



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

August 21, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Geddes Federal Savings and Loan Association
Charter Number 705278

2208 W. Genesee Street
Syracuse, NY 13219

Office of the Comptroller of the Currency

5000 Brittonfield Parkway, Suite A132
East Syracuse, NY 13057

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

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Overall CRA Rating

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

The Lending Test is rated: Outstanding

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on performance in the state of New York. The performance demonstrated an excellent distribution of loans to geographies of different income levels, an excellent distribution of loans to borrowers of different income levels, a more than reasonable loan-to-deposit (LTD) ratio, and a substantial majority of lending within the assessment area (AA).
- The Community Development (CD) Test rating is based on the bank's performance in the state of New York. The performance demonstrated adequate responsiveness to CD needs through CD loans, qualified investments, and CD services.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is more than reasonable.

Geddes Federal Savings and Loan Association's (GFSLA or bank) LTD ratio is calculated on a bank-wide basis and meets the standard for outstanding performance. The bank's average LTD ratio for the 12-quarter period following the date of the prior evaluation period, December 31, 2019, through the end of the current evaluation period, December 31, 2022, is 113.6 percent, with quarterly ratios ranging from a low of 107.4 percent to a high of 120.4 percent. In comparison, the quarterly average of four similarly situated banks was 71.6 percent, ranging from a low of 59.4 percent to a high of 96.0 percent.

Lending in Assessment Area

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

The bank originated and purchased 80.0 percent 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.

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	1,192	80.0	298	20.0	1,490	202,833	76.9	60,975	23.1	263,808
Total	1,192	80.0	298	20.0	1,490	202,833	76.9	60,975	23.1	263,808
Source: 01/01/2020 – 12/31/2022 Bank Data Due to rounding, totals may not equal 100.0%										

Description of Institution

GFSLA is a federally chartered mutual savings association headquartered in Syracuse, N.Y. As of December 31, 2022, the bank's assets totaled \$616.6 million with \$435.9 million in deposits and \$98.2 million of tier 1 capital. The bank's loan portfolio totaled \$519.3 million and included \$492.8 million or 94.9 percent in one- to four-family home mortgage loans, consistent with the bank's strategic focus on residential mortgage lending.

GFSLA operates as a single state bank in the state of New York. The bank has one designated AA within the state, the Syracuse NY MSA AA. The AA includes Onondaga County in its entirety, which is a portion of the Syracuse, N.Y. metropolitan statistical area (MSA #45060). GFSLA has two branch offices located in middle- and upper-income geographies within the AA. The AA meets the requirements of the Community Reinvestment Act (CRA) regulation and does not arbitrarily exclude any low- or moderate-income geographies.

GFSLA offers traditional banking products and services to customers throughout its competitive financial services market area. The bank's strategic focus is home mortgage lending with loans provided through its own mortgage loan officers, brokers, correspondents, and purchases from a Community Development Financial Institution (CDFI) focused on lending in low- and moderate-income geographies and to low- and moderate-income borrowers. GFSLA offers its own loan product targeted to low- and moderate-income geographies and borrowers and has increased its purchases of loans in its AA from the CDFI during the evaluation period. Competitors include large banks, community banks, credit card companies, online mortgage lenders, and credit unions.

There were no legal, financial or other factors impeding the bank's ability to help meet the credit needs of the communities it serves during the evaluation period. GFSLA received a "Satisfactory" rating for its prior CRA performance evaluation dated August 17, 2020, which was based on "Satisfactory" ratings for both the Lending Test and the Community Development Test.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assessed the bank's performance in its AAs under the CRA. The bank was evaluated using the Intermediate Small Bank CRA examination procedures, which included the Lending Test and the Community Development Test. The Lending Test evaluated the bank's record of meeting the credit needs of its AA through its primary lending product, home mortgages. The Community Development Test assessed the bank's engagement in community development activities, including CD

loans and services, qualified investments, grants, and donations, based on the needs of the community and the bank's capacities. The evaluation period for both tests was January 1, 2020, through December 31, 2022.

