



## PUBLIC DISCLOSURE

February 9, 2026

## 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 reasonable distribution of loans to geographies of different income levels and reasonable distribution of loans to borrowers of different income levels.
- The Community Development (CD) Test rating is based on performance in the AA in the state of New York. The performance exhibits adequate responsiveness to CD needs through CD loans, qualified investments, and CD services.
- BSNB's average loan-to-deposit (LTD) ratio is more than reasonable.
- The bank had no consumer complaints regarding its Community Reinvestment Act (CRA) performance during the evaluation period.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio was more than reasonable. BSNB's average LTD ratio for the 12-quarter period following the date of the prior evaluation period, January 1, 2022, through the end of the current evaluation period, December 31, 2024, was 94.7 percent. In comparison, the quarterly average LTD ratio of five similarly situated banks in the surrounding areas was 76.8 percent during the same period, with ratios ranging from a low of 62.8 percent and to a high of 90.7 percent.

### Lending in Assessment Area

A majority of the bank's loans were inside its AA. The bank originated and purchased 52.9 percent of its total loans inside the AA during the evaluation period. BSNB was not required to maintain data for consumer loans; therefore, performance was assessed based on a loan sample and does not include the entire population of loan originations. BSNB did not submit affiliate lending data for consideration.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	495	52.4	450	47.6	945	235,085	77.5	68,439	22.5	303,524
Consumer	20	69.0	9	31.0	29	330	66.4	167	33.6	497
<b>Total</b>	<b>515</b>	<b>52.9</b>	<b>459</b>	<b>47.1</b>	<b>974</b>	<b>235,415</b>	<b>77.4</b>	<b>68,606</b>	<b>22.6</b>	<b>304,021</b>

Source: 1/1/2022 - 12/31/2024 Bank Data.  
Due to rounding, totals may not equal 100.0%

## Description of Institution

BSNB is an intrastate community bank headquartered in Ballston Spa, New York. As of December 31, 2024, BSNB had \$896.3 million in total assets. The bank is wholly owned by Ballston Spa Bancorp, Inc., a single bank holding company. Lending products include home mortgages, commercial mortgages, commercial business loans, and consumer loans. Deposit products include various checking accounts, savings accounts, and certificates of deposit.

As of December 31, 2024, BSNB had \$696.5 million in total deposits and \$73.4 million in tier 1 capital. Net loans totaled \$755.4 million. Real estate loans composed most loans, totaling \$668.7 million or 88.5 percent of net loans. Consumer loans were the second largest segment of the portfolio, totaling \$55.3 million or 7.3 percent of net loans. Commercial loans totaled an additional \$25 million or 3.3 percent of net loans. All other loans totaling \$15 million composed the remaining segments of the portfolio.

BSNB is a single-state bank with one AA in the Albany-Schenectady-Troy, NY Metropolitan Statistical Area (MSA) AA (MSA #10580) in state of New York (referred to as the Albany-Schenectady-Troy NY MSA AA). The AA consists of three of the five counties composing the Albany-Schenectady-Troy, NY MSA: Albany, Schenectady, and Saratoga. BSNB operates 13 banking offices in Albany and Saratoga counties, each equipped with a deposit-taking automated teller machine (ATM).

There are no legal, financial, or other impediments hindering the bank's ability to meet the credit needs of its AA. BSNB's prior Performance Evaluation dated March 20, 2023, resulted in a "Satisfactory" rating based on a "Satisfactory" Lending Test rating and an "Satisfactory" Community Development Test rating.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This performance evaluation assessed the bank's performance in its AA under the CRA. The OCC evaluated the bank's performance under the Intermediate Small Bank CRA procedures, which includes the Lending Test and Community Development Test. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through its primary lending products, home mortgage and consumer loans. During the evaluation period, home mortgage loans were 50.8 percent of total number of loans originated and 25.3 percent loans originated by total dollar originated. Consumer loans were 30.2 percent of total number of loans originated and 2.8 percent of loans originated by total dollar. The Community Development Test assessed the bank's engagement in CD activities, including CD loans and services, qualified investments, grants, and donations, based on the needs of the community and the bank's capacities. The evaluation period was January 1, 2022, to December 31, 2024. The OCC assessed 2022, 2023, and 2024 lending activities against the 2020 U.S. Census data.

