



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

January 9, 2023

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Champlain National Bank  
**Charter Number: 9405**

3900 NYS Route 22  
Willsboro, NY 12296

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: Satisfactory.**

**The Community Development Test is rated: Outstanding.**

The major factors that support this rating include:

- The Lending Test rating is based on Champlain National Bank's (CNB or bank) performance in the assessment area (AA) in the state of New York, which demonstrated excellent distribution of loans to borrowers of different income levels and businesses of different sizes and reasonable distribution of loans to geographies of different income levels.
- The Community Development (CD) Test rating is based on performance in the state of New York. The performance exhibits excellent responsiveness to CD needs through CD loans, qualified investments, and CD services.

### Loan-to-Deposit Ratio

The bank's loan-to-deposit (LTD) ratio is reasonable considering the bank's size, financial condition, and AA credit needs. CNB's average LTD ratio for the 12-quarter period following the date of the prior evaluation period, December 31, 2018, through the end of the current evaluation period, December 31, 2021, is 77 percent. In comparison, the quarterly average LTD ratio of six similarly situated banks was 81.1 percent, ranging from a low of 66.6 percent to a high of 96 percent. The LTD ratio is calculated on a bank-wide basis.

### Lending in Assessment Area

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

Within the sample the OCC selected, 100 percent of loans were originated within the AA. Management provided additional data demonstrating the bank originated and purchased 78.5 percent (by number) and 82.8 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.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	45	100.0	0	0.0	<b>45</b>	5,496	100.0	0	0.0	<b>5,496</b>
Small Business	46	100.0	0	0.0	<b>46</b>	4,241	100.0	0	0.0	<b>4,241</b>
Consumer	33	100.0	0	0.0	<b>33</b>	852	100.0	0	0.0	<b>852</b>
<b>Total</b>	<b>124</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>124</b>	<b>10,589</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>10,589</b>

## **Description of Institution**

CNB is an intrastate community bank headquartered in Willsboro, New York. As of December 31, 2021, CNB had \$456.3 million in total assets. The bank is a wholly owned subsidiary of Champlain Bank Corporation, a single bank holding company. This CRA evaluation did not consider any CNB affiliates. There was no merger or acquisition activity during the evaluation period.

As of December 31, 2021, CNB had \$402.5 million in total deposits and \$40.3 million in tier 1 capital. Total net loans were \$275.7 million, which was 60.4 percent of total assets. Real estate loans were 72.4 percent of gross loans, with one- to four-family residential real estate loans composing 25 percent of gross loans, multifamily loans composing 15.2 percent, non-farm non-residential loans composing 28 percent, and construction loans composing 4.2 percent. Commercial and industrial loans were 13.4 percent of gross loans, and consumer loans, mainly automobile loans, were 12.6 percent.

CNB's strategy during the evaluation period focused on organic loan and deposit growth, with a focus on digital product and service offerings. The bank offers traditional and non-complex lending and deposit products and services to customers in its sole AA through its 10 branch locations, online banking, and mobile banking application. Each branch is equipped with an automated teller machine (ATM), six of which are deposit-taking. The bank does not have any free-standing ATMs. Seven branches also have a drive-up window, and one has a walk-up window. Branch hours are generally 9:00 a.m. to 5:00 p.m., with some exceptions, and the drive-up windows usually open a half hour before the branch. Two branches have Saturday hours from 9:00 a.m. to 12:00 p.m.

All 10 branches in the AA are in Clinton and Essex counties. A majority of Clinton County and almost all of Essex County are covered by the Adirondack Park, a six-million-acre park consisting of state- and privately-owned lands with tight controls over land usage.

There are no legal, financial, or other impediments hindering the bank's ability to meet the credit needs of its AA. CNB received a "Satisfactory" rating for its prior CRA evaluation dated October 15, 2019.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The bank's performance was assessed using small business, home mortgage, and consumer loans originated and purchased during the evaluation period, which was January 1, 2019, through December 31, 2021. Performance also included an assessment of CD activities over the same period. CD activities included CD loans, qualified investments, grants, donations, and CD services.

