



## **PUBLIC DISCLOSURE**

March 30, 2020

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Maspeth Federal Savings and Loan Association  
Charter Number: 705138

5618 69th St.  
Maspeth, NY 11378

Office of the Comptroller of the Currency

343 Thornall St.  
Suite 610  
Edison, NJ 08837

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

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## Overall CRA Rating

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

The following table indicates the performance level of Maspeth Federal Savings and Loan Association (Maspeth FS and LA) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Maspeth FS and LA) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	x	x	x
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 Low Satisfactory performance in the state of New York.
- The Investment Test rating is based on Low Satisfactory performance in the state of New York.
- The Service Test rating is based on Low Satisfactory performance in the state of New York.

### Lending in Assessment Area

A high percentage of the bank's loans are in its assessment area (AA).

The bank originated and purchased 71.1 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

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										
2016	79	60.3	52	39.7	131	44,496	56.9	33,715	43.1	78,211
2017	78	73.6	28	26.4	106	45,004	69.7	19,600	30.3	64,604
2018	106	76.3	33	23.7	139	74,082	76.6	22,574	23.4	96,657
2019	98	74.2	34	25.8	132	54,137	75.3	17,736	24.7	71,873
Total	361	71.1	147	28.9	508	217,719	69.9	93,625	30.1	311,344

Findings from the analysis of the in/out ratio factored positively into the overall analysis of the geographic distribution of lending by income level of geography in the AA. The bank originated or purchased 508 loans totaling \$311.3 million during the evaluation period. The bank originated or purchased 361 loans amounting to \$217.7 million within its AA, representing 71.1 percent of total home mortgage loans by number and 69.9 percent by dollar amount.

## Description of Institution

Maspeth FS and LA is a federally chartered savings and loan association headquartered in Queens County, New York. As of December 31, 2019, the bank maintained \$1.96 billion in total assets. The bank did not have any merger and acquisition activity that would impact banking activities during the evaluation period. Maspeth is an independent bank without a holding company, affiliates, or subsidiaries.

Maspeth FS and LA operates six branches and one loan processing office throughout the state of New York. Five branches and five ATMs are located in Queens County and one branch and one ATM are located in the adjacent Nassau County. No branches were opened or closed during the evaluation period. Branch office hours are regular business hours Monday through Friday with all six branches open on Saturday. The loan processing center is closed Saturday.

Maspeth FS and LA operates as a traditional savings and loan association that offers real estate financing, retail banking services, consumer banking products, and commercial banking products. As of December 31, 2019, Maspeth had \$1.79 billion in net loans, representing 90.82 percent of total assets. Real estate loans accounted for 99.3 percent of the gross loan portfolio. Real estate loans were comprised of \$962.50 million in 1-4 family residential mortgages and \$829.21 million in commercial mortgages. As of December 31, 2019, tier 1 capital totaled \$647.01 million.

Maspeth received a rating of “Satisfactory” in the prior CRA Performance Evaluation dated August 29, 2016. There are no legal, financial, or other factors that impeded Maspeth’s ability to meet the credit needs of the community within its AA during the evaluation period.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The OCC evaluated Maspeth FS and LA's CRA performance using the Large Bank Examination Procedures for the evaluation period of January 1, 2016 through December 31, 2019. In order to assess performance, the OCC reviewed all HMDA-reportable home mortgage loans originated during the evaluation period. HMDA-reportable home mortgage loans consisted of one-to-four family, refinance, multifamily, and home improvement loans. We also reviewed community development (CD) loans, investments, and services. Small business and consumer loans are not a primary product of the bank. However, we did consider qualified small business loans as part of the CD review.

The AA demographic data changed over the course of the evaluation period following the implementation of the 2015 ACS Census Data, effective January 1, 2017. Therefore, we analyzed the data from 2017-2019 as a separate review period from the 2016 review period.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact the coronavirus pandemic has had on economies across the United States are not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating 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 bank is only active in the state of New York and has only one AA. The overall rating is based solely on CRA activity in the state of New York.

## 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 assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

## State Rating

### State of New York

**CRA rating for the State of New York:** Satisfactory

**The Lending Test is rated:** Low Satisfactory

**The Investment Test is rated:** Low Satisfactory

**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- A high percentage of the bank's home mortgage loans are in the AA.
- The bank exhibited excellent geographic distribution of loans in New York during the evaluation period.
- The institution has made an adequate number of CD loans.
- Lending levels reflect good responsiveness to CD needs in the AA.
- The institution has an adequate number of CD investments and grants.
- The institution provides an adequate level of CD services.

