveness to credit and community economic development needs.
- Service delivery systems are readily accessible to geographies and individuals of different income levels.
- The bank provides a low level of CD services.

Description of Institution's Operations in Vermont

CBNA has delineated two AAs within the state of Vermont; Burlington-South Burlington, VT MSA, which includes Franklin and Chittenden counties and the VT Non-MSA, which includes Addison, Bennington, Rutland, Washington, Windham, and Windsor counties.

CBNA has \$879.5 million in deposits in the state, representing about one percent of the bank's deposits. Primary competitors include People's United Bank, N.A., TD Bank, N.A, and Community Bank, N.A. There are 21 FDIC-insured depository institutions within the bank's AAs. CBNA has 13 branches and 16 ATMs within the state representing 1.7 percent of total branches and 1.3 percent of total ATMs.

As part of the CRA evaluation, the OCC reviewed information from one community contact made within the state of Vermont to determine local economic conditions and community needs. The major identified need included affordable housing for seniors and low-income residents.

VT Non-MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: VT Non-MSA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	97	0.0	6.2	78.4	15.5	0.0
Population by Geography	293,202	0.0	6.7	77.0	16.4	0.0
Housing Units by Geography	165,621	0.0	5.6	78.4	16.0	0.0
Owner-Occupied Units by Geography	88,107	0.0	4.6	78.0	17.5	0.0
Occupied Rental Units by Geography	35,400	0.0	12.6	74.3	13.2	0.0
Vacant Units by Geography	42,114	0.0	1.9	83.0	15.1	0.0
Businesses by Geography	25,467	0.0	8.0	75.3	16.7	0.0
Farms by Geography	1,533	0.0	2.0	78.4	19.6	0.0
Family Distribution by Income Level	76,796	18.6	17.3	22.4	41.7	0.0
Household Distribution by Income Level	123,507	23.1	15.6	18.3	43.0	0.0
Median Family Income Non-MSAs – VT		\$64,849	Median Housing Value			\$219,973
			Median Gross Rent			\$860
			Families Below Poverty Level			7.5%
<i>Source: 2015 ACS Census and 2018 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>						

Scope of Evaluation in Vermont

The VT Non-MSA received a full-scope review. This area accounted for nearly 60 percent of the deposits and lending in the state. In evaluating the geographic distribution of loans, more emphasis was placed on performance in moderate-income geographies given there were no low-income geographies in the 2015 ACS. The Burlington MSA 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 VT Non-MSA is excellent.

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope review, the bank's performance in the VT Non-MSA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs, when considering competition and the bank's market presence.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Vermont Non-MSA	583	444	0	1	1,028	59.4	58.7
Burlington MSA	284	417	0	1	702	40.6	41.3

Dollar Volume of Loans (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State*	%State Deposits
Vermont Non-MSA	86,346	18,225	0	4,700	109,271	57.2	58.7
Burlington MSA	56,388	19,452	0	6,000	81,840	42.8	41.3

CBNA ranked third in deposits with 8.4 percent market share. In overall home mortgage lending, CBNA ranked fourth with a 5.5 percent market share. There are 231 mortgage lenders in the AA, many without a depository presence. There are 18 depository institutions in the AA. The top lender in this market was Quicken Loans with 7.6 percent market share, followed by Vermont State Employees Credit Union with 7.3 percent, and People's United Bank, FSB, with 6.2 percent. In small loans to businesses, CBNA ranked 12th with a market share of 2.5 percent. The top three lenders held a combined market share of 38.6 percent. The top lender was American Express with 17.5 percent, followed by Capital One with 10.9 percent, and Citigroup with 10.2 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in its AA.

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. The geographic distribution of home mortgage loans is excellent.

2017 to 2018

This AA has no designated low-income geographies. The proportion of loans in moderate-income geographies exceeded the proportion of owner-occupied homes in those geographies and significantly exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

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. The geographic distribution of small loans to businesses is good.

2017 to 2018

This AA has no designated low-income geographies. The proportion of loans in moderate-income geographies was below the proportion of businesses located in those geographies and exceeded the aggregate distribution of loans.

2016

Performance in 2016 was inconsistent with 2017 to 2018. Only 0.2 percent of businesses were located in low-income geographies. CBNA originated no loans in low-income geographies. The proportion of loans in moderate-income geographies exceeded both the proportion of businesses located in those geographies and the aggregate distribution of loans.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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 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. The borrower distribution of home mortgage loans is excellent.

2017 to 2018

The proportion of loans to low-income borrowers was below the proportion of low-income families within the AA but significantly exceeded the aggregate distribution of loans. Considering the higher performance relative to all lenders, the distribution is good to low-income borrowers. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2016

Performance was inconsistent with 2017 to 2018. The proportion of loans to moderate-income borrowers was below the proportion of moderate-income families and approximated the aggregate distribution of loans. The proportion of loans to low-income borrowers was consistent.

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. The borrower distribution of small loans to businesses is excellent.

2017 to 2018

The proportion of loans to small businesses exceeded the percentage of small businesses in the CSA and significantly exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018.

Community Development Lending

The bank is a leader in making CD loans.

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.

CBNA demonstrated excellent responsiveness to the identified affordable housing needs by providing \$4.7 million in construction financing for the development of 25 units of affordable housing, with all units allocated to tenants earning less than 80 percent of the AMI. This represented 6.9 percent of allocated Tier 1 Capital.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Burlington MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

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 Vermont is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Vermont Non-MSA is excellent.

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

The bank has excellent responsiveness to credit and community economic development needs. CBNA makes extensive use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total					Unfunded Commitments**
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Vermont Non-MSA	15	6,115	8	1,473	23	67.6	7,588	54.1	1	1,091
Burlington MSA	1	4,017	10	2,417	11	32.4	6,434	45.9	2	1,907

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

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

The combined prior and current period dollar volume represents 11.1 percent of allocated Tier 1 Capital. The CD investments helped finance the development or preservation of over 236 units of affordable housing in the Vermont Non-MSA.

- \$1.4 million in a multi-investor LIHTC fund. The investment helped to fund the construction of a 22-unit affordable apartment complex in Bennington, VT.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Burlington MSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The institution's performance under the Service Test in the state of Vermont is rated Outstanding.

Based on a full-scope review, the institution's performance in the VT Non-MSA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

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
Burlington MSA	58.7	6	22.2	0.0	33.3	33.3	33.3	1.5	18.5	60.6	19.5
VT Non-MSA	41.3	7	77.8	0.0	28.6	57.1	14.3	0.0	6.7	77.0	16.4

The distribution of branches was excellent in moderate-income geographies. The distribution of branches in moderate-income geographies significantly exceeded the percentage of the population in moderate-income geographies. None of the branches in middle- or upper-income census tracts were within one quarter of a mile of moderate-income census tracts to provide LMI individuals and moderate-income geographies additional access to retail banking services.

Access to retail banking services was further expanded through alternative delivery systems, including ATMs and digital banking platforms (online banking/mobile banking). Over the three-year evaluation period, an average of 47 percent of customer households in moderate-income geographies utilized the bank's digital banking platforms to access banking services. The bank also operated nine deposit-taking ATMs in the VT Non-MSA. ATM availability was excellent in moderate-income geographies. The percentage of the bank's ATMs in moderate-income census tracts exceeded the percentage of the population in moderate-income geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Burlington MSA	0	0	0	0	0	0
VT Non-MSA	0	7	0	-1	-5	-1

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. Although the bank

closed seven branches, the remaining branches remained readily accessible in moderate-income geographies and to LMI individuals.

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.

Community Development Services

The institution provides a low level of CD services.

CBNA employees provided 132 hours of CD services to three organizations that meet the definition of CD. During the evaluation period, 10 CBNA employees in the AA provided 10 CD services targeted to LMI individuals and two affordable housing activities throughout the AA. Services primarily involved providing financial literacy and education to LMI students and individuals located in LMI geographies. Other services involved providing board leadership for local non-profit organizations, assisting with affordable housing, and offering technical support for local non-profit organizations.

