



PUBLIC DISCLOSURE

January 10, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Savannah Bank National Association
Charter Number: 12810

1565 Main Street, P.O. Box 278
Savannah, NY 13146

Office of the Comptroller of the Currency

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

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

Table of Contents

Overall CRA Rating.....	1
Description of Institution.....	2
Scope of the Evaluation.....	2
Discriminatory or Other Illegal Credit Practices Review.....	4
State Rating.....	5
State of New York.....	5
Lending Test	10
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of MMSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

Overall CRA Rating

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

The lending test is rated: **Satisfactory**.

The major factors that support this rating include:

- The Lending Test rating is based on performance in New York State, which demonstrated an overall reasonable distribution of loans to geographies of different income levels and an overall reasonable distribution of loans to borrower of different income levels.
- A reasonable loan-to-deposit (LTD) ratio during the evaluation period.
- A majority of home mortgage loans originated during the evaluation period were within the bank’s assessment areas (AA).

Loan-to-Deposit Ratio

Considering the bank’s size, financial condition, and credit needs of the AAs, the bank’s LTD ratio is reasonable.

Savannah Bank, National Association’s (SBNA) average LTD ratio for the prior fourteen quarters, covering the time since the end of the prior evaluation period, was 51.2 percent, with a quarterly high of 53.2 percent in fourth quarter 2019 and a quarterly low of 49.1 percent in first quarter 2019. During the same period, a custom peer group of three similarly situated banks, operating in similar markets or competing directly with SBNA, had an average LTD ratio of 49.7 percent, and ranged from 32.6 percent to 62.6 percent.

Lending in Assessment Area

A majority of the bank’s loans are inside its AAs.

The bank originated and purchased 64.7 percent of its home mortgages inside the bank’s AAs during the evaluation period. This analysis is performed at the bank level rather than the AA level.

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	108	64.7	59	35.3	167	9,930	51.7	9,268	48.3	19,197
Total	108	64.7	59	35.3	167	9,930	51.7	9,268	48.3	19,197

Description of Institution

SBNA is an intrastate community bank with \$158.5 million in assets as of December 31, 2020. SBNA's main office is in Savannah, N.Y. and all its branches and AAs are located within the state of New York. Savannah is a small, rural community approximately 40 miles west of the city of Syracuse; 50 miles east of the city of Rochester; and within approximately 20 miles of the city of Auburn. As of December 31, 2020, SBNA reported \$142.7 million in total deposits and \$13.1 million in tier 1 capital.

SBNA operates five full-service branches and one drive-through branch in its two AAs. All locations have automated teller machines (ATMs). In addition, all branches except for the branch located in the Finger Lakes Mall have a drive through facility. There were no branches opened or closed during the evaluation period. SBNA offers a traditional selection of banking products and services, including online banking and bill pay. The bank has no affiliates.

As of December 31, 2020, the bank's assets were primarily composed of \$72 million (45.4 percent) in loans and \$84.6 million (53.4 percent) in investments. The loan portfolio was comprised of 59.0 percent one- to four-family residential real estate loans, 22.0 percent commercial real estate, 18.1 percent commercial and industrial loans, and 1.5 percent consumer loans. The bank's business strategy was to primarily focus on originating one- to four-family residential mortgages.

There were no legal, financial, or other factors that would impede the bank's ability to help meet the credit needs in its AAs. At the last CRA examination, dated October 23, 2017, SBNA received a "Satisfactory" CRA rating.

Scope of the Evaluation in New York

Evaluation Period/Products Evaluated

The evaluation period covered January 1, 2018, through December 31, 2020 for home mortgage loans, which was the bank's primary product. Home mortgage loans include home purchase, home improvement, home mortgage refinance, and multi-family loans as reported on the Loan Application Register (LAR) required by the Home Mortgage Disclosure Act (HMDA).

The market share and peer comparisons are based on the information contained in the aggregate HMDA Loan Registers, which are available for public review. The aggregate HMDA Registers for 2018 are used for the 2018 evaluation period comparison, the 2019 registers are used for the 2019 evaluation period comparison, and the 2020 registers for the 2020 evaluation period comparison.

