



PUBLIC DISCLOSURE

July 09, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Cayuga Lake National Bank
Charter Number 412

3 Cayuga Street
Union Springs, NY 13160

Office of the Comptroller of the Currency

5000 Brittonfield Parkway
Suite 102B
East Syracuse, NY 13057

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it 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 primary factors supporting the CRA rating are as follows:

- A substantial majority of home mortgage loans originated during the evaluation period were inside the bank's assessment area (AA).
- The bank had reasonable distribution of home mortgage loans to borrowers of different incomes within the AA.
- The bank had a reasonable loan-to-deposit ratio during the evaluation period.
- The bank had a reasonable distribution of home mortgage loans among census tracts of different income designations within the AA.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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 One 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.

Description of Institution

Cayuga Lake National Bank (CLNB) is a \$154.0 million, intrastate, community bank headquartered in Union Springs, New York (NY). CLNB is wholly owned by a single bank holding company, Cayuga Lake Bank Corporation. The bank has one AA made up of all CTs in Cayuga County, located in Central NY. Cayuga County is not part of a Metropolitan Statistical Area (MSA). The main office is located approximately 12 miles southwest of the county seat of Auburn, NY, and is very close to the eastern shore of Cayuga Lake. The main office is located in an upper-income CT. CLNB has one branch located in a middle-income CT in Aurora, NY, approximately 12 miles south of the main office. Since the prior CRA evaluation, the bank has not closed or opened any new branches or been involved in any mergers or acquisitions. The main office and the branch offer full-service banking. The main office has a drive-thru, while the Aurora branch is a walk-up. Both branches have 24-hour automated teller machine (ATM) access. Banking hours, at the main office and the branch, are 9:00 a.m. to 4:00 p.m. Monday through Thursday, with lobby hours extended to 5:00 p.m. on Friday. At the main office, the drive-thru opens an hour earlier and closes an hour later than lobby hours. For retail customers who like the option of electronic banking, the bank offers online banking with a bill payment feature. The bank also offers a mobile banking product with remote deposit capture using a mobile phone's camera. Loan products are not complex. Management's strategy emphasizes attentive service, streamlined onsite decision making and retaining originated loans rather than selling loans on the secondary market to attract customers.

CLNB sources the majority of its deposits from the AA. From June 30, 2014 to June 30, 2017, CLNB held the third largest deposit market share among the 12 Federal Deposit Insurance Corporation (FDIC) insured banks serving the county. CLNB's market share was in the range of 12 percent to 13 percent during that period. First Niagara, and its successor KeyBank, maintained a market share range from 28 percent to 32 percent during the same period, while Tompkins Trust Company held its position as the second largest recipient of deposits over the same period, with a market share between 13 percent and 15 percent. From a lending stand point, competition for loans is moderately high. CLNB competes with other community, regional, and large banking financial institutions. In 2017, there were approximately 104 lenders with reportable HMDA activity in Cayuga County.

As of December 31, 2017, CLNB's balance sheet included \$69.7 million in gross loans. Gross loans consisted of the following: \$53.4 million (76.6 percent) residential mortgage loans, \$6.4 million (9.2 percent) commercial real estate, \$3.9 million (5.6 percent) consumer loans, \$3.4 million (4.9 percent) commercial and industrial loans, and \$2.6 million (3.7 percent) agricultural loans. The bank does not offer products targeted to low- or moderate-income mortgage applicant borrowers; however, it does offer a home improvement loan that is 200 basis points lower than its other consumer installment loans.

CLNB has no legal or financial impediments that would hinder its ability to help meet the credit needs in its defined AA. At the last CRA examination dated March 9, 2011, the bank demonstrated an outstanding level of performance.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation covered the time period from March 9, 2011 to December 31, 2017. Our review of the bank's performance under the lending test for this period was based on a sample of home mortgage loan originations, the bank's primary loan product, from January 1, 2015 to December 31, 2017. Home mortgage loans consist of home purchase loans, residential refinance loans and home improvement loans.

