



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

March 20, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Ballston Spa National Bank
Charter Number 1253

990 State Route 67
Ballston Spa, NY 12020

Office of the Comptroller of the Currency

5000 Brittonfield Parkway, Suite A132
East Syracuse, NY 13057

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

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Overall CRA Rating

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

The Lending Test is rated: Satisfactory

The Community Development test is rated: Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on Ballston Spa National Bank's (BSNB or bank) performance in the assessment area (AA) in the state of New York, which demonstrated a reasonable distribution of loans to individuals of different income levels and businesses of different sizes and a reasonable distribution of loans to geographies of different income levels.
- The Community Development (CD) Test rating is based on performance in the state of New York, which demonstrated adequate responsiveness to CD needs through CD loans, qualified investments, and CD services.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio (LTD) is more than reasonable. BSNB's average LTD ratio for the eight-quarter period following the date of the prior evaluation period, December 31, 2019, through the end of the current evaluation period, December 31, 2021, was 82.7 percent. In comparison, the quarterly average LTD ratio of four similarly situated financial institutions located in the AA was 74.4 percent, ranging from a low of 61.9 percent to a high of 84.2 percent.

Lending in Assessment Area

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

BSNB originated and purchased 79.8 percent (by number) and 81.6 percent (by dollar) 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. BSNB did not submit affiliate lending data for consideration during this evaluation.

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	683	72.8	255	27.2	938	178,679	79.9	44,940	20.1	223,619
Small Business	578	90.0	64	10.0	642	52,777	88.1	7,101	11.9	59,878
Total	1,261	79.8	319	20.2	1,580	231,456	81.6	52,041	18.4	283,497

Source: Evaluation Period: 1/1/2020 – 12/31/2021 Bank Data
Due to rounding, totals may not equal 100.0%

Description of Institution

BSNB is an intrastate community bank headquartered in Ballston Spa, N.Y. BSNB is a wholly-owned subsidiary of Ballston Spa Bancorp, Inc., a one bank holding company also headquartered in Ballston Spa, N.Y. Ballston Spa Bancorp, Inc. has two other subsidiaries, Ballston Statutory Trust I, a statutory trust incorporated in Connecticut; and Ballston Spa Risk Management, Inc. a captive insurance subsidiary incorporated in Nevada. BSNB has one subsidiary, Ballston Spa National Bank Real Estate Company, Inc., a real estate investment trust formed to hold one- to four-family residential mortgages and home equity loans in exchange for its common stock via an assignment from the bank. This performance evaluation did not include or consider any activities performed or conducted by bank affiliates.

BSNB offers traditional banking, fiduciary, and insurance products and services to corporate, municipal, and individual customers throughout its branch network. Lending activities primarily focus on home mortgage lending and commercial real estate lending. As of December 31, 2021, BSNB's assets totaled \$766 million with \$533 million in total loans, \$685 million in total deposits, and \$61 million in tier 1 equity capital. Total loans consist of \$228 million or 42.8 percent commercial real estate loans, \$224 million or 42.0 percent home mortgage loans, 32 million or 6.1 percent commercial and industrial loans, \$30 million or 5.6 percent consumer loan, \$14 million or 2.6 percent home equity loans and lines of credit, and \$6 million or 1.1 percent in other loan types.

BSNB has one designated AA, the Albany-Schenectady-Troy NY MSA AA. The AA is comprised of three of the five counties that make up the Albany-Schenectady-Troy, N.Y. metropolitan statistical area (MSA #10580)—Albany, Saratoga, and Schenectady counties. BSNB operates 10 branches in Saratoga County and three branches in Albany County. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income geographies.

BSNB did not have any legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AA during the evaluation period. BSNB received a "Satisfactory" rating for its prior CRA performance evaluation dated March 2, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The bank's performance was assessed using home mortgage and small business loans originated and purchased during the evaluation period, which was January 1, 2020, through December 31, 2021. The evaluation period did not include 2022 lending activity because aggregate peer lending data was not available at the time of the evaluation; therefore, analysis of this activity would not be meaningful. Performance also included an assessment of CD activities over the same period, including CD loans and services, qualified investments, and donations.

Lending performance was assessed based on the bank's primary loan products. Primary loan products, for purposes of this review, included home mortgage loans and small business loans. Home Mortgage Disclosure Act (HMDA) and small business aggregate lending as well as market share percentages

consider only lenders that submit HMDA and small business data. Lenders that collect but do not submit data are not considered in the percentages.