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 metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details

regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

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

In determining overall conclusions for SBNA, the rating was based upon the bank's performance in its only Rating Area, New York State.

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) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

State Rating

State of New York

CRA rating for the State of New York¹: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- An overall reasonable distribution of loans to geographies of different income levels.
- An overall reasonable distribution of loans to borrowers of different income levels.
- SBNA did not receive any CRA related complaints during the evaluation period.

Description of Institution's Operations in New York

As of December 31, 2020, SBNA had two AAs within New York State, the Savannah non-MSA AA and Rochester MSA AA. The Savannah non-MSA AA included parts of Seneca and Cayuga counties and the Rochester MSA AA was a portion of the MSA in the eastern half of Wayne County. All New York State AAs met the requirements of the CRA regulation and did not arbitrarily exclude any low- or moderate-income tracts.

SBNA offered a full range of loan and deposit products and services through five branches with ATMs in the New York State. During the evaluation period, 100 percent of deposits and HMDA loan originations were in New York State.

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

Savannah non-MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Savannah non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	5.0	10.0	70.0	15.0	0.0
Population by Geography	77,878	5.5	10.9	66.3	17.2	0.0
Housing Units by Geography	35,475	4.1	12.3	65.1	18.6	0.0
Owner-Occupied Units by Geography	20,292	2.0	8.2	67.9	21.8	0.0
Occupied Rental Units by Geography	10,371	8.4	22.1	60.6	8.9	0.0
Vacant Units by Geography	4,812	3.5	8.2	62.7	25.6	0.0
Businesses by Geography	4,198	7.2	13.8	62.0	16.9	0.0
Farms by Geography	264	0.4	1.9	56.8	40.9	0.0
Family Distribution by Income Level	18,605	18.8	17.5	22.4	41.3	0.0
Household Distribution by Income Level	30,663	24.7	15.4	18.7	41.2	0.0
Median Family Income Non-MSAs - NY		\$59,570	Median Housing Value			\$103,351
			Median Gross Rent			\$683
			Families Below Poverty Level			9.1%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Savannah non-MSA AA consisted of 20 contiguous census tracts in parts of Cayuga and Seneca counties. Per the American Community Survey (ACS), one census tract in the AA was low-income, two were moderate-income, 14 were middle-income, and three were upper-income. The bank excluded the southern two most census tracts in Seneca County and seven census tracts in the eastern and southern portion of Cayuga County. Given the bank's lending and branch locations, it is generally reasonable to exclude these census tracts. All excluded census tracts were middle-income or upper-income.

SBNA offered its full range of products and services through four branches and one drive-through branch located in the AA. SBNA's primary lending focus in the Savannah non-MSA AA was home mortgages, consistent with the bank overall. During the COVID-19 pandemic, the bank offered and approved payment deferrals to customers requesting relief.

As of June 30, 2021, SBNA had \$108.5 million in deposits in the Savannah non-MSA AA, resulting in a deposit market share of 6.4 percent. SBNA had the eighth largest deposit market share in the AA. KeyBank, N.A. had the highest market share at 18.9 percent, followed by Generations Bank at 11.6 percent, Five Star Bank at 11.4 percent, and Tompkins Trust Company at 10.5 percent. Additional banks with market share greater than SBNA included Chemung Canal Trust Company, Cayuga Lake National Bank, and Lyons National Bank.

The bank's home mortgage loan originations in the Savannah non-MSA AA accounted for 82.4 percent of its total home mortgage originations in its AAs. Per 2019 peer home mortgage HMDA data, SBNA was 11th of 101 lenders by loan count, with 35 loans or 2.4 percent of the market, and 14th by total dollar amount, with \$3.6 million or 2.2 percent of the AA. The top three home mortgage lenders in 2019 were The Lyons National Bank, Empower Federal Credit Union, and Community Bank, N.A. SBNA did not file a 2020 HMDA LAR following the 2020 HDMA rule change raising the threshold reporting requirement for close-ended loans from 25 to 100. In 2020, the bank originated 18 loans in the AA, which would have resulted in approximately 1 percent of the market share by loan count or tied for 22nd of 100 lenders.