### Description of Institution's Operations in New York

Maspeth FS and LA has delineated two Metropolitan Divisions (MD) within the New York-Northern New Jersey-Long Island, NY-NJ-PA MSA #35620. They are the New York-White Plains-Wayne, NY-NJ MD (#35614) and the Nassau-Suffolk, NY MD (#35004), both within New York State (Referred to as Maspeth AA). The bank operates six branches and six ATMs throughout the Maspeth AA.

The Maspeth AA is comprised of 953 census tracts. Within the geography, 22 tracts or 2.40 percent are low-income; 174 or 18.30 percent are moderate-income; 462 or 48.50 percent are middle-income; and 258 or 27.10 percent are in upper-income tracts. There are also 36 tracts or 3.80 percent listed as unknown by the US Census Bureau. Total population within the AA is 3,655,751. The AA consists of 865,110 families, of which 355,560 or 41.09 percent are low- and moderate-income families (LMI). The median family income within the Nassau-Suffolk, NY MD is \$108,193 while the median income within the NY- Jersey City – White Plains, NY-NJ MD is \$67,560.

According to the 2019 Deposit Market Share Report, Maspeth FS and LA had approximately \$1.2 billion in deposits in the AA. The bank is ranked 68<sup>th</sup> out of 187 depository institutions in the AA with a market share of 0.07 percent. The deposit market is dominated by large multinational institutions with the top five consisting of JP Morgan Chase (31.69 percent); Bank of America (7.55 percent); The Bank of New York Mellon (6.67 percent); Citibank (6.11 percent); and HSBC Bank USA (5.69 percent).

Based on the 2018 Market Share report, Maspeth FS and LA originated or purchased 64 home mortgage loans for a total of approximately \$49 million. This represents a market share of 0.33 percent and ranks the bank 77<sup>th</sup> out of 294 lenders.

Moody's Analytics report as of November 2019 for the New York City-Jersey City-White Plains MD notes that the local economy is slowing down rapidly. Payrolls in the AA have flattened. The housing market remains stagnant, with single-family and condominium prices moving sideways or lower, and multifamily building prices falling well-below the mid-decade peak. Longer-term concerns are also mounting with high costs and quality of life concerns driving migration and holding back potential. The report predicts that job growth will continue through the first half of 2020 before a national slowdown drives financial services lower, spilling more broadly into consumer industries and real estate. Longer term high costs will drive continued out-migration, leading to subpar income and output growth.

Moody's Analytics report as of November 2019 for the Nassau-Suffolk, NY MD notes similar trends. Payrolls have flattened and the unemployment rate is creeping higher despite a shrinking labor force. The report notes the strength of the MD is a robust healthcare sector which accounts for a large share of jobs. However, fiscal challenges cloud the short and long-term outlooks with Nassau and Suffolk counties considered the two most stressed counties in the state due to revenue shortages. The report predicts that the Nassau-Suffolk, NY MD will slow further, with payrolls contracting by the second half of 2020. Softness in financial services will conspire with public-sector vulnerability to push the economy in the wrong direction. Longer-term, net out-migration and fewer high-wage opportunities will lead to subpar growth.

We reviewed previous community contacts from two local community organizations within the Maspeth AA. The first organization focuses on fair housing, tenant rights, and foreclosure prevention. The services target low-income individuals and families. The second organization focuses on economic development through attracting and assisting new businesses in order to grow the local economy. The community contacts indicated there is a need for affordable housing and employment opportunities in the AA. The contacts indicated that there are opportunities for banks to open more branches and provide more credit opportunities in LMI geographies. Additionally, there are opportunities for banks to fund more small businesses and provide financial education to start-up businesses in the area.



