



PUBLIC DISCLOSURE

July 22, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Community Bank, National Association
Charter Number: 8531

45-49 Court Street
Canton, N.Y. 13617

Office of the Comptroller of the Currency

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Suite 102B
East Syracuse, N.Y. 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 following table indicates the performance level of **Community Bank, National Association (CBNA)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Community Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on good responsiveness to meeting the credit needs of the assessment areas (AA), good distribution of loans among borrowers of different income levels and businesses of different sizes and good geographic distribution of loans in the AAs. Additionally, a substantial majority of the loans are in the AAs, and CBNA makes extensive use of innovative and/or flexible lending practices in order to serve bank-wide credit needs
- The Investment Test rating is based on a significant level of investments that reflect adequate responsiveness to credit and community development (CD) needs of the AA.
- The Service Test rating is based on service delivery systems that are readily accessible to census tracts and borrowers of different income levels in the AAs and an adequate overall level of CD services.

CBNA offers an affordable housing mortgage product called the Affordable Homeownership Grant Program for people of low- or moderate-income through several non-profit agencies involved in affordable housing. The non-profit agencies provide grant funds to low- and moderate-income first-time homebuyers to cover the amount of the down payment. CBNA provides concurrent mortgage loans which feature an interest rate below the prevailing conventional mortgage rates (three eighths to five eighths of a percent below conventional rates) and pays for all closing costs. The borrower is not required to repay the closing costs if the loan is paid-off early. CBNA originated 55 loans for \$3.2 million bank-wide during the evaluation period.

CBNA participates in the Guaranteed Rural Housing Program, a loan program through the U.S. Department of Agriculture. Applicants must meet the program's income limits and geographic requirements and not be eligible for traditional mortgage products offered by the bank. The program

features mortgages with low or no down payment, no requirement for private mortgage insurance (PMI), 30-year loan terms, liberal underwriting criteria, and low cash reserve requirements. CBNA originated 80 loans for \$7.4 million in this program bank-wide during the evaluation period.

CBNA participates in the Federal National Mortgage Association HomeReady Mortgage Program, which is aimed at helping creditworthy low- and moderate-income borrowers access to affordable mortgages. The program's features include low down payment financing for home purchases, consideration of flexible sources of repayment including income from a non-borrower household member, reduced premium PMI, and homeownership counseling. CBNA originated 33 loans for \$3.0 million in this program bank-wide during the evaluation period.

The bank offers a portfolio mortgage with no closing costs, low down payment requirements (as low as 3 percent of the purchase price) and a wide variety of loan terms including 10, 15, 20 and 30 years. CBNA originated 3,338 loans for \$319.7 million bank-wide during the evaluation period.

Lending in Assessment Area

A substantial majority of the bank's loans are in its assessment areas.

The bank originated and purchased 95.3 percent (by number) and 92.7 percent (by dollar) of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

By product, 96.1 percent by number and 94.0 percent by dollar of home mortgages were inside the AA. Regarding small business loans, 93.1 percent by number and 90.4 percent by dollar amount were inside the AA. Finally, 95.8 percent of small farm loans by number and 95.7 percent by dollar amount were in the AA. This performance was positively factored into the overall analysis of the geographic distribution of lending by income level of census tract.

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	15,631	96.1	635	3.9	16,266	1,190,638	94.0	76,750	6.0	1,267,388
Small Business	5,193	93.1	387	6.9	5,580	722,757	90.4	76,575	9.6	799,332
Small Farm	947	95.8	42	4.2	989	71,659	95.6	3,096	4.1	74,755
Total	21,771	95.3	1,064	4.7	22,835	1,985,054	92.7	156,421	7.3	2,141,475

*Source: Evaluation Period: Source: 1/1/2016 - 12/31/2018 Bank Data
Due to rounding, totals may not equal 100.0*

Description of Institution

Community Bank, N.A. is an interstate bank headquartered in Canton, New York (N.Y.), and operating in New York, Pennsylvania (Pa.), Massachusetts (Mass.), and Vermont (Vt.). CBNA executive offices

are located in DeWitt, N.Y., a suburb of Syracuse, N.Y. CBNA is a wholly-owned subsidiary of Community Bank System, Inc. (CBSI), a one-bank holding company. CBSI had total assets of \$10.6 billion as of December 31, 2018. CBSI's other subsidiary includes Benefit Plans Administrative Services, Inc., an employee benefits administration and consulting firm. In addition, CBSI wholly-owns three unconsolidated subsidiary trusts for issuing mandatorily redeemable preferred securities.

CBNA's operating subsidiaries include The Carta Group, Inc., CBNA Preferred Funding Corporation (PFC), CBNA Treasury Management Corporation, Community Investment Services, Inc., NOTCH Investment Fund, LLC (NOTCH), Nottingham Advisors Inc., OneGroup N.Y., Inc. (OneGroup), and Oneida Preferred Funding II LLC (OPFCII). OneGroup is a full-service insurance agency, which primarily offers personal and commercial property insurance. NOTCH, PFC and OPFCII primarily act as investors in residential real estate loans and properties. CBNA's operating subsidiaries had no impact on the bank's capacity to lend in the AAs where it operates.

CBNA is one of the largest community banks headquartered in Upstate New York. It is a full-service interstate bank with 221 branches serving 54 counties spanning Upstate New York, Northeastern Pennsylvania, Vermont, and Western Massachusetts. CBNA has 12 AAs in New York, three AAs in Pennsylvania, two AAs in Vermont and one AA in Massachusetts. The bank operates principally in smaller rural towns, villages, and cities within its market area. CBNA provides a range of retail and commercial banking services. In addition to traditional deposit and loan products, CBNA offers insurance and investment products and trust services. CBNA's primary business focus is consistent across all states and includes growing the retail line of business, mainly home mortgage lending and retail deposit products and services, as well as, expanding the commercial line of business through small business and small farm lending and commercial deposit products and services.

Since the prior CRA evaluation in July 2016, CBNA expanded its operations from Upstate New York and Northeastern Pennsylvania into Vermont and Massachusetts with its May 2017 acquisition of Merchants Bancshares, Inc. headquartered in Burlington, Vt. CBNA acquired Merchants Bancshares Inc., the parent company of Merchants Bank, resulting in the acquisition of 31 branches in 12 counties throughout Vermont and one branch in Western Massachusetts.

As of December 31, 2018, CBNA had \$10.4 billion in total assets that included \$6.3 billion in total loans, representing 60 percent of total assets. The bank's loan mix consists of 43 percent residential real estate loans, 24 percent commercial real estate loans, 20 percent consumer loans, 9 percent commercial loans, 3 percent political/other loans and 1 percent agricultural loans. As of December 31, 2018, CBNA reported tier 1 capital of \$913 million.

CBNA operates in a competitive financial services market. Its competitors include an array of large banks, credit unions, thrift institutions, mortgage companies, and community banks. CBNA is not subject to any known financial, legal or regulatory restrictions that would impede its ability to help meet the credit needs of its AAs.

CBNA's last CRA exam was July 27, 2016, at which time the bank's performance was rated "Satisfactory."

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period covered January 1, 2016 through December 31, 2018, for home mortgage, small business, and small farm loans. Home mortgage loans include home purchase, home improvement and home mortgage refinance loans as reported on the Loan Application Register (LAR) required by the HMDA. The evaluation period for CD loans, investments, and services is July 27, 2016 through December 31, 2018. Lending performance for the 2016 and 2017-2018 time periods are analyzed separately due to changes as a result of the Census Bureau's 2015 American Community Survey (ACS) which updated area demographic information and is used to assess 2017 and 2018 performance.

The market share and peer comparisons are based on the information contained in the aggregate HMDA information and Small Business/Farm Registers, which are available for public review. The aggregate HMDA and Small Business/Farm Registers for 2016 are used for the 2016 evaluation period comparison, and the 2017 registers are used for the 2017-2018 evaluation period comparison. The peer comparisons in this evaluation include only lenders who were required to file HMDA data and a Small Business/Farm Register in 2016 and 2017.

Selection of Areas for Full-Scope Review

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

Ratings

The bank's overall rating is a blend of the state ratings. In arriving at the overall rating, the greatest weight was given to New York State. Twelve of the bank's 18 AAs are located in New York State, along with a substantial majority of the bank's branches, loans and deposits. Pennsylvania, which has three AAs, was given slightly more weight than Vermont. Massachusetts was given the least weight considering the limited physical presence, number of loans, and deposit market share. CBNA began operations in Vermont and Massachusetts in May 2017 upon the acquisition of Merchant's Bank.

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 assessment area by an affiliate

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

The OCC has not identified that this institution 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: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to the credit needs of its AAs.
- The bank exhibits a good distribution of loans among borrowers in different geographies.
- The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes.
- CBNA has a significant level of qualified CD investments and grants. Investments reflect adequate responsiveness to the CD needs of the AAs.
- Delivery systems are readily accessible to census tracts and individuals of different income levels in the AAs.
- The bank provides a relatively high level of CD services.

Description of Institution's Operations in New York

CBNA has 12 AAs within the state of New York. The AAs are as follows: the New York Non-MSA AA (N.Y. Non-MSA AA), the Albany-Schenectady-Troy, N.Y. MSA AA (Albany MSA AA), Binghamton, N.Y. MSA AA (Binghamton MSA AA), Buffalo-Cheektowaga, N.Y. MSA AA (Buffalo MSA AA), Elmira, N.Y. MSA AA (Elmira MSA AA), Glens Falls, N.Y. MSA AA (Glens Falls MSA AA), Ithaca, N.Y. MSA AA (Ithaca MSA AA), Kingston, N.Y. MSA AA (Kingston MSA AA), Rochester, N.Y. MSA AA (Rochester MSA AA), Syracuse, N.Y. MSA AA (Syracuse, MSA AA), Utica-Rome, N.Y. MSA AA (Utica MSA AA), and Watertown-Fort Drum, N.Y. MSA AA (Watertown MSA AA).

CBNA is rooted in the very northern part of New York State, where its predecessor, St. Lawrence National Bank was chartered in 1866. The bank maintains a significant presence in the "North Country," including its main office in Canton, N.Y., and remains focused on upholding its roots as a small-town community bank. CBNA's primary business focus in New York State is to operate as a community bank with local decision-making, principally in smaller, more rural towns, villages and cities within its geographic market areas of Upstate New York and to provide a broad array of banking and financial services to retail, commercial, and municipal customers.

CBNA has 157 branches in the state, which represents 71.7 percent of the bank's total branch network, in addition to 163 automated teller machines (ATM). As of June 30, 2018, CBNA's total dollar volume of deposits in New York State was \$6.2 billion. The bank ranked third out of 75 institutions operating in the 35 counties in New York State where CBNA operates with 7.0 percent market share. Major

competitors include M&T Bank, KeyBank National Association (KeyBank), NBT Bank, National Association, and Bank of America, National Association (Bank of America). Deposits in New York State accounted for 71.0 percent of total bank deposits. During the evaluation period, CBNA originated 79.6 percent of its total home mortgage, small business, and small farm loans within New York State.

Community contacts for this examination consisted of discussions with representatives from two charitable organizations in the N.Y. Non-MSA AA. One contact discussed pockets of high childhood poverty throughout the region and a lack of mental health providers, particularly considering a growing opioid problem. The contact indicated the need for more affordable and quality housing and affordable child care. It was the contact's opinion that a lack of access to the internet, broadband services, transportation, and childcare lead to significant barriers to finding and maintaining employment. The contact discussed the opportunity for banks to participate in a non-profit housing organization whereby funds are used to rehab aging mobile homes. The contact stated that local banks appear to support the initiative.

A second community contact described the region as aging and shrinking in population and noted unemployment and job opportunities as areas of concern. It is the contact's opinion the area benefits from financial literacy training on credit and foreclosures and would benefit further from having more financial resources for the aging population and retired individuals. The contact indicated banks are very involved in the community and are active participants in revitalization and development projects.

