



PUBLIC DISCLOSURE

November 21, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Seneca Savings
Charter Number: 703552

35 Oswego Street
Baldwinsville, NY 13027

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 **Satisfactory**.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on performance in the assessment area (AA) in the state of New York, which demonstrated a reasonable distribution of loans to borrowers of different income levels and a reasonable distribution of loans to geographies of different income levels.
- Seneca Savings' (Seneca or bank) average loan-to-deposit (LTD) ratio is more than reasonable based on the bank's size, financial condition, and credit needs of the AA.
- A majority of home mortgage and small business loans originated and purchased during the evaluation period are inside the AA.
- The bank demonstrated excellent responsiveness to community development (CD) needs through community development loans.

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.

Seneca's average LTD ratio for the 16-quarter period following the date of the prior evaluation period, December 31, 2017, through the end of the current evaluation period, December 31, 2021, is 102.3 percent. The ratio ranged from a low of 91.1 percent to a high of 110.9 percent. In comparison, the quarterly average LTD ratio of five similarly situated financial institutions in the surrounding areas was 53.2 percent during the same period, ranging from a low of 31.8 percent to a high of 65.3 percent.

Lending in Assessment Area

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

The bank originated and purchased 69.2 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. Seneca was not required to maintain a Community Reinvestment Act (CRA) register for small business/farm data; therefore, small business performance was assessed based on a loan sample and does not include the entire population of loan originations and purchases.

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	208	66.7	104	33.3	312	40,993	76.9	12,284	23.1	53,277
Small Business	32	91.4	3	8.6	35	4,638	99.4	28	0.6	4,666
Total	240	69.2	107	30.8	347	45,631	78.8	12,312	21.2	57,943

Description of Institution

Seneca is a \$215 million, single-state, federal savings association headquartered in Baldwinsville, N.Y. The bank is a wholly owned subsidiary of Seneca Federal Bancorp, Inc., a federally chartered mid-tier stock holding company, which is a subsidiary of Seneca Financial MHC, a federally chartered mutual holding company. The bank has one wholly-owned subsidiary, Seneca Savings Insurance Agency, Inc. dba Financial Quest (Quest). Quest offers financial planning and investment advisory services and sells various insurance and investment products through broker networks. The bank has not been involved in any mergers or acquisitions since the prior CRA evaluation.

The bank operates four branches in one AA, the Syracuse, NY metropolitan statistical area (MSA) AA. The AA includes 156 census tracts in Onondaga and Madison counties, which are part of the Syracuse, NY MSA. The AA was expanded to include the 16 census tracts of Madison County with the opening of the Bridgeport branch location in late 2019. No branch locations were closed during the evaluation period. The bank's AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

The bank's strategy during the evaluation period focused on organic loan and deposit growth throughout its branch network and AA. The bank offers traditional and non-complex lending and deposit products and services to customers in its market area through its four branch locations, online banking, and mobile banking application. More specifically, Seneca views Onondaga County, which is the most populous county in the three county Syracuse, NY MSA, as a primary area for growth, particularly for commercial lending and deposit gathering.

Seneca reported total loans of \$152 million, representing 70.7 percent of total assets, as of December 31, 2021. The bank's lending products include conventional residential real estate mortgages, home equity lines of credit and loans, commercial real estate loans, commercial and industrial loans, and other consumer loan products. Loan portfolio composition was as follows: 62.9 percent residential real estate loans, 26.7 percent commercial real estate loans, 10 percent commercial and industrial loans, and 0.4 percent consumer and other loans. Tier 1 equity capital totaled \$24.1 million as of December 31, 2021.

Seneca reported total deposits of \$164.8 million or 76.7 percent of total assets as of December 31, 2021. The bank's deposit products include demand accounts, negotiable order of withdrawal accounts, savings accounts, money market accounts and certificate of deposit accounts. Deposits are sourced from within Seneca's market area.

There were no legal, financial, or other impediments hindering the bank's ability to meet the credit needs of its AA. Seneca was rated "satisfactory" as its last CRA evaluation dated October 29, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation (PE) assessed the bank