BSNB provided home mortgage information for 2020 and 2021 as required by HMDA. BSNB also provided small business information for 2020 and 2021, although not required by the Community Reinvestment Act (CRA). The bank did not collect or submit any consumer loan data for consideration.

Selection of Areas for Full-Scope Review

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

Ratings

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

BSNB’s rating is based on its performance within the state of New York, which consists of one AA, the Albany-Schenectady-Troy NY MSA AA. Home mortgage lending received the most weight in the performance assessment as home mortgage loans represented 59.4 percent (by number) and 78.9 percent (by dollar) of originations and purchases during throughout the evaluation period.

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

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c), in determining a national 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 bank has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of New York

CRA rating for the State of New York: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- A reasonable distribution of loans to geographies of different income levels.
- A reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- Adequate responsiveness to CD needs in the state of New York through CD loans, qualified investment, and CD services.

Description of Institution's Operations in New York

As of December 31, 2021, BSNB had one AA in the state of New York, the Albany-Schenectady-Troy NY MSA AA. The AA consisted of the 168 contiguous census tracts in Albany, Saratoga, and Schenectady counties. Per the 2015 American Community Survey (ACS) data, there were 17 low-income census tracts, 30 moderate-income census tracts, 77 middle-income census tracts, 41 upper-income census tracts, and three census tracts without an income classification. The three census tracts without an income classification represent SUNY Albany, Skidmore College, and Union College. The AA met the requirements of the CRA regulation and did not arbitrarily exclude any low- or moderate-income geographies.

BSNA offered its full range of products and services through its 13 branch locations and automated teller machines in the AA, as well as its online banking and mobile banking applications. All branches were located in middle- or upper-income census tracts of Saratoga and Albany counties. The bank did not open or close any branches during the evaluation period.

The bank faced strong competition for deposits in its AA. As of June 30, 2021, BSNB reported \$615 million in deposits in the Albany-Schenectady-Troy, NY MSA AA, which represented 100 percent of total deposits. BSNB ranked 15th out of 39 depository institutions, with a deposit market share of 1.6 percent. The bank's top competitors for deposit market share include KeyBank, N.A. with 26.5 percent, State Employees Federal Credit Union with 12.8 percent, and Bank of America, N.A. with 8.3 percent.

The bank faced strong competition for home mortgage and small business loans in its AA. Based on the 2021 HMDA market share data, 296 lenders originated or purchased 29,254 home mortgage loans in the AA. BSNB ranked 21st, or in the 93rd percentile, with a 1.1 percent market share, while the top five mortgage lenders had a combined market share of 37.9 percent. Based on 2021 peer small business data, 135 lenders originated or purchased 16,500 small business loans in the AA. BSNB was not required to report small business data; however, the top five lenders had a combined market share of 54 percent.

The economic climate in the Albany-Schenectady-Troy, NY MSA is positive. According to the U.S. Bureau of Labor Statistics (BLS) December 2021 data, the unemployment rate (not seasonally adjusted) in the Albany-Schenectady-Troy NY MSA was 2.7 percent, which outperformed the state unemployment rate of 4.8 percent. During the evaluation period, unemployment ranged from a low of 2.7 percent in December 2021 to a high of 14.1 percent in April 2020 during the COVID-19 pandemic. Per Moody's Analytics, the key sectors of the economy include government, education and health services, and professional and business services. The MSA includes the city of Albany, the state capital, with significant employers centered in federal and state government agencies. Major private sector employers in the region include health care providers St. Peter's Health Partners and Albany Medical Center; supermarket chains, Golub Corporation and Hannaford Supermarkets; and General Electric.

During the evaluation period, the OCC and other financial regulators met various organizations that aid socially and economically disadvantaged small businesses, homeownership services, and promote local economic development. Contacts from these organizations identified a need for affordable housing, homeownership assistance, financial education, flexible small business lending, banking services for smaller and struggling business, start-up capital, and general economic development. Contacts noted that financial institutions in the area are generally responsive to community needs.