N.Y. Non-MSA AA

Table A – Demographic Information of the Assessment Area: 2016						
Assessment Area: N.Y. Non-MSA 2010 U.S. Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	260	1.2	9.2	76.5	10.4	2.7
Population by Geography	972,018	1.1	8.6	78.8	10.7	0.8
Housing Units by Geography	487,744	0.7	8.8	80.5	10.0	0.0
Owner-Occupied Units by Geography	281,242	0.3	6.9	82.3	10.6	0.0
Occupied Rental Units by Geography	104,018	2.5	16.4	70.7	10.4	0.0
Vacant Units by Geography	102,484	0.3	6.2	85.6	7.9	0.0
Businesses by Geography	45,899	1.7	9.7	76.7	11.7	0.2
Farms by Geography	3,759	0.1	3.0	89.1	7.7	0.1
Family Distribution by Income Level	252,279	20.2	18.6	22.4	38.7	0.0
Household Distribution by Income Level	385,260	24.3	16.8	19.0	40.0	0.0
Median Family Income Non-MSAs - N.Y.		\$54,386	Median Housing Value			\$99,592
			Median Gross Rent			\$617
			Families Below Poverty Level			10.0%

Source: 2010 U.S. Census and 2016 D&B Data. Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area: 2017-2018

Assessment Area: N.Y. Non-MSA 2015 ACS U.S. Census

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	261	1.9	8.0	75.9	10.3	3.8
Population by Geography	961,691	1.3	8.3	78.2	10.7	1.4
Housing Units by Geography	490,609	1.3	8.0	80.3	10.4	0.0
Owner-Occupied Units by Geography	270,954	0.4	6.7	82.3	10.5	0.0
Occupied Rental Units by Geography	107,225	3.9	14.1	70.9	11.0	0.1
Vacant Units by Geography	112,430	0.7	5.3	84.7	9.2	0.1
Businesses by Geography	45,015	2.8	9.0	74.6	13.2	0.3
Farms by Geography	3,543	0.1	3.4	87.6	9.0	0.0
Family Distribution by Income Level	240,302	21.4	18.2	21.9	38.6	0.0
Household Distribution by Income Level	378,179	25.1	16.3	18.2	40.4	0.0
Median Family Income Non-MSAs - N.Y.		\$59,570	Median Housing Value			\$107,233
			Median Gross Rent			\$679
			Families Below Poverty Level			11.4%

Source: 2015 ACS Census and 2018 D&B Data. Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in New York

The OCC conducted a full-scope review of the N.Y. Non-MSA AA. Bank delineated non-MSA AAs within the state are combined, analyzed, and presented as one AA for purposes of this evaluation. The N.Y. Non-MSA AA combines bank delineated Northern N.Y., Southern N.Y., and Central N.Y. non-MSA AAs and represents 61.2 percent of the bank's total lending, 62.8 percent of the total number of branches, and 57.7 percent of total deposits in New York State. Given the significance of the non-MSA AAs to the evaluation of the bank's overall performance in New York State, all remaining AA's received limited-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

Home mortgage lending was given the greatest weight when arriving at the bank's overall lending performance in New York State as it comprised 74.2 percent of the number of total loans. This was followed by small business loans at 20.6 percent. Small farm loans received the least weight of the products, accounting for 5.1 percent of loans. Examiners weighed the 2017-2018 evaluation period more heavily than the 2016 evaluation period, as 60.5 percent of the total number of loans were originated or purchased during this 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 High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the N.Y. Non-MSA AA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans* 2016-2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Review:							
N.Y. Non-MSA	8,440	2,217	551	25	11,233	61.40	57.69
Limited Review:							
Albany MSA	37	2	2	0	41	0.23	0.35
Binghamton MSA	203	55	31	0	289	1.59	1.14
Buffalo MSA	388	121	11	1	521	2.86	2.23
Elmira MSA	247	39	5	0	291	1.60	1.21
Glen Falls MSA	80	15	0	0	95	0.52	0.93
Ithaca MSA	80	12	5	0	97	0.53	0.08
Kingston MSA	18	7	0	0	25	0.14	0.50
Rochester MSA	1,309	325	245	5	1,884	10.35	10.58
Syracuse MSA	1,075	480	34	5	1,594	8.76	13.31
Utica MSA	640	273	25	1	939	5.16	4.90
Watertown MSA	971	290	23	1	1,285	7.06	7.08

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

Dollar Volume of Loans* 2016-2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Review:							
N.Y. Non-MSA	571,701	279,309	41,014	9,140	901,164	58.13	57.69
Limited Review:							
Albany MSA	3,697	353	166	0	4,216	0.27	0.35
Binghamton MSA	14,597	10,735	2,174	0	27,506	1.77	1.14
Buffalo MSA	30,907	12,305	1,205	300	44,717	2.88	2.23
Elmira MSA	17,570	9,460	646	0	27,676	1.79	1.21
Glen Falls MSA	6,311	1,000	0	0	7,311	0.47	0.93
Ithaca MSA	8,500	1,409	358	0	10,267	0.66	0.08
Kingston MSA	1,660	278	0	0	1,938	0.13	0.50
Rochester MSA	86,735	29,770	21,033	16,000	153,538	9.90	10.58
Syracuse MSA	88,486	67,623	2,602	3,836	162,547	10.49	13.31
Utica MSA	56,951	29,234	1,095	10,548	97,828	6.31	4.90
Watertown MSA	75,467	35,159	748	150	111,524	7.19	7.08

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

CBNA's lending activity in the N.Y. Non-MSA AA is excellent considering the bank's deposits and competition. As of June 30, 2018, CBNA ranked first of 35 institutions in deposit market share with \$3.5 billion in total deposits in the AA, representing 26.3 percent of total market deposits. Based on 2017 aggregate HMDA data, CBNA ranked first of 319 lenders in home mortgage loan originations and purchases with 18.9 percent market share. Based on 2016 aggregate HMDA data, CBNA ranked first of

329 lenders home mortgage loan originations and purchases with 20.6 percent market share. The bank ranked seventh of 100 lenders for small business loans with 5.7 percent market share in 2017 and fifth of 108 lenders 2016 with 8.0 percent. Banks with higher market share consist primarily of credit card companies who typically originate small dollar loans. CBNA ranked second of 29 lenders for small farm loans with 13.8 percent market share in 2017 behind a farm equipment manufacturer. In 2016, CBNA ranked first of 31 lenders for small farm loans with 22.4 percent share.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AAs.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans reflects good distribution. In 2017-2018, the percentage of home mortgage loans to borrowers in low-income census tracts was near to the percentage of owner-occupied housing in low-income census tracts. When compared to aggregate lending data, the percentage of home mortgage loans in low-income census tracts was near to the percentage of loans by all lenders in low-income census tracts. In 2016, CBNA did not originate or purchase any home mortgage loans in the low-income census tracts. This is reasonable given the percentage of owner-occupied housing in low-income tracts of the N.Y. Non-MSA AA is minimal with 0.4 percent in 2017-2018 and 0.3 percent in 2016 of owner-occupied housing located in low-income tracts.

In 2017-2018, the percentage of home mortgage loans to borrowers in moderate-income census tracts was near to the percentage of owner-occupied housing and near to the percentage of loans by all lenders in moderate-income census tracts. In 2016, the percentage of home mortgage loans to borrowers in moderate-income census tracts was equal to the percentage of owner-occupied housing and exceeded the percentage of loans by all lenders in moderate-income census tracts.

Small Loans to Businesses

Refer to Table Q in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good. In 2017-2018, the percentage of small loans to businesses in low-income census tracts was lower than the percentage of businesses in low-income census tracts and somewhat lower than the percentage of loans by all lenders in low-income census tracts. In 2016, CBNA did not originate or purchase any small loans to businesses in low-income census tracts. It is worth noting the percentage of businesses in low-income census tracts of the N.Y. Non-MSA AA is low with 1.7 percent in 2016 and 2.8 percent in 2017-2018 of businesses in low income census tracts.

In 2016 and 2017-2018, CBNA's percentage of small loans to businesses in moderate-income census tracts exceeded the percentage of businesses in moderate-income census tracts and exceeded the percentage of loans by all lenders in moderate-income census tracts.

Small Loans to Farms

Refer to Table S in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms was adequate. In 2016 and 2017-2018, CBNA did not originate or purchase any small loans to farms in low-income census tracts. This is reasonable when considering only 0.1 percent of the farms in 2016 and 2017-2018 are located in low-income census tracts. In 2016 and 2017-2018, the percentage of small loans to farms in moderate-income census tracts was somewhat lower than the percentage of farms in those census tracts and near to the percentage of loans by all lenders in moderate-income census tracts.

Lending Gap Analysis

OCC examiners reviewed summary reports and AA maps detailing CBNA's lending activity over the evaluation period for home mortgage loans and small loans to businesses and farms to identify any gaps in the geographic distribution of loans. No unexplained conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

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 distribution of home mortgage loans among individuals of different income levels was good. In 2016 and 2017-2018, the percentage of home mortgage loans to low-income borrowers was somewhat lower than the distribution of low-income families and exceeded the percentage of loans by all lenders to low-income families. Given the median family housing value of \$107 thousand, it would be difficult for a low-income borrower, who would earn less than \$29,800, to qualify for a home mortgage loan. In 2016 and 2017-2018, the percentage of home mortgage loans to moderate-income borrowers exceeded the distribution of moderate-income families and exceeded the percentage of loans by all lenders to moderate-income families.

Small Loans to Businesses

Refer to Table R in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes was good. In 2016 and 2017-2018, the percentage of CBNA's loans to small businesses (businesses with revenues of \$1 million or less) was somewhat lower than the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses exceeded the percentage of loans by all lenders to small businesses in the AA in 2016 and 2017-2018.

Small Loans to Farms

Refer to Table T in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to farms of different sizes was good. In 2016 and 2017-2018, the percentage of CBNA's loans to small farms (farms with revenues of \$1,000,000 or less) was near to the percentage of small farms in the AA. When compared to aggregate lending, the bank's percentage of loans to small farms exceeded the percentage of loans by all lenders to small farms in the AA in 2016 and 2017-2018.

Community Development Lending

The institution has made an adequate level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

CBNA made an adequate level of CD loans in the N.Y. Non-MSA AA. The bank originated 25 loans totaling \$9.1 million. Ten loans totaling \$699 thousand benefited five affordable housing organizations. Eight loans totaling \$7.0 million benefited four community service organizations. Five loans totaling \$787 thousand benefited one school district primarily serving low- and moderate-income students. Two loans totaling \$600 thousand benefited one organization working to revitalize areas in Cattaraugus County.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices on a bank-wide basis in order to serve AA credit needs. In addition to the practices described earlier in the Performance Evaluation, CBNA participates in programs specific to New York State.

CBNA participates in affordable mortgage loan programs through the State of New York Mortgage Authority (SONYMA), which are beneficial to people with low- or moderate-income. The key features of these programs are low down payment requirements, no PMI or guarantee fees, no minimum credit scores, and interest rates that are customarily below prevailing market rates. The program also offers low interest loans to cover down payment costs. CBNA originated 21 loans for \$1.8 million in this program statewide during the evaluation period.

CBNA participates in the Federal Home Loan Bank of New York (FHLBNY) First Home Club, which offers an incentive for low- and moderate-income households to save for 18 months towards the purchase of a new home. The First Home Club provides down payment and closing cost assistance to eligible first-time homebuyers purchasing a home through approved member community lenders for pre-set intervals and terms and provides credit toward the cost of homeownership counseling from an approved agency, as this is a requirement of the program. CBNA began offering this program in late 2016 and originated three loans for \$237 thousand statewide during the evaluation period. The FHLB discontinued the program after the evaluation period and replaced it with the Home Buyers Dream program, in which the bank continues to participate.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the limited-scope AAs in New York State is consistent with the bank's overall performance under the Lending Test in the full-scope area.

Performance varied among the 11 limited-scope AAs, with some having stronger, similar, or weaker performance than the full-scope AA. Performance was stronger in the Rochester MSA AA due to excellent distribution of loans to borrowers and excellent geographic distribution of loans. Performance in the Buffalo MSA AA, Elmira MSA AA, Glens Falls MSA AA, Ithaca MSA AA and Syracuse MSA AA was consistent with performance in the full-scope AA. Performance in the Binghamton MSA AA, Utica MSA AA, and Watertown MSA AA was weaker than the full-scope AA due to weaker geographic distribution of loans. The bank did not originate a sufficient volume of loans to conduct a meaningful analysis of performance in the Albany MSA AA and Kingston MSA AA.

Refer to Tables O through V in the state of New York section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the N.Y. Non-MSA AA is good. CBNA has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

The bank made 197 investments totaling \$27.5 million during the evaluation period. Of the investments made during the evaluation period, the bank invested \$25.7 million in mortgage-backed securities (MBS) where the underlying mortgages were originated to low- or moderate-income borrowers in the AA. CBNA invested in eight municipal securities totaling \$1.6 million with proceeds used for community service or revitalization projects in low- and moderate-income geographies, in federally declared disaster areas or middle-income census tracts designated as distressed or underserved. Investments also included qualified donations totaling \$153 thousand.

In addition, the bank had 65 prior period investments consisting solely of MBS totaling \$83.0 million, benefiting assessment areas in N.Y. and Pa., with a total outstanding balance of \$70.2 million benefiting assessment areas in N.Y.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
N.Y. Non-MSA			197	27,496	197	26.88%	27,496	14.37%	0	0
Limited Review:										
Albany MSA			20	3,145	20	2.73%	3,145	1.64%	0	0
Binghamton MSA			54	7,755	54	7.37%	7,755	4.05%	0	0
Buffalo MSA			57	11,261	57	7.78%	11,261	5.88%	0	0
Elmira MSA			22	1,522	22	3.00%	1,522	0.80%	0	0
Glens Falls MSA			12	1,094	12	1.64%	1,094	0.57%	0	0
Ithaca MSA			8	1,251	8	1.09%	1,251	0.65%	0	0
Kingston MSA			2	387	2	0.27%	387	0.20%	0	0
Rochester MSA			68	16,421	68	9.28%	16,421	8.58%	0	0
Syracuse MSA			106	38,253	106	14.46%	38,253	19.99%	0	0
Utica MSA			58	8,809	58	7.91%	8,809	4.60%	0	0
Watertown MSA			64	3,773	64	8.73%	3,773	1.97%	0	0
State of N.Y.	65	70,228			65	8.87%	70,228	36.69%	0	0

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

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

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Albany MSA, Binghamton MSA, Buffalo MSA, Elmira MSA, Glens Falls MSA, Ithaca MSA, Kingston MSA, Rochester MSA, Syracuse MSA, Utica MSA, and Watertown MSA AAs is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the N.Y. Non-MSA AA is good.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
N.Y. Non-MSA	57.69	97	61.78	3.09	8.25	75.26	13.40	1.34	8.33	78.20	10.71
Limited Review:											
Albany MSA	0.35	1	0.64	0	0	100.0	0	0	54.64	41.51	0
Binghamton MSA	1.14	3	1.91	0	0	100.0	0	8.38	16.60	43.50	31.52
Buffalo MSA	2.23	4	2.55	0	0	75.0	25.0	0	2.94	47.50	47.98
Elmira MSA	1.21	2	1.27	50.0	0	0	50.0	13.49	9.11	50.68	23.79
Glens Falls MSA	0.93	2	1.27	0	0	100.0	0	0	0	100.00	0
Ithaca MSA	0.08	1	0.64	0	0	0	100.0	0	15.24	54.55	24.41
Kingston MSA	0.50	1	0.64	0	0	100.0	0	0	0	100.00	0
Rochester MSA	10.58	19	12.10	0	31.58	63.16	5.26	0	14.87	69.74	13.96
Syracuse MSA	13.31	13	8.28	0	38.46	30.77	30.77	9.31	16.74	45.44	27.24
Utica MSA*	4.90	7	4.46	0	0	42.86	42.86	14.52	10.47	43.71	29.02
Watertown MSA	7.08	7	4.46	0	14.29	71.43	14.29	0	18.31	74.48	7.13

*One branch in the Utica MSA AA is located in Census Tract which does not have income information.