Data Integrity

CLNB does not have a branch office or deposit-taking ATM in a MSA, and as a result, is not required to maintain loan data in accordance with the Home Mortgage Disclosure Act. Therefore, we determined the bank's performance, under the lending test, using a sample of 100 home mortgage loan originations totaling \$9.86 million. We completed an additional review of 2015 and 2016 data when our samples unexpectedly revealed no loans to low-income borrowers. Management provided us with files for all home mortgage loans to low-income borrowers in those years. We verified the income and location, then compared the result to originations in the appropriate years.

Selection of Areas for Full-Scope Review

We conducted a full-scope review on the bank's only AA, the Cayuga Lake Non-MSA AA, which consists of 20 CTs representing the entirety of Cayuga County. Refer to Appendix A for more information regarding the evaluation scope.

Ratings

The bank's overall rating is based on the full-scope review of the bank's one AA. The assessment for borrower and geographic distribution measures the bank's performance against performance by other lenders in the AA and on performance against AA demographics.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §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 Consumer Financial Protection Bureau, as applicable.

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

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

Conclusions with Respect to Performance Tests

LENDING TEST

The bank's performance under the lending test is satisfactory. The assessment reflects that a substantial majority of loans originated are within the bank's AA, and a reasonable loan-to-deposit ratio. The distribution of loans within the AA reflects reasonable distribution among individuals of different income levels and reasonable distribution among census tracts of different income designations. We assigned less weight to the geographic distribution of loans given the limited number of low- and moderate-income CTs.

Loan-to-Deposit Ratio

CLNB's average loan-to-deposit ratio during the evaluation period was reasonable. The bank's average quarterly loan-to-deposit ratio since the prior CRA evaluation through December 31, 2017, was 53.81 percent. Two banks who serve major portions of Cayuga County reported loan-to-deposit ratios of 51.89 percent and 57.38 percent for the same period. These banks compete directly with CLNB.

Lending in Assessment Area

A substantial majority of the number of the bank's home mortgage loans originated during the evaluation period were inside the AA. Based on our sampling of home mortgage loans, by number and dollar amount, CLNB originated, respectively, 97.0 and 95.1 percent, of its loans in the AA.

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											
2015	29	96.7	1	3.3	30	2,324	91.1	228	8.9	2,552	
2016	30	100.0	0	0.0	30	3,341	100.0	0	0.0	3,341	
2017	38	95.0	2	5.0	40	3,710	93.5	260	6.5	3,970	
Subtotal	97	97.0	3	3.0	100	9,375	95.1	488	4.9	9,863	
Total	97	97.0	3	3.0	100	9,375	95.1	488	4.9	9,863	
<i>Source: 2015, 2016 and 2017 samples of residential and home improvement loans originated. Due to rounding, totals may not equal 100.0</i>											

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

The distribution of residential mortgage loans originated in the bank's AA reflects reasonable distribution among borrowers of different income levels. CLNB's lending to low-income borrowers reflects reasonable distribution. In 2017, the percent of residential mortgage loans to low-income borrowers is near to the distribution of low-income families and exceeds aggregate lending in the AA. In 2015 and 2016, the percent of home mortgage loans to low-income borrowers is lower than the distribution of low-income families and aggregate lending in the AA. CLNB's lending to moderate-income borrowers reflects excellent distribution. For 2015, 2016, and 2017, the percent of home mortgage loans to moderate-income borrowers exceeds the distribution of moderate-income families. For 2015 and 2016, the percent of home mortgage loans to moderate-income borrowers exceeds the aggregate lending in the AA. For 2017, the percent of residential mortgage loans to moderate-income borrowers is near the aggregate lending in the AA.

Please refer to Tables 1, 2, and 3 in Appendix C for further information.