Home mortgage loans include home purchase, home improvement, home mortgage refinance, and multi-family loans as reported on the Loan Application Register required by the Home Mortgage Disclosure Act (HMDA). HMDA aggregate lending as well as market share percentages consider only lenders that submit HMDA data. Lenders that collect but do not submit data are not considered in the percentages.

Selection of Areas for Full-Scope Review

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

Ratings

The bank's overall rating is based on its performance within the state of New York. The state rating is based on the full-scope review of the bank's Syracuse NY MSA AA, which is all geographies in Onondaga County.

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

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of New York

CRA rating for the State of New York: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- A substantial majority of the bank's home mortgage originations and purchases are inside the bank's delineated AA.
- The bank had an excellent distribution of home mortgage loans among census tracts of different income levels within the AA.
- The bank had an excellent distribution of home mortgage loans to borrowers of different income levels within the AA.
- The bank demonstrated adequate responsiveness to CD needs in its AA within the context of its overall strategy and capacity through CD loans, qualified investments, and CD services.

Description of Institution's Operations in New York State

GFSLA designated a single AA located in the state of New York, the Syracuse NY MSA AA. The AA consists of Onondaga County in its entirety, which is a portion of the Syracuse, N.Y. MSA (MSA #45060). According to the 2015 American Community Survey (ACS) data, the AA was comprised of 140 contiguous census tracts, which included 23 low-income census tracts, 20 moderate-income census tracts, 50 middle-income census tracts, 42 upper-income census tracts, and five census tracts without an income classification. Based on the 2020 U.S. Census data, the AA is now comprised of 142 contiguous census tracts, which include 18 low-income census tracts, 21 moderate-income census tracts, 54 middle-income census tracts, 42 upper-income census tracts, and seven census tracts without an income classification.

Syracuse NY MSA AA

GFSLA operates two branch locations within the AA. The Westvale branch, which is also the location of the bank's headquarters and operations center, is in a middle-income census tract on the western border of the city of Syracuse. The bank's second branch is located in an upper-income census tract approximately 15 miles across town in Manlius, N.Y. Both locations have drive-through facilities and 24-hour automated teller machines (ATMs). The bank maintains a relationship with Allpoint Network to provide bank customers with surcharge-free access to Allpoint ATMs throughout the United States. GFSLA also offers access alternatives including, bank by mail, debit cards, online banking with bill-pay, and mobile banking with remote deposit capture.

GFSLA offers traditional banking products and services to customers throughout its AA. The bank's primary objective is to profitably make and retain loans for the purchase, refinance or improvement of

one- to four-family residences. While GFSLA does have mortgage loan originators, it also uses brokers and correspondents to increase its reach in providing loans for the portfolio. In addition to traditional home mortgage financing, the bank offers the GeddeStart home purchase mortgage program given the credit needs of the AA. The program provides special financing terms to low- and moderate-income individuals for the acquisition of homes in low- and moderate-income geographies within Onondaga County. The program provides financing up to \$125,000 with a three percent down payment, no private mortgage insurance requirement, and a half-percent rate reduction for 30-year terms and a quarter-percent rate reduction for 20- and 25-year term mortgages. The product is also offered through GFSLA's brokers and correspondents. During the evaluation period, the bank originated 31 mortgages totaling \$2.8 million under this program.

GFSLA has also continued to develop its relationship with a local non-profit CDFI. The organization cultivates relationships with low- and moderate-income individuals and originates mortgages in low- and moderate-income geographies within Onondaga County. The bank also supports this organization through loans to fund home improvement lending and makes subordinated investments to further assist it in its efforts to improve low- and moderate-income geographies and families. During the evaluation period, GFSLA purchased 94 mortgages and 30 home equity loans totaling \$9 million from this CDFI.