In the N.Y. Non-MSA AA, the distribution of CBNA's branches in low-income census tracts exceeds the distribution of the population living in these areas. The distribution of CBNA's branches in moderate-income census tracts is near to the distribution of the population living in these areas. Of the 97 branches in the AA, three are in low-income census tracts and eight are in moderate-income census tracts. CBNA offers alternative delivery systems in the form of ATMs. There are 94 ATMs in the full-scope AA, three are in low-income census tracts and eight are in moderate-income census tracts. Customers or non-customers who receive New York State Public Assistance through the Electronic Benefits Transfer Program can withdraw funds from any CBNA ATM free of charge.

Distribution of Branch Openings/Closings					
Branch Openings/Closings					
# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
		Low	Mod	Mid	Upp
0	2	0	0	-2	0

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. CBNA closed two branches during the evaluation period, both of which were in middle-income census tracts. One branch was located in the Albany MSA AA while the other was located in the Utica MSA AA. The bank has another branch in the Utica MSA AA located less than three miles from the branch that closed.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. Services are comparable among locations regardless of the income level of the census tract. Most branch offices offer extended hours on various days of the week including Saturday hours. Management sets branch hours based on customer needs and traffic patterns in the area. The bank also offers banking online, by mobile phone, by telephone, and by mail. Telephone banking is available in Spanish. Through these systems, customers can access deposit and loan account information, make loan payments, transfer funds between CBNA accounts, and pay bills.

The bank offers a variety of free or low-cost deposit products and services at all branches that are beneficial to low- and moderate-income individuals due to the limited costs associated and/or the increased accessibility/convenience of the product or service. Some examples include free checking, savings, online banking, return of check images, and mobile deposit. The bank cashes government checks for customers and non-customers for free except for a nominal fee applied to non-customers for income tax refund checks. The bank also offers secured credit cards through a relationship with the First National Bank of Omaha that allows customers in all market areas to build credit.

Community Development Services

The institution provides a relatively high level of CD services.

Management and bank employees support various organizations in the communities served by the bank by offering financial expertise to such groups. Numerous personnel are members of the board of directors, finance committees, and loan committees of organizations that provide CD services. Employees participated in approximately 75 organizations, devoting approximately 1,300 hours to CD activities during the evaluation period. The organizations provide CD service through supporting affordable housing for people with low- and moderate-income, providing community services targeted to people with low- and moderate-income, supporting economic development by financial small businesses that are involved in job creation and retention for people of low- and moderate-income or in low- or moderate-income census tracts, and the revitalization and stabilization of low- and moderate-income census tracts or distressed or underserved middle-income census tracts.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Albany MSA, Binghamton MSA, Buffalo MSA, Elmira MSA, Glens Falls MSA, Ithaca MSA, Kingston MSA, Rochester MSA, Syracuse MSA, Utica MSA, and Watertown MSA AAs is consistent with the bank's overall performance under the Service Test in the full-scope area.

State Rating

State of Pennsylvania

CRA rating for the State of Pennsylvania: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to the credit needs of its AAs.
- The bank exhibits a good distribution of loans among borrowers in different geographies.
- The bank exhibits a good distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- CBNA has a significant level of qualified CD investments and grants. Investments reflect adequate responsiveness to the CD needs of the AAs.
- Delivery systems are readily accessible to census tracts and individuals of different income levels in the AAs.
- The bank provides an adequate level of CD services.

Description of Institution's Operations in Pennsylvania

CBNA has three AAs within the state of Pennsylvania. They include the Scranton-Wilkes-Barre-Hazleton, Pa. MSA AA (Scranton-WB MSA AA), Allentown-Bethlehem-Easton, Pa.-NJ MSA AA (Allentown MSA AA) and Pennsylvania Non-MSA AA (Pa. Non-MSA AA).

In Pennsylvania, CBNA continues to operate as a community bank with local decision-making, principally in smaller, more rural towns, villages and cities within its geographic market area of Northeastern Pennsylvania by providing friendly, personalized, high-quality financial services and products to the communities served. Management trusts that the local character of its business, knowledge of the customers and their needs, and its comprehensive retail and business products, together with responsive decision-making at the branch and regional levels, enable the bank staff to effectively serve communities in its geographic market. CBNA's primary business focus is consistent across all states and includes growing the retail line of business, mainly home mortgage lending and retail deposit products and services and expanding the commercial line of business through small business and small farm lending and commercial deposit products and services.

CBNA has 32 branches in the state which represents 14.5 percent of the bank's total branch network in addition to 31 ATMs. As of June 30, 2018, CBNA's total dollar volume of deposits in Pennsylvania was \$1.2 billion. The bank ranked third out of 29 institutions operating in the six counties in Pennsylvania where CBNA operates with 7.3 percent market share of deposits. Major competitors include PNC Bank

(PNC), National Association, Peoples Security Bank and Trust Company (Peoples), M&T Bank, and Wells Fargo Bank, National Association (Wells Fargo). Deposits in Pennsylvania accounted for 13.3 percent of total bank deposits. During the evaluation period, CBNA originated 11.7 percent of its total HMDA, small business and small farm loans within Pennsylvania.

The OCC contacted a member of the community who works for a local city government department responsible for providing grants for Economic and Community Development initiatives in the Scranton-WB MSA AA. The contact described the area as economically stagnant with little job growth and a declining population. The contact identified home rehabilitation as a primary community need considering the aging housing stock, most of which was built before 1940. The contact also mentioned a need for affordable housing and financing for low- and moderate-income first-time homebuyers and noted lending to these individuals as an opportunity for participation in the community amongst local financial institutions.

Scranton-WB MSA AA

Table A – Demographic Information of the Assessment Area: 2016						
Assessment Area: Scranton-WB MSA 2010 U.S. Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	170	2.4	20.6	59.4	17.1	0.6
Population by Geography	563,631	2.2	18.4	58.4	21.1	0.0
Housing Units by Geography	258,520	2.2	19.0	59.2	19.6	0.0
Owner-Occupied Units by Geography	157,034	0.7	14.4	61.7	23.2	0.0
Occupied Rental Units by Geography	71,162	5.2	27.4	54.2	13.2	0.0
Vacant Units by Geography	30,324	3.3	23.3	57.8	15.6	0.0
Businesses by Geography	35,375	5.6	14.9	58.7	20.6	0.1
Farms by Geography	793	0.5	7.7	63.2	28.6	0.0
Family Distribution by Income Level	147,130	20.3	18.0	21.7	40.0	0.0
Household Distribution by Income Level	228,196	24.4	16.5	17.0	42.1	0.0
Median Family Income MSA - 42540 Scranton--Wilkes-Barre--Hazleton, Pa. MSA		\$56,045	Median Housing Value			\$123,891
			Median Gross Rent			\$612
			Families Below Poverty Level			9.6%

*Source: 2010 U.S. Census and 2016 D&B Data. Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.*

Table A – Demographic Information of the Assessment Area: 2017-2018

Assessment Area: Scranton-WB MSA 2015 ACS U.S. Census

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	170	3.5	24.7	51.2	19.4	1.2
Population by Geography	561,701	3.2	20.5	52.2	23.6	0.5
Housing Units by Geography	258,782	3.1	20.3	54.5	21.8	0.4
Owner-Occupied Units by Geography	152,184	1.6	14.2	56.5	27.5	0.0
Occupied Rental Units by Geography	72,436	6.0	31.3	48.8	12.9	1.0
Vacant Units by Geography	34,162	3.0	24.1	57.4	14.9	0.6
Businesses by Geography	35,503	2.7	19.1	51.9	24.2	2.1
Farms by Geography	804	1.2	10.3	54.6	33.8	0.0
Family Distribution by Income Level	141,530	21.3	17.6	20.5	40.6	0.0
Household Distribution by Income Level	224,620	25.1	15.9	16.9	42.2	0.0
Median Family Income MSA - 42540 Scranton--Wilkes-Barre--Hazleton, Pa. MSA		\$59,887	Median Housing Value			\$130,472
			Median Gross Rent			\$710
			Families Below Poverty Level			11.1%

Source: 2015 ACS Census and 2018 D&B Data. Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Pennsylvania

The OCC conducted a full-scope review of the Scranton-WB MSA AA. This AA represents 82.7 percent of the bank's total lending, 78.1 percent of the total number of branches, and 87.2 percent of total deposits in Pennsylvania. All remaining AA's received limited-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

Home mortgage lending was given the greatest weight when arriving at the bank's overall lending performance in Pennsylvania as it comprised 65.7 percent of the number of total loans. This was followed by small business loans at 33.9 percent. Farm loans were not evaluated or weighted due to the minimal number of originations, comprising 0.3 percent of the total. Examiners weighed the 2017-2018 evaluation period more heavily than the 2016 evaluation period, as 58.9 percent of the total number of loans were originated or purchased during this period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Pennsylvania

LENDING TEST

The bank's performance under the Lending Test in Pennsylvania is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans* 2016-2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Review:							
Scranton WB MSA	1,401	802	1	33	2,237	82.67	87.17
Limited Review:							
Allentown MSA	68	9	0	0	77	2.84	3.91
Pa. Non-MSA	288	96	8	0	392	14.49	8.92

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

Dollar Volume of Loans* 2016-2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Review:							
Scranton WB MSA	124,891	124,376	30	3,232	252,529	84.44	87.17
Limited Review:							
Allentown MSA	2,956	1,895	0	0	4,851	1.62	3.91
Pa. Non-MSA	24,845	16,623	221	0	41,689	13.94	8.92

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

CBNA's lending activity in the Scranton-WB MSA AA is good considering the bank's deposits and competition. As of June 30, 2018, total dollar volume of deposits in the AA was \$1.0 billion, representing 7.9 percent of total market deposits and the fourth highest market share of 22 institutions. Based on 2017 aggregate HMDA data, CBNA ranked seventh of 310 lenders for home mortgage loan originations/purchases with 4.0 percent market share. Based on 2016 aggregate HMDA data, CBNA ranked third of 335 lenders for home mortgage loan originations/purchases with 4.8 percent market share. Banks with higher market share included larger institutions, mortgage brokers, and Pennsylvania-based banks. CBNA ranked fourteenth of 88 lenders for small business loans with 2.2 percent market share in 2017 and ninth of 90 lenders in 2016 with 3.8 percent market share. Banks with higher market share consist of credit card companies who primarily originate small dollar loans and Pennsylvania-based banks. In 2016, CBNA ranked twelfth of 38 lenders for small farm lending with 2.6 percent market share.

CBNA originated nine small farm loans across all AAs in Pennsylvania during the evaluation period as reflected in the preceding table. Due to the minimal number, an analysis of small farm loans is not meaningful and has not been included in the narrative below.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA(s).

Home Mortgage Loans

Refer to Table O in the state of Pennsylvania 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 reflects excellent distribution. In 2016 and 2017-2018, the percentage of home mortgage loans to borrowers in low-income census tracts exceeded the percentage of owner-occupied housing in low-income census tracts in the AA and exceeded the percentage of loans by all lenders in moderate-income census tracts. In 2016 and 2017, the percentage of home mortgage loans to borrowers in moderate-income census tracts exceeded the percentage of owner-occupied housing in moderate-income census tracts and exceeded the percentage of loans by all lenders in moderate-income census tracts.

Small Loans to Businesses

Refer to Table Q in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was adequate. In 2017-2018, the percentage of small loans to businesses in low-income census tracts was somewhat lower than the percentage of businesses in low-income census tracts and near to the percentage of loans by all lenders in low-income census tracts. In 2016, the percentage of small loans to businesses in low-income census tracts was somewhat lower than the percentage of businesses in low-income census tracts and exceeded the percentage of loans by all lenders in low-income census tracts. In 2017-2018, the percentage of small loans to businesses in moderate-income census tracts was lower than the percentage of businesses in moderate-income census tracts and lower than the percentage of loans by all lenders in moderate-income census tracts. In 2016, the percentage of small loans to businesses in moderate-income census tracts was somewhat lower than the percentage of businesses in moderate-income census tracts and exceeded the percentage of loans by all lenders in moderate-income census tracts.