Management provided HMDA-reported home mortgage loan information for 2022, 2023, and 2024. The OCC determined the data submitted as required by HMDA was reliable and accurate. In addition, the OCC verified the management-submitted CD activity data.

Consumer loan data is not reported. Therefore, the OCC determined the bank's performance under the Lending Test using a random loan sample of 29 consumer loans and considered the results in context as they do not represent the bank's total originations and purchases during the evaluation period.

## **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 AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable 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 based on the rating for the state of New York. The State Rating is based on the full-scope review of the bank’s Albany-Schenectady-Troy NY MSA AA.

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

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

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

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

## 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:

- The distribution of loans across geographies of different income levels is reasonable.
- The distribution of loans to individuals of different income levels is reasonable.
- Adequate responsiveness to CD needs in the bank's AA through CD loans, qualified investments, and CD services.
- BSNB did not receive any CRA related complaints during the evaluation period.

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

The AA consists of the entirety of Albany, Schenectady, and Saratoga counties. The AA meets the requirements of the CRA and does not arbitrarily exclude low- and moderate-income geographies. According to the 2020 U.S. Census data, the AA comprised 195 census tracts including 17 low-income, 31 moderate-income, 88 middle-income, 53 upper-income, and six with no corresponding census-level income designation available. According to the Federal Financial Institutions Examination Council (FFIEC) list of distressed and underserved tracts, there were no census tracts designated as distressed or underserved in the AA.

BSNB's primary lending products in the state of New York during the evaluation period were home mortgage and consumer loans within its AA. BSNB offered its full range of products and services through its 13 branch locations and ATMs in the AA, as well as its online banking and mobile banking applications. BSNB operated 10 full-service branches in Saratoga County. The bank also operated three branches in Albany County. All branches are located in middle- or upper-income census tracts in the AA. The bank did not open or close any branches during the evaluation period.

BSNB operates in a competitive financial services market. Competition from other financial institutions operating in the area is strong with 23 institutions operating in the AA with 223 offices and \$26.3 billion in total deposits. As of June 30, 2023, BSNB had the 11<sup>th</sup> largest market share in the AA, with 2.7 percent of AA deposits. The market is concentrated with the three largest depositors having over 50 percent of the deposit market share. KeyBank, N.A. had the largest market share with 29.6 percent of deposits followed by TrustCo Bank and Bank of America, N.A., which had 11.5 percent and 11.2 percent of deposits, respectively.

The bank also faced strong competition for home mortgage loans in the AA. Based on the 2024 HMDA market share data, 248 institutions originated or purchased 13,791 home mortgage loans in the AA. BSNB ranked 20<sup>th</sup> with 0.9 percent market share. While competition is strong, home mortgage lending

in the market is concentrated. The top three institutions – Broadview Federal Credit Union and SEFCU Services, LLC; Homestead Funding Corp.; and TrustCo Bank – had 39.6 percent of the market share.

### Economic Data

According to the U.S. Bureau of Labor Statistic December 2024 data, the unemployment rate (not seasonally adjusted) in the Albany-Schenectady-Troy, NY MSA was 3.1 percent, which outperformed the state unemployment rate of 4.2 percent. During the evaluation period, unemployment ranged from a low of 2.5 percent in April 2023 to a high of 3.9 percent in February 2024. 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 state capital, which hosts significant employers centered in federal and state government agencies. Major private sector employers in the region include health services such as Albany Medical Center and St. Peter’s Health Partners, and supermarkets such as Northeast Grocery Inc. and Hannaford Supermarkets.