The bank faces competition for deposit and loan customers. As of June 30, 2022, there were 15 FDIC-insured institutions in the AA. These financial institutions had 103 offices in the AA, with deposits totaling \$13.1 billion. The deposit market share is dominated by four large financial institutions whose combined market share totals 71.2 percent, including M&T Bank (30.9%), KeyBank, N.A. (15.9 percent), JP Morgan Chase Bank, N.A. (12.7 percent) Bank of America, N.A. (11.7 percent). GFSLA ranked seventh with a deposit market share of 3.4%. Based on 2022 HMDA market share data, 248 lenders originated or purchased 15,957 home mortgage loans in the AA. GFSLA ranked eighth, or in the 97th percentile, with a 3.1 percent market share. Empower Federal Credit Union dominated the market with a market share of 17.9 percent.

The overall economy in the AA experienced temporary disruption due to the impact of the COVID-19 pandemic but has subsequently stabilized. According to the U.S Bureau of Labor Statistics (BLS), the unemployment rate (not seasonally adjusted) in Onondaga County spiked to 17.7 percent in April 2020 after initial shutdowns and declined to 6.0 percent by December 2020 and 2.9 percent by December 2022. This compares favorably to the state unemployment rate of 3.8 percent in December 2022. The local housing market saw increased demand for homes, and housing prices increased while interest rates declined through March of 2022 and stimulated demand. However, inflationary pressure spurred the Federal Reserve to increase rates seven times or by approximately 425 basis points in the last three quarters of 2022. The largest employers in the AA were Upstate University Health System, Syracuse University, St. Joseph's Hospital Health Center, Wegmans, and Crouse Hospital.

The OCC utilized information from one community contact within the Syracuse NY MSA AA to determine local economic conditions and community needs. The organization is a local CDFI founded to serve low-income residents and neighborhoods in the city of Syracuse, N.Y. The contact noted the need for improved housing, particularly in the city's Southern neighborhoods with higher poverty levels, and the need for micro business loans. The contact further noted that the application process for loans can be cumbersome for many applicants that do not have financial experience.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Syracuse NY MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	140	16.4	14.3	35.7	30.0	3.6
Population by Geography	468,304	13.2	11.8	37.9	35.3	1.8
Housing Units by Geography	203,956	12.7	13.6	38.9	33.5	1.3
Owner-Occupied Units by Geography	120,529	3.8	8.7	44.8	42.6	0.2
Occupied Rental Units by Geography	64,112	24.8	21.8	30.8	19.0	3.5
Vacant Units by Geography	19,315	28.5	16.5	29.1	24.7	1.1
Businesses by Geography	39,021	10.4	9.8	37.7	39.3	2.8
Farms by Geography	1,026	3.3	5.1	41.7	48.8	1.1
Family Distribution by Income Level	112,623	20.9	16.2	19.9	43.1	0.0
Household Distribution by Income Level	184,641	24.9	14.9	16.8	43.4	0.0
Median Family Income MSA - 45060 Syracuse, NY MSA		\$68,468	Median Housing Value			\$130,362
			Median Gross Rent			\$781
			Families Below Poverty Level			10.5%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Syracuse NY MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	142	12.7	14.8	38.0	29.6	4.9
Population by Geography	476,516	9.8	13.8	37.5	34.3	4.6
Housing Units by Geography	209,068	10.4	15.1	39.0	32.5	3.0
Owner-Occupied Units by Geography	121,902	3.1	10.7	43.7	41.9	0.6
Occupied Rental Units by Geography	65,447	20.8	22.1	32.6	18.6	5.9
Vacant Units by Geography	21,719	20.6	18.1	31.9	21.8	7.7
Businesses by Geography	39,914	8.8	11.1	38.9	33.2	8.0
Farms by Geography	1,040	2.8	7.2	48.8	39.5	1.6
Family Distribution by Income Level	113,106	21.5	16.5	20.0	42.0	0.0
Household Distribution by Income Level	187,349	24.8	15.2	17.5	42.5	0.0
Median Family Income MSA - 45060 Syracuse, NY MSA		\$79,766	Median Housing Value			\$147,930
			Median Gross Rent			\$877
			Families Below Poverty Level			9.9%
Source: 2020 U.S. Census and 2022 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 State