Lending Gap Analysis

OCC examiners reviewed summary reports and AA maps detailing CBNA's lending activity over the evaluation period for home mortgage loans and small loans to businesses and farms to identify any gaps in the geographic distribution of loans. No unexplained conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Pennsylvania 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 among individuals of different income levels was excellent. In 2016 and 2017-2018, the percentage of home mortgage loans to low-income borrowers was somewhat

lower than the distribution of low-income families but exceeded the percentage of loans by all lenders to low-income families. In 2016 and 2017-2018, the percentage of home mortgage loans to moderate-income borrowers exceeded the distribution of moderate-income families and exceeded the percentage of loans by all lenders to moderate-income families.

Small Loans to Businesses

Refer to Table R in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes was adequate. In 2017-2018, the percentage of CBNA's loans to small businesses (businesses with revenues of \$1 million or less) was lower than the percentage of small businesses in the AA. In 2016, the percentage of CBNA's loans to small businesses was somewhat lower than the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses exceeded the percentage of loans by all lenders to small businesses in the AA in 2016 and 2017-2018.

Community Development Lending

The institution has made an adequate level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

CBNA had an adequate level of CD loans in the Scranton-WB MSA AA. The bank originated 33 loans totaling \$3.2 million. Thirty-one loans totaling \$3.0 million benefited one organization providing community services to low- and moderate-income individuals with disabilities. One loan totaling \$160 thousand was used for revitalization/stabilization of a moderate-income borough in Luzerne County

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. There are no practices specific to Pennsylvania, but rather bank wide practices serve to meet the credits needs of customers within all AAs in the state.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Allentown MSA AA is consistent with the bank's overall performance under the Lending Test in the full-scope AA. The bank's performance under the Lending Test in the Pa. Non-MSA AA is weaker than the bank's overall performance under the Lending Test in the full-scope area due to weaker geographic distribution of loans. The bank originated 15 percent of its loans in the Pa. Non-MSA AA during the evaluation period. Weaker performance in this AA did not significantly impact the overall Lending Test conclusion in Pa. due to the bank's limited presence in the Pa. Non-MSA AA.

Refer to Tables O through V in the state of Pennsylvania section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Pennsylvania is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Scranton-WB MSA AA is good. CBNA has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

The bank made 105 investments totaling \$18.2 million during the evaluation period. Of the investments made during the evaluation period, the bank invested \$18.1 million in MBS where the underlying mortgages were originated to low- or moderate-income borrowers in the AA. Investments also included qualified donations totaling \$51 thousand.

In addition, the bank had 65 prior period investments consisted solely of MBS totaling \$83.0 million, benefiting assessment areas in N.Y. and Pa., with a total outstanding balance of \$12.8 million benefiting assessment areas in Pa.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Scranton WB MSA			105	18,232	105	50.00%	18,232	50.07%	0	0
Limited Review:										
Allentown MSA			20	2,234	20	9.52%	2,234	8.67%	0	0
Pa. Non-MSA			20	3,156	20	9.52%	3,156	6.14%	0	0
State of Pa.	65	12,790			65	30.95%	12,790	35.13%	0	0

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

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

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Allentown MSA AA and Pa. Non-MSA AA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in Pennsylvania is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Scranton-WB Pa. MSA AA is good.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Scranton WB MSA*	87.17	25	78.13	4.0	24.0	56.0	12.0	3.19	20.52	52.16	23.60
Limited Review:											
Allentown	3.91	2	6.45	50.0	50.0	0	0	10.00	29.84	60.16	0.00
Pa. Non-MSA	8.92	5	16.13	0	0	60.0	40.0	0	15.23	67.22	17.54

*One branch in the Scranton-WB MSA AA is located in a Census Tract which does not have income information.

In the Scranton WB MSA AA, the distribution of CBNA’s branches in low- and moderate-income census tracts exceeds the distribution of the population living in these areas. Of the 25 branches in the AA, one is in a low-income census tract and six are in moderate-income census tracts. CBNA offers alternative delivery systems in the form of ATMs at all branch locations in the Scranton WB MSA.

Distribution of Branch Openings/Closings					
Branch Openings/Closings					
# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
		Low	Mod	Mid	Upp
0	0	0	0	0	0

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

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. Services are comparable among locations regardless of the income level of the census tract. Most branch offices offer extended hours on various days of the week including Saturday hours. Management sets branch hours based on customer needs and traffic patterns in the area. The bank also offers banking online, by mobile phone, by telephone, and by mail. Telephone banking is available in Spanish. Through these systems, customers

can access deposit and loan account information, make loan payments, transfer funds between CBNA accounts, and pay bills.

The bank offers a variety of free or low-cost deposit products and services at all branches that are beneficial to low- and moderate-income individuals due to the limited costs associated and/or the increased accessibility/convenience of the product or service. Some examples include free checking, savings, online banking, return of check images, and mobile deposit. The bank cashes government checks for customers and non-customers for free, except for a nominal fee applied to non-customers for income tax refund checks. The bank also offers secured credit cards through a relationship with the First National Bank of Omaha that allows customers in all market areas to build credit.

Community Development Services

The institution provides an adequate level of CD services.

Management and bank employees support various organizations in the communities served by the bank by offering financial expertise to such groups. A total of 15 bank employees are members of the board of directors, finance committees, and loan committees of organizations that provide CD services. Employees participated in approximately 25 organizations, devoting approximately 300 hours to CD activities during the evaluation period. The organizations provide CD service through supporting affordable housing for people with low- and moderate-income, providing community services targeted to people with low- and moderate-income, and supporting economic development by financial small businesses that are involved in job creation and retention for people of low- and moderate-income or in low- or moderate-income census tracts.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Allenton MSA AA and Pa. Non-MSA and is consistent with the bank's overall performance under the Service Test in the full-scope area.

State Rating

State of Vermont

CRA rating for the State of Vermont: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The bank exhibits an excellent distribution of loans among borrowers in different geographies.
- The bank exhibits a good distribution of loan among individuals of different income levels and business and farms of different sizes.
- CBNA has a significant level of qualified CD investments and grants. Investments reflect adequate responsiveness to the CD needs of the AAs.
- Delivery systems are readily accessible to census tracts and individuals of different income levels in the AAs.
- The bank provides an adequate level of CD services.

Description of Institution's Operations in Vermont

CBNA has two AAs within the state of Vermont. They include the Vermont Non-MSA AA (Vt. Non-MSA AA) and Burlington-South Burlington, Vt. MSA AA (Burlington MSA AA).

CBNA's primary business focus in Vermont is consistent with all other states, and includes growing the retail line of business, mainly home mortgage lending and retail deposit products and services and expanding the commercial line of business through small business and small farm lending and commercial deposit products and services. CBNA has 31 branches in the state which represents 14.0 percent of the bank's total branch network in addition to 31 ATMs. As of June 30, 2018, CBNA's total dollar volume of deposits in Vermont was \$1.3 billion. The bank ranked third out of 25 institutions operating in the 12 counties in Vermont where CBNA operates with 9.9 percent market share of deposits. Major competitors include People's United Bank, National Association, TD Bank, National Association (TD Bank), Citizens Bank, National Association, and KeyBank. Deposits in Vermont accounted for 14.6 percent of total bank deposits. During the evaluation period, CBNA originated 3.8 percent of its total HMDA, small business and small farm loans within Vermont.

The Federal Deposit Insurance Corporation (FDIC) contacted a member of the community who is a member of the board of a non-profit organization whose goal is to develop, rehabilitate, maintain and provide safe and affordable housing in the Vt. Non-MSA to low- and moderate-income individuals. The contact stated economic conditions are difficult, inclusive of low growth and difficulty keeping businesses open. It is the contact's opinion that there is a need for affordable housing among low- and moderate-income individuals and the elderly and stated the need for smaller, local banks to partner with non-profit organizations to provide such housing.

Vt. Non-MSA AA

Table A – Demographic Information of the Assessment Area: 2017-2018						
Assessment Area: Vermont Non-MSA 2015 ACS U.S. Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	111	0.0	8.1	77.5	14.4	0.0
Population by Geography	345,189	0.0	9.4	75.5	15.1	0.0
Housing Units by Geography	187,779	0.0	7.7	76.7	15.6	0.0
Owner-Occupied Units by Geography	103,442	0.0	6.9	77.1	16.1	0.0
Occupied Rental Units by Geography	40,220	0.0	15.2	72.1	12.7	0.0
Vacant Units by Geography	44,117	0.0	2.9	80.2	17.0	0.0
Businesses by Geography	28,901	0.0	9.6	74.0	16.4	0.0
Farms by Geography	1,856	0.0	3.8	78.9	17.3	0.0
Family Distribution by Income Level	89,548	19.1	18.0	22.4	40.5	0.0
Household Distribution by Income Level	143,662	23.3	15.9	18.4	42.4	0.0
Median Family Income Non-MSAs - Vt.		\$64,849	Median Housing Value			\$212,991
			Median Gross Rent			\$846
			Families Below Poverty Level			7.8%

Source: 2015 ACS Census and 2018 D&B Data. Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Vermont

The OCC conducted a full-scope review of the Vt. Non-MSA AA. The Vt. Non-MSA AA represents 45.0 percent of the bank's total lending, 61.3 percent of the total number of branches, and 46.3 percent of total deposits in Vermont. Examiners completed a limited-scope review of the Burlington MSA AA.

Small business loans were given slightly more weight than home mortgage loans when arriving at the bank's overall lending performance. Small business loans comprised 55.2 percent of the number of total loans as compared to 44.8 percent of home mortgage loans. Farm loans were not evaluated or given any weight in the rating due to the minimal number of originations. Additionally, the evaluation will consider only the 2017-2018 period since CBNA did not enter the market until May 2017.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VERMONT**LENDING TEST**

The bank's performance under the Lending Test in Vermont is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans* 2017-2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Review:							
Vt. Non-MSA	197	188	1	2	388	44.96	46.27
Limited Review:							
Burlington MSA	184	282	5	4	475	55.04	53.73

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

Dollar Volume of Loans* 2017-2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Review:							
Vt. Non-MSA	18,067	34,038	168	470	52,743	31.34	46.27
Limited Review:							
Burlington MSA	55,241	58,862	199	1,256	115,558	68.66	53.73

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

CBNA's lending activity in the Vt. Non-MSA AA is adequate considering the bank's deposits and competition. As of June 30, 2018, CBNA ranked third of 21 institutions in deposit market share in the AA with \$584 million in deposits representing 7.6 percent of total market deposits. Based on 2017 aggregate HMDA data, CBNA ranked twenty-seventh of 218 lenders for home mortgage loan originations/purchases with 1.0 percent market share. In 2017, CBNA ranked twenty-first of 79 lenders for small business loans with 1.2 percent market share and eleventh of 15 lenders for small farm loans with 0.6 percent market share. Banks with higher market share for home mortgage, small business and small farm loans include larger institutions, mortgage brokers, credit card companies, and state banks.

CBNA originated six small farm loans in both AAs in Vermont during the evaluation period as reflected in the preceding table. Due to the minimal number, an analysis of small farm loans is not meaningful and has not been included in the narrative below.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of Vermont 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 reflects excellent distribution. In 2017-2018, the percentage of home mortgage loans to borrowers in moderate-income census tracts was near to the portion of owner-occupied housing in moderate-income census tracts. When compared to aggregate lending data, the percentage of home mortgage loans exceeded the percentage of loans by all lenders in moderate-income census tracts. The AA does not include any low-income census tracts.

Small Loans to Businesses

Refer to Table Q in the state of Vermont section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent. In 2017-2018, the percentage of small loans to businesses in moderate-income census tracts exceeded the percentage of businesses in moderate-income census tracts and exceeded the percentage of loans by all lenders in moderate-income census tracts.

Lending Gap Analysis

OCC Examiners reviewed summary reports and AA maps detailing CBNA's lending activity over the evaluation period for home mortgage loans and small loans to businesses and farms to identify any gaps in the geographic distribution of loans. No unexplained conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Vermont 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 among individuals of different income levels was good. In 2017-2018, the percentage of home mortgage loans to low-income borrowers was lower than the distribution of low-income families and exceeded the percentage of loans by all lenders to low-income families. Given the median family housing value of \$213 thousand, it would be difficult for a low-income borrower, who would earn less than \$32,500, to qualify for a home mortgage loan. In 2017-2018, the percentage of home mortgage loans to moderate-income borrowers exceeded the distribution of moderate-income families and exceeded the percentage of loans by all lenders to moderate-income families.

Small Loans to Businesses

Refer to Table R in the state of Vermont section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes was good. In 2017-2018, the percentage of CBNA's loans to small businesses (businesses with revenues of \$1 million or less) was somewhat lower than the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses exceeded the percentage of loans by all lenders to small businesses.

Community Development Lending

The institution has made a low level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

CBNA made a low level of CD loans in the Vt. Non-MSA AA. The assessment considered the bank's recent entrance in the market. The bank originated two loans for \$470 thousand to local townships to help stabilize Federal Emergency Management Agency designated disaster areas.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. There are no practices specific to Vermont, but rather bank wide practices serve to meet the credits needs of customers within the Vermont Non-MSA AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Burlington MSA AA is consistent with the bank's overall performance under the Lending Test in the full-scope AA.