Albany-Schenectady-Troy NY MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Albany-Schenectady-Troy NY MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	168	10.1	17.9	45.8	24.4	1.8
Population by Geography	686,033	7.5	16.0	47.9	27.4	1.2
Housing Units by Geography	307,205	8.8	17.7	48.1	25.3	0.2
Owner-Occupied Units by Geography	174,170	2.9	12.7	52.4	32.0	0.0
Occupied Rental Units by Geography	95,962	15.5	23.2	42.8	18.1	0.3
Vacant Units by Geography	37,073	19.0	26.6	41.4	12.2	0.8
Businesses by Geography	67,598	13.8	11.4	44.1	30.3	0.4
Farms by Geography	1,681	2.5	7.9	63.1	26.5	0.1
Family Distribution by Income Level	161,356	19.5	17.5	22.0	41.1	0.0
Household Distribution by Income Level	270,132	23.8	15.2	18.8	42.2	0.0
Median Family Income MSA - 10580 Albany-Schenectady-Troy, N.Y. MSA		\$81,103	Median Housing Value			\$203,689
			Median Gross Rent			\$922
			Families Below Poverty Level			6.9%

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

Scope of Evaluation in New York

The OCC conducted a full-scope review of the Albany-Schenectady-Troy, NY MSA AA, the bank's only AA. The review weighted loan types proportionally with their percentage of originations and

purchases. As a result, home mortgage lending, which accounted for 59.4 percent (by number) and 78.9 percent (by dollar) of originations and purchases throughout the evaluation period, were given more weight than small business loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

The geographic distribution of home mortgage loans is reasonable. The geographic distribution of home mortgage loans in low-income census tracts was below the percentage of owner-occupied housing and near to aggregate lending in the AA. The geographic distribution of home mortgage loans in moderate-income census tracts was near to the percentage of owner-occupied housing and aggregate lending in the AA.

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 poor. The geographic distribution of small loans to businesses in low-income census tracts was significantly below the percentage of businesses located in low-income census tracts and aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income census tracts was well below the percentage of businesses located in low-income census tracts and aggregate lending in the AA.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

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

The assessment of performance considered housing affordability for low-income borrowers during the evaluation period given the median listing price and median family income. The median housing value was \$203,689 in the AA based on the 2015 ACS; however, per the Federal Reserve Economic Data maintained by the Federal Reserve Bank of St. Louis, the median home listing price in the Albany-Schenectady-Troy NY MSA ranged from \$295,750 to \$368,650 during the evaluation period. Based on the median listing price during the evaluation period, the monthly principal and interest payment of a 30-year mortgage with no down payment and a fixed 5 percent interest rate ranges from \$1,588 to \$1,979. Using a threshold of 30 percent of income for housing affordability and the 2021 updated median family of \$95,600 in the AA, a low-income individual could afford a maximum monthly payment of \$1,195 without including additional expenses or real estate taxes. When including these additional expenses, it becomes even more difficult for low-income individuals to afford a mortgage in the AA.

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 bank's originations and purchases of small loans to businesses.

The borrower distribution of small loans to businesses was reasonable. The distribution of smalls loans to businesses with less than \$1 million in revenue was below the number of businesses with less than \$1 million in revenue and exceeded aggregate lending in the AA.

Responses to Complaints

The bank did not receive any CRA-related complaints during the evaluation period.

COVID-19 Pandemic Activities

BSNB participated as a lender in the Small Business Administration's (SBA) Paycheck Protection Program (PPP). The PPP was implemented to encourage businesses to keep employees on payrolls during the initial lockdowns of the COVID-19 pandemic. Loans originated under the program carried an interest rate of 1 percent and had a maturity of two years if originated prior to June 5, 2020, and five years if originated after that date. The SBA forgave the loans if a business met certain requirements such as spending at least 60 percent of proceeds on payroll costs and maintaining employee and compensation levels. There were two rounds of the PPP, with the second round having stricter eligibility to target small businesses most affected by the COVID-19 pandemic's economic impact. BSNB participated in both rounds of PPP. During the evaluation period, BSNB originated 559 PPP loans

totaling \$44.0 million. In addition, BSNB provided deferrals to borrowers strained by the COVID-19 economic crisis on a case-by-case basis.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

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

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Albany-Schenectady-Troy NY MSA AA	12	63.2	22,974	77.8
Statewide	7	36.8	6,571	22.2
Total	19	100.0	29,545	100.0

BSNB demonstrated excellent responsiveness to CD needs through CD loans. During the evaluation period, BSNB originated 12 qualified CD loans totaling \$23 million, or 37.5 percent of tier 1 capital in the Albany-Schenectady-Troy NY MSA AA, and seven loans totaling \$6.6 million or 10.7 percent of capital in the statewide area. CD lending includes six loans totaling \$7.1 million for affordable housing for low- or moderate-income individuals, four loans totaling \$6.1 million to organizations providing community services targeting low- or moderate-income individuals, five loans totaling \$14.2 million to revitalize and stabilize low- or moderate-income geographies and four loans totaling \$2.2 million for economic development.