Geographic Distribution of Loans

The bank's geographic distribution reflects reasonable distribution among census tracts of different income designations. In 2015 and 2016, the AA included only one low-income CT; in 2017, two moderate-income CTs were added as a result of the 2015 American Community Survey (ACS) Census update of the 2010 census. CLNB's lending to low-income geographies reflects reasonable distribution. In 2015, the percent of home mortgage loans originated in low-income geographies exceeds the distribution of owner-occupied housing units in the low-income census tract as well as aggregate lending in that census tract. In 2016 and 2017, the percent of home mortgage loans originated in the low-income census tract is lower than the distribution of owner occupied housing units in the low-income census tract as well as aggregate lending in that census tract. CLNB's lending to moderate-income geographies reflects reasonable distribution. In 2017, the percent of residential mortgages originated in moderate geographies is near the distribution of owner-occupied housing units in the moderate-income census tracts and aggregate lending in those geographies.

Please refer to Tables 4, 5, and 6 in Appendix C for further information.

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 metropolitan and nonmetropolitan areas 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 (excludes CD loans): (01/01/2015 to 12/31/2017) Investment and Service Tests and CD Loans: Not applicable	
Financial Institution	Products Reviewed	
Cayuga Lake National Bank (CLNB) Union Springs, NY	Home purchase, refinance and improvement loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Cayuga Lake Non-MSA AA	Full Scope	

Appendix B: Community Profiles for Full-Scope Areas

Non-MSA

Demographic Information of the Assessment Area						
Assessment Area: Cayuga Lake Non-MSA AA 2015 & 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	5.0	0.0	65.0	25.0	5.0
Population by Geography	80,026	6.0	0.0	66.9	27.1	0.0
Housing Units by Geography	36,469	4.4	0.0	69.8	25.8	0.0
Owner-Occupied Units by Geography	23,011	2.1	0.0	67.3	30.6	0.0
Occupied Rental Units by Geography	9,027	11.6	0.0	78.5	9.9	0.0
Vacant Units by Geography	4,431	1.7	0.0	64.7	33.6	0.0
Businesses by Geography	3,333	7.9	0.0	64.6	27.5	0.0
Farms by Geography	318	0.6	0.0	63.2	36.2	0.0
Family Distribution by Income Level	20,864	16.9	16.8	22.3	43.9	0.0
Household Distribution by Income Level	32,038	21.0	16.4	18.3	44.3	0.0
Median Family Income Non-MSAs - NY		\$54,386	Median Housing Value			\$99,898
Unemployment Rate = 4.4% <i>(The US Bureau of Labor Statistics June 2018)</i>			Median Gross Rent			\$630
			Families Below Poverty Level			8.5%

Source: 2010 U.S. Census, 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.

Demographic Information of the Assessment Area						
Assessment Area: Cayuga Lake Non-MSA AA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	5.0	10.0	60.0	20.0	5.0
Population by Geography	79,173	5.4	10.7	62.5	21.3	0.0
Housing Units by Geography	36,405	4.0	11.9	62.6	21.5	0.0
Owner-Occupied Units by Geography	22,028	1.9	7.6	64.2	26.4	0.0
Occupied Rental Units by Geography	8,944	9.7	25.6	55.0	9.7	0.0
Vacant Units by Geography	5,433	3.1	7.3	68.7	20.9	0.0
Businesses by Geography	3,334	7.9	15.2	54.4	22.5	0.0
Farms by Geography	304	0.3	1.6	70.4	27.6	0.0
Family Distribution by Income Level	19,797	17.3	17.0	21.5	44.2	0.0
Household Distribution by Income Level	30,972	21.4	14.8	18.6	45.2	0.0
Median Family Income Non-MSAs - NY		\$59,570	Median Housing Value			\$115,141
Unemployment Rate = 4.4% <i>(The US Bureau of Labor Statistics June 2018)</i>			Median Gross Rent			\$676
			Families Below Poverty Level			8.0%

Source: 2015 ACS Census 2017 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.