Based on a limited-scope review, the bank's performance under the Service Test in the Burlington MSA is consistent with the bank's overall performance under the Service Test in the state of Vermont.

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:	01/01/2016 to 12/31/2018	
Bank Products Reviewed:	Home mortgage loans, small loans to businesses, community development loans, investments, and services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Citizens One CDC	Bank Subsidiary	Community development investments
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Boston MMSA	Full-scope	CT: Windham MA: Barnstable, Bristol, Norfolk, Plymouth, Suffolk, Essex, Middlesex, Worcester NH: Belknap, Hillsborough, Merrimack, Rockingham, Strafford RI Bristol, Kent, Newport. Providence, Washington
New York CSA	Full-scope	CT: Fairfield, New Haven NY: Dutchess, Orange, Ulster, Westchester
Connecticut		
Hartford CSA	Full-scope	Hartford, Middlesex, New London
Delaware		
Philadelphia CSA	Full-scope	New Castle, Kent
Salisbury MSA	Limited-scope	Sussex
Massachusetts		
Springfield CSA	Full-scope	Hampden, Hampshire, Franklin
Pittsfield MSA	Limited-scope	Berkshire
Michigan		
Detroit CSA	Full-scope	Livingston, Macomb, Monroe, Oakland, Wayne, Washtenaw
Lansing CSA	Limited-scope	Ingham, Shiawassee
Saginaw MSA	Limited-scope	Saginaw
New Hampshire		
NH Non-MSA	Full-scope	Carroll, Cheshire, Coos, Grafton, Sullivan
New York		
Albany CSA	Full-scope	Albany, Fulton, Montgomery, Rensselaer, Saratoga, Schenectady, Warren
Binghamton MSA	Limited-scope	Broome
Buffalo MSA	Limited-scope	Erie, Niagara
Ithaca CSA	Limited-scope	Cortland, Tompkins
NY Non-MSA	Limited-scope	Chautauqua, Chenango, Otsego, Sullivan
Rochester MSA	Full-scope	Livingston, Monroe. Ontario, Wayne
Syracuse MSA	Limited-scope	Madison, Onondaga

Utica-Rome MSA	Limited-scope	Herkimer, Oneida
Ohio		
Cleveland CSA	Full-scope	Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, Summit, Stark, Tuscarawas
Toledo MSA	Limited-scope	Lucas, Wood
Youngstown CSA	Limited-scope	Mahoning, Trumbull, Columbiana
OH Non-MSA	Limited-scope	Scioto
Vermont		
Burlington MSA	Limited-scope	Chittenden, Franklin
VT Non-MSA	Full-scope	Addison, Bennington, Rutland, Washington, 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
MCSA/MMSA or State:				
Boston MCSA	Outstanding	Outstanding	Outstanding	Outstanding
New York MCSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Connecticut	Outstanding	Outstanding	High Satisfactory	Outstanding
Delaware	Outstanding	Outstanding	Outstanding	Outstanding
Massachusetts	Outstanding	Outstanding	Outstanding	Outstanding
Michigan	Outstanding	Outstanding	High Satisfactory	Outstanding
New Hampshire	Outstanding	Outstanding	Outstanding	Outstanding
New York	Outstanding	Outstanding	High Satisfactory	Outstanding
Ohio	Outstanding	Outstanding	High Satisfactory	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: 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.

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																				2016
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 Loan	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	5,042	1,518,274	100	303,844	2.8	2.8	3.3	13.3	12.0	13.0	49.9	44.8	48.7	33.9	40.4	35.1	0.0	0.0	0.0	
Total	5,042	1,518,274	100	303,844	2.8	2.8	3.3	13.3	12.0	13.0	49.9	44.8	48.7	33.9	40.4	35.1	0.0	0.0	0.0	

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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																			2016
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	5,042	1,518,274	100.0	303,844	21.6	4.9	4.2	16.9	17.6	15.2	21.1	23.8	22.7	40.4	51.7	43.1	0.0	2.0	14.9
Total	5,042	1,518,274	100.0	303,844	21.6	4.9	4.2	16.9	17.6	15.2	21.1	23.8	22.7	40.4	51.7	43.1	0.0	2.0	14.9

Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 2016

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	4,034	265,180	100.0	183,024	7.0	5.5	6.1	14.4	15.5	13.9	43.1	44.4	43.9	35.4	34.6	35.9	0.2	0.1	0.2
Total	4,034	265,180	100.0	183,024	7.0	5.5	6.1	14.4	15.5	13.9	43.1	44.4	43.9	35.4	34.6	35.9	0.2	0.1	0.2

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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											2016
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	4,034	265,180	100.0	183,024	83.2	78.5	44.3	6.9	18.9	9.9	2.6
Total	4,034	265,180	100.0	183,024	83.2	78.5	44.3	6.9	18.9	9.9	2.6

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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 2017-18

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	23,048	5,141,569	100.0	271,321	3.2	2.9	4.4	13.7	11.9	14.9	46.4	42.8	45.2	36.5	42.2	35.2	0.1	0.1	0.1
Total	23,048	5,141,569	100.0	271,321	3.2	2.9	4.4	13.7	11.9	14.9	46.4	42.8	45.2	36.5	42.2	35.2	0.1	0.1	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 **2017-18**

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	23,048	5,141,569	100.0	271,321	22.8	8.0	6.2	16.5	19.7	18.8	20.0	25.4	23.6	40.7	45.1	38.5	0.0	1.8	12.9
Total	23,048	5,141,569	100.0	271,321	22.8	8.0	6.2	16.5	19.7	18.8	20.0	25.4	23.6	40.7	45.1	38.5	0.0	1.8	12.9

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 **2017-18**

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	9,709	541,932	100.0	181,773	7.3	7.2	6.8	15.3	17.7	15.1	39.8	40.4	40.6	36.9	34.3	37.1	0.6	0.4	0.5
Total	9,709	541,932	100.0	181,773	7.3	7.2	6.8	15.3	17.7	15.1	39.8	40.4	40.6	36.9	34.3	37.1	0.6	0.4	0.5

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 2017-18

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	9,709	541,932	100.0	181,773	83.5	80.2	46.5	6.7	17.4	9.8	2.4
Total	9,709	541,932	100.0	181,773	83.5	80.2	46.5	6.7	17.4	9.8	2.4

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
NY CSA	783	426,206	100.0	77,171	2.7	1.3	2.6	11.7	7.2	10.4	37.1	25.7	36.4	48.5	65.9	50.6	0.0	0.0	0.0
Total	783	426,206	100.0	77,171	2.7	1.3	2.6	11.7	7.2	10.4	37.1	25.7	36.4	48.5	65.9	50.6	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
NY CSA	783	426,206	100.0	77,171	19.7	2.4	4.5	15.3	8.9	13.7	18.8	11.9	19.8	46.3	71.4	48.6	0.0	5.4	13.4
Total	783	426,206	100.0	77,171	19.7	2.4	4.5	15.3	8.9	13.7	18.8	11.9	19.8	46.3	71.4	48.6	0.0	5.4	13.4

Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
NY CSA	706	54,114	100.0	102,632	6.7	6.7	6.4	14.6	13.6	12.9	32.7	39.0	31.9	45.9	40.8	48.9	0.0	0.0	0.0
Total	706	54,114	100.0	102,632	6.7	6.7	6.4	14.6	13.6	12.9	32.7	39.0	31.9	45.9	40.8	48.9	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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 2016