Refer to Tables O through V in the state of Vermont section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Vermont is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Vt. Non-MSA AA is good. CBNA has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

The bank made 54 investments totaling \$11.7 million during the evaluation period. Of the investments made during the evaluation period, the bank invested \$11.4 million in MBS where the underlying mortgages were originated to low- and moderate-income borrowers in the AA. Investments also include qualified donations totaling \$22 thousand.

CBNA had 20 prior period investments, with a total outstanding balance of \$8.8 million. The investments consisted solely of low-income housing tax credits (LIHTC) that benefited affordable housing for low-income households.

CBNA has \$1.5 million in one unfunded commitment for a LIHTC to support affordable housing for low-income households throughout the state of Vermont and four LIHTCs from the prior period with a current unfunded commitment of \$529 thousand.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Vt. Non-MSA	5	3,531	54	11,700	59	43.38%	15,231	42.33%		
Limited Review:										
Burlington MSA	6	3,474	61	15,170	67	49.27%	18,644	51.81%		
State of Vermont	9	1,837	1	271	10	7.35%	2,108	5.86%	5	2,071

* 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.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Burlington MSA AA is consistent with the bank's overall performance under the Investment Test in the Vt. Non-MSA AA.

SERVICE TEST

The bank's performance under the Service Test in Vermont is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Vt. Non-MSA	46.27	19	61.29	0.00	10.53	73.68	15.79	0.00	9.42	75.52	15.06
Limited Review:											
Burlington MSA	53.73	12	38.71	8.33	25.0	58.33	8.33	1.44	19.36	60.34	18.86

In the Vt. Non-MSA AA, the distribution of CBNA's branches in moderate-income census tracts exceeds the distribution of the population living in those areas. Of the 19 branches in the AA, two branches are located in moderate-income census tracts. There are no low-income census tracts.

Distribution of Branch Openings/Closings					
Branch Openings/Closings					
# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
		Low	Mod	Mid	Upp
0	0	0	0	0	0

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

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. Services are comparable among locations regardless of the income level of the census tract. Most branch offices offer extended hours on various days of the week including Saturday hours. Management sets branch hours based on customer needs and traffic patterns in the area.

Community Development Services

The institution provides an adequate level of CD services.

Since acquiring branches in Vermont in 2017, bank employees have supported seven organizations in the communities served by the bank. The assessment considered the bank's recent entrance in the market. Seven employees devoted approximately 125 hours to various organizations including serving on the board or a leadership committee within the organization. The organizations provide CD service through supporting affordable housing for people with low- and moderate-income, providing community services targeted to people with low- and moderate-income, and supporting economic development by small businesses that are involved in job creation and retention for people of low- and moderate-income income or in moderate-income census tracts.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Burlington MSA AA is consistent with the bank's overall performance under the service test in the full-scope area.

State Rating

State of Massachusetts

CRA rating for the State of Massachusetts: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to the credit needs of its AAs.
- The bank exhibits an excellent distribution of loans among borrowers in different geographies.
- The bank exhibits a poor distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.
- CBNA has a significant level of qualified CD investments and grants. Investments reflect adequate responsiveness to the CD needs of the AAs.
- Delivery systems are reasonably accessible to census tracts and individuals of different income levels in the AAs.
- The bank provides an adequate level of CD services.

Description of Institution's Operations in Massachusetts

CBNA's sole AA within the state of Massachusetts is the Springfield MSA AA. CBNA's primary business focus in Massachusetts is consistent with all other states, and includes growing the retail line of business, mainly home mortgage lending and retail deposit products and services and expanding the commercial line of business through small business and small farm lending and commercial deposit products and services. While the focus is consistent, management recognizes the bank's small presence in Massachusetts and the market differs somewhat from the other three states where they operate. CBNA is working toward increasing brand awareness of retail mortgage and small business loan products through additional advertising and outreach events.

The only branch within the state is in the Springfield MSA AA and has an onsite ATM. As of June 30, 2018, CBNA's total dollar volume of deposits in Massachusetts was \$37 million. The bank ranked sixteenth out of 18 institutions operating in the one county in Massachusetts where CBNA operates with 0.3 percent market share of deposits. Major competitors include Bank of America, Peoples Bank, TD Bank, Westfield Bank, and Berkshire Bank. Deposits in Massachusetts accounted for 0.4 percent of total bank deposits. During the evaluation period, CBNA originated 0.3 percent of its total home mortgage, small business and small farm loans within Massachusetts.

OCC examiners contacted an affordable housing non-profit in the Springfield MSA AA that also builds and manages housing developments that promote community revitalization and stabilization. The

contact stated the local economy is robust and employment opportunities are strong. However, they noted that while banks seem eager to lend throughout the MSA, many low- and moderate-income borrowers struggle to qualify for mortgages due to their credit history. The contact stated that it would be beneficial for local financial institutions to participate in financial literacy programs to help improve the credit worthiness of low- and moderate-income borrowers. The contact also mentioned significant opportunities exist for institutions to invest or donate to community development organizations.

Springfield MSA AA

Table A – Demographic Information of the Assessment Area: 2017-2018						
Assessment Area: Springfield MSA 2015 ACS U.S. Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	95	25.3	22.1	27.4	25.3	0.0
Population by Geography	431,749	20.9	21.5	28.5	29.1	0.0
Housing Units by Geography	175,531	20.5	22.2	29.8	27.5	0.0
Owner-Occupied Units by Geography	97,505	7.1	18.0	33.5	41.3	0.0
Occupied Rental Units by Geography	65,013	38.3	27.3	25.3	9.1	0.0
Vacant Units by Geography	13,013	31.2	28.4	24.6	15.9	0.0
Businesses by Geography	23,396	21.9	22.8	22.8	32.5	0.0
Farms by Geography	555	4.7	12.3	28.8	54.2	0.0
Family Distribution by Income Level	105,965	28.3	16.5	17.3	37.9	0.0
Household Distribution by Income Level	162,518	29.5	14.9	15.4	40.1	0.0
Median Family Income MSA - 44140 Springfield, Mass. MSA		\$67,381	Median Housing Value			\$186,473
			Median Gross Rent			\$820
			Families Below Poverty Level			14.5%

Source: 2015 ACS Census and 2018 D&B Data. Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Massachusetts

The bank's rating is based exclusively on a full-scope evaluation of its only AA, the Springfield MSA. The lending test is based solely on small business loan activity due to the lack of home mortgage and small farm loans originated during the evaluation period. Refer to the table in Appendix A for more information regarding the AA. Additionally, the evaluation will consider only the 2017-2018 period since CBNA did not enter the market until May 2017.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS

LENDING TEST

The bank's performance under the Lending Test in Massachusetts is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans* 2017-2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Review:							
Springfield MSA	6	69	0	1	76	100	0.43

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

Dollar Volume of Loans* 2017-2018							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Review:							
Springfield MSA	2,057	10,328	0	330	12,715	100	0.43

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

CBNA's lending activity in the Springfield MSA AA is good considering the bank's deposits and competition. As of June 30, 2018, CBNA ranked sixteenth of 18 institutions in deposit market share with \$37 million in deposits in the AA which represents 0.3 percent of total market deposits. Based on 2017 aggregate HMDA data, CBNA ranked one hundred twenty-eighth of 278 lenders for home mortgage loan originations and purchases with 0.04 percent market share. The bank ranked twenty-seventh of 74 lenders for small business loans with 0.47 percent market share. CBNA faces strong competition from large banks, credit card companies, credit unions, and state banks and has a limited presence in the state, with only one deposit taking branch location.

CBNA originated six home mortgage loans and zero small farm loans in Massachusetts during the evaluation period as reflected in the preceding table. Due to the minimal number, an analysis of home mortgage and small farm loans is not meaningful and has not been included in the narrative below.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the state of Massachusetts section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent. In 2017-2018, the percentage of small loans to businesses in low-income census tracts was near to the percentage of businesses in low-income census tracts and exceeded the percentage of loans by all lenders in low-income census tracts. In 2017-2018, the percentage of small loans to businesses in moderate-income census tracts exceeded the

percentage of businesses in moderate-income census tracts and exceeded the percentage of loans by all lenders in moderate-income tracts.

Lending Gap Analysis

Examiners reviewed summary reports and AA maps detailing CBNA's lending activity over the evaluation period for home mortgage loans and small loans to businesses and farms to identify any gaps in the geographic distribution of loans. No unexplained conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a poor distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Small Loans to Businesses

Refer to Table R in the state of Massachusetts section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes was poor. In 2017-2018, the percentage of CBNA's loans to small businesses (businesses with revenues of \$1 million or less) was lower than the percentage of small businesses in the AA. When compared to aggregate lending data, the bank's percentage of loans to small businesses was somewhat lower than the percentage of loans by all lenders to small businesses.

Community Development Lending

The institution has made a low level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The assessment considered the bank's small presence and recent entrance in the market. CBNA originated one CD loan during the evaluation period for \$330 thousand to an assisted living facility where more than 50 percent of residents are low- or moderate-income and eligible for Medicaid.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. There are no practices specific to Massachusetts, but rather bank wide practices serve to meet the credits needs of customers within the Springfield MSA AA.

INVESTMENT TEST

The bank's performance under the Investment Test in Massachusetts is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Springfield MSA AA is good. CBNA has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

The bank made 56 investments totaling \$20.8 million during the evaluation period. Of the investments made during the evaluation period, the bank invested \$20.7 million in MBS where the underlying mortgages were originated to low- or moderate-income borrowers. Investments also include qualified donations totaling \$19 thousand.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Springfield MSA	0	0	56	20,817	56	100%	20,817	100%	0	0

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

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

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Springfield MSA	0.43	1	100.0	100.0	0	0	0	20.88	21.47	28.52	29.13

In the Springfield MSA AA, CBNA has one branch located in a low-income census tract. The census tract where the sole CBNA branch in Massachusetts is located borders four other low-income census tracts and two moderate-income census tracts.

Distribution of Branch Openings/Closings					
Branch Openings/Closings					
# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
		Low	Mod	Mid	Upp
0	0	0	0	0	0

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

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. The branch is open from 9:00 a.m. until 4:30 p.m., Monday through Thursday, with extended lobby hours on Friday until 5:00 p.m. Management set these hours based on customer needs and traffic patterns in the area.

The bank offers a variety of free or low-cost deposit products and services that are beneficial to low- and moderate-income individuals due to the limited costs associated and/or the increased accessibility/convenience of the product or service. Some examples include free checking and savings accounts, online banking, return of check images, and mobile deposit. The bank cashes government checks for customers and non-customers for free, except for a nominal fee applied to non-customers for income tax refund checks. The bank also offers secured credit cards through a relationship with the First National Bank of Omaha that allows customers in all market areas to build credit. The bank also offers banking online, by mobile phone, by telephone, and by mail. Telephone banking is available in Spanish. Through these systems, customers can access deposit and loan account information, make loan payments, transfer funds between CBNA accounts, and pay bills.

Community Development Services

The institution provides an adequate level of CD services. The assessment considered the bank’s small presence and recent entrance in the market. The bank had three employees volunteer a total of 300 hours during the evaluation period to four separate organizations. The organizations provide CD service by providing community service activities targeted to people with low- and moderate-income, specifically disadvantaged children, activities that help to revitalize and stabilize low- and moderate-income geographic areas and promote economic development by providing financial expertise to small businesses.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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:	Lending Test: 01/01/2016 to 12/31/2018 Investment and Service Tests and CD Loans: 07/27/2016 to 12/31/2018	
Bank Products Reviewed:	Home mortgage, small business, small farm loans, community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA		NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
New York		
N.Y. Non-MSA	Full-scope	Counties of Allegany, Cattaraugus, Chautauqua, Chenango, Clinton, Delaware, Essex, Franklin, Lewis, St. Lawrence, Schuylers, Seneca, and Steuben; Partial Counties of Cayuga and Hamilton
Albany N.Y. MSA	Limited-scope	Schoharie County
Binghamton N.Y. MSA	Limited-scope	Tioga County; Part of Broome County
Buffalo N.Y. MSA	Limited-scope	Part of Erie County
Elmira N.Y. MSA	Limited-scope	Chemung County
Glens Falls N.Y. MSA	Limited-scope	Partial Counties of Warren and Washington
Ithaca N.Y. MSA	Limited-scope	Tompkins County
Kingston N.Y. MSA	Limited-scope	Part of Ulster County
Rochester N.Y. MSA	Limited-scope	Counties of Livingston, Ontario, Wayne, and Yates
Syracuse N.Y. MSA	Limited-scope	Counties of Madison, Onondaga, and Oswego
Utica N.Y. MSA	Limited-scope	Counties of Herkimer and Oneida
Watertown N.Y. MSA	Limited-scope	Part of Jefferson County
Pennsylvania		
Scranton-WB Pa. MSA	Full-scope	Counties of Lackawanna, Luzerne, and Wyoming
Pa. Non-MSA	Limited-scope	Susquehanna County; Part of Bradford County
Allentown Pa. MSA	Limited-scope	Part of Carbon County
Vermont		
Vt. Non-MSA	Full-scope	Counties of Bennington, Caledonia, Lamoille, Washington, and Windham; Partial Counties of Addison, Orange, Rutland, and Windsor
Burlington Vt. MSA	Limited-scope	Counties of Chittenden, Franklin, and Grand Isle
Massachusetts		
Springfield Mass. MSA	Full-scope	Part of Hampden County

Appendix B: Summary of State Ratings

RATINGS Community Bank, National Association				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Community Bank, N.A.	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State:				
New York	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Pennsylvania	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Vermont	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Massachusetts	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

