



## **PUBLIC DISCLOSURE**

June 29, 2020

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

Maple City Savings Bank, FSB  
Charter 701899

145 Main Street  
Hornell, NY 14843-1524

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.

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## Overall CRA Rating

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

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

The major factors that support this rating include:

- Maple City Savings Bank (MCSB) had a more than reasonable average loan-to-deposit (LTD) ratio during the evaluation period.
- A substantial majority of home mortgage loans originated during the evaluation period were inside the bank's assessment area (AA).
- MCSB had excellent distribution of home mortgage loans to geographies of different income levels within the AA.
- MCSB had reasonable distribution of home mortgage loans to borrowers of different income levels within the AA during the evaluation period.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and the credit needs of the AA, the bank's LTD ratio is more than reasonable. MCBS's quarterly average LTD ratio for the evaluation period is 100.1 percent with a range of 95.2 percent to 108.7 percent. While the LTD ratio fluctuated during the evaluation period, the composition and characteristics of the balance sheet remain consistent as the bank grew in total asset size. The loan portfolio increased by \$11.2 million or 17.2 percent during the evaluation period, with growth primarily occurring in one- to four-family residential loans. Four similarly situated Upstate New York savings banks with assets of less than \$250 million had quarterly average LTD ratios ranging from 92.2 percent to 126.1 percent. The bank's average LTD ratio was comparable with the four banks used in our evaluation and compared well against the overall average LTD ratio of 109.4 percent.

### Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA. This demonstrates excellent performance in lending to households within the AA and was considered in the analysis of geographic distribution. The bank originated and purchased 84.8 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank level, rather than at 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	39	84.8	7	15.2	46	3,068	84.3	570	15.7	3,638
Total	39	84.8	7	15.2	46	3,068	84.3	570	15.7	3,638

Source: Evaluation Period: 1/1/2017 - 12/31/2019 Bank Data  
Due to rounding, totals may not equal 100.0

## Description of Institution

MCSB is a full-service intrastate bank headquartered in Hornell, N.Y. MCSB is wholly-owned subsidiary of Maple City Savings Mutual Holding Company, a single-bank holding company. As of December 31, 2019, MCSB had total assets of \$86.5 million, deposits of \$72.1 million, and tier 1 capital of \$7.3 million.

MCSB focuses on its strategy and operations as a small community bank and has not materially changed its composition of lending products. MCSB continues to offer a range of lending products, primarily focused on one- to four-family residential real estate lending. As of December 31, 2019, MCSB reported \$77 million in net loans representing a ratio of net loans and leases to assets of 89 percent. The distribution of the loan portfolio is exhibited in Table 1 below.

<b>Loan Category</b>	<b>Amount (\$000s)</b>	<b>Percentage of Total Loans</b>	<b>Percentage of Total Assets</b>
Secured by Mortgages on 1-4 Family	\$56,649	73.6%	65.5%
Commercial Real Estate	\$8,107	10.5%	9.4%
Commercial & Industrial Loans	\$3,662	4.8%	4.2%
Multifamily	\$3,264	4.2%	3.8%
Construction and Land Development	\$2,574	3.3%	3.0%
Farmland/Agriculture	\$1,648	2.1%	1.9%
Consumer Loans	\$947	1.2%	1.1%
Loans to Nondepository F.I.	\$137	0.2%	0.2%
<b>Total</b>	<b>\$76,988</b>	<b>100%</b>	<b>89.0%</b>

MCSB operates within the state of New York with a single AA. MCSB has two full-service branches, both are located in Hornell, N.Y, and are centrally situated within the AA. The main office is located in a moderate-income geography. The main office and branch locations operate during normal business hours from Monday to Friday. Each location has a drive-up window and a 24-hour automated teller machine (ATM). The bank also offers online and mobile banking services to its customers.

There are no legal, financial, or other impediments to MCSB's ability to help meet the credit needs within its communities. MCSB received an Outstanding rating at its prior CRA evaluation by the OCC dated March 9, 2015.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the small bank procedures, which includes the lending test. The lending test evaluates the bank's record of meeting the credit needs of its AAs through its primarily lending activities in home mortgage loans. The evaluation period is January 1, 2017, to December 31, 2019. With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact the coronavirus pandemic has had on economies across the United States are not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

Bank management indicated home mortgage loans to be the bank's primary loan product. The review of lending activity during the evaluation period confirmed home mortgage loans are the bank's primary loan product considering both the number and amount of loans originated. MCSB's AA is not in a metropolitan statistical area (MSA). The bank is not subject to Home Mortgage Disclosure Act (HMDA) requirements and does not file a HMDA Loan Application Register (LAR). Home mortgage information used in the Lending Test is based on a sample of loans rather than total bank originations and purchases over the evaluation period. Examiners chose a random sample of 46 home mortgage loans originated during the evaluation period to assess the bank's distribution of loans to borrowers and geographies of different income levels within the AA.