CNB was not required to maintain home mortgage loan data in accordance with the Home Mortgage Disclosure Act during the evaluation period. The bank was also not required to maintain a CRA register for small business data. In addition, consumer loan data is not reported. Therefore, the OCC determined the bank's performance under the Lending Test using a loan sample from the entire evaluation period for the three primary products and considered the results in context as they do not represent the bank's total originations and purchases during the evaluation period.

## **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**

A bank’s overall rating is a blend of the state ratings. For CNB, the overall rating is based on lending activity in its only state, New York.

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 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:** Satisfactory

**The Community Development Test is rated:** Outstanding

The major factors that support this rating include:

- A reasonable geographic distribution of loans to geographies of different income levels.
- A reasonable distribution of loans to borrowers of different income levels.
- Excellent responsiveness to CD needs in the state of New York through CD loans, qualified investments, and CD services.

## Description of Institution’s Operations in New York

As of December 31, 2021, CNB had one AA in the state of New York, the NY Non MSA AA. The NY Non MSA AA included the entire political subdivisions of Clinton and Essex counties. The AA met the requirements of the CRA regulation and did not arbitrarily exclude any low- or moderate-income areas.

### NY Non MSA AA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: NY Non MSA AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	32	3.1	3.1	71.9	18.8	3.1
Population by Geography	120,597	2.3	2.8	70.2	22.4	2.3
Housing Units by Geography	61,596	2.4	2.6	73.2	21.6	0.2
Owner-Occupied Units by Geography	32,988	0.5	1.6	74.6	23.2	0.0
Occupied Rental Units by Geography	14,178	7.6	6.6	63.7	21.9	0.3
Vacant Units by Geography	14,430	1.6	0.9	79.2	17.8	0.6
Businesses by Geography	8,330	4.3	2.0	68.6	24.7	0.5
Farms by Geography	405	0.7	1.0	83.7	14.6	0.0
Family Distribution by Income Level	30,189	19.1	15.7	21.1	44.2	0.0
Household Distribution by Income Level	47,166	22.4	15.6	17.5	44.4	0.0
Median Family Income Non-MSAs –NY		\$59,570	Median Housing Value			\$136,946
Median Family Income Non-MSAs – 2021		\$69,400	Median Gross Rent			\$762
			Families Below Poverty Level			9.9%

*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.*

The NY Non MSA AA consisted of 32 contiguous census tracts in Clinton and Essex counties. Per the 2015 American Community Survey (ACS) data, there was one low-income census tract, one moderate-income census tract, 23 middle-income census tracts, six upper-income census tracts, and one census tract without an income classification.

CNB offered its full range of products and services through its 10 branch locations in the AA, as well as its online banking and mobile banking application. All branches were in middle- or upper-income census tracts. The bank did not open or close any branches during the evaluation period.

As of June 30, 2021, CNB had \$370.9 million in deposits in the AA and ranked first out of 13 deposit-taking institutions in the AA with a deposit market share of 22.7 percent. Other deposit-taking institutions included Community Bank, N.A. with a deposit market share of 15.9 percent, Glens Falls National Bank and Trust Company with a deposit market share of 13.6 percent, NBT Bank, N.A. with a deposit market share of 11.4 percent, and TD Bank, N.A. with a deposit market share of 9.1 percent.

### **Economic Data**

In 2021, the Federal Financial Institutions Examination Council's (FFIEC) updated median family income in the AA was approximately \$69,400, up from approximately \$59,570 in 2015. Per the Federal Reserve Economic Data maintained by the Federal Reserve Bank of St. Louis, the unemployment rate (not seasonally adjusted) in Clinton County was 5 percent in January 2019 and 2.8 percent in December 2021. During the COVID-19 pandemic, unemployment peaked at 17.8 percent in April 2020. Essex County had a slightly higher unemployment rate (not seasonally adjusted) of 5.8 percent in January 2019 and 3.3 percent in December 2021. The unemployment rate also peaked in April 2020 at 19.5 percent. According to Data USA, the most common employment sectors in Clinton County were healthcare and social assistance, retail trade, and manufacturing. For Essex County, the top employment sectors were healthcare and social assistance, educational services, and accommodation and food services.

### **Community Contacts**

The OCC utilized one community contact in the bank's AA to determine local economic conditions and community needs. The community contact was an organization that provides affordable housing solutions to low- and moderate-income individuals in Clinton County. The contact noted the primary needs are affordable housing, specifically the number of units and financing of affordable housing, throughout the county and infrastructure supporting housing in rural parts of the county.