CLNB's Non-MSA AA consists of 20 CTs. In 2015 and 2016, the AA had one low-income tract, no moderate-income tracts, 13 middle-income tracts, five upper-income tracts, and one unassigned income tract. The unassigned income tract is a result of the census tract extending out into the lake. Cayuga County is the 34th most populated county in New York and borders the Central NY counties of Cortland, Jefferson, Onondaga, Seneca, Oswego, Tompkins, and Wayne.

The 2015 ACS Census updated the 2010 census and changed the classification of several tracts effective in 2017. Notably, two CTs were reduced from middle- to moderate-income. One CT has remained a low-income tract during all three years. The two moderate tracts are located in the northern section of Auburn, NY. According to the FFIEC's list of Distressed and Underserved Tracts, there were no CTs classified as distressed or underserved in 2015, 2016, or 2017.

As of 2010, the AA had 80,026 persons and included 36,469 total housing units. Approximately 88 percent of the housing units were occupied, with 63.1 percent of the total housing units owner-occupied and 24.8 percent rentals. Approximately 12.2 percent of housing units were vacant. The weighted average median housing value was \$99,898 and the average age of a home was 59 years. The AA has 20,864 total families and had a MFI of \$60,000 in 2015 and \$58,900 in 2016. Based on the 2010 census data, the AA includes 32,038 households with 3,754 (11.7 percent) of those reportedly living below the poverty line.

Based on the changes made by the ACS, as of 2017, the AA had 79,173 persons and included 36,405 total housing units. Approximately 85 percent of the housing units were occupied, with 60.5 percent of the total housing units owner-occupied and 24.6 percent rentals. Approximately 14.9 percent of housing units were vacant. The weighted average median housing value was \$115,141 and the average age of a home was 58 years. The AA has 19,797 total families and had a MFI of \$62,500 in 2017. Based on the 2010 census data, the AA includes 30,972 households with 3,679 (11.9 percent) of those reportedly living below the poverty line.

Competition for home mortgage loans in the AA is significant. On average during 2015, 2016 and 2017, there were approximately 115 HMDA reporting institutions in the market, of which the top ten lenders typically accounted for about 50% of the loans originated. The top five lenders remained relatively unchanged during the three years. This included banks with branches primarily in Auburn, the county seat and areas with the highest population. The top five lenders primarily include AmeriCu Credit Union, Empower Federal Credit Union, M&T Bank, KeyBank, and The First National Bank of Groton. Quicken Loans and Wells Fargo were also in the top five in at least one of the three years.

As of June 30, 2017, the FDIC reports CLNB holding a 12.65 percent market share of deposits, ranking it third in the county following KeyBank and Tompkins Trust Company. KeyBank leads other FDIC insured institutions with 31.85 percent of the county's depository market share.

The unemployment rate in Cayuga County was 5.1 percent as of December 31, 2017, higher than the New York State unemployment rate of 4.7 percent at the same date. Unemployment in Cayuga County is seasonal. In February 2017, unemployment in the county was at a high point of 6.4 percent. Following the peak in February, the unemployment rate had a downward trend, reaching its low point of 4.4 percent in October 2017, before trending upwards for the remainder of the year. The May 2018 unemployment rate was 4.3 percent. According to the Cayuga Economic Development Agency, major employers in the county include Auburn Community Hospital, Department of Corrections, Auburn Enlarged City School District, Cayuga Onondaga BOCES, Walmart, Cayuga County, Xylem Inc., Wegmans, Cayuga Community College, and Union Springs Central School District. Based on economic data from 2016, the most common industries by number of employees are healthcare, manufacturing and retail trade.