### **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 based on its performance in the New York state rating area, which is based on performance in MCSB's single AA, the Steuben-Allegany non-MSA AA.

### **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 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<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

The major factors that support this rating include:

- MCSB had excellent distribution of home mortgage loans to geographies of different income levels within the AA.
- MCSB had reasonable distribution of home mortgage loans to borrowers of different income levels within the AA during the evaluation period.

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

MCSB operates two branches within a single AA within the state of New York. The bank's AA is defined as the full counties of Allegany and Steuben, N.Y. The Steuben-Allegany non-MSA AA consists of 43 census tracts; none of which are low-income; 9.3 percent are moderate-income; 81.4 percent middle-income 7.0 percent upper-income; 2.3 percent for which income is undesignated. MCSB ranks sixth in the AA for deposit market share with approximately 4.0 percent. The top three banks for deposit market share represent 77.4 percent: Community Bank, N.A., 28.2 percent; Steuben Trust Company, 24.8 percent; and Five Star Bank, 24.4 percent. As noted above, the bank is not subject to HMDA reporting requirements; therefore, the home mortgage market share information was not available.

The Steuben-Allegany non-MSA AA has a relatively low cost of housing that facilitates homeownership for low- and moderate-income (LMI) individuals and families. The table below illustrates housing affordability calculations for the AA. The monthly mortgage payment calculations assume a 30-year mortgage with a 5 percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses. The maximum low-income and maximum moderate-income annual income calculations are based on 50 percent and 80 percent of the 2019 FFIEC adjusted median family income for the AA, respectively. As the table illustrates, LMI borrowers could be able to afford the median home price.

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

MSA	2019 Updated MFI	Maximum Low-Income Annual Income	Maximum Affordable Mortgage Amount	Maximum Monthly Mortgage Payment	Maximum Moderate-Income Annual Income	Maximum Affordable Mortgage Amount	Maximum Monthly Mortgage Payment	2019 Median Home List Price*	Mortgage Payment Based on List Price
Steuben-Allegany non-MSA AA	66,200	33,100	154,148	828	52,960	280,913	1,324	127,900	687

\*Source – Realtor.com estimated home value for Steuben County, N.Y.

Economic data from the Federal Reserve and discussions with management on the area indicate relatively stable trends. Based on unemployment data from the St. Louis Federal Reserve, the average unemployment rate from January 1, 2017, to December 31, 2019 for Steuben County was 5.1 percent, ranging from 3.8 to 7 percent. Based on the same source and dates, the average unemployment rate for Allegany County was 5.9 percent, ranging from 4.2 to 8.4 percent. In addition to unemployment, many households in the AA have sub-prime credit. Examiners evaluated household credit scores from January 1, 2017, to December 31, 2019 using data generated by Equifax. During that period, households with an average credit score below 660 accounted for 23.5 percent and 23.7 percent of the household credit in Steuben and Allegany County, respectively. This is a significant obstacle to obtaining extensions of credit, including home mortgage loans.

The largest employer in the AA is Alstom, which is a train manufacturing plant based in Hornell, N.Y, and employs 800 workers. In May 2019, Amtrak contracted with Alstom to manufacture its Acela Express trains for future deployment, which provided job security to its workforce. Though, another major employer in the area, Dresser Rand, which is a turbine manufacturing government contractor and employed 250 workers, was closed in April 2020 after the initial closure announcement in May 2018. Workers and their families have left Wellsville (Allegany County) in anticipation of the closure.

For 2018 through 2019, the FFIEC designated 11 middle-income census tracts in Allegany County as distressed given unemployment statistics in the area.

As part of the CRA evaluation, the OCC conducted a community contact within the AA to determine local economic conditions and community needs. The contacts included a housing development and a municipal development organization. These contacts indicated the need for job opportunities, housing infrastructure improvements, and financial literacy programs. The perception of community banks serving these communities was generally positive.