### Community Contacts

During the evaluation period and in conjunction with the CRA evaluation, the OCC and other regulators met with three organizations in the AA that aid socially and economically disadvantaged small businesses and provide homeownership services. Contacts from these organizations identified a need for affordable housing, homeownership assistance, financial education, small business educational services, and banking services for smaller and struggling businesses. The OCC also met with a community development financial institution (CDFI). The CDFI indicated a strong need for flexible small business lending, specifically start-up capital and revolving working capital lines of credit.

Assessment Area - 2024 Albany Schenectady-Troy NY MSA AA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	195	8.72	15.90	45.13	27.18	3.08
Population by Geography	708,418	8.22	13.68	46.39	29.74	1.97
Housing Units by Geography	319,323	8.86	15.30	46.93	27.68	1.23
Owner-Occupied Housing by Geography	177,732	3.43	9.89	50.68	35.79	0.21
Occupied Rental Units by Geography	103,767	15.35	22.00	40.86	19.01	2.77
Vacant Units by Geography	37,824	16.52	22.36	46.01	13.33	1.78
Businesses by Geography	32,817	5.31	8.91	41.63	25.99	18.15
Farms by Geography	995	2.01	5.93	58.99	27.24	5.83
Family Distribution by Income Level	166,948	20.78	16.83	21.42	40.96	0.00
Household Distribution by Income Level	281,499	23.73	16.17	17.48	42.62	0.00
Unemployment rate (%)	4.61	11.11	6.38	4.24	2.58	9.91
Households Below Poverty Level (%)	9.82	29.95	17.40	7.45	4.15	21.20
Median Family Income (10580 - Albany-Schenectady-Troy, NY MSA)		\$95,438		Median Housing Value		\$218,800
Median Family Income (10580 - Albany-Schenectady-Troy, NY MSA) for 2024		\$117,800		Median Gross Rent		\$1,048
				Families Below Poverty Level		5.84
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
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 bank's one AA in the state of New York, located in the Albany-Schenectady-Troy NY MSA AA. Home mortgage lending received a heavier weighting over consumer lending in the performance assessment given its proportion of originations and purchases throughout the evaluation period.

## **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 was reasonable.

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

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

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

Refer to Table 7 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. During the evaluation period, the geographic distribution of home mortgage loans to low-income geographies was below the percentage of households and significantly below the aggregate lending in low-income geographies in the AA. The geographic distribution of home mortgage loans to moderate-income geographies was below the percentage of households and aggregate lending in moderate-income geographies in the AA. The OCC considered the strong market competition for home mortgages in the AA, as mentioned above, when evaluating performance.

#### ***Consumer Loans***

Refer to Table 13 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 consumer loan originations and purchases.

The geographic distribution of consumer loans is poor. In the sample of consumer loans originated during the evaluation period, the bank made no consumer loans to low-income geographies in the AA. The geographic distribution of consumer loans to moderate-income geographies was significantly below

the percentage of households and aggregate lending in moderate-income geographies in the AA. The OCC considered the small sample of consumer loans size when evaluating performance.

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

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of BSNB's home mortgage loans during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

As the OCC analyzed a sample of consumer loans and not the entire population, the OCC did not perform a lending gap analysis of consumer loans.

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

The bank exhibited a reasonable distribution of loans to individuals of different income levels given the product lines offered by the bank. While home mortgage loans represent a higher proportion of loans originated by number and dollar amounts, the performance relative to the distribution of consumer loans to individuals of different income levels was substantially better the demographics and outweighed the weaker home mortgage distribution performance.

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

Refer to Table 8 in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to individuals of different income levels is poor. During the evaluation period, the distribution of home mortgages to low-income borrowers was significantly below the percentage of low-income families and well below the aggregate lending in the AA. The distribution of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families but was well below the aggregate lending in the AA.

### ***Consumer Loans***

Refer to Table 14 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 consumer loan originations and purchases.