The OCC completed a full-scope review of the bank's only AA, the Syracuse NY MSA AA. The bank's primary product is home mortgage lending. The bank did not originate a sufficient volume of small business or small farm loans to make their analysis meaningful, therefore, were excluded from the analysis. The OCC assessed 2020 and 2021 lending activities against the 2015 ACS data and 2022 lending activities against the 2020 U.S. Census data. Lending activities in 2020 and 2021 were weighted more heavily than 2022 given the amount of origination and purchase activity reported during the period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK STATE

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review.

Based on a full-scope review of the bank's Syracuse NY MSA AA, the bank's lending performance in the state of New York is excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the state of New York.

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

Home Mortgage Loans

The geographic distribution of home mortgage loans is excellent. In 2020 and 2021, the geographic distribution of home mortgage loans in low- and moderate-income census tracts exceeded the percentage of owner-occupied housing units and aggregate lending in the AA. In 2022, the geographic distribution of home mortgage loans in low-income census tracts exceeded the percentage of owner-occupied housing units and aggregate lending in the AA. In 2022, the geographic distribution of home mortgage loans in moderate-income census tracts was near to the percentage of owner-occupied housing units and aggregate lending in the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels in the state of New York.

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.

Home Mortgage Loans

The borrower distribution of home mortgage loans is excellent. In 2020, 2021, and 2022, home mortgage lending to low-income borrowers was below the percentage of low-income families and exceeded aggregate lending in the AA. In 2020 and 2021, home mortgage lending to moderate-income borrowers exceeded the percentage of moderate-income families and was near to aggregate lending in the AA. In 2022, home mortgage lending to moderate-income borrowers exceeded the percentage of moderate-income families and was below aggregate lending in the AA.

The assessment of performance considered housing affordability for low-income borrowers during the evaluation period given the median listing price and median family income. Per the Federal Reserve Economic Data maintained by the Federal Reserve Bank of St. Louis, the median listing price in Onondaga County ranged from \$179,950 to \$207,450 during the evaluation period. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making less than \$45,550 per year (or less than 50 percent of the 2022 FFIEC adjusted median family income in the AA) could afford a mortgage payment of \$1,139 per month. However, within the state of New York, property taxes are higher than those in most of the country. The effective tax rate in Onondaga County is 3.01 percent. This results in a monthly real estate tax payment of \$520 on a property valued at \$207,450, which when considered, illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,634 (\$1,114 principal and interest and \$529 real estate taxes).

The assessment of performance also considered the level of competition from FDIC-insured institutions, credit unions, and mortgage lenders within the AA, which makes it difficult to originate loans to low- and moderate-income borrowers. According to 2022 peer mortgage data, 58 lenders competed for 318 home mortgage loans for low-income borrowers and 92 lenders competed for 1,335 home mortgage loans for moderate-income borrowers. The top two lenders for low-income borrowers held a combined market share of 23.3 percent and the top five lenders for moderate-income borrowers held a combined market share of 35.8 percent. Despite this level of competition and a limited branch network, GFSLA ranked third, or in the 95th percentile, with a market share of 6.0 percent for lending to low-income borrowers, and ninth, or in the 91st percentile, with a market share of 3.1 percent for lending to moderate-income borrowers in the AA.

Responses to Complaints

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

COVID-19 Pandemic Activities

GFSLA worked to meet community credit needs during the COVID-19 pandemic by implementing government loan programs and working with existing customers impacted by the pandemic.

- The bank granted short-term principal and interest deferrals to 130 residential mortgage borrowers.