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
NY CSA	706	54,114	100.0	102,632	86.2	83.9	46.2	5.8	15.0	8.0	1.1
Total	706	54,114	100.0	102,632	86.2	83.9	46.2	5.8	15.0	8.0	1.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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																				2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
NY CSA	2,898	946,467	100.0	80,740	2.9	2.0	3.3	12.2	9.0	12.2	32.9	26.1	31.6	52.0	62.8	52.8	0.0	0.0	0.0	
Total	2,898	946,467	100.0	80,740	2.9	2.0	3.3	12.2	9.0	12.2	32.9	26.1	31.6	52.0	62.8	52.8	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 **2017-18**

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 Loan	Aggregate	% Families	% Bank Loan	Aggregate	% Families	% Bank Loan	Aggregate	% Families	% Bank Loan	Aggregate	% Families	% Bank Loan	Aggregate
NY CSA	2,898	946,467	100.0	80,740	21.1	5.4	5.5	14.8	14.4	15.1	17.4	17.1	19.9	46.7	62.2	47.0	0.0	0.9	12.3
Total	2,898	946,467	100.0	80,740	21.1	5.4	5.5	14.8	14.4	15.1	17.4	17.1	19.9	46.7	62.2	47.0	0.0	0.9	12.3

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 2017-18

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
NY CSA	1,434	79,812	100.0	96,001	7.0	5.8	7.2	14.2	12.6	13.5	29.7	36.1	28.4	49.1	45.5	50.8	0.1	0.0	0.1
Total	1,434	79,812	100.0	96,001	7.0	5.8	7.2	14.2	12.6	13.5	29.7	36.1	28.4	49.1	45.5	50.8	0.1	0.0	0.1

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 2017-18

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
NY CSA	1,434	79,812	100.0	96,001	86.4	87.4	51.5	5.7	11.9	7.9	0.7
Total	1,434	79,812	100.0	96,001	86.4	87.4	51.5	5.7	11.9	7.9	0.7

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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																			2016
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
Hartford CSA	227	51,019	100.0	35,881	3.5	1.3	3.1	12.0	9.7	10.5	48.7	46.7	47.8	35.7	42.3	38.5	0.0	0.0	0.0
Total	227	51,019	100.0	35,881	3.5	1.3	3.1	12.0	9.7	10.5	48.7	46.7	47.8	35.7	42.3	38.5	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 **2016**

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
Hartford CSA	227	51,019	100.0	35,881	21.6	10.1	6.4	17.5	18.9	19.0	22.1	19.8	22.2	38.8	47.6	34.6	0.0	3.5	17.7
Total	227	51,019	100.0	35,881	21.6	10.1	6.4	17.5	18.9	19.0	22.1	19.8	22.2	38.8	47.6	34.6	0.0	3.5	17.7

Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 **2016**

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
Hartford CSA	488	24,096	100.0	28,770	8.9	3.3	7.4	12.9	13.7	12.6	43.2	46.3	45.5	34.8	36.5	34.4	0.3	0.2	0.1
Total	488	24,096	100.0	28,770	8.9	3.3	7.4	12.9	13.7	12.6	43.2	46.3	45.5	34.8	36.5	34.4	0.3	0.2	0.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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											2016
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	488	24,096	100.0	28,770	84.1	84.2	48.1	6.0	14.5	9.9	1.2
Total	488	24,096	100.0	28,770	84.1	84.2	48.1	6.0	14.5	9.9	1.2

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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																			2017-18
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 Loan	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loan	Aggregate	% of Owner-Occupied Housing Units	% Bank Loan	Aggregate
Hartford CSA	1,206	236,599	100.0	34,176	4.3	3.6	4.7	10.9	6.3	10.0	43.9	40.3	43.0	41.0	49.8	42.3	0.0	0.0	0.0
Total	1,206	236,599	100.0	34,176	4.3	3.6	4.7	10.9	6.3	10.0	43.9	40.3	43.0	41.0	49.8	42.3	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 2017-18

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
Hartford CSA	1,206	236,599	100.0	34,176	22.8	11.8	10.6	16.9	23.7	23.8	20.4	26.1	22.3	39.9	36.5	29.4	0.0	1.9	13.9
Total	1,206	236,599	100.0	34,176	22.8	11.8	10.6	16.9	23.7	23.8	20.4	26.1	22.3	39.9	36.5	29.4	0.0	1.9	13.9

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 2017-18

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
Hartford CSA	977	56,903	100.0	27,762	10.3	7.3	9.5	12.0	9.4	12.2	40.7	42.7	41.1	36.7	40.6	37.1	0.3	0.0	0.2
Total	977	56,903	100.0	27,762	10.3	7.3	9.5	12.0	9.4	12.2	40.7	42.7	41.1	36.7	40.6	37.1	0.3	0.0	0.2

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 2017-18

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	977	56,903	100.0	27,762	84.3	85.2	50.4	5.9	13.8	9.8	1.0
Total	977	56,903	100.0	27,762	84.3	85.2	50.4	5.9	13.8	9.8	1.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 **2016**

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	265	65,649	71.2	25,806	2.1	0.8	1.2	19.5	17.0	16.2	45.2	31.7	46.2	33.2	50.6	36.4	0.0	0.0	0.0
Salisbury MSA	107	39,167	28.8	10,602	0.0	0.0	0.0	11.8	2.8	9.3	73.5	68.2	69.1	14.7	29.0	21.5	0.0	0.0	0.0
Total	372	104,816	100.0	36,408	1.6	0.5	0.9	17.6	12.9	14.2	52.2	42.2	52.8	28.6	44.4	32.1	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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																			2016
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	265	65,649	71.2	25,806	20.3	7.9	6.6	18.0	21.9	17.5	21.5	15.5	20.3	40.2	52.1	29.3	0.0	2.6	26.3
Salisbury MSA	107	39,167	28.8	10,602	20.4	2.8	3.4	19.3	12.2	10.6	21.9	3.7	16.6	38.5	80.4	54.5	0.0	0.9	15.0
Total	372	104,816	100.0	36,408	20.3	6.5	5.6	18.3	19.1	15.5	21.6	12.1	19.2	39.8	60.2	36.7	0.0	2.2	23.0

Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 **2016**

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	246	10,260	71.1	14,969	3.4	1.2	2.7	20.7	22.8	21.0	39.9	48.0	38.6	36.0	28.0	37.7	0.0	0.0	0.0
Salisbury MSA	100	3,437	28.9	4,551	0.0	0.0	0.0	12.6	8.0	10.8	67.6	81.0	64.8	19.7	11.0	24.3	0.0	0.0	0.0
Total	346	13,697	100.0	19,520	2.6	0.9	2.1	18.9	18.5	18.7	46.3	57.5	44.7	32.2	23.1	34.5	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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 2016

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	246	10,260	71.1	14,969	82.0	88.2	45.9	6.6	8.9	11.4	2.8
Salisbury MSA	100	3,437	28.9	4,551	85.2	92.0	47.6	4.4	2.0	10.4	6.0
Total	346	13,697	100.0	19,520	82.7	89.3	46.3	6.1	6.9	11.2	3.8

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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 2017-18

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	949	155,172	71.8	24,549	1.7	0.7	1.1	19.2	17.0	18.5	48.8	43.2	47.3	30.3	39.1	33.1	0.0	0.0	0.0
Salisbury MSA	373	97,905	28.2	10,945	0.0	0.0	0.0	6.5	2.9	4.0	77.0	67.0	70.0	16.4	30.0	26.0	0.0	0.0	0.0
Total	1,322	253,077	100.0	35,494	1.3	0.5	0.8	15.9	13.0	14.0	56.1	49.9	54.3	26.7	36.5	30.9	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 2017-18

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	949	155,172	71.8	24,549	20.9	14.0	9.9	17.6	22.9	20.4	21.0	23.8	20.5	40.4	38.1	24.7	0.0	1.2	24.5
Salisbury MSA	373	97,905	38.9	10,945	20.1	8.3	4.8	18.2	16.1	13.2	21.2	15.0	18.0	40.4	59.5	50.1	0.0	1.1	13.9
Total	1,322	253,077	100.0	35,494	20.7	12.4	8.3	17.8	21.0	18.1	21.1	21.3	19.7	40.4	44.2	32.5	0.0	1.1	21.3