Per the 2015 ACS, there were 35,475 total housing units in the AA, with 57.2 percent being owner-occupied, 29.2 percent being rental units, and 13.6 percent being vacant. The median housing value was approximately \$103,000 in the AA; however, per the Federal Reserve Economic Data (FRED) maintained by Federal Reserve Bank of St. Louis, the median home listing price in Cayuga County was \$232,450 at its peak in July 2020. Cayuga County experienced a substantial increase from a median listing of \$149,450 in January 2018 due to increased market pressures from the COVID-19 pandemic. While the median listing price declined to \$168,700 in December 2020, this was influenced more by fewer listed homes than a true decline in value. The increase in median listing price would increase the principal and interest payment for a 30-year mortgage with no down payment and a fixed 5 percent interest rate from \$802 in January 2018 to \$1,248 at its peak or \$906 in December 2020. The mortgage payment is significantly higher than the median rent in the AA of \$683 and may be an impediment for low- and moderate-income borrowers to obtain a home mortgage. Using the threshold of 30 percent of income for housing affordability, a low-income individual could afford a maximum monthly payment of \$745 without including additional expenses or real estate taxes, and a moderate-income individual could afford a maximum monthly payment of \$1,191. When including these additional expenses, it becomes even more difficult for low- and moderate-income individuals to afford a mortgage as the maximum payment for a low-income individual was already below the median listing price at the low point.

It was similar in Seneca County. Per Realtor.com, where FRED sources its data, Seneca County had a median home listing price of \$144,950 in December 2020. Seneca County experienced less of an increase from January 2019, the earliest data was available, but experienced a substantial increase following the evaluation period, with the median home listing price in December 2021 equaling \$174,500. Given the smaller number of housing units for sale, the median fluctuates between \$125,500 and \$174,900 every few months. Using the upper and lower bounds of these fluctuations and assuming the mortgage is a 30-year loan at a fixed 5 percent interest rate, the principal and interest payments would range between \$674 and \$939. The median rent in the AA is similar to the principal and interest payment only on the lower end of the range, and a low-income borrower could only afford a monthly mortgage payment on the lower end of the range when excluding additional expenses.

Median income in 2020 was approximately \$57,000 in Seneca County and \$59,000 in Cayuga County. Both counties' median income was slightly lower, although in line with, the median income of the AA at \$59,570. According to Data USA, top employment industries in the counties were health care, manufacturing, educational services, and retail. Per the FRED, unemployment during the evaluation period in Seneca County ranged from a low of 2.9 percent in September 2018 to a high of 16.6 percent in April 2020 following the recession stemming from the COVID-19 pandemic. Similarly, in Cayuga

County, the unemployment rate ranged from a low of 3.3 percent in September 2019 to a high of 16.6 percent in April 2020. Following the partial recovery, the Seneca and Cayuga counties had unemployment rates of 6.2 percent and 5.9 percent, respectively, at the end of December 2020. Both counties were similar to New York State unemployment rates throughout the evaluation period.

The OCC utilized two community contacts, one in Seneca County and one in Cayuga County. The Seneca County community contact was a local housing organization dedicated to providing affordable housing within the AA, and the Cayuga County organization was a community fundraising organization. The organization in Seneca indicated needs for affordable housing for low- and moderate-income individuals and families, and the organization in Cayuga County indicated a need for increased financial literacy education opportunities.