- The bank participated in the Small Business Administration's (SBA) Paycheck Protection Program (PPP) to support business impacted by the COVID-19 pandemic. During the evaluation period, the bank originated 13 PPP loans totaling \$167,000.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

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

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Syracuse NY MSA AA	1	100.0	1,000	100.0

GFSLA demonstrated adequate responsiveness to CD needs through CD loans. CD lending consisted of one loan totaling \$1 million to a CDFI whose proceeds were used to fund home improvements for low- and moderate-income individuals and borrowers, which is an identified credit need in the AA.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Syracuse NY MSA AA	1	500	54	5,053	55	100.0	5,553	100.0	0	0

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

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

GFSLA demonstrated excellent responsiveness to CD needs through qualified investments and grants. During the evaluation period, the bank purchased five qualified investments totaling \$5 million, consisting of three \$1 million capital investments dedicated to financing the purchase and improvement

of affordable housing and two \$1 million municipal bond investments whose purpose are for the revitalization and capital improvement of facilities and essential services within the city of Syracuse and the Village of Solway, which contain the majority of the low- and moderate-income census tracts in the AA. The bank also made 49 donations totaling \$53,035 to organizations dedicated to supporting affordable housing for low- or moderate-income individuals and providing community services to low- and moderate-income individuals. Prior period investments totaled \$500,000 to an organization that provides affordable housing to low- and moderate-income individuals in the AA.

Extent to Which the Bank Provides Community Development Services

GFSLA demonstrated adequate responsiveness to CD needs through CD services during the evaluation period, given the bank's asset size, limited branch presence, and limited number of employees. Bank employees served on the Boards of Directors or Board Loan Committees of five organizations that provide CD services in the AA, providing approximately 511 hours of service during the evaluation period. The CD organizations supported affordable housing and community service.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2020 to 12/31/2022	
Bank Products Reviewed:	Home mortgage loans CD loans, qualified investments, and CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of New York		
Syracuse NY MSA AA	Full-Scope	Onondaga County

Appendix B: Summary of State Ratings

RATINGS		GEDDES FEDERAL SAVINGS & LOAN ASSOCIATION	
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State Rating
GFSLA	Outstanding	Satisfactory	Outstanding
State:			
New York	Outstanding	Satisfactory	Outstanding

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.
Syracuse NY MSA AA	762	124,008	100.0	15,731	3.8	5.8	2.7	8.7	10.4	8.2	44.8	31.9	43.3	42.6	51.6	45.7	0.2	0.4	0.1
Total	762	124,008	100.0	15,731	3.8	5.8	2.7	8.7	10.4	8.2	44.8	31.9	43.3	42.6	51.6	45.7	0.2	0.4	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.
Syracuse NY MSA AA	430	78,826	100.0	11,327	3.1	4.2	2.8	10.7	9.5	11.8	43.7	30.9	42.1	41.9	54.7	42.5	0.6	0.7	0.8
Total	430	78,826	100.0	11,327	3.1	4.2	2.8	10.7	9.5	11.8	43.7	30.9	42.1	41.9	54.7	42.5	0.6	0.7	0.8
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.
Syracuse NY MSA AA	762	124,008	100.0	15,731	20.9	12.1	8.4	16.2	18.4	20.6	19.9	19.0	23.1	43.1	50.4	36.3	0.0	0.1	11.5
Total	762	124,008	100.0	15,731	20.9	12.1	8.4	16.2	18.4	20.6	19.9	19.0	23.1	43.1	50.4	36.3	0.0	0.1	11.5
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.
Syracuse NY MSA AA	430	78,826	100.0	11,327	21.5	11.6	10.6	16.5	17.7	23.0	20.0	21.4	23.6	42.0	47.4	32.8	0.0	1.9	10.1
Total	430	78,826	100.0	11,327	21.5	11.6	10.6	16.5	17.7	23.0	20.0	21.4	23.6	42.0	47.4	32.8	0.0	1.9	10.1
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

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