The following table provides a summary of the demographics that includes housing, business, and farm information for the Steuben-Allegany non-MSA AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Steuben-Allegany non-MSA AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	43	0.0	9.3	81.4	7.0	2.3
Population by Geography	146,735	0.0	8.5	81.8	9.7	0.0
Housing Units by Geography	74,873	0.0	8.1	83.0	8.8	0.0
Owner-Occupied Units by Geography	42,129	0.0	7.9	83.4	8.7	0.0
Occupied Rental Units by Geography	17,214	0.0	9.8	75.8	14.4	0.0
Vacant Units by Geography	15,530	0.0	7.0	89.9	3.1	0.0
Businesses by Geography	6,191	0.0	8.3	79.7	12.0	0.0
Farms by Geography	522	0.0	7.3	89.8	2.9	0.0
Family Distribution by Income Level	37,977	21.3	20.0	21.9	36.9	0.0
Household Distribution by Income Level	59,343	24.5	17.1	18.8	39.6	0.0
Median Family Income Non-MSAs – N.Y.		\$59,570	Median Housing Value			\$87,004
			Median Gross Rent			\$657
			Families Below Poverty Level			11.8%
<i>Source: 2015 ACS Census and 2018 D&amp;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>						

## Scope of Evaluation in New York

A full-scope review of the Steuben-Allegany non-MSA AA was performed. The evaluation period is January 1, 2017, to December 31, 2019. This is the bank's only AA and where its main office and branch is located. The bank's main office and branch are located in Steuben County, but a significant amount of loan and deposit activity continues to occur in Allegany County. The AA includes all 43 census tracts of both counties and meets the requirements of the regulation. The AA does not exclude any LMI census tracts or reflect illegal discrimination.

## LENDING TEST

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

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Steuben-Allegany non-MSA AA is excellent.

## Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans within 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 bank's distribution of home mortgage loans among geographies of different income levels within the AA is excellent. In 2017-2019, the distribution of home mortgages made in moderate-income geographies significantly exceeds both the percent of owner-occupied housing in moderate-income geographies and aggregate industry distribution. During the evaluation period, there were no loans made to low-income geographies as there were no geographies identified as low-income within the bank's 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 or farms 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 bank exhibits a reasonable distribution of loans to individuals of different income levels, considering the level of competition faced for lending to LMI borrowers within the AA. In 2017-2019, home mortgages made to low-income borrowers is below both the percentage of low-income families and the aggregate industry distribution. The percentage of home mortgages made to moderate-income borrowers during the evaluation period substantially meets the percentage of moderate-income families and is near to the aggregate industry distribution in the AA.

The OCC considered the operations and office locations of MCSB within the AA when assessing performance within the AA. MCSB's two branches are both located within the city of Hornell, N.Y., this in conjunction with the level of strong competition from FDIC insured institutions and numerous credit unions within the AA places MCSB in a difficult position to originate loans to LMI borrowers disbursed throughout the AA. The following table demonstrates the significant competition for LMI borrowers in the AA. The top five lenders represent more than half of the \$16.8 million and \$39.5 million in market share for LMI, respectively. MCSB did not rank as it is not a HMDA filing institution.

2019 HMDA Market Share Data					
Assessment Area: Steuben-Allegany non-MSA AA					
Low-Income Borrowers			Moderate-Income Borrowers		
Bank	Rank	% Market Share	Bank	Rank	% Market Share
Community Bank, N.A.	1	19.03	Community Bank, N.A.	1	19.63
Corning Federal Credit Union	2	13.84	Corning Federal Credit Union	2	11.01
Servu Federal Credit Union	3	13.49	Servu Federal Credit Union	3	10.28
First Heritage FCU	4	4.50	Quicken Loans	4	4.59
Five Star Bank	5	4.15	Steuben Trust Company	5	4.59
Total Lenders	51			68	

**Responses to Complaints**

The bank did not receive any complaints related to CRA lending performance in this rating area.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	01/01/2017 to 12/31/2019	
<b>Bank Products Reviewed:</b>	Home mortgage loans	
<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>		
Steuben-Allegany non-MSA AA	Full-scope	Allegany and Steuben Counties

## Appendix B: Summary of MMSA and State Ratings

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RATINGS	Maple City Savings Bank, FSB
Overall Bank:	Lending Test Rating
MCSB	Outstanding
MMSA or State:	
New York	Outstanding

## 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 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

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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/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

**Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

**Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-2019**

Assessment Area	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
-Steuben-Allegany non-MSA AA	46	3,826	100.00	0	0	0	7.9	28.3	6.5	83.4	69.6	78.8	8.7	2.2	14.7	0	0	0
<b>Total</b>	46	3,826	100.00	0	0	0	7.9	28.3	6.5	83.4	69.6	78.8	8.7	2.2	14.7	0	0	0

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

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-2019**

Assessment Area	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
-Steuben-Allegany non-MSA AA	46	3,826	100.00	21.3	6.5	9.5	20	19.6	21.1	21.9	21.7	23.5	36.9	52.2	35.7	0	0	10.2
<b>Total</b>	46	3,826	100.00	21.3	6.5	9.5	20	19.6	21.1	21.9	21.7	23.5	36.9	52.2	35.7	0	0	10.2

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