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

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

Tables of Performance Data

State of New York – 2017-2018

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

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
Albany MSA AA	24	2,754	0.3	598	0.0	0.0	0.0	58.7	58.3	55.9	41.3	41.7	44.1	0.0	0.0	0.0	0.0	0.0	0.0
Binghamton MSA AA	120	8,840	1.4	3,041	3.7	2.5	2.6	12.8	7.5	12.5	47.9	61.7	46.9	35.6	28.3	38.0	0.0	0.0	0.0
Buffalo MSA AA	245	19,936	2.9	3,990	0.0	0.0	0.0	2.9	3.3	1.9	48.9	81.6	45.0	48.2	15.1	53.1	0.0	0.0	0.0
Elmira MSA AA	145	10,658	1.7	1,898	4.7	6.9	3.8	8.5	4.8	8.8	56.3	62.8	54.4	30.6	25.5	32.9	0.0	0.0	0.0
Glens Falls MSA AA	50	3,932	0.6	651	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Ithaca MSA AA	44	4,856	0.5	1,454	0.0	0.0	0.0	12.2	13.6	10.8	70.6	72.7	70.1	17.0	13.6	17.0	0.2	0.0	2.1
Kingston MSA AA	10	1,076	0.1	176	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
N.Y. Non-MSA AA	5,173	379,360	62.2	15,601	0.4	0.3	0.4	6.7	6.1	6.7	82.3	84.4	80.5	10.5	9.2	12.5	0.0	0.0	0.0
Rochester MSA AA	798	55,984	9.6	7,513	0.0	0.0	0.0	12.4	14.0	13.2	73.1	81.6	70.3	14.4	4.4	16.6	0.0	0.0	0.0
Syracuse MSA AA	672	58,398	8.1	15,095	2.6	0.4	2.1	14.0	24.4	13.8	51.7	56.3	50.4	31.6	18.9	33.6	0.1	0.0	0.1
Utica MSA AA	442	42,625	5.3	5,397	6.4	0.7	5.9	7.4	2.0	6.7	50.9	77.6	50.5	35.3	19.7	36.8	0.0	0.0	0.0
Watertown MSA AA	599	51,432	7.2	2,585	0.0	0.0	0.0	7.9	5.3	8.2	83.2	87.5	84.2	8.9	7.2	7.6	0.0	0.0	0.0
Total	8,322	639,850	100.0	57,999	1.6	0.4	1.5	9.9	8.2	10.0	66.3	80.8	63.3	22.1	10.6	25.2	0.0	0.0	0.1

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18

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
Albany MSA AA	24	2,754	0.5	598	27.5	16.7	13.4	23.0	29.2	30.6	25.5	37.5	19.7	24.1	12.5	22.9	0.0	4.2	13.4
Binghamton MSA AA	120	8,840	2.6	3,041	22.7	20.0	9.8	16.4	30.0	21.9	20.6	25.8	23.4	40.2	23.3	31.3	0.0	0.8	13.6
Buffalo MSA AA	245	19,936	2.9	3,990	13.1	9.0	4.9	16.1	25.7	16.1	20.9	27.8	23.1	49.9	35.9	41.1	0.0	1.6	14.8
Elmira MSA AA	145	10,658	1.7	1,898	22.9	15.9	10.1	16.1	19.3	19.7	21.0	34.5	24.0	40.0	26.9	33.8	0.0	3.4	12.4
Glens Falls MSA AA	50	3,932	1.1	651	21.5	12.0	8.0	17.4	26.0	16.7	23.8	30.0	21.7	37.3	30.0	43.8	0.0	2.0	9.8
Ithaca MSA AA	44	4,856	1.2	1,454	21.0	20.5	8.5	16.7	25.0	18.8	21.2	15.9	23.0	41.0	31.8	39.6	0.0	6.8	10.1
Kingston MSA AA	10	1,076	0.3	176	21.6	20.0	5.1	16.8	10.0	18.8	23.8	50.0	22.2	37.8	10.0	48.9	0.0	10.0	5.1
N.Y. Non-MSA AA	5,173	379,360	62.2	15,601	21.4	12.1	8.6	18.2	23.9	20.2	21.9	26.9	24.4	38.6	34.7	35.5	0.0	2.4	11.3
Rochester MSA AA	798	55,984	9.6	7,513	21.0	14.0	7.9	18.4	30.3	21.4	21.2	28.2	23.6	39.5	25.8	34.8	0.0	1.6	12.3
Syracuse MSA AA	672	58,398	8.1	15,095	21.8	11.9	7.7	17.2	25.6	20.6	20.4	23.5	23.3	40.6	30.8	34.7	0.0	8.2	13.7
Utica MSA AA	442	42,625	5.3	5,397	22.2	7.9	8.5	15.9	23.5	19.2	21.2	26.2	24.9	40.6	39.1	37.3	0.0	3.2	10.1
Watertown MSA AA	599	51,432	7.2	2,585	19.8	8.5	4.6	18.3	23.2	17.4	22.4	23.9	25.0	39.5	39.9	38.4	0.0	4.5	14.6
Total	8,322	639,850	100.0	57,999	21.1	12.0	8.0	17.5	24.7	20.1	21.3	26.6	23.8	40.1	33.8	35.7	0.0	3.0	12.4

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Albany MSA AA	0	0	0.0	386	0.0	0.0	0.0	46.8	0.0	46.6	51.9	0.0	52.6	0.0	0.0	0.0	1.3	0.0	0.8
Binghamton MSA AA	32	6,050	1.5	2,254	12.7	6.3	10.4	14.6	6.3	17.1	48.9	81.3	47.6	23.9	6.3	24.9	0.0	0.0	0.0
Buffalo MSA AA	65	6,891	5.7	2,451	0.0	0.0	0.0	2.9	0.0	2.4	41.7	61.5	38.1	55.3	33.8	59.4	0.1	4.6	0.1
Elmira MSA AA	18	5,891	1.6	800	20.6	22.2	16.1	11.5	11.1	13.0	41.7	38.9	40.4	26.1	27.8	30.4	0.1	0.0	0.1
Glens Falls MSA AA	8	507	0.4	392	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Ithaca MSA AA	6	1,102	0.5	1,554	0.0	0.0	0.0	16.0	0.0	16.5	47.6	83.3	49.2	33.9	16.7	31.0	2.5	0.0	3.3
Kingston MSA AA	4	180	0.2	165	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
N.Y. Non-MSA AA	1,211	157,540	56.0	10,939	2.8	1.3	2.3	9.0	11.0	7.6	74.6	77.4	76.3	13.2	10.3	13.8	0.3	0.0	0.1
Rochester MSA AA	173	16,911	8.0	4,465	0.0	0.0	0.0	17.1	24.3	13.1	65.1	74.6	67.2	17.6	1.2	19.6	0.2	0.0	0.0
Syracuse MSA AA	304	41,758	14.0	9,340	8.0	2.6	6.0	14.6	15.8	13.1	44.0	56.9	44.4	31.1	24.7	34.8	2.4	0.0	1.7
Utica MSA AA	168	19,825	16.5	3,204	14.4	0.6	14.6	13.8	2.4	11.9	39.3	63.1	35.9	30.7	31.5	36.1	1.8	2.4	1.4
Watertown MSA AA	175	19,386	8.1	1,544	0.0	0.0	0.0	18.2	12.6	15.0	75.7	83.4	78.4	6.0	4.0	6.5	0.1	0.0	0.1
Total	2,164	276,041	100.0	37,494	5.4	1.4	4.4	12.5	11.7	11.3	57.6	73.1	57.9	23.6	13.5	25.7	1.0	0.3	0.7

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-18**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Albany MSA AA	0	0	0.0	386	80.2	0.0	50.8	4.1	0.0	15.7	0.0
Binghamton MSA AA	32	6,050	1.6	2,254	78.3	28.1	45.7	6.8	62.5	15.0	16.7
Buffalo MSA AA	65	6,891	3.0	2,451	82.6	66.2	52.6	6.1	32.3	11.3	2.9
Elmira MSA AA	18	5,891	0.8	800	72.4	61.1	40.8	7.6	38.9	20.0	0.0
Glens Falls MSA AA	8	507	0.5	392	82.8	100.0	42.3	4.9	0.0	12.3	0.0
Ithaca MSA AA	6	1,102	0.3	1,554	78.6	83.3	53.1	6.1	33.3	15.3	0.0
Kingston MSA AA	4	180	0.2	165	88.7	50.0	54.5	3.8	50.0	7.5	0.0
N. Y. Non-MSA AA	1,211	157,540	56.0	10,939	77.0	61.0	49.2	6.1	36.4	16.8	2.6
Rochester MSA AA	173	16,911	8.4	4,465	79.7	66.5	53.8	6.2	31.8	14.1	3.1
Syracuse MSA AA	304	41,758	14.0	9,340	78.8	53.0	46.7	7.1	44.4	14.1	2.6
Utica MSA AA	168	19,825	7.8	3,204	78.5	59.5	48.5	7.0	36.9	14.4	3.6
Watertown MSA AA	175	19,386	8.1	1,544	74.6	57.1	47.1	7.0	38.9	18.4	4.0
Total	2,164	276,041	100.0	37,494	78.3	59.8	48.9	6.5	37.5	15.2	2.7

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2017-18**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Albany MSA AA	2	166	0.4	32	0.0	0.0	0.0	61.5	100.0	71.9	37.9	0.0	28.1	0.0	0.0	0.0	0.6	0.0	0.0
Binghamton MSA AA	15	1,226	5.1	43	3.0	0.0	0.0	8.8	0.0	0.0	60.8	73.3	86.0	27.4	26.7	14.0	0.0	0.0	0.0
Buffalo MSA AA	4	309	0.8	95	0.0	0.0	0.0	0.2	0.0	0.0	59.6	100.0	88.4	40.2	0.0	11.6	0.0	0.0	0.0
Elmira MSA AA	2	146	0.8	8	3.4	0.0	0.0	7.5	0.0	0.0	65.3	100.0	100.0	23.8	0.0	0.0	0.0	0.0	0.0
Glens Falls MSA AA	0	0	0.0	8	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Ithaca MSA AA	3	131	0.6	41	0.0	0.0	0.0	11.3	0.0	26.8	75.7	100.0	68.3	13.0	0.0	4.9	0.0	0.0	0.0
Kingston MSA AA	0	0	0.0	3	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
N.Y. Non MSA AA	314	23,621	62.1	1,095	0.1	0.0	0.3	3.4	1.6	1.8	87.6	80.6	86.3	9.0	17.8	11.6	0.0	0.0	0.0
Rochester MSA AA	123	11,925	24.3	629	0.0	0.0	0.0	8.1	8.1	8.6	82.8	91.9	89.3	9.1	0.0	2.1	0.0	0.0	0.0
Syracuse MSA AA	16	890	3.5	180	1.7	0.0	0.0	12.2	25.0	16.1	53.7	62.5	62.8	31.8	12.5	21.1	0.6	0.0	0.0
Utica MSA AA	16	746	3.2	78	2.0	0.0	0.0	2.2	0.0	0.0	62.8	75.0	55.1	33.1	25.0	44.9	0.0	0.0	0.0
Watertown MSA AA	11	238	2.7	67	0.0	0.0	0.0	4.2	0.0	0.0	82.6	90.9	91.0	13.2	9.1	9.0	0.0	0.0	0.0
Total	506	39,398	100.0	2,279	0.6	0.0	0.1	6.9	4.2	6.0	75.6	82.6	83.4	16.8	13.2	10.4	0.1	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Albany MSA AA	2	166	0.4	32	98.8	100.0	53.1	0.6	0.0	0.6	0.0
Binghamton MSA AA	15	1,226	3.0	43	97.3	73.3	58.1	1.7	26.7	1.0	0.0
Buffalo MSA AA	4	309	0.8	95	96.1	100.0	44.2	2.8	0.0	1.2	0.0
Elmira MSA AA	2	146	0.8	8	96.6	100.0	62.5	0.7	0.0	2.7	0.0
Glens Falls MSA AA	0	0	0.0	8	96.3	0.0	25.0	2.4	0.0	1.2	0.0
Ithaca MSA AA	3	131	0.8	41	96.2	100.0	53.7	2.4	100.0	1.4	0.0
Kingston MSA AA	0	0	0.0	3	100.0	0.0	33.3	0.0	0.0	0.0	0.0
N.Y. Non-MSA AA	314	23,621	62.1	1,095	96.4	88.9	57.4	2.6	11.1	0.9	0.0
Rochester MSA AA	123	11,925	24.3	629	95.2	80.5	58.5	4.2	19.5	0.6	0.0
Syracuse MSA AA	16	890	3.5	180	95.5	87.5	48.3	3.0	22.2	1.5	0.0
Utica MSA AA	16	746	3.2	78	96.9	87.5	41.0	1.0	12.5	2.2	0.0
Watertown MSA AA	11	238	2.7	67	96.4	81.8	22.4	2.4	28.6	1.2	0.0
Total	506	39,398	100.0	2,279	96.2	86.2	54.6	2.7	13.8	1.1	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Tables of Performance Data