Rochester MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Rochester MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.0	75.0	25.0	0.0	0.0
Population by Geography	14,402	0.0	74.7	25.3	0.0	0.0
Housing Units by Geography	6,657	0.0	77.5	22.5	0.0	0.0
Owner-Occupied Units by Geography	4,335	0.0	72.4	27.6	0.0	0.0
Occupied Rental Units by Geography	1,043	0.0	84.3	15.7	0.0	0.0
Vacant Units by Geography	1,279	0.0	89.1	10.9	0.0	0.0
Businesses by Geography	620	0.0	71.1	28.9	0.0	0.0
Farms by Geography	78	0.0	57.7	42.3	0.0	0.0
Family Distribution by Income Level	3,721	25.3	24.9	24.9	24.9	0.0
Household Distribution by Income Level	5,378	21.7	23.8	20.6	33.9	0.0
Median Family Income MSA - 40380 Rochester, NY MSA		\$67,757	Median Housing Value			\$82,687
			Median Gross Rent			\$669
			Families Below Poverty Level			9.4%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Rochester MSA AA consisted of four contiguous census tracts in the eastern portion of Wayne County in the Rochester MSA (MSA #40380). The main office, which is in the southeastern portion of the county, is the only branch located in the AA. The exclusion of the remaining portions of the county and broader MSA is reasonable given the distance from the main office. Per the ASC data, three of the census tracts are moderate-income and one of the census tracts is middle-income.

SBNA offered its full range of products and services through the main office in the AA. SBNA's primary lending focus in the Rochester MSA AA was home mortgages, consistent with the bank overall. During the COVID-19 pandemic, the bank offered and approved payment deferrals to customers requesting relief.

As of June 30, 2021, SBNA had \$31.4 million in deposits in the Rochester MSA AA, resulting in a deposit market share of 17.6 percent. The Lyons National Bank was the only other bank with branches in the AA, having \$146.8 million in deposits or 82.4 percent of total deposits.

The bank's home mortgage loan originations in the Rochester MSA AA accounted for 17.6 percent of its total home mortgage originations in its AAs. Per 2019 peer home mortgage HMDA data, SBNA was sixth of 44 lenders by loan count, with 10 loans or 3.6 percent of the market, and eighth by total dollar amount, with \$670,000 or 2.9 percent of the AA. The top three home mortgage lenders were The Lyons National Bank, Reliant Community Federal Credit Union, and ESL Federal Credit Union. As noted, SBNA did not file a 2020 HMDA LAR following the 2020 HDMA rule change. In 2020, the bank originated five loans in the AA, which would have resulted in approximately 2.0 percent of the market share by loan count or 10th of 36 lenders.

Per the 2015 ACS, there were 6,657 total housing units in the AA, with 65.1 percent being owner-occupied, 15.7 percent being rental units, and 19.2 percent being vacant. The median housing value was approximately \$83,000 in the AA; however, per the FRED, the median home listing price in Wayne County in December 2020 was \$209,900. This increased substantially from \$129,900 in January 2018 due to increased market pressures from the COVID-19 pandemic. The increase in median listing price would increase the principal and interest payment for a 30-year mortgage with no down payment and a fixed 5 percent interest rate from \$697 to \$1,127. The mortgage payment is significantly higher than the median rent in the AA of \$669 and may be an impediment to low- and moderate-income borrowers obtaining a home mortgage. Using the threshold of 30 percent of income for housing affordability, a low-income individual could afford a \$775 monthly payment without including additional expenses or real estate taxes, and a moderate-income individual could afford a \$1,240 payment.

Median income in Wayne County was approximately \$62,000 in 2020, lower than the median income of approximately \$68,000 in the broader Rochester MSA. According to Data USA, top employment industries in Wayne County were manufacturing, health care, and retail. Per the FRED, unemployment during the evaluation period in Wayne County ranged from a low of 3.2 percent in October 2018 to a high of 15.1 percent in April 2020 following the recession stemming from the COVID-19 pandemic. Following the partial recovery, the county had an unemployment rate of 5.7 percent at the end of December 2020. Wayne County's unemployment rate was consistently lower than the Rochester MSA and New York unemployment rates throughout the evaluation period.

The OCC utilized one community contact with a local housing organization dedicated to providing affordable housing within the AA. The organization indicated needs for affordable housing for low- and moderate-income individuals and families and financing options for housing rehabilitation.

Scope of Evaluation in New York

The bank has two AA, the Savannah non-MSA AA and Rochester MSA AA, both of which received a full-scope review during this evaluation.