## State of New York

Table A – Demographic Information of the Assessment Area						
Assessment Area: Maspeth 2019 AA QnsNssu NYMSA 35620						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	953	2.4	18.3	48.5	27.1	3.8
Population by Geography	3,655,751	3.4	21.4	49.9	25.0	0.2
Housing Units by Geography	1,311,445	3.6	20.1	49.6	26.7	0.1
Owner-Occupied Units by Geography	694,338	1.1	10.9	53.5	34.4	0.1
Occupied Rental Units by Geography	526,946	6.8	31.7	44.9	16.4	0.1
Vacant Units by Geography	90,161	3.8	22.4	47.1	26.5	0.1
Businesses by Geography	277,360	2.3	17.6	49.4	30.1	0.5
Farms by Geography	2,908	3.0	16.7	53.3	26.3	0.7
Family Distribution by Income Level	865,110	23.8	17.3	19.5	39.4	0.0
Household Distribution by Income Level	1,221,284	25.6	15.5	17.8	41.1	0.0
Median Family Income - 35004 Nassau County-Suffolk County, NY		\$108,193	Median Housing Value			\$465,535
Median Family Income - 35614 New York-Jersey City-White Plains, NY-NJ		\$67,560	Median Gross Rent			\$1,403
			Families Below Poverty Level			9.2%
Source: 2015 ACS Census and 2019 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.						

## Scope of Evaluation in New York

We conducted a full-scope review of Maspeth's AA. Maspeth's AA consists of the Nassau County-Suffolk County, NY MD #35004 and the New York-Jersey City-White Plains, NY-NJ MD #35614. Both MDs are located entirely in the state of New York and the overall CRA rating is based solely on the bank's performance in this AA.

Changes to the bank's AA demographic data resulting from implementation of the 2015 ACS Census necessitated that performance during 2016 be considered separately from performance during 2017-19.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

### LENDING TEST

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

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

Based on a full-scope review, the bank's performance in the Maspeth AA is good.

#### Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Community Development	Total	%State Loans	%State Deposits
New York	361	16	377	0.33	0.07

Dollar Volume of Loans					
Assessment Area	Home Mortgage	Community Development	Total	%State Loans	%State Deposits
New York	217,719	5,575	223,294	0.33	0.07

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

Based on the data in the preceding tables and performance context considerations, the lending activity in New York reflects good responsiveness to AA needs. The bank originated or purchased a good volume of loans by both number of loans and dollar volume of loans relative to its capacity given the size and complexity of the institution, competition and market presence. The bank's market share of loans is notably higher than the bank's market share of deposits.

#### 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 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.

Maspeth FS and LA's performance for geographic distribution of loans during the overall evaluation period is excellent. In order to assess the geographic distribution of home mortgage loans, we compared the percentage of home mortgage loans to the percentage of owner-occupied housing units in each of the four geographic income categories, with an emphasis on LMI geographies. We also compared the bank's performance with other home mortgage lenders in the AA, which is reflected in the aggregate data on Table O. Our conclusion is based upon the geographic distribution of loans during the 2016 and 2017- 2019 review periods.

Maspeth FS and LA's performance during the 2016 review period was excellent. The percentage of home mortgage loans originated in low-income geographies exceeded the percentage of owner-occupied housing units and the percentage of home mortgage loans originated by other home mortgage lenders in low-income geographies. The percentage of home mortgage loans originated in moderate-income geographies exceeded the percentage of owner-occupied housing units and the percentage of home mortgage loans originated by other home mortgage lenders in moderate-income geographies.

Maspeth FS and LA's performance during the 2017-19 review period was excellent. The percentage of home mortgage loans originated in low-income geographies exceeded the percentage of owner-occupied housing units and the percentage of home mortgage loans originated by other home mortgage lenders in low-income geographies. The percentage of home mortgage loans originated in moderate-income geographies exceeded the percentage of owner-occupied housing units and the percentage of home mortgage loans originated by other home mortgage lenders in moderate-income geographies.

### ***Lending Gap Analysis***

The OCC performed a lending gap analysis that included a review of maps showing the distribution of branches, ATMs, and lending activity. The OCC did not identify any unexplained conspicuous lending gaps in the Maspeth AA. The analysis had a neutral impact on the overall geographic distribution of loans in the AA.

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

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

### ***Home Mortgage Loans***

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

Maspeth FS and LA's performance during the overall evaluation period is poor. We compared the percentage of home mortgage loans to the percentage of families in each of the four borrower income categories with an emphasis on LMI families. We also compared the bank's performance against other home mortgage lenders in the AA as reflected in the aggregate data on Table P. Our conclusion is based upon the distribution of loans by income level of the borrower in the 2016 and 2017-19 review periods.