State of New York – 2016

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

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
Albany MSA AA	13	943	0.3	1,343	0.0	0.0	0.0	21.6	38.5	14.3	71.7	61.5	71.9	6.7	0.0	13.9	0.0	0.0	0.0
Binghamton MSA AA	83	5,757	1.6	3,202	3.1	1.2	2.6	12.2	6.0	9.8	47.3	73.5	47.6	37.4	19.3	39.9	0.0	0.0	0.0
Buffalo MSA AA	143	10,971	2.8	4,148	0.0	0.0	0.0	1.0	4.2	0.2	45.9	79.0	42.2	53.1	16.8	57.5	0.0	0.0	0.0
Elmira MSA AA	102	6,912	2.0	1,831	2.8	1.0	1.3	23.3	15.7	20.2	41.3	44.1	39.2	32.6	39.2	39.4	0.0	0.0	0.0
Glens Falls MSA AA	30	2,379	0.6	627	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Kingston MSA AA	8	584	0.2	168	0.0	0.0	0.0	41.2	25.0	39.3	58.8	75.0	60.7	0.0	0.0	0.0	0.0	0.0	0.0
N.Y. Non-MSA AA	3,267	192,341	63.3	15,873	0.3	0.0	0.1	6.9	6.9	5.4	82.3	83.0	81.2	10.6	10.1	13.3	0.0	0.0	0.0
Syracuse MSA AA	403	30,088	7.8	15,482	3.3	0.7	2.2	13.6	12.2	12.5	49.2	68.0	47.4	34.0	19.1	37.9	0.0	0.0	0.0
Utica MSA AA	198	14,326	3.8	5,356	3.1	0.5	2.3	10.1	1.0	9.3	51.1	80.3	50.2	35.7	18.2	38.1	0.0	0.0	0.0
Watertown MSA AA	371	24,035	7.2	2,537	0.0	0.0	0.0	9.2	5.4	8.6	69.6	76.6	70.8	21.2	17.8	20.5	0.0	0.3	0.1
Ithaca MSA AA	36	3,644	0.7	1,623	0.2	0.0	0.2	15.7	27.8	13.2	62.4	55.6	63.5	21.6	16.7	22.6	0.0	0.0	0.4
Rochester MSA AA	511	30,751	9.9	7,890	0.0	0.0	0.0	10.0	10.8	7.8	73.7	83.6	73.2	16.3	5.7	19.0	0.0	0.0	0.0
Total	5,165	322,731	100.0	60,080	1.3	0.1	1.0	10.0	7.6	8.8	64.9	80.1	61.9	23.8	12.1	28.3	0.0	0.0	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016

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
Albany MSA AA	13	943	0.3	1,343	20.7	30.8	7.3	21.3	53.8	19.0	22.7	7.7	25.7	35.2	7.7	35.8	0.0	0.0	12.2
Binghamton MSA AA	83	5,757	1.6	3,202	21.3	16.9	7.9	18.4	28.9	21.7	20.7	25.3	23.9	39.6	28.9	30.9	0.0	0.0	15.6
Buffalo MSA AA	143	10,971	2.8	4,148	12.2	7.7	4.5	15.0	20.3	16.7	22.8	31.5	24.1	50.0	39.2	39.7	0.0	1.4	15.0
Elmira MSA AA	102	6,912	2.0	1,831	22.1	12.7	8.8	16.6	19.6	18.7	21.2	31.4	24.1	40.1	34.3	36.7	0.0	2.0	11.7
Glens Falls MSA AA	30	2,379	0.6	627	20.9	23.3	6.2	20.4	3.3	14.5	25.8	30.0	21.1	32.9	43.3	46.3	0.0	0.0	12.0
Kingston MSA AA	8	584	0.2	168	27.1	12.5	4.2	18.2	0.0	16.1	19.0	37.5	20.8	35.6	50.0	53.0	0.0	0.0	6.0
N.Y. Non-MSA AA	3,267	192,341	63.3	15,873	20.2	10.9	7.3	18.6	24.4	19.6	22.4	26.3	24.0	38.7	35.4	37.5	0.0	3.0	11.6
Syracuse MSA AA	403	30,088	7.8	15,482	21.3	12.4	9.1	17.1	26.1	21.3	21.5	23.1	23.4	40.0	30.8	31.9	0.0	7.7	14.3
Utica MSA AA	198	14,326	3.8	5,356	21.0	7.6	7.1	16.3	18.7	19.5	21.0	25.3	24.9	41.8	42.9	39.1	0.0	5.6	9.3
Watertown MSA AA	371	24,035	7.2	2,537	20.8	9.2	4.3	18.0	22.6	13.8	22.0	24.8	21.6	39.2	41.2	44.4	0.0	2.2	15.9
Ithaca MSA AA	36	3,644	0.7	1,623	19.4	2.8	4.8	18.9	19.4	17.4	20.4	41.7	23.6	41.2	36.1	46.1	0.0	0.0	8.1
Rochester MSA AA	511	30,751	9.9	7,890	18.7	16.2	8.7	18.4	29.7	20.0	24.2	26.8	24.4	38.6	24.9	35.8	0.0	2.3	11.1
Total	5,165	322,731	100.0	60,080	20.0	11.4	7.6	17.8	24.5	19.6	22.1	26.3	23.9	40.0	34.7	36.4	0.0	3.2	12.6

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Albany MSA AA	3	353	0.2	803	0.0	0.0	0.0	14.6	33.3	13.6	79.1	66.7	79.2	5.7	0.0	7.2	0.6	0.0	0.0
Binghamton MSA AA	23	4,685	1.5	2,223	11.4	21.7	11.2	17.3	17.4	17.4	40.2	26.1	37.9	31.1	34.8	33.6	0.0	0.0	0.0
Buffalo MSA AA	56	5,414	3.5	2,398	0.0	0.0	0.0	0.8	0.0	0.4	45.8	71.4	44.0	53.3	26.8	55.5	0.1	1.8	0.0
Elmira MSA AA	21	3,569	1.3	830	16.0	9.5	12.9	24.1	19.0	23.9	31.3	23.8	30.5	28.7	47.6	32.8	0.0	0.0	0.0
Glens Falls MSA AA	7	493	0.4	430	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Kingston MSA AA	3	98	0.2	168	0.0	0.0	0.0	48.7	0.0	40.5	51.3	100.0	59.5	0.0	0.0	0.0	0.0	0.0	0.0
N.Y. Non-MSA AA	916	121,769	57.9	11,210	1.7	0.0	1.5	9.7	11.9	8.4	76.7	78.1	77.9	11.7	10.0	12.2	0.2	0.0	0.1
Syracuse MSA AA	176	25,865	11.1	9,663	13.5	4.0	11.4	14.0	7.4	12.5	43.5	68.2	46.0	29.0	20.5	30.1	0.0	0.0	0.0
Utica MSA AA	105	9,409	6.6	3,128	4.4	0.0	5.0	15.2	11.4	15.4	47.4	69.5	42.7	31.0	19.0	35.5	2.0	0.0	1.4
Watertown MSA AA	115	15,773	7.3	1,519	0.0	0.0	0.0	18.7	13.0	15.1	59.3	72.2	62.3	21.8	14.8	22.5	0.2	0.0	0.0
Ithaca MSA AA	6	307	0.4	1,605	0.2	0.0	0.7	25.2	0.0	23.1	46.9	100.0	49.3	27.3	0.0	26.8	0.4	0.0	0.1
Rochester MSA AA	152	12,859	9.6	4,499	0.1	0.0	0.0	12.7	10.5	9.7	68.8	84.2	69.7	18.4	5.3	20.6	0.0	0.0	0.0
Total	1,583	200,594	100.0	38,476	5.3	0.9	4.6	12.7	11.0	11.5	58.4	75.0	59.0	23.2	13.0	24.7	0.3	0.1	0.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2016**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Albany MSA AA	3	353	0.2	803	80.7	66.7	45.1	6.1	33.3	13.2	0.0
Binghamton MSA AA	23	4,685	1.5	2,223	79.6	30.4	43.5	6.5	69.6	13.9	0.0
Buffalo MSA AA	56	5,414	3.5	2,398	83.0	58.9	48.8	6.0	35.7	11.0	5.4
Elmira MSA AA	21	3,569	1.3	830	73.2	61.9	41.6	7.5	38.1	19.4	0.0
Glens Falls MSA AA	7	493	0.4	430	82.8	100.0	44.7	4.8	0.0	12.4	0.0
Kingston MSA AA	3	98	0.2	168	88.8	100.0	56.5	3.5	0.0	7.7	0.0
N.Y. Non-MSA AA	916	121,769	57.9	11,210	77.9	56.3	47.9	5.9	39.2	16.2	4.5
Syracuse MSA AA	176	25,865	11.1	9,663	79.1	48.9	43.9	7.1	45.5	13.8	5.7
Utica MSA AA	105	9,409	6.6	3,128	78.9	61.9	50.4	6.7	32.4	14.4	5.7
Watertown MSA AA	115	15,773	7.3	1,519	74.2	53.0	41.9	7.1	42.6	18.6	4.3
Ithaca MSA AA	6	307	0.4	1,605	78.4	83.3	49.8	6.2	16.7	15.4	0.0
Rochester MSA AA	152	12,859	9.6	4,499	80.3	75.0	51.1	6.0	23.7	13.7	1.3
Total	1,583	200,594	100.0	38,476	78.9	57.6	46.9	6.4	38.2	14.7	4.2

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2016

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Albany MSA AA	0	0	0.0	30	0.0	0.0	0.0	27.1	0.0	30.0	69.0	0.0	70.0	3.9	0.0	0.0	0.0	0.0	0.0
Binghamton MSA AA	16	948	3.8	43	0.6	0.0	0.0	6.8	0.0	0.0	67.7	87.5	90.7	24.8	12.5	9.3	0.0	0.0	0.0
Buffalo MSA AA	7	896	1.6	69	0.0	0.0	0.0	0.2	0.0	0.0	56.1	100.0	75.4	43.7	0.0	24.6	0.0	0.0	0.0
Elmira MSA AA	3	500	0.7	15	2.1	0.0	6.7	17.6	0.0	0.0	50.0	100.0	80.0	30.3	0.0	13.3	0.0	0.0	0.0
Glens Falls MSA AA	0	0	0.0	6	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Kingston MSA AA	0	0	0.0	2	0.0	0.0	0.0	52.4	0.0	0.0	47.6	0.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
N.Y. Non-MSA AA	237	17,393	55.6	1,058	0.1	0.0	0.0	3.0	1.7	1.8	89.1	93.7	94.0	7.7	4.6	4.3	0.1	0.0	0.0
Syracuse MSA AA	18	1,712	4.2	150	1.8	0.0	0.7	10.2	5.6	7.3	58.3	72.2	72.0	29.7	22.2	20.0	0.0	0.0	0.0
Utica MSA AA	9	349	2.1	83	0.8	0.0	0.0	2.4	0.0	1.2	68.8	77.8	77.1	28.0	22.2	21.7	0.0	0.0	0.0
Watertown MSA AA	12	510	2.8	53	0.0	0.0	0.0	3.2	0.0	0.0	75.9	91.7	84.9	20.8	8.3	15.1	0.0	0.0	0.0
Ithaca MSA AA	2	227	0.5	27	0.0	0.0	0.0	18.2	0.0	48.1	69.7	100.0	48.1	12.0	0.0	3.7	0.0	0.0	0.0
Rochester MSA AA	122	9,108	28.6	640	0.0	0.0	0.0	8.0	5.7	8.0	81.6	94.3	88.4	10.3	0.0	3.6	0.0	0.0	0.0
Total	426	31,643	100.0	2,176	0.4	0.0	0.1	6.2	2.8	4.8	77.4	92.5	88.3	16.0	4.7	6.8	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Albany MSA AA	0	0	0.0	30	97.5	0.0	30.0	1.0	0.0	1.5	0.0
Binghamton MSA AA	16	948	3.8	43	97.4	81.3	62.8	1.6	18.8	1.0	0.0
Buffalo MSA AA	7	896	1.6	69	97.2	100.0	50.7	2.2	0.0	0.6	0.0
Elmira MSA AA	3	500	0.7	15	97.2	33.3	20.0	0.7	66.7	2.1	0.0
Glens Falls MSA AA	0	0	0.0	6	97.2	0.0	33.3	1.4	0.0	1.4	0.0
Kingston MSA AA	0	0	0.0	2	100.0	0.0	100.0	0.0	0.0	0.0	0.0
N.Y. Non-MSA AA	237	17,393	55.6	1,058	97.2	88.6	63.0	2.2	10.5	0.7	0.8
Syracuse MSA AA	18	1,712	4.2	150	95.7	83.3	57.3	3.4	16.7	1.0	0.0
Utica MSA AA	9	349	2.1	83	97.4	100.0	62.7	0.6	0.0	2.0	0.0
Watertown MSA AA	12	510	2.8	53	97.6	91.7	43.4	1.4	8.3	1.1	0.0
Ithaca MSA AA	2	227	0.5	27	95.6	100.0	55.6	2.6	0.0	1.8	0.0
Rochester MSA AA	122	9,108	28.6	640	96.1	90.2	67.2	3.6	9.8	0.4	0.0
Total	426	31,643	100.0	2,176	96.8	88.7	62.1	2.4	10.8	0.9	0.5