The distribution of consumer loans to individuals of different income levels is excellent. During the evaluation period, the distribution of consumer loans to low- and moderate-income borrowers significantly exceeded the percentage of low- and moderate-income families in the AA.

### **Responses to Complaints**

BSNB did not receive any CRA related complaints during the evaluation period.

## **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 exhibited adequate responsiveness to CD 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.

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Albany-Schenectady-Troy NY MSA AA	20	95.2	16,161	99.4
Broader Statewide or Regional Area	1	4.8	101	0.6
Total	21	100.0	16,263	100.0

BSNB demonstrated excellent responsiveness to CD needs through CD lending. During the evaluation period, BSNB originated 20 qualified CD loans in the AA totaling \$16.2 million, or 22 percent of tier 1 capital. The CD loans supported affordable housing, economic development, and community services in the AA.

The following are examples of CD loans the bank originated or purchased in the AA:

- One \$3.8 million loan to finance the construction of a brewery/restaurant providing for economic development through a Small Business Administration loan program financing package.
- One \$2 million loan to finance the construction of a 10-unit apartment building to provide affordable housing in a low-income census tract.
- One \$500,000 loan to provide funding to a business that provides community services through a business model tailored to low- and moderate-income individuals.

### Broader Statewide or Regional Area

BSNB received consideration for CD lending activities outside their delineated AA. BSNB originated one loan totaling \$101,250, or 0.1 percent of tier 1 capital in the broader statewide area. The loan supported affordable housing in a low-income census tract. Consideration was given to the loan outside the AA because BSNB was responsive to the needs and opportunities of its delineated AA.

## Number and Amount of 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	95	2,558	95	96.9	2,558	96.5	0	0
Broader Statewide or Regional Area	1	89	2	5	3	3.1	94	3.5	0	0
<b>Total</b>	<b>1</b>	<b>89</b>	<b>97</b>	<b>2,652</b>	<b>98</b>	<b>100.0</b>	<b>2,652</b>	<b>100.0</b>	<b>0</b>	<b>0</b>

\* "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 adequate responsiveness to CD needs through qualified investments, donations, and grants. During the evaluation period, BSNB purchased one mortgage-backed security totaling \$2.4 million where the underlying mortgages were to low- and moderate-income borrowers. The bank also has one prior period investment totaling approximately \$89,000 for eligible stock in an economic development organization focusing on financing small businesses. In addition, BSNB made 28 donations totaling approximately \$34,000 to organizations providing affordable housing, 57 donations totaling approximately \$68,000 to organizations providing community services to low- and moderate-income individuals, and three donations totaling \$20,000 to organizations providing economic development in the AA.

The following are examples of qualified donations in the AA:

- Three donations to a regional food bank totaling \$15,000 to help fund drive-thru pantries as well as seven donations totaling \$11,040 to match local branch collections to various food pantries.
- Two years of loan forgiveness totaling \$10,000 to a CDFI providing loans and training to small businesses and small business owners. The bank also donated \$10,000 for the organization's capital campaign to help expand its small business incubator.
- Seven donations totaling \$7,500 to an organization providing community services and affordable housing to low- and moderate-income individuals including a homeless shelter, job training, and emergency, seasonal, and senior services.

Beginning in 2024, the bank began participating in the Federal Home Loan Bank of New York's Small Business Recovery Grant program. The program allows member banks to provide up to \$50,000 in grants ranging in size from \$2,500 to \$10,000 to small businesses and nonprofits for startup or expansion costs. BSNB dispensed \$45,000 to six organizations in the AA and \$5,000 to two outside of the AA but in the broader regional area. Three organizations were small businesses and five were nonprofits. Consideration was given to the two organizations outside the AA because BSNB was responsive to the needs and opportunities of its delineated AA.