Performance during the 2016 review period was poor. The percentage of home mortgage loans originated to low-income families was substantially below the percentage of low-income families and below the percentage of home mortgage loans originated by other lenders in the AA. The percentage of home mortgage loans originated to moderate-income families was substantially below the percentage of moderate-income families and the percentage of home mortgage loans originated by other lenders in the AA.

Performance during the 2017-19 review period was poor. The percentage of home mortgage loans originated to low-income families was substantially below the percentage of low-income families and below the percentage of home mortgage loans originated by other lenders in the AA. The percentage of home mortgage loans originated to moderate-income families was substantially below the percentage of

moderate-income families and below the percentage of home mortgage loans originated by other lenders in the AA.

In arriving at our conclusion of poor performance for distribution of loans by income level of the borrower, we considered two significant performance context factors. First, the bank has a very low market share due to a highly competitive home mortgage origination market in which it is difficult to compete against larger financial institutions that offer a variety of products. Second, there are limited opportunities to extend home mortgage loans to low-income families due to the high cost of housing in the AA as evidenced by the low lending from other lenders in LMI geographies throughout the AA. During the 2016 review period, other lenders originated 2.7 percent of loans to low-income borrowers as compared to 22.3 percent of low-income families in the AA and 12.3 percent of loans to moderate-income borrowers as compared to 17.6 percent of moderate-income families. During the 2017-19 review period, other lenders originated 3.4 percent of loans to low-income borrowers as compared to the 23.8 percent of low-income families in the AA and 12.3 percent of loans to moderate-income borrowers as compared to 17.5 percent of moderate-income families.

### **Community Development Lending**

The institution has made an adequate level of 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.

During the evaluation period, the bank originated 16 CD loans totaling \$5.58 million. CD lending represents 0.86 percent of tier one capital. CD loans were primarily made for affordable housing and activities that promote economic development by financing small businesses. CD lending had a positive impact on the overall lending test for New York.

### **Product Innovation and Flexibility**

The institution makes no 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 York is rated Low Satisfactory

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

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

The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits adequate responsiveness to credit and community economic development needs.  
The institution does not use 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)
Maspeth AA	0	0	203	\$1,147	203	100	\$1,147	100	0	0

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

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

Maspeth FS and LA made 203 qualified investments in the form of donations and grants to 34 separate organizations totaling \$1.15 million throughout the AA during the evaluation period. This compares to \$376.3 thousand in qualified donations and grants in the August 29, 2016 CRA Performance Evaluation. The bank displays adequate responsiveness to community needs in relation to the size and performance of the bank, and available opportunities throughout the AA. Donations and grants supported a variety of CD needs, primarily social services for LMI individuals and geographies, affordable housing, and economic development activities designed to revitalize and stabilize neighborhoods.

Examples of qualified investments include:

- Sixteen donations totaling \$460 thousand to a local community center that provides a variety of service programs to the residents in the local LMI geographies, including meals on wheels, summer programs, and educational programs.
- Sixteen grants totaling \$175 thousand to a non-profit organization that provides immigration and social services to LMI individuals and families. The mission is to encourage and enable individuals and families in need to achieve maximum self-sufficiency and independence.
- Four donations totaling \$28.5 thousand to a hospital in the AA that provides services to underserved residents in need that have minimal or no health insurance.
- Three donations totaling \$28 thousand to a nonprofit organization in Nassau County dedicated to strengthening families in need by providing a variety of services targeting LMI individuals, families and geographies including sheltering homeless, providing educational services, and youth development.
- One donation totaling \$2 thousand to a nonprofit organization dedicated to develop, preserve and facilitate affordable housing in New York City through an array of specialized programs and services.

## SERVICE TEST

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

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

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

### Retail Banking Services

Service delivery systems are reasonably 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
Maspeth AA	100	6	100	0	16.7	16.7	66.6	3.4	21.4	49.9	25.0

The bank operates a total of six branches and one loan center within the AA. The main office is in Maspeth, while the other five branches are in Forest Hills, Fresh Meadows, Ridgewood, Rego Park, and New Hyde Park. Four of the branches are in an upper-income geography, one branch is in a middle-income geography, and one branch is in a moderate-income geography. There are no branches located in a low-income geography, however, opportunities are minimal. There are only 23 low-income census tracts out of 953 total census tracts in the bank's AA, representing 2.4 percent.