### **Scope of Evaluation in New York**

The OCC conducted a full-scope review of the NY Non MSA AA, CNB's only AA. The review weighted loan types proportionally with their percentage of originations. As a result, small loans to businesses, which accounted for approximately 50 percent of originations during the evaluation period, were given more weight than home mortgage and consumer loans, which each accounted for approximately 25 percent of originations.

# **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK**

## **LENDING TEST**

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

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's lending performance in the state of New York is reasonable.

### **Distribution of Loans by Income Level of the Geography**

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

#### ***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 is excellent. The geographic distribution of home mortgages in low- and moderate-income census tracts significantly exceeds the percentage of owner-occupied housing in low- and moderate- income census tracts and aggregate lending in the AA.

#### ***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 is excellent. The geographic distribution of small loans to businesses in low- and moderate-income census tracts significantly exceeds the percentage of small businesses in low- and moderate-income census tracts and aggregate lending in the AA.

#### ***Consumer Loans***

Refer to Table U 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 consumer loan originations and purchases.

The distribution of consumer loans is reasonable. The bank made no consumer loans in low- or moderate-income census tracts during the evaluation period. The assessment of performance considered the limited number of low- and moderate-income census tracts as well as the number of households in the low- and moderate-income census tracts. In the low-income census tract, there were only 1,256 households, or 2.7 percent of total households in the AA. The census tract is adjacent to the State University of New York (SUNY) College at Plattsburgh campus and has a significant off-campus student population living in it. The census tract is also part of the downtown business district. The moderate-income census tract had only 1,456 households, or 3.1 percent of total households in the AA and was also adjacent to SUNY Plattsburgh.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

### ***Home Mortgage Loans***

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

The borrower distribution of home mortgage loans to individuals of different income levels is reasonable. The bank made no home mortgage loans to low-income individuals in the AA. Home mortgage lending to moderate-income borrowers exceeded the percentage of moderate-income families and aggregate lending to moderate-income families in the AA.

The assessment of borrower distribution of home mortgages loans considered housing affordability and the fact that aggregate home mortgage lending was well below the volume of low-income families in the AA. Per the Federal Reserve Economic Data maintained by the Federal Reserve Bank of St. Louis, the median home listing price in Clinton County increased from \$153,125 in January 2020 to \$189,225 in December 2021 while peaking in June 2021 at \$249,900. Based on the median home listing price, the principal and interest payment for a 30-year mortgage with no down payment and a fixed 5 percent interest rate increased from \$822 in January 2020 to \$1,016 in December 2021 and \$1,342 at its peak. Using the threshold of 30 percent of income for housing affordability, a low-income individual earning 50 percent of the median income could afford a maximum monthly payment of \$840 in 2020 and \$868 in 2021 based on the updated median family income. When including additional expenses such as real estate taxes and homeowners' insurance, it becomes even more difficult for low-income individuals to afford a mortgage. The situation is similar in Essex County, where the median listing price, per Realtor.com, increased from \$179,900 in January 2020 to \$199,900 in December 2021 while peaking at \$298,500 in July 2020. The resulting mortgage payment would be \$966 in January 2020, \$1,073 in December 2021, and \$1,602 at its peak.

### ***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 originations and purchases of small loans to businesses.

The distribution of small loans to businesses of different sizes is excellent. The distribution of small loans to businesses with less than \$1 million in revenue is well below the percentage of businesses with less than \$1 million in revenue but exceeds the aggregate lending in the AA.

The assessment of the performance of small loans to businesses of different sizes was impacted by a lack of revenue information as only 34.8 percent of loans in the sample reported revenue information, which can be attributable to the bank's lending under the Small Business Administration (SBA) Paycheck Protection Program (PPP). Management reported 474 PPP loans originated for \$42.1 million in the AA. Management did not collect revenue information on PPP loans, and as a result, the sample had a higher percentage of loans without revenue information in 2020 and 2021 (73.7 percent and 88.9 percent, respectively).