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 **2017-18**

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	477	25,575	70.7	14,898	4.3	3.1	4.2	25.6	20.5	24.1	45.0	53.0	43.9	25.0	23.3	27.9	0.0	0.0	0.0
Salisbury MSA	198	7,940	29.3	4,624	0.0	0.0	0.0	9.1	5.6	6.9	70.1	73.2	71.5	20.8	21.2	21.6	0.0	0.0	0.0
Total	675	33,515	100.0	19,522	3.3	2.2	3.2	21.9	16.1	20.0	50.8	59.0	50.4	24.1	22.7	26.4	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 2017-18

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	477	25,575	70.7	14,898	82.4	83.9	49.9	6.4	14.7	11.1	1.5
Salisbury MSA	198	7,940	32.1	4,624	85.5	91.4	49.3	4.4	8.6	10.1	0.0
Total	675	33,515	100.0	19,522	83.1	86.1	49.7	6.0	12.9	10.9	1.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 **2016**

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
Pittsfield MSA	10	1,189	3.4	3,168	0.6	0.0	0.5	6.9	0.0	6.7	69.5	80.0	69.3	22.9	20.0	23.5	0.0	0.0	0.0
Springfield CSA	287	41,277	96.6	17,375	2.9	7.3	2.9	16.0	22.3	15.9	44.2	38.7	43.2	36.9	31.7	38.0	0.0	0.0	0.0
Total	297	42,466	100.0	20,543	2.4	7.1	2.6	14.4	21.5	14.4	48.8	40.1	47.3	34.4	31.3	35.7	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 **2016**

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
Pittsfield MSA	10	1,189	3.4	3,168	21.8	30.0	8.0	17.0	30.0	16.7	22.6	20.0	18.8	38.6	10.0	42.2	0.0	10.0	14.3
Springfield CSA	287	41,277	96.6	17,375	23.4	10.1	6.0	16.4	25.8	19.8	19.6	28.6	23.4	40.6	24.7	36.0	0.0	10.8	14.8
Total	297	42,466	100.0	20,543	23.2	10.8	6.3	16.5	25.9	19.3	20.1	28.3	22.7	40.3	24.2	37.0	0.0	10.8	14.7

Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 **2016**

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
Pittsfield MSA	19	940	9.4	2,372	8.1	0.0	7.5	7.7	5.3	6.5	62.9	73.7	62.1	21.3	21.1	23.9	0.0	0.0	0.0
Springfield CSA	183	9,072	90.6	13,935	12.3	10.9	10.5	19.0	13.7	15.8	36.7	29.5	37.4	31.8	45.9	36.1	0.2	0.0	0.1
Total	202	10,012	100.0	16,307	11.5	9.9	10.1	16.8	12.9	14.5	41.7	33.7	41.0	29.8	43.6	34.3	0.2	0.0	0.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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 **2016**

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
Pittsfield MSA	19	940	9.4	2,372	81.7	89.5	49.4	6.2	10.5	12.1	0.0
Springfield CSA	183	9,072	90.6	13,935	81.9	85.8	41.5	6.2	13.1	11.8	1.1
Total	202	10,012	100.0	16,307	81.9	86.1	42.6	6.2	12.9	11.9	1.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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																				2017-18
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	
Pittsfield MSA	85	13,143	7.7	3,292	3.1	3.5	4.0	10.2	9.4	9.1	55.5	45.9	54.5	31.2	41.2	32.4	0.0	0.0	0.0	
Springfield CSA	1,020	145,018	92.3	16,517	4.3	9.6	5.7	12.7	22.7	15.3	40.3	33.2	39.0	42.7	34.4	40.0	0.0	0.0	0.0	
Total	1,105	158,161	100.0	19,809	4.1	9.1	5.4	12.2	21.7	14.3	43.1	34.2	41.6	40.6	34.9	38.7	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 2017-18

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
Pittsfield MSA	85	13,143	10.8	3,292	21.3	5.9	7.7	17.6	17.6	18.3	20.5	25.9	20.0	40.6	50.6	42.2	0.0	0.0	11.8
Springfield CSA	1,020	145,018	92.3	16,517	24.2	11.3	7.9	16.1	32.0	22.9	18.5	23.3	23.3	41.2	28.9	30.8	0.0	4.5	15.1
Total	1,105	158,161	100.0	19,809	23.7	10.9	7.9	16.4	30.9	22.2	18.8	23.5	22.7	41.1	30.6	32.7	0.0	4.2	14.5

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 **2017-18**

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
Pittsfield MSA	41	1,400	10.2	2,265	12.9	7.3	11.2	6.6	4.9	6.9	43.1	61.0	44.4	37.4	26.8	37.5	0.0	0.0	0.0
Springfield CSA	360	14,047	159.3	12,056	12.9	8.1	12.3	15.2	18.1	14.7	34.7	33.9	34.0	36.5	39.7	38.7	0.8	0.3	0.3
Total	401	15,447	177.4	14,321	12.9	8.0	12.1	13.6	16.7	13.5	36.2	36.7	35.7	36.7	38.4	38.5	0.6	0.2	0.2

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 2017-18

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
Pittsfield MSA	41	1,400	11.1	2,265	81.1	80.5	51.1	6.3	14.6	12.6	12.5
Springfield CSA	360	14,047	89.8	12,056	81.8	87.8	46.0	6.1	10.6	12.0	1.7
Total	401	15,447	100.0	14,321	81.7	87.0	46.8	6.2	11.0	12.1	2.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 2016

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	1,395	197,296	96.5	158,537	4.3	2.5	1.2	18.5	18.2	10.1	41.2	38.0	42.3	36.0	41.3	46.4	0.0	0.0	0.0
Lansing CSA	38	3,348	2.6	10,128	5.3	0.0	3.3	17.6	18.4	13.4	49.1	57.9	50.9	28.0	23.7	32.4	0.0	0.0	0.1
Saginaw MSA	12	717	0.8	4,226	5.6	0.0	1.1	15.5	0.0	7.4	43.7	91.7	44.4	35.2	8.3	47.2	0.0	0.0	0.0
Total	1,445	201,361	100.0	172,891	4.4	2.4	1.3	18.3	18.1	10.2	41.8	39.0	42.8	35.5	40.6	45.6	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 2016

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	1,395	197,296	96.5	158,537	21.6	11.7	7.6	17.0	18.3	17.1	19.9	19.5	22.0	41.5	36.2	40.1	0.0	14.3	13.2
Lansing CSA	38	3,348	2.6	10,128	22.8	21.1	8.4	17.3	23.7	19.9	20.8	13.2	22.4	39.1	26.3	35.1	0.0	15.8	14.2
Saginaw MSA	12	717	0.8	4,226	21.9	16.7	9.0	16.9	50.0	20.2	20.7	16.7	22.1	40.6	8.3	35.4	0.0	8.3	13.3
Total	1,445	201,361	100.0	172,891	21.7	12.0	7.7	17.0	18.7	17.3	20.0	19.3	22.0	41.3	35.7	39.7	0.0	14.3	13.3

Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 2016

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	1,028	60,433	94.5	105,739	6.2	2.9	4.4	17.7	19.5	15.5	37.6	35.3	35.5	37.8	41.8	44.1	0.6	0.5	0.4
Lansing CSA	32	1,766	2.9	4,479	6.8	15.6	8.9	27.3	9.4	24.0	35.5	34.4	34.5	27.6	40.6	31.4	2.9	0.0	1.1
Saginaw MSA	28	613	2.6	2,206	6.0	0.0	4.5	14.7	3.6	12.0	42.3	78.6	40.4	37.0	17.9	43.1	0.0	0.0	0.0
Total	1,088	62,812	100.0	112,424	6.2	3.2	4.6	18.2	18.8	15.7	37.6	36.4	35.6	37.1	41.2	43.6	0.8	0.5	0.4