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

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals.

Each branch offers full retail services and are open Monday to Saturday with 24-hour ATM accessibility. The bank offers personal checking, business checking, savings, credit cards, certificate of deposit, and IRA accounts. In order to meet the community's credit needs, the bank offers residential, commercial, and home improvement loans. Additional services offered include online banking, mobile banking, and mobile payment services. Online banking allows bank customers to view transaction histories and current balance, transfer funds between accounts, verify status of direct deposits, view and print paid checks or place stop payments, and schedule payments. Mobile banking allows customers to deposit checks, view account balances, transfer between accounts, pay bills, and utilize text message banking. Mobile payments services allow customers to utilize their debit card through Apple Pay, Samsung Pay, and Google Pay.

## Community Development Services

The institution provides an adequate level of CD services.

CD services throughout the evaluation period were responsive to community needs. Bank employees performed and supported an adequate number of CD services throughout the evaluation period. Bank employees provided 2,267 hours of CD service to 11 different organizations or events. The services primarily focused on financial literacy and social services targeting LMI individuals and geographies.

Examples of qualified CD services in the AA include the following.

- Maspeth Town Hall is Five bank employees conducted and supported 1,104 service hours to a community center that provides social and educational services for local residents in LMI geographies during the evaluation period. Bank employees offered their expertise through leadership positions overseeing fundraising events and supporting services that include providing food for those in need through meals on wheels.
- One bank employee serves in a leadership role for a food pantry and thrift shop that serves LMI individuals and families in the community., The employee performed 270 hours of service for the organization during the evaluation period.
- Three bank employees provided 455 hours of service in leadership roles to an endowment fund that provides financial assistance and scholarships to students of LMI backgrounds during the evaluation period.

## Appendix A: Scope of Examination

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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”.

<b>Time Period Reviewed:</b>	01/01/2016 – 12/31/2019	
<b>Bank Products Reviewed:</b>	Home Mortgage Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>New York</b>		
Maspeth AA	Full-Scope	New York-Jersey City-White Plains, NY-NJ MD #35614; Nassau County-Suffolk County, NY MD #35004



## Appendix B: Summary of MMSA and State Ratings

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RATINGS      Maspeth FS and LA				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State
Maspeth FS and LA	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State:				
New York	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

(\*) 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

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### 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 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- 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 S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -**  
Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer 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 households in those geographies.
- Table V. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																2016		
	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Maspeth AA	79	44,496	0.18	1.1	2.5	1.1	12.6	22.8	12.6	55.6	59.5	57.5	30.7	15.2	28.7	0.0	0.0	0.0
<b>Total</b>	79	44,496	0.18	1.1	2.5	1.1	12.6	22.8	12.6	55.6	59.5	57.5	30.7	15.2	28.7	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data  
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																2017-19		
	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Maspeth AA	282	173,224	0.33	1.1	3.2	1.6	10.9	20.2	13.8	53.5	49.3	55.2	34.4	27.3	29.3	0.1	0.0	0.1
<b>Total</b>	282	173,224	0.33	1.1	3.2	1.6	10.9	20.2	13.8	53.5	49.3	55.2	34.4	27.3	29.3	0.1	0.0	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0



<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																<b>2016</b>		
	<b>Total Home Mortgage Loans</b>			<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
Maspeth AA	79	44,496	0.18	22.3	1.3	2.7	17.6	1.3	12.3	20.8	6.3	25.6	39.3	43.0	44.7	0.0	48.1	14.7
<b>Total</b>	79	44,496	0.18	22.3	1.3	2.7	17.6	1.3	12.3	20.8	6.3	25.6	39.3	43.0	44.7	0.0	48.1	14.7
Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0																		

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																<b>2017-19</b>		
	<b>Total Home Mortgage Loans</b>			<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
Maspeth MSA	282	173,224	0.33	23.8	2.5	3.4	17.3	4.3	12.3	19.5	6.4	24.1	39.4	36.9	45.4	0.0	50.0	14.8
<b>Total</b>	282	173,224	0.33	23.8	2.5	3.4	17.3	4.3	12.3	19.5	6.4	24.1	39.4	36.9	45.4	0.0	50.0	14.8
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0																		