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Tables of Performance Data

State of Pennsylvania – 2017-2018

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

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
Allentown MSA AA	47	2,178	4.5	790	9.0	14.9	3.9	28.1	31.9	26.6	62.9	53.2	69.5	0.0	0.0	0.0	0.0	0.0	0.0
Pa. Non-MSA AA	147	12,625	14.0	1,441	0.0	0.0	0.0	13.3	5.4	11.3	68.2	82.3	69.3	18.6	12.2	19.4	0.0	0.0	0.0
Scranton WB MSA AA	858	84,662	81.6	10,667	1.6	3.5	1.5	14.2	18.2	13.1	56.5	56.5	53.6	27.6	21.7	31.8	0.0	0.1	0.1
Total	1,052	99,466	100.0	12,898	1.9	3.5	1.5	15.0	17.0	13.7	58.4	60.0	56.3	24.7	19.4	28.5	0.0	0.1	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18

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
Allentown MSA AA	47	2,178	4.5	790	28.5	25.5	12.2	20.8	44.7	23.5	23.1	21.3	23.2	27.7	8.5	21.6	0.0	0.0	19.5
Pa. Non-MSA AA	147	12,625	27.8	1,441	19.2	10.9	5.3	17.9	25.2	15.9	20.8	33.3	25.8	42.1	29.9	37.8	0.0	0.7	15.3
Scranton WB MSA AA	858	84,662	81.6	10,667	21.3	13.9	7.2	17.6	27.9	17.9	20.5	24.0	22.2	40.6	29.8	36.9	0.0	4.4	15.8
Total	1,052	99,466	100.0	12,898	21.5	14.0	7.2	17.9	28.2	18.0	20.7	25.2	22.7	40.0	28.9	36.1	0.0	3.7	16.0

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Allentown MSA AA	7	1,297	2.8	478	7.4	0.0	4.0	28.4	71.4	33.5	64.2	28.6	62.6	0.0	0.0	0.0	0.0	0.0	0.0
Pa. Non-MSA AA	61	10,701	11.8	1,057	0.0	0.0	0.0	12.7	0.0	10.8	63.0	67.2	69.5	24.3	32.8	19.7	0.0	0.0	0.0
Scranton WB MSA AA	450	67,866	86.9	9,557	2.7	2.0	2.3	19.1	11.8	17.5	51.9	62.0	51.8	24.2	22.7	26.7	2.1	1.6	1.8
Total	518	79,864	100.0	11,092	2.6	1.7	2.1	18.9	11.2	17.5	53.6	62.2	54.0	23.0	23.6	24.8	1.8	1.4	1.5

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Allentown MSA AA	7	1,297	1.5	478	80.5	42.9	47.3	4.8	57.1	14.7	0.0
Pa. Non-MSA AA	61	10,701	11.8	1,057	83.5	45.9	47.0	4.6	54.1	11.9	0.0
Scranton WB MSA AA	450	67,866	86.9	9,557	81.9	52.7	45.7	6.0	46.0	12.0	1.3
Total	518	79,864	100.0	11,092	82.0	51.7	45.9	5.8	47.1	12.2	1.2

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Allentown MSA AA	0	0	0.0	5	0.0	0.0	0.0	33.8	0.0	40.0	66.2	0.0	60.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Pa. Non-MSA AA	5	110	100.0	65	0.0	0.0	0.0	2.9	0.0	0.0	78.5	100.0	76.9	18.7	0.0	23.1	0.0	0.0	0.0	0.0
Scranton WB MSA AA	0	0	0.0	52	1.2	0.0	0.0	10.3	0.0	3.8	54.6	0.0	59.6	33.8	0.0	36.5	0.0	0.0	0.0	0.0
Total	5	110	100.0	122	0.8	0.0	0.0	9.7	0.0	3.3	61.5	100.0	68.9	27.9	0.0	27.9	0.0	0.0	0.0	0.0

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Allentown MSA AA	0	0	0.0	5	95.6	0.0	100.0	4.4	0.0	0.0	0.0
Pa. Non-MSA AA	5	110	100.0	65	99.7	100.0	49.2	0.0	0.0	0.3	0.0
Scranton WB MSA AA	0	0	0.0	52	96.6	0.0	57.7	2.4	0.0	1.0	0.0
Total	5	110	100.0	122	97.4	100.0	54.9	1.9	0.0	0.8	0.0

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Tables of Performance Data

State of Pennsylvania – 2016

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

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
Allentown MSA AA	21	778	3.0	815	0.0	0.0	0.0	66.8	76.2	62.6	33.2	23.8	37.4	0.0	0.0	0.0	0.0	0.0	0.0
Pa. Non-MSA AA	141	12,220	20.0	1,574	0.0	0.0	0.0	8.2	1.4	5.6	91.8	98.6	94.4	0.0	0.0	0.0	0.0	0.0	0.0
Scranton WB MSA AA	543	40,229	77.0	11,331	0.7	1.3	0.7	14.4	11.2	10.5	61.7	66.1	61.1	23.2	21.4	27.7	0.0	0.0	0.0
Total	705	53,227	100.0	13,720	0.5	1.0	0.6	17.0	11.2	13.1	63.6	71.3	63.5	18.8	16.5	22.9	0.0	0.0	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016

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
Allentown MSA AA	21	778	3.0	815	27.5	38.1	14.6	25.1	38.1	25.4	22.4	14.3	22.0	25.0	9.5	19.9	0.0	0.0	18.2
Pa. Non-MSA AA	141	12,220	20.0	1,574	19.1	7.1	4.3	20.2	31.9	17.0	22.8	23.4	24.4	37.9	34.0	40.0	0.0	3.5	14.4
Scranton WB MSA AA	543	40,229	77.0	11,331	20.3	11.2	8.1	18.0	27.1	17.7	21.7	25.6	21.6	40.0	33.7	36.3	0.0	2.4	16.2
Total	705	53,227	100.0	13,720	20.6	11.2	8.1	18.7	28.4	18.1	21.8	24.8	22.0	38.8	33.1	35.8	0.0	2.6	16.1

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Allentown MSA AA	2	598	0.5	455	0.0	0.0	0.0	68.1	50.0	65.3	31.9	50.0	34.7	0.0	0.0	0.0	0.0	0.0	0.0
Pa. Non-MSA AA	35	5,922	9.0	1,000	0.0	0.0	0.0	6.8	0.0	6.3	93.2	100.0	93.7	0.0	0.0	0.0	0.0	0.0	0.0
Scranton WB MSA AA	352	56,510	90.5	9,258	5.6	3.4	4.3	14.9	10.8	12.7	58.7	63.4	59.5	20.6	21.9	23.4	0.1	0.6	0.1
Total	389	63,030	100.0	10,713	4.8	3.1	3.8	16.8	10.0	14.3	60.8	66.6	61.7	17.5	19.8	20.2	0.1	0.5	0.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Allentown MSA AA	2	598	0.5	455	81.4	100.0	49.9	4.5	0.0	14.1	0.0
Pa. Non-MSA AA	35	5,922	9.0	1,000	83.6	54.3	44.5	4.6	45.7	11.8	0.0
Scranton WB MSA AA	352	56,510	90.5	9,258	82.2	59.4	45.8	5.8	37.2	12.0	3.4
Total	389	63,030	100.0	10,713	82.3	59.1	45.8	5.6	37.8	12.1	3.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2016

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Allentown MSA AA	0	0	0.0	2	0.0	0.0	0.0	55.9	0.0	50.0	44.1	0.0	50.0	0.0	0.0	0.0	0.0	0.0	0.0
Pa. Non-MSA AA	3	111	75.0	80	0.0	0.0	0.0	0.9	0.0	0.0	99.1	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Scranton WB MSA AA	1	30	25.0	36	0.5	0.0	0.0	7.7	0.0	2.8	63.2	100.0	75.0	28.6	0.0	22.2	0.0	0.0	0.0
Total	4	141	100.0	118	0.3	0.0	0.0	8.2	0.0	1.7	72.4	100.0	91.5	19.1	0.0	6.8	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Allentown MSA AA	0	0	0.0	2	94.9	0.0	50.0	5.1	0.0	0.0	0.0
Pa. Non-MSA AA	3	111	75.0	80	100.0	100.0	63.8	0.0	0.0	0.0	0.0
Scranton WB MSA AA	1	30	25.0	36	97.1	100.0	58.3	2.1	0.0	0.8	0.0
Total	4	141	100.0	118	97.8	100.0	61.9	1.7	0.0	0.5	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Tables of Performance Data

State of Vermont – 2017-2018

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

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
Burlington MSA AA	184	55,241	48.3	6,397	1.0	1.6	1.2	13.2	30.4	14.9	65.6	51.6	65.0	20.2	16.3	18.9	0.0	0.0	0.0
Vt. Non-MSA AA	197	18,067	51.7	7,426	0.0	0.0	0.0	6.9	6.6	5.3	77.1	81.7	75.0	16.1	11.7	19.8	0.0	0.0	0.0
Total	381	73,308	100.0	13,823	0.4	0.8	0.5	9.1	18.1	9.7	73.0	67.2	70.4	17.5	13.9	19.4	0.0	0.0	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18

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
Burlington MSA AA	184	55,241	48.3	6,397	20.5	9.2	10.7	17.9	19.0	23.5	23.1	16.8	26.0	38.5	28.8	31.7	0.0	26.1	8.1
Vt. Non-MSA AA	197	18,067	51.7	7,426	19.1	7.6	7.2	18.0	22.8	19.5	22.4	29.9	23.1	40.5	30.5	41.7	0.0	9.1	8.5
Total	381	73,308	100.0	13,823	19.6	8.4	8.8	18.0	21.0	21.3	22.6	23.6	24.4	39.8	29.7	37.1	0.0	17.3	8.3

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Burlington MSA Vt.	282	58,862	114.6	4,497	0.9	0.0	1.2	23.5	23.8	21.1	53.8	46.8	54.3	21.6	29.1	23.1	0.2	0.4	0.3
Vt. Non-MSA AA	188	34,038	40.0	6,529	0.0	0.0	0.0	9.6	11.7	7.8	74.0	69.1	72.3	16.4	19.1	19.9	0.0	0.0	0.0
Total	470	92,900	191.1	11,026	0.3	0.0	0.5	15.0	18.9	13.2	66.2	55.7	65.0	18.4	25.1	21.2	0.1	0.2	0.1

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Burlington Vt.	282	58,862	62.9	4,497	83.3	42.6	42.9	6.3	56.4	10.4	2.1
Vt. Non-MSA AA	188	34,038	40.0	6,529	82.2	59.0	49.0	6.0	41.0	11.7	0.0
Total	470	92,900	100.0	11,026	82.6	49.1	46.5	6.1	50.2	11.2	1.3

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Burlington Vt.	5	199	100.0	62	0.1	0.0	0.0	12.6	20.0	24.2	67.7	20.0	61.3	19.6	60.0	14.5	0.0	0.0	0.0
Vt. Non-MSA AA	1	168	25.0	147	0.0	0.0	0.0	3.8	0.0	3.4	78.9	100.0	73.5	17.3	0.0	23.1	0.0	0.0	0.0
Total	6	367	100.0	209	0.0	0.0	0.0	6.6	16.7	9.6	75.4	33.3	69.9	18.0	50.0	20.6	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Burlington Vt.	5	199	83.3	62	97.3	100.0	30.6	1.3	0.0	1.4	0.0
Vt. Non-MSA AA	1	168	25.0	147	97.1	100.0	34.0	2.0	0.0	0.8	0.0
Total	6	367	100.0	209	97.2	100.0	33.0	1.8	0.0	1.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Tables of Performance Data

State of Massachusetts – 2017-2018

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-2018

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
Springfield MSA AA	6	2,057	100.0	9,819	7.1	33.3	8.0	18.0	16.7	20.0	33.5	0.0	33.6	41.3	50.0	38.3	0.0	0.0	0.0
Total	6	2,057	100.0	9,819	7.1	33.3	8.0	18.0	16.7	20.0	33.5	0.0	33.6	41.3	50.0	38.3	0.0	0.0	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18

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
Springfield MSA AA	6	2,057	300.0	9,819	28.3	0.0	5.9	16.5	0.0	21.1	17.3	0.0	23.1	37.9	16.7	32.9	0.0	83.3	16.9
Total	6	2,057	300.0	9,819	28.3	0.0	5.9	16.5	0.0	21.1	17.3	0.0	23.1	37.9	16.7	32.9	0.0	83.3	16.9

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Springfield MSA AA	69	10,328	100.0	7,381	21.9	21.7	19.6	22.8	30.4	21.7	22.8	33.3	24.0	32.5	14.5	34.7	0.0	0.0	0.0
Total	69	10,328	100.0	7,381	21.9	21.7	19.6	22.8	30.4	21.7	22.8	33.3	24.0	32.5	14.5	34.7	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Springfield MSA AA	69	10,328	100.0	7,381	80.6	36.2	44.7	7.0	63.8	12.4	0.0
Total	69	10,328	100.0	7,381	80.6	36.2	44.7	7.0	63.8	12.4	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Springfield MSA AA	0	0	0.0	11	4.7	0.0	0.0	12.3	0.0	0.0	28.8	0.0	45.5	54.2	0.0	54.5	0.0	0.0	0.0
Total	0	0	0.0	11	4.7	0.0	0.0	12.3	0.0	0.0	28.8	0.0	45.5	54.2	0.0	54.5	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Farms				Farms with Revenues <= IMM			Farms with Revenues > IMM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Springfield MSA AA	0	0	0.0	11	96.8	0.0	54.5	1.4	0.0	1.8	0.0
Total	0	0	0.0	11	96.8	0.0	54.5	1.4	0.0	1.8	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
to rounding, totals may not equal 100.0