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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 2016

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	1,028	60,433	94.5	105,739	82.5	73.0	42.0	7.4	22.4	10.1	4.7
Lansing CSA	32	1,766	2.9	4,479	78.0	81.3	44.4	6.9	12.5	15.1	6.3
Saginaw MSA	28	613	2.6	2,206	76.6	100.0	43.2	7.7	0.0	15.7	0.0
Total	1,088	62,812	100.0	112,424	82.0	73.9	42.1	7.4	21.5	10.6	4.6

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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 **2017-18**

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	4,922	652,458	96.4	141,992	6.0	3.9	2.7	17.9	15.3	13.5	38.1	35.2	40.5	37.9	45.6	43.2	0.1	0.0	0.1
Lansing CSA	138	17,884	2.7	9,502	4.7	3.6	4.2	19.2	13.8	18.3	42.3	47.8	42.3	33.6	34.8	34.9	0.2	0.0	0.3
Saginaw MSA	44	3,845	0.9	3,768	7.8	0.0	1.7	9.6	2.3	4.0	54.8	95.5	59.4	27.8	2.3	34.9	0.0	0.0	0.0
Total	5,104	674,187	100.0	155,262	5.9	3.8	2.8	17.6	15.2	13.6	39.1	36.0	41.1	37.2	44.9	42.5	0.1	0.0	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 2017-18

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	4,922	652,458	96.4	141,992	22.6	12.2	9.0	16.5	21.5	19.3	18.9	23.7	22.7	42.1	41.2	37.6	0.0	1.4	11.4
Lansing CSA	138	17,884	2.7	9,502	23.4	18.1	11.3	17.1	17.4	23.3	19.7	25.4	22.6	39.8	37.7	31.2	0.0	1.4	11.7
Saginaw MSA	44	3,845	1.2	3,768	21.2	4.5	7.5	17.1	43.2	20.7	20.7	15.9	24.2	41.0	36.4	36.6	0.0	0.0	11.0
Total	5,104	674,187	100.0	155,262	22.6	12.3	9.1	16.5	21.5	19.6	19.0	23.7	22.7	41.9	41.1	37.2	0.0	1.4	11.4

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 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																				2017-18
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	2,538	150,374	95.4	88,592	7.5	7.1	6.5	19.2	21.6	18.1	32.6	31.5	32.4	39.5	39.2	41.9	1.2	0.7	1.0	
Lansing CSA	43	1,738	2.9	4,504	11.1	4.7	13.5	22.2	16.3	20.1	29.0	53.5	26.2	34.0	25.6	38.4	3.8	0.0	1.8	
Saginaw MSA	79	1,508	3.0	2,210	6.7	2.5	5.4	12.2	2.5	9.9	53.3	82.3	53.5	27.9	12.7	31.2	0.0	0.0	0.0	
Total	2,660	153,620	100.0	95,306	7.7	6.9	6.8	19.2	20.9	18.0	33.0	33.4	32.6	38.7	38.2	41.5	1.4	0.6	1.0	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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												2017-18
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	2,538	150,374	95.4	88,592	82.4	76.5	51.5	7.4	20.6	10.2	2.8	
Lansing CSA	43	1,738	1.8	4,504	78.2	86.0	47.8	7.0	11.6	14.8	4.5	
Saginaw MSA	79	1,508	3.0	2,210	75.2	92.4	45.7	8.0	7.6	16.9	0.0	
Total	2,660	153,620	100.0	95,306	81.9	77.1	51.2	7.4	20.1	10.7	2.7	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 **2016**

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-Metro	179	30,315	100.0	6,733	0.0	0.0	0.0	19.8	22.9	21.0	66.0	62.6	64.3	14.2	14.5	14.7	0.0	0.0	0.0
Total	179	30,315	100.0	6,733	0.0	0.0	0.0	19.8	22.9	21.0	66.0	62.6	64.3	14.2	14.5	14.7	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 2016

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-Metro	179	30,315	100.0	6,733	19.8	7.8	4.9	20.6	15.6	17.5	23.5	21.8	18.8	36.1	52.5	43.3	0.0	2.2	15.6
Total	179	30,315	100.0	6,733	19.8	7.8	4.9	20.6	15.6	17.5	23.5	21.8	18.8	36.1	52.5	43.3	0.0	2.2	15.6

Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 2016

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-Metro	181	10,749	100.0	5,117	0.0	0.0	0.0	20.2	18.2	20.3	66.3	70.7	66.4	13.4	11.1	13.3	0.0	0.0	0.0
Total	181	10,749	100.0	5,117	0.0	0.0	0.0	20.2	18.2	20.3	66.3	70.7	66.4	13.4	11.1	13.3	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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 2016

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-Metro	181	10,749	100.0	5,117	80.8	86.7	46.6	6.0	11.1	13.2	2.2
Total	181	10,749	100.0	5,117	80.8	86.7	46.6	6.0	11.1	13.2	2.2

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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 2017-18

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-Metro	699	102,407	100.0	7,524	1.0	1.3	0.6	19.7	18.9	16.2	66.2	65.2	69.6	13.1	14.6	13.7	0.0	0.0	0.0
Total	699	102,407	100.0	7,524	1.0	1.3	0.6	19.7	18.9	16.2	66.2	65.2	69.6	13.1	14.6	13.7	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 2017-18

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-Metro	699	102,407	100.0	7,524	21.3	14.3	8.5	20.1	22.2	20.2	22.2	19.7	21.8	36.3	42.8	37.5	0.0	1.0	12.0
Total	699	102,407	100.0	7,524	21.3	14.3	8.5	20.1	22.2	20.2	22.2	19.7	21.8	36.3	42.8	37.5	0.0	1.0	12.0

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 2017-18

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-Metro	298	13,101	202.7	5,447	0.9	0.7	0.3	20.8	20.1	19.9	62.9	62.4	65.3	15.5	16.8	14.5	0.0	0.0	0.0
Total	298	13,101	202.7	5,447	0.9	0.7	0.3	20.8	20.1	19.9	62.9	62.4	65.3	15.5	16.8	14.5	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 2017-18

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-Metro	298	13,101	100.0	5,447	80.2	88.9	50.0	6.4	8.1	13.4	3.0
Total	298	13,101	100.0	5,447	80.2	88.9	50.0	6.4	8.1	13.4	3.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 **2016**

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
Albany CSA	273	36,553	18.2	24,574	4.0	2.9	2.9	10.4	6.6	8.9	59.1	59.3	58.7	26.5	31.1	29.5	0.0	0.0	0.0
Binghamton MSA 2016	43	3,991	2.9	3,222	2.9	7.0	2.6	13.1	9.3	11.0	51.4	53.5	50.0	32.5	30.2	36.5	0.0	0.0	0.0
Buffalo MSA	667	67,699	44.4	23,954	5.0	2.1	2.5	14.3	16.9	11.0	43.1	41.4	43.8	37.7	39.6	42.7	0.0	0.0	0.0
Ithaca CSA	8	456	0.5	2,431	0.2	0.0	0.2	10.1	25.0	8.8	64.3	50.0	64.9	25.4	0.0	25.8	0.0	25.0	0.3
NY Non-Metro	41	4,157	2.7	4,572	0.2	0.0	0.1	10.2	2.4	8.4	75.3	87.8	76.8	14.3	9.8	14.8	0.0	0.0	0.0
Rochester CSA	347	24,653	23.1	26,633	3.3	5.2	2.2	10.6	16.7	9.0	54.9	46.7	55.7	31.3	31.4	33.2	0.0	0.0	0.0
Syracuse MSA	84	6,845	5.6	11,868	4.1	3.6	2.6	12.9	17.9	12.3	37.7	35.7	36.4	45.3	42.9	48.6	0.0	0.0	0.0
Utica MSA	40	2,801	2.7	6,220	3.1	15.0	2.5	9.4	10.0	8.7	58.9	45.0	57.1	28.6	30.0	31.6	0.0	0.0	0.0
Total	1,503	147,155	100.0	103,474	3.6	3.5	2.4	11.7	14.3	9.8	52.9	47.3	52.5	31.8	34.8	35.3	0.0	0.1	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 **2016**