Number and Amount of Qualified Investments

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Albany-Schenectady-Troy NY MSA AA	0	0	77	155	77	98.7	155	63.5	0	0
Statewide	1	89	0	0	1	1.3	89	36.5	0	0
Total	1	89	77	155	78	100.0	244	100.0	0	0

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

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

BSNB demonstrated poor responsiveness to CD needs through qualified investments, donations, and grants. During the evaluation period, BSNB made 77 donations totaling \$155,000 to various CD eligible charitable and non-profit organizations within the Albany-Schenectady-Troy NY MSA AA. The activities supported affordable housing for low- or moderate-income individuals, provided community services to low-or moderate-income individuals, and supported economic development. Prior period investments include \$89,000 in outstanding stock balances to an economic development organization providing financing to small businesses throughout the state of New York, including the bank's AA.

Extent to Which the Bank Provides Community Development Services

BSNB demonstrated adequate responsiveness to CD needs through CD services. During the evaluation period, six employees and directors contributed 370 hours to six CD organizations primarily in board and leadership positions in the Albany-Schenectady-Troy NY MSA AA. Organizations benefiting from employee expertise included three affordable housing organizations, one organization providing community services targeting low- or moderate-income individuals, and two economic development organizations. In addition, BSNB offers Better U, an online education portal providing free of charge interactive modules covering a range of key financial concepts. The portal is available to the general public via BSNB's website.

During the COVID 19 pandemic, BSNB assisted the Regional Food Bank in safely and efficiently distributing food to those in need. BSNB employees contributed 970 qualified hours by distributing food to communities targeting low- or moderate-income individuals in the AA.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2020 to 12/31/2021	
Bank Products Reviewed:	Home mortgage and small business loans CD loans, qualified investments, and CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of New York		
Albany-Schenectady-Troy MSA AA	Full-Scope	Albany, Saratoga, and Schenectady counties

Appendix B: Summary of State Ratings

RATINGS Ballston Spa National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State Rating
BSNB	Satisfactory	Satisfactory	Satisfactory
State:			
New York	Satisfactory	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2020-21

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.
Albany-Schenectady-Troy NY MSA AA	683	178,679	100.0	29,254	2.9	2.1	2.7	12.7	10.1	12.5	52.4	62.5	52.0	32.0	25.2	32.7	0.0	0.1	0.1
Total	683	178,679	100.0	29,254	2.9	2.1	2.7	12.7	10.1	12.5	52.4	62.5	52.0	32.0	25.2	32.7	0.0	0.1	0.1

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2020-21

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.
Albany-Schenectady-Troy NY MSA AA	683	178,679	100.0	29,254	19.5	7.9	8.4	17.5	20.4	22.2	22.0	23.7	24.6	41.1	42.0	33.6	0.0	6.0	11.2
Total	683	178,679	100.0	29,254	19.5	7.9	8.4	17.5	20.4	22.2	22.0	23.7	24.6	41.1	42.0	33.6	0.0	6.0	11.2

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2020-21

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.
Albany-Schenectady-Troy NY MSA AA	578	52,777	100.0	16,442	13.8	3.1	10.7	11.4	5.7	10.9	44.1	68.0	45.7	30.3	23.0	32.3	0.4	0.2	0.4
Total	578	52,777	100.0	16,442	13.8	3.1	10.7	11.4	5.7	10.9	44.1	68.0	45.7	30.3	23.0	32.3	0.4	0.2	0.4

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 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 2020-21

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Albany-Schenectady-Troy NY MSA AA	578	52,777	100.0	16,442	85.6	51.0	42.1	4.2	11.8	10.3	37.2
Total	578	52,777	100.0	16,442	85.6	51.0	42.1	4.2	11.8	10.3	37.2

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.