The assessment of performance also leveraged the distribution of small loans to businesses of different sizes in 2019 when all loans reported revenue information. Performance in 2019 was excellent. Since management generally collects revenue information on all loans except PPP loans, the assessment of performance considered the distribution of small loans to businesses of different sizes excluding loans without reported revenue information for the evaluation period. Using this consideration, the distribution of small loans to businesses of different sizes is excellent. The distribution of small loans to businesses with less than \$1 million in revenue approximates the percentage of businesses with less than \$1 million in revenue and exceeds the aggregate lending in the AA.

In addition, the performance assessment also considered the size of loans. During the evaluation period, 73.9 percent of small loans to businesses of different sizes in the AA were less than \$100,000.

### ***Consumer Loans***

Refer to Table V 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 consumer loan originations and purchases.

The borrower distribution of consumer loans to individuals of different income levels is excellent. Consumer lending to low-income borrowers was somewhat below the percentage of low-income households but approximates the percentage of moderate-income households in the AA. Aggregate lending data for consumer loans was not collected.

### **Responses to Complaints**

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

### **COVID-19 Pandemic Activities**

CNB actively 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.

- CNB granted short-term principal, interest, or principal and interest deferrals to 295 commercial, consumer, and home mortgage borrowers.
- CNB participated in the SBA PPP to support businesses impacted by the COVID-19 pandemic. During the evaluation period, CNB originated 474 PPP loans totaling \$42.1 million for customers and non-customers.
- CNB demonstrated flexibility in working with commercial borrowers with sudden cash flow deficits due to lockdowns adversely impacting business operations. During the evaluation period, CNB originated three loans to borrowers to supplement cash flow deficits totaling \$119,000.

## COMMUNITY DEVELOPMENT TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development 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 \$
NY Non MSA AA	7	100.0	5,517	100.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>5,517</b>	<b>100.0</b>

CNB demonstrated excellent responsiveness to CD needs through CD loans. During the evaluation period, CNB originated seven qualified CD loans totaling \$5.5 million. Six of the loans totaling \$4.4 million had proceeds going to organizations with affordable housing or community services targeted to low- and moderate-income individuals or promote economic development. In addition, the bank made one PPP loan after October 1, 2022, for \$1.1 million that was qualified under the June 2020 CRA rule for community development.

### 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)
NY Non MSA AA	0	0	41	3,396	41	89.1	3,396	84.2	0	0
Greater regional area			5	635	5	10.9	635	15.8	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>46</b>	<b>4,031</b>	<b>46</b>	<b>100.0</b>	<b>4,031</b>	<b>100.0</b>	<b>0</b>	<b>0</b>

\* *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.

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

CNB demonstrated excellent responsiveness to CD needs through qualified investments and grants. During the evaluation period, CNB made 33 investments totaling \$3.4 million and eight grants totaling \$14,000 in the NY Non MSA AA. Consideration was given to five investments totaling \$635,000 located in the regional area that did not have a purpose, mandate, or function to serve the AA because CNB was responsive to the needs and opportunities of its AA. There were no prior investments submitted to the OCC for consideration.

The bank's investment activity focused on community service and economic development. Examples of qualified investments and grants made during the evaluation period include:

- The investments were bonds issued by local school districts for their respective portions of funding capital improvements to the Clinton-Essex-Warren-Washington Board of Cooperative Education Services campus. The purpose is to enhance the campus for better educational and job training opportunities.
- The grants were made to community development organizations providing community services targeted to low- and moderate-income individuals. Examples of the programs supported include the provision of emergency shelter, food and meals and financial literacy.

### **Extent to Which the Bank Provides Community Development Services**

CNB demonstrated an excellent responsiveness to CD needs in the AA, given the asset size, branch presence, and number of employees of the bank. CNB employees and members of senior management served as board members, on finance committees, or as treasurers for 13 CD organizations during the evaluation period. The organizations collectively cover a wide range of CD activities such as providing community services targeted to low- and moderate-income individuals, supporting affordable housing for low- and moderate-income individuals, and supporting economic development by financing small businesses that are creating and retaining jobs for low- and moderate-income individuals. In addition, consideration was given to service CD needs in the regional area that did not have a purpose, mandate, or function to serve the AA because CNB was responsive to the needs and opportunities of its AA. The one organization provides affordable housing to low- and moderate-income individuals.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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”.