When assessing overall Lending Testing performance, the Savannah non-MSA AA received greater weight given the significantly greater amount of deposits and loan originations in the AA. The Savannah non-MSA AA contains 77.5 percent of the bank's deposits and accounts for 82.4 percent of home mortgages. The Rochester MSA AA contains 22.5 percent of the bank's deposits and accounts for 17.6 percent of home mortgage. In the Savannah non-MSA AA, the bank's performance in the distribution of loans by income level of geography and performance in the distribution of loans by income level of the borrower were given equal weight given the mix of census tracts designations in AAs. In the Rochester MSA AA, more weight was given to the bank's performance in the distribution of loans by income level of the borrower because there were no low-income census tracts.

Lending Test

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Savannah non-MSA AA is good and performance in the Rochester MSA AA is adequate.

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 appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Savannah non-MSA AA

The bank's level of home mortgage loans to borrowers in low- and moderate-income geographies was excellent. The bank's level of home mortgages significantly exceeded both the demographic data and aggregate performance during the evaluation period for both low- and moderate-income geographies.

Rochester MSA AA

The bank's level of home mortgage loans to moderate-income geographies was reasonable. During the evaluation period, the bank's level of home mortgages was below the demographic data and aggregate performance. There were no low-income geographies 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 given the product lines offered by the bank.

Home Mortgage Loans

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

Savannah non-MSA AA

The bank's level of home mortgage loans to borrowers of different income levels was reasonable. During the evaluation period, the bank's level of home mortgages to low-income borrowers was below the demographic data but significantly exceeded the aggregate performance. The bank's level of home mortgages to moderate-income individuals was below the demographic data and aggregate performance. When assessing performance, examiners considered the affordability of housing for low- and moderate-income borrowers in the AA given median housing value and the median family income.

Rochester MSA AA

The bank's level of home mortgage loans to borrowers of different income levels was reasonable. The bank's level of home mortgages to low-income borrowers was below the demographic data and somewhat below the aggregate data. While the bank's level of home mortgages to moderate-income borrowers significantly exceeded both the demographic and aggregate data. When assessing performance, examiners considered the affordability of housing for low-income borrowers in the AA given median housing value and the median family income.

Responses to Complaints

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

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2018 to 12/31/2020	
Bank Products Reviewed:	Home mortgages	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None.		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of New York		
Savannah non-MSA	Full-scope	Portions of Seneca and Cayuga counties
Rochester MSA #40380 (partial)	Full-scope	Portions of Wayne County

Appendix B: Summary of MMSA and State Ratings

RATINGS	SBNA
Overall Bank:	Lending Test Rating
SBNA	Satisfactory
MMSA or State:	
New York	Satisfactory

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.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Savannah non-MSA AA	89	8,433	82.4	1,824	2.0	10.1	1.4	8.2	14.6	9.5	67.9	60.7	69.4	21.8	14.6	19.7	0.0	0.0	0.0
Rochester MSA AA	19	1,496	17.6	330	0.0	0.0	0.0	72.4	52.6	81.5	27.6	47.4	18.5	0.0	0.0	0.0	0.0	0.0	0.0
Total	108	9,929	100.0	2,154	1.7	8.3	1.2	19.5	21.3	20.5	60.8	58.3	61.6	18.0	12.0	16.7	0.0	0.0	0.0

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 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	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Savannah non-MSA AA	89	8,433	83.5	1,824	18.8	6.7	4.8	17.5	13.5	17.9	22.4	20.2	23.1	41.3	42.7	39.7	0.0	16.9	14.4
Rochester MSA AA	19	1,496	22.2	330	25.3	10.5	12.4	24.9	47.4	27.9	24.9	33.3	24.5	24.9	35.7	23.3	0.0	--	11.8
Total	108	9,929	100.0	2,154	19.9	7.4	6.0	18.8	19.4	19.5	22.8	19.4	23.4	38.5	39.8	37.2	0.0	13.9	14.0

*Source: 2015 ACS Census ; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*