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
Albany CSA	273	36,553	18.2	24,574	20.4	8.8	7.0	17.9	22.3	20.4	21.7	16.5	23.7	40.0	28.2	33.5	0.0	24.2	15.4
Binghamton MSA	43	3,991	2.9	3,222	21.7	11.6	8.1	17.6	16.3	22.3	20.9	20.9	23.4	39.8	27.9	29.5	0.0	23.3	16.6
Buffalo MSA	667	67,699	44.4	23,954	21.6	7.2	7.5	17.4	23.2	20.4	20.9	19.2	23.1	40.1	28.5	31.9	0.0	21.9	17.1
Ithaca CSA	8	456	0.5	2,431	17.8	12.5	5.1	18.8	50.0	17.6	21.5	12.5	23.9	42.0	25.0	42.8	0.0	0.0	10.6
NY Non-Metro	41	4,157	2.7	4,572	21.1	7.3	7.7	17.8	24.4	17.7	21.9	12.2	21.8	39.2	36.6	40.5	0.0	19.5	12.2
Rochester CSA	347	24,653	23.1	26,633	20.2	13.3	8.0	17.2	23.3	20.4	22.0	13.8	23.2	40.6	19.0	35.0	0.0	30.5	13.4
Syracuse MSA	84	6,845	5.6	11,868	20.9	7.1	8.3	16.0	20.2	20.5	20.6	15.5	22.6	42.5	21.4	33.8	0.0	35.7	14.7
Utica MSA	40	2,801	2.7	6,220	21.3	5.0	7.6	17.2	27.5	20.3	21.5	27.5	25.3	40.1	15.0	37.8	0.0	25.0	9.0
Total	1,503	147,155	100.0	103,474	20.8	9.0	7.6	17.4	23.0	20.3	21.4	17.3	23.3	40.4	25.7	34.2	0.0	25.0	14.6

Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 2016

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
Albany CSA	280	14,934	24.0	14,981	6.8	7.1	6.1	15.2	9.6	12.5	53.0	61.8	54.0	25.0	21.4	27.4	0.0	0.0	0.0
Binghamton MSA	46	2,642	3.9	2,388	10.9	2.2	10.4	18.1	21.7	17.0	42.4	43.5	41.1	28.5	32.6	31.4	0.0	0.0	0.0
Buffalo MSA	278	10,200	23.9	14,981	8.0	1.8	7.0	14.5	16.2	13.8	41.0	40.6	38.6	36.0	41.4	40.5	0.4	0.0	0.1
Ithaca CSA	19	3,286	1.6	2,194	0.2	0.0	0.5	17.7	15.8	16.9	52.3	73.7	53.0	29.5	10.5	29.5	0.3	0.0	0.1
NY Non-Metro	37	2,674	3.2	4,084	3.0	0.0	1.9	15.6	10.8	15.3	68.1	75.7	67.4	13.2	13.5	15.4	0.0	0.0	0.0
Rochester CSA	300	12,635	25.8	15,693	9.9	9.0	8.0	11.0	8.3	8.7	48.5	52.7	49.2	30.4	30.0	33.9	0.2	0.0	0.1
Syracuse MSA	142	5,615	12.2	7,849	16.3	7.0	13.9	12.2	12.0	10.9	35.9	48.6	38.9	35.6	32.4	36.3	0.0	0.0	0.0
Utica MSA	63	2,551	5.4	3,584	4.8	3.2	4.8	14.4	11.1	14.8	53.5	54.0	49.0	25.6	28.6	30.2	1.7	3.2	1.2
Total	1,165	54,537	100.0	65,754	8.5	5.6	7.3	13.9	11.8	12.3	47.6	52.3	47.6	29.7	30.1	32.6	0.3	0.2	0.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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 2016

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
Albany CSA	280	14,934	24.0	14,981	79.5	82.1	46.4	6.7	14.3	13.8	3.6
Binghamton MSA	46	2,642	3.9	2,388	78.9	80.4	44.5	6.8	17.4	14.3	2.2
Buffalo MSA	278	10,200	23.9	14,981	80.2	80.9	46.4	7.4	13.7	12.4	5.4
Ithaca CSA	19	3,286	1.6	2,194	78.0	78.9	50.5	6.4	15.8	15.6	5.3
NY Non-Metro	37	2,674	3.2	4,084	79.7	89.2	48.3	6.0	10.8	14.3	0.0
Rochester CSA	300	12,635	25.8	15,693	80.5	82.0	44.7	7.3	13.3	12.2	4.7
Syracuse MSA	142	5,615	12.2	7,849	78.7	85.9	42.9	7.6	10.6	13.6	3.5
Utica MSA	63	2,551	5.4	3,584	78.9	92.1	50.8	6.6	6.3	14.6	1.6
Total	1,165	54,537	100.0	65,754	79.7	82.9	46.0	7.0	13.0	13.2	4.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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 2017-18

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
Albany CSA	1,088	163,730	17.7	27,352	2.9	3.0	2.7	12.4	11.9	11.9	58.4	53.1	57.9	26.3	31.9	27.5	0.0	0.0	0.0
Binghamton MSA	136	11,850	2.2	3,646	3.4	4.4	3.2	12.1	14.7	12.0	58.1	54.4	55.3	26.3	26.5	29.5	0.0	0.0	0.0
Buffalo MSA	2,656	299,526	43.1	28,852	6.9	4.6	4.4	11.4	9.6	9.5	43.8	43.4	44.4	37.9	42.4	41.6	0.0	0.0	0.0
Ithaca CSA	63	8,320	1.0	2,251	0.0	0.0	0.0	10.1	15.9	10.0	68.6	68.3	67.0	21.2	15.9	22.4	0.1	0.0	0.6
NY Non-Metro	166	21,155	2.7	5,082	0.6	0.0	0.4	7.8	5.4	7.0	83.1	77.1	81.9	8.4	17.5	10.7	0.0	0.0	0.0
Rochester MSA	1,545	174,274	25.1	28,488	3.6	4.1	2.8	11.3	13.0	10.5	50.6	43.2	49.5	34.5	39.7	37.2	0.0	0.0	0.0
Syracuse MSA	345	39,044	5.6	12,845	3.2	2.3	2.4	10.3	12.5	9.4	47.3	46.1	46.7	39.0	39.1	41.4	0.1	0.0	0.1
Utica MSA	157	14,657	2.6	5,984	5.0	8.9	4.3	7.2	12.7	7.3	60.0	58.0	56.0	27.8	20.4	32.3	0.0	0.0	0.0
Total	6,156	732,557	100.0	114,500	4.0	4.0	3.1	10.9	11.2	10.2	53.9	47.0	52.2	31.1	37.8	34.5	0.0	0.0	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 **2017-18**