The economy is stable to improving. To achieve post down-turn economic growth within the county, the Cayuga Economic Development Agency developed a strategic plan in 2011. The goal of the plan was to outline action items to strengthen job development, assist business expansion, and maintain a strong tax base. Since implementation of the plan and the turn in the economy, the county has seen the highest private job growth in the manufacturing and professional sectors, at approximately 2 percent growth in each sector. Additionally, the county has various projects in place to promote business start-ups and expansions.

We contacted a realty firm serving Cayuga County. The President of the firm reports that higher closing costs are detrimental to low- and moderate-income applicant's efforts in qualifying for a residential mortgage loan. The President noted that a community development organization had an outreach session targeted to local realtors to make aware or reinforce their awareness of programs that can help low- and moderate-income applicants accumulate down payment and closing cost funds. The contact also mentioned one institution offering certain government-sponsored loan products targeted to low- and moderate-income borrowers. There were no negative comments about any of the banks serving the county.

Appendix C: Tables of Performance Data

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
Cayuga Lake Non-MSA AA 2015	26	2,216	100.0	1,596	16.9	5.6*	8.0	16.8	23.1	21.0	22.3	30.8	24.1	43.9	46.2	35.4	0.0	0.0	11.5
Total	26	2,216	100.0	1,596	16.9	5.6*	8.0	16.8	23.1	21.0	22.3	30.8	24.1	43.9	46.2	35.4	0.0	0.0	11.5

Source: 2010 U.S Census; 01/01/2015 - 12/31/2015 Bank Sampled Data, 2015 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0
 *Additional low income borrower testing

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
Cayuga Lake Non-MSA AA 2016	28	2,998	100.0	1,667	16.9	1.8*	5.6	16.8	21.4	21.1	22.3	21.4	25.7	43.9	57.1	36.9	0.0	0.0	10.7
Total	28	2,998	100.0	1,667	16.9	1.8*	5.6	16.8	21.4	21.1	22.3	21.4	25.7	43.9	57.1	36.9	0.0	0.0	10.7

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

Table 3: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2017		
	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	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cayuga Lake Non-MSA AA 2017	33	3,206	100.0	1,561	17.3	15.2	8.0	17.0	18.2	19.7	21.5	30.3	25.3	44.2	36.4	34.6	0.0	0.0	12.4
Total	33	3,206	100.0	1,561	17.3	15.2	8.0	17.0	18.2	19.7	21.5	30.3	25.3	44.2	36.4	34.6	0.0	0.0	12.4

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

Table 4 : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2015	
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	
Cayuga Lake Non-MSA AA 2015	27	2,223	100.0	1,596	2.1	3.7	1.9	0.0	0.0	0.0	67.3	37.0	66.9	30.6	59.3	31.1	0.0	0.0	0.0	
Total	27	2,223	100.0	1,596	2.1	3.7	1.9	0.0	0.0	0.0	67.3	37.0	66.9	30.6	59.3	31.1	0.0	0.0	0.0	

Source: 2010 U.S Census; 01/01/2015 - 12/31/2015 Sample Bank Data (includes one employee loan not included in demographic data), 2015 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table 5 : 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	
Cayuga Lake Non-MSA AA 2016	28	2,998	100.0	1,667	2.1	0.0	1.1	0.0	0.0	0.0	67.3	17.9	68.3	30.6	82.1	30.6	0.0	0.0	0.0	
Total	28	2,998	100.0	1,667	2.1	0.0	1.1	0.0	0.0	0.0	67.3	17.9	68.3	30.6	82.1	30.6	0.0	0.0	0.0	

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

Table 6 : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017		
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		
Cayuga Lake Non-MSA AA 2017	33	3,206	100.0	1,561	1.9	0.0	1.7	7.6	6.1	9.6	64.2	33.3	66.8	26.4	60.6	21.9	0.0	0.0	0.0		
Total	33	3,206	100.0	1,561	1.9	0.0	1.7	7.6	6.1	9.6	64.2	33.3	66.8	26.4	60.6	21.9	0.0	0.0	0.0		

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