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

BSNB demonstrated adequate responsiveness to CD needs through CD services in the AA given the asset size, branch presence, and number of employees. During the evaluation period, nine senior management and board directors contributed 647 qualified hours to eight organizations, including one

affordable housing organization, five community service organizations, and two economic development organizations. Most service hours consisted of bank personnel serving in a leadership role such as a board member or serving on the finance committee for the organizations. Consideration was also given to the 112 service hours provided by one employee to an organization offering community services to low- and moderate-income individuals in the broader regional area because BSNB was responsive to the needs and opportunities of its delineated AA.

Examples of qualified CD services provided during the evaluation period include:

- Two employees served as board members of an organization that provides affordable housing to veterans.
- One employee served as a board member of an economic development organization. The employee served on the committee providing loans and financial experience to small businesses.
- One employee provided a financial planning basics workshop to direct service professionals. The workshop was recorded and can be accessed by those who did not attend the live workshop.

## 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 MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	01/01/2022 to 12/31/2024	
<b>Bank Products Reviewed:</b>	Home mortgage and consumer loans Community development loans, qualified investments, and community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None.		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>New York</b>		
Albany-Schenectady-Troy NY MSA	Full-scope	Albany, Saratoga, and Schenectady counties

# Appendix B: Summary of State Ratings

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RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Ballston Spa National Bank	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

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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 the Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

**Consumer Loan(s):** 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 CD loans and qualified investments, branch distribution, and CD services).

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

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

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

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

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

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

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

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

**Multistate Metropolitan Statistical Area (MMSA):** 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.

**Prior Period Investments:** Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

**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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

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

**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 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/AA. 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 7. 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 8. 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/AA. The table also presents aggregate peer data for the years the data is available.
- Table 13. 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 14. 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/AA.

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.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
2024 Albany Schenectady-Troy NY MSA AA	495	235,085	100.0	48,613	3.4	2.4	5.0	9.9	8.3	11.6	50.7	54.8	48.7	35.8	33.3	34.3	0.2	1.2	0.4
<b>Total</b>	<b>495</b>	<b>235,085</b>	<b>100.0</b>	<b>48,613</b>	<b>3.4</b>	<b>2.4</b>	<b>5.0</b>	<b>9.9</b>	<b>8.3</b>	<b>11.6</b>	<b>50.7</b>	<b>54.8</b>	<b>48.7</b>	<b>35.8</b>	<b>33.3</b>	<b>34.3</b>	<b>0.2</b>	<b>1.2</b>	<b>0.4</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2024 Albany Schenectady-Troy NY MSA AA	495	235,085	100.0	48,613	20.8	6.3	9.7	16.8	16.0	23.5	21.4	21.4	24.9	41.0	45.4	31.2	--	10.9	10.7
<b>Total</b>	<b>495</b>	<b>235,085</b>	<b>100.0</b>	<b>48,613</b>	<b>20.8</b>	<b>6.3</b>	<b>9.7</b>	<b>16.8</b>	<b>16.0</b>	<b>23.5</b>	<b>21.4</b>	<b>21.4</b>	<b>24.9</b>	<b>41.0</b>	<b>45.4</b>	<b>31.2</b>	<b>--</b>	<b>10.9</b>	<b>10.7</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
2024 Albany Schenectady-Troy NY MSA AA	20	497	100.0	7.8	0.0	14.4	5.0	47.1	90.0	29.6	5.0	1.2	0.0
<b>Total</b>	<b>20</b>	<b>497</b>	<b>100.0</b>	<b>7.8</b>	<b>0.0</b>	<b>14.4</b>	<b>5.0</b>	<b>47.1</b>	<b>90.0</b>	<b>29.6</b>	<b>5.0</b>	<b>1.2</b>	<b>0.0</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data.  
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
2024 Albany Schenectady-Troy NY MSA AA	20	497	100.0	23.7	35.0	16.2	35.0	17.5	15.0	42.6	15.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>497</b>	<b>100.0</b>	<b>23.7</b>	<b>35.0</b>	<b>16.2</b>	<b>35.0</b>	<b>17.5</b>	<b>15.0</b>	<b>42.6</b>	<b>15.0</b>	<b>0.0</b>	<b>0.0</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%