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
Albany CSA	1,088	163,730	17.7	27,352	20.5	13.1	8.9	17.4	24.9	22.4	22.0	24.2	25.4	40.1	36.7	34.6	0.0	1.1	8.6
Binghamton MSA	136	11,850	2.2	3,646	22.6	18.4	9.5	17.6	24.3	23.7	21.0	21.3	23.9	38.8	32.4	33.5	0.0	3.7	9.4
Buffalo MSA	2,656	299,526	43.1	28,852	22.2	12.4	9.7	16.6	26.1	22.7	20.3	27.2	23.5	40.9	32.4	32.3	0.0	1.8	11.8
Ithaca CSA	63	8,320	4.8	2,251	20.0	19.0	8.0	16.2	23.8	21.5	21.7	30.2	24.4	42.1	25.4	36.1	0.0	1.6	10.0
NY Non-Metro	166	21,155	2.7	5,082	22.4	6.0	8.3	18.0	16.9	19.3	21.8	30.1	22.9	37.9	45.2	40.5	0.0	1.8	9.0
Rochester MSA	1,545	174,274	25.1	28,488	21.6	15.9	8.5	16.9	24.5	21.5	19.8	23.9	22.2	41.6	33.3	34.4	0.0	2.5	13.5
Syracuse MSA	345	39,044	5.6	12,845	20.7	15.1	9.7	16.6	20.6	21.5	20.2	27.2	22.8	42.5	33.6	36.4	0.0	3.5	9.6
Utica MSA	157	14,657	2.6	5,984	22.0	20.4	8.2	16.9	23.6	21.0	21.5	23.6	24.0	39.6	29.3	37.9	0.0	3.2	8.9
Total	6,156	732,557	100.0	114,500	21.5	13.8	9.0	17.0	24.8	21.9	20.8	25.7	23.6	40.7	33.7	34.6	0.0	2.0	10.8

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 **2017-18**

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
Albany CSA	631	27,909	23.3	15,334	10.4	7.8	8.0	12.4	10.6	11.8	52.2	53.4	52.2	24.6	28.2	27.7	0.4	0.0	0.3
Binghamton MSA	123	4,158	4.5	2,400	12.2	13.0	9.8	14.0	17.1	16.0	56.1	47.2	55.9	17.7	22.8	18.3	0.0	0.0	0.0
Buffalo MSA	707	30,657	26.1	15,301	9.1	8.9	8.8	12.2	11.3	11.4	37.9	40.2	36.3	37.2	38.8	41.1	3.6	0.8	2.4
Ithaca CSA	54	1,266	2.0	2,090	0.0	0.0	0.0	13.4	13.0	13.8	52.5	61.1	53.5	32.3	25.9	30.2	1.8	0.0	2.5
NY Non-Metro	77	2,643	2.8	4,137	4.5	2.6	3.1	13.8	3.9	12.4	70.6	80.5	71.9	11.0	13.0	12.6	0.1	0.0	0.0
Rochester MSA	633	24,479	23.3	15,963	9.5	10.6	8.2	13.5	10.3	11.4	43.6	41.4	44.1	33.2	37.8	36.2	0.3	0.0	0.1
Syracuse MSA	344	12,662	12.7	8,119	9.3	6.7	6.9	10.8	11.3	10.3	40.9	45.3	40.8	36.2	35.8	40.1	2.8	0.9	2.0
Utica MSA	144	4,163	5.3	3,860	11.9	13.9	12.2	13.7	7.6	11.1	47.7	59.7	45.6	25.3	16.7	30.0	1.5	2.1	1.2
Total	2,713	107,937	100.0	67,204	9.2	8.8	7.8	12.6	10.8	11.7	46.5	47.1	46.3	30.1	32.8	33.2	1.5	0.4	1.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 2017-18

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
Albany CSA	631	27,909	23.3	15,334	80.0	87.3	49.2	6.5	11.1	13.5	1.6
Binghamton MSA	123	4,158	4.7	2,400	77.7	87.8	46.5	7.2	10.6	15.2	1.6
Buffalo MSA	707	30,657	26.1	15,301	80.1	84.4	49.5	7.4	11.9	12.5	3.7
Ithaca CSA	54	1,266	2.0	2,090	78.1	88.9	53.4	6.3	11.1	15.6	0.0
NY Non-Metro	77	2,643	2.8	4,137	78.8	96.1	52.9	6.3	3.9	15.0	0.0
Rochester MSA	633	24,479	23.3	15,963	80.6	85.8	49.1	7.3	10.6	12.2	3.6
Syracuse MSA	344	12,662	12.7	8,119	78.5	88.4	45.7	7.6	9.6	14.0	2.0
Utica MSA	144	4,163	5.4	3,860	78.6	91.7	48.1	6.8	7.6	14.6	1.4
Total	2,713	107,937	100.0	67,204	79.7	86.9	49.0	7.0	10.6	13.3	2.5

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 2016

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	1,422	144,097	80.7	89,652	5.0	3.2	1.8	14.5	13.9	10.0	45.1	46.6	44.1	35.5	36.2	44.1	0.0	0.0	0.0
OH Non-Metro	28	1,277	1.6	1,383	8.5	17.9	5.1	12.1	3.6	10.4	75.7	78.6	79.3	3.7	0.0	5.2	0.0	0.0	0.0
Toledo MSA	192	10,978	10.9	13,731	6.3	8.9	1.4	14.0	16.7	7.7	44.5	47.9	43.6	35.3	26.6	47.4	0.0	0.0	0.0
Youngstown CSA	120	7,344	6.8	11,649	4.3	1.7	0.7	14.7	6.7	8.1	58.9	72.5	62.2	22.0	19.2	29.0	0.0	0.0	0.0
Total	1,762	163,696	100.0	116,415	5.1	4.0	1.7	14.4	13.6	9.6	47.4	49.0	46.3	33.1	33.4	42.5	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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																				2016
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	1,422	144,097	80.7	89,652	21.1	11.8	7.9	17.6	23.0	18.2	21.1	18.2	20.5	40.1	28.6	37.1	0.0	18.4	16.3	
OH Non-Metro	28	1,277	1.6	1,383	30.6	14.3	7.2	17.2	21.4	18.1	19.2	17.9	21.4	32.9	32.1	35.8	0.0	14.3	17.5	
Toledo MSA	192	10,978	10.9	13,731	22.3	13.0	7.1	16.8	22.9	17.2	20.1	19.3	22.9	40.7	20.3	38.8	0.0	24.5	14.0	
Youngstown CSA	120	7,344	6.8	11,649	20.9	11.7	7.1	18.4	15.8	19.8	21.8	20.0	22.6	38.9	27.5	32.7	0.0	25.0	17.8	
Total	1,762	163,696	100.0	116,415	21.4	12.0	7.7	17.6	22.5	18.2	21.1	18.4	21.0	39.9	27.6	36.9	0.0	19.5	16.2	

Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 **2016**

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	686	37,041	82.4	55,148	7.4	5.8	5.9	13.3	11.7	11.5	40.1	40.4	38.1	38.9	42.1	44.4	0.3	0.0	0.1
OH Non-Metro	5	644	0.6	633	25.2	40.0	21.5	6.8	0.0	8.2	64.6	60.0	67.1	3.4	0.0	3.2	0.0	0.0	0.0
Toledo MSA	89	3,496	10.7	7,970	7.0	3.4	4.9	15.1	20.2	11.6	41.0	44.9	38.4	36.7	31.5	45.0	0.3	0.0	0.0
Youngstown CSA	53	1,097	6.4	7,139	6.7	1.9	5.9	13.1	9.4	11.2	52.5	64.2	50.4	27.7	24.5	32.5	0.0	0.0	0.0
Total	833	42,278	100.0	70,890	7.5	5.5	6.0	13.4	12.4	11.4	41.9	42.5	39.6	36.9	39.6	42.9	0.2	0.0	0.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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 2016

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	686	37,041	82.4	55,148	81.3	78.9	44.5	7.4	16.9	11.3	4.2
OH Non-Metro	5	644	0.6	633	79.0	60.0	49.4	5.9	40.0	15.0	0.0
Toledo MSA	89	3,496	10.7	7,970	78.5	85.4	43.9	7.7	14.6	13.9	0.0
Youngstown CSA	53	1,097	6.4	7,139	80.3	94.3	44.7	6.8	3.8	12.9	1.9
Total	833	42,278	100.0	70,890	80.9	80.4	44.5	7.4	16.0	11.8	3.6

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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 **2017-18**