<b>Time Period Reviewed:</b>	01/01/2019 to 12/31/2021	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, and consumer loans CD loans, qualified investments, and CD services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	None reviewed	Not applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of New York</b>		
NY Non MSA AA	Full-Scope	Clinton County, Essex County

## Appendix B: Summary of MMSA and State Ratings

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RATINGS Champlain National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Champlain National Bank	Satisfactory	Outstanding	Outstanding
State:			
New York	Satisfactory	Outstanding	Outstanding

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

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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

**Table V. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2019-21**

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.
NY Non MSA AA	45	5,496	100.0	3,026	0.5	4.4	0.7	1.6	2.2	1.8	74.6	88.9	70.0	23.2	4.4	27.5	0.0	0.0	0.1
<b>Total</b>	<b>45</b>	<b>5,496</b>	<b>100.0</b>	<b>3,026</b>	<b>0.5</b>	<b>4.4</b>	<b>0.7</b>	<b>1.6</b>	<b>2.2</b>	<b>1.8</b>	<b>74.6</b>	<b>88.9</b>	<b>70.0</b>	<b>23.2</b>	<b>4.4</b>	<b>27.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.1</b>

Source: 2015 ACS; 01/01/2019 - 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** **2019-21**

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	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.
NY Non MSA AA	45	5,496	100.0	3,026	19.1	0.0	3.7	15.7	17.8	14.8	21.1	20.0	22.0	44.2	44.4	46.7	0.0	17.8	12.8
<b>Total</b>	<b>45</b>	<b>5,496</b>	<b>100.0</b>	<b>3,026</b>	<b>19.1</b>	<b>0.0</b>	<b>3.7</b>	<b>15.7</b>	<b>17.8</b>	<b>14.8</b>	<b>21.1</b>	<b>20.0</b>	<b>22.0</b>	<b>44.2</b>	<b>44.4</b>	<b>46.7</b>	<b>0.0</b>	<b>17.8</b>	<b>12.8</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 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** **2019-21**

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	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.
NY Non MSA AA	46	4,241	100.0	2,044	4.3	10.9	3.9	2.0	6.5	2.1	68.6	67.4	68.5	24.7	15.2	25.3	0.5	0.0	0.2
<b>Total</b>	<b>46</b>	<b>4,241</b>	<b>100.0</b>	<b>2,044</b>	<b>4.3</b>	<b>10.9</b>	<b>3.9</b>	<b>2.0</b>	<b>6.5</b>	<b>2.1</b>	<b>68.6</b>	<b>67.4</b>	<b>68.5</b>	<b>24.7</b>	<b>15.2</b>	<b>25.3</b>	<b>0.5</b>	<b>0.0</b>	<b>0.2</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 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** **2019-21**

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	Aggt.	% Businesses	% Bank Loans	% Businesses	% Bank Loans
NY Non MSA AA	46	4,241	100.0	2,044	81.3	28.3	25.1	5.2	6.5	13.5	65.2
<b>Total</b>	<b>46</b>	<b>4,241</b>	<b>100.0</b>	<b>2,044</b>	<b>81.3</b>	<b>28.3</b>	<b>25.1</b>	<b>5.2</b>	<b>6.5</b>	<b>13.5</b>	<b>65.2</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography** **2019-21**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
NY Non MSA AA	33	852	100.0	2.7	0.0	3.1	0.0	71.3	78.8	22.8	21.2	0.1	0.0
<b>Total</b>	<b>33</b>	<b>852</b>	<b>100.0</b>	<b>2.7</b>	<b>0.0</b>	<b>3.1</b>	<b>0.0</b>	<b>71.3</b>	<b>78.8</b>	<b>22.8</b>	<b>21.2</b>	<b>0.1</b>	<b>0.0</b>

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

**Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** **2019-21**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
NY Non MSA AA	33	852	100.0	22.4	15.2	15.6	15.2	17.5	24.2	44.4	45.4	0.0	0.0
<b>Total</b>	<b>33</b>	<b>852</b>	<b>100.0</b>	<b>22.4</b>	<b>15.2</b>	<b>15.6</b>	<b>15.2</b>	<b>17.5</b>	<b>24.2</b>	<b>44.4</b>	<b>45.4</b>	<b>0.0</b>	<b>0.0</b>

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*