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	4,954	613,566	81.8	101,757	5.8	4.3	2.8	15.6	12.9	12.1	44.0	41.2	44.6	34.4	41.5	40.5	0.1	0.1	0.0
OH Non-Metro	67	5,099	1.1	1,329	0.6	0.0	0.4	28.6	26.9	23.7	54.5	35.8	52.6	16.4	37.3	23.3	0.0	0.0	0.0
Toledo MSA	681	65,932	11.2	14,196	7.4	4.1	2.5	13.1	12.6	9.2	42.9	46.4	42.5	36.6	36.9	45.8	0.0	0.0	0.0
Youngstown CSA	357	30,649	5.9	13,826	4.6	1.7	1.1	12.1	8.4	7.7	55.7	55.7	58.9	27.6	34.2	32.3	0.0	0.0	0.0
Total	6,059	715,247	100.0	131,108	5.8	4.1	2.5	15.1	12.8	11.5	45.6	42.6	45.9	33.5	40.5	40.0	0.1	0.1	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 **2017-18**

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	4,954	613,566	81.8	101,757	22.0	13.6	9.5	17.0	24.7	19.9	20.1	24.4	21.7	40.9	35.2	35.9	0.0	2.0	13.0
OH Non-Metro	67	5,099	1.5	1,329	29.3	20.9	10.5	15.4	26.9	23.4	18.3	17.9	24.4	37.0	32.8	32.4	0.0	1.5	9.3
Toledo MSA	681	65,932	11.2	14,196	23.8	13.7	9.4	16.4	23.9	20.2	19.3	28.0	22.9	40.5	33.6	35.9	0.0	0.7	11.5
Youngstown CSA	357	30,649	5.9	13,826	21.1	12.3	10.0	18.2	29.7	22.4	20.7	26.9	24.3	40.0	29.1	31.3	0.0	2.0	12.1
Total	6,059	715,247	100.0	131,108	22.2	13.6	9.6	17.1	24.9	20.3	20.0	24.9	22.1	40.7	34.7	35.4	0.0	1.8	12.7

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 **2017-18**

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	1,788	82,808	84.4	53,743	8.1	7.0	7.2	15.1	12.3	13.8	37.9	36.4	37.0	38.0	43.8	41.3	0.8	0.6	0.7
OH Non-Metro	14	1,063	1.4	652	14.4	0.0	16.0	29.1	50.0	30.8	40.5	28.6	38.7	16.0	21.4	14.6	0.0	0.0	0.0
Toledo MSA	173	8,038	8.2	6,628	13.4	10.4	11.4	11.0	13.9	10.6	35.9	40.5	33.2	39.6	35.3	44.7	0.1	0.0	0.0
Youngstown CSA	143	8,319	6.8	7,551	7.1	7.7	6.3	11.7	10.5	10.6	47.0	51.0	45.9	34.2	30.8	37.1	0.0	0.0	0.0
Total	2,118	100,228	100.0	68,574	8.7	7.3	7.6	14.5	12.6	13.3	38.7	37.6	37.6	37.5	42.1	40.9	0.6	0.5	0.5

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 2017-18

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	1,788	82,808	84.4	53,743	81.3	81.4	49.9	7.3	16.8	11.4	1.8
OH Non-Metro	14	1,063	1.1	652	79.0	64.3	50.0	5.9	35.7	15.1	0.0
Toledo MSA	173	8,038	8.2	6,628	78.1	83.8	47.3	7.8	14.5	14.1	1.7
Youngstown CSA	143	8,319	6.8	7,551	79.5	81.1	47.7	7.0	16.8	13.5	4.5
Total	2,118	100,228	100.0	68,574	80.7	81.4	49.4	7.3	16.7	12.0	1.8

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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																				2016
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	66	14,405	33.0	7,529	0.4	0.0	0.7	16.3	22.7	14.9	56.5	36.4	57.9	26.7	40.9	26.4	0.1	0.0	0.0	
VT Non-Metro	134	19,012	67.0	6,676	0.1	0.0	0.0	7.1	7.5	6.1	72.9	85.8	69.8	19.9	6.7	24.1	0.0	0.0	0.0	
Total	200	33,417	100.0	14,205	0.2	0.0	0.4	10.6	12.5	10.8	66.7	69.5	63.5	22.5	18.0	25.3	0.0	0.0	0.0	

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 2016

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	66	14,405	33.0	7,529	18.1	7.6	6.4	18.9	15.2	20.9	23.5	15.2	25.4	39.5	47.0	35.4	0.0	15.2	11.9
VT Non-Metro	134	19,012	67.0	6,676	17.8	7.5	4.3	18.3	13.4	13.6	22.4	18.7	20.7	41.5	35.1	47.5	0.0	25.4	13.9
Total	200	33,417	100.0	14,205	17.9	7.5	5.4	18.5	14.0	17.4	22.8	17.5	23.2	40.7	39.0	41.1	0.0	22.0	12.9

Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 2016

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	127	5,297	43.6	6,131	1.1	0.0	0.5	20.9	9.4	18.1	51.0	62.2	53.1	26.8	28.3	28.1	0.2	0.0	0.1
VT Non-Metro	164	7,249	56.4	6,240	0.2	0.0	0.1	11.3	11.6	8.8	67.1	67.7	67.3	21.4	20.7	23.8	0.0	0.0	0.0
Total	291	12,546	100.0	12,371	0.6	0.0	0.3	15.1	10.7	13.4	60.7	65.3	60.3	23.6	24.1	25.9	0.1	0.0	0.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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 2016

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	127	5,297	43.6	6,131	82.9	86.6	37.1	6.6	13.4	10.5	0.0
VT Non-Metro	164	7,249	56.4	6,240	82.4	89.6	44.7	6.1	8.5	11.5	1.8
Total	291	12,546	100.0	12,371	82.6	88.3	40.9	6.3	10.7	11.1	1.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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																			2017-18
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	218	41,983	32.7	6,337	1.0	1.4	1.2	11.7	10.1	13.3	66.2	61.9	66.1	21.1	26.6	19.3	0.0	0.0	0.0
VT Non-Metro	449	67,334	67.3	6,481	0.0	0.0	0.0	4.6	4.7	3.2	78.0	74.2	76.9	17.5	21.2	19.9	0.0	0.0	0.0
Total	667	109,317	100.0	12,818	0.4	0.5	0.6	7.3	6.4	8.2	73.4	70.2	71.6	18.9	22.9	19.6	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 2017-18

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	218	41,983	41.9	6,337	20.6	13.3	9.9	17.6	25.2	23.2	23.0	24.3	25.4	38.8	36.2	30.8	0.0	0.9	10.7
VT Non-Metro	449	67,334	67.3	6,481	18.6	10.7	6.4	17.3	18.9	17.8	22.4	19.6	21.5	41.7	48.8	42.8	0.0	2.0	11.5
Total	667	109,317	100.0	12,818	19.4	11.5	8.1	17.4	21.0	20.4	22.6	21.1	23.4	40.6	44.7	36.9	0.0	1.6	11.1

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 **2017-18**

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	290	14,155	50.9	4,348	0.9	0.7	1.2	22.8	15.5	20.1	53.7	58.6	54.4	22.3	25.2	23.9	0.2	0.0	0.3
VT Non-Metro	280	10,976	49.1	5,731	0.0	0.0	0.0	8.0	6.4	6.0	75.3	73.6	74.2	16.7	20.0	19.9	0.0	0.0	0.0
Total	570	25,131	100.0	10,079	0.4	0.4	0.5	14.0	11.1	12.1	66.5	66.0	65.7	19.0	22.6	21.6	0.1	0.0	0.1

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 2017-18

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	290	14,155	58.2	4,348	83.2	88.6	42.9	6.4	10.3	10.4	2.0
VT Non-Metro	224	9,108	43.6	4,479	82.9	89.7	50.1	5.8	8.5	11.3	1.8
Total	514	23,263	100.0	8,827	83.0	89.1	46.5	6.1	9.5	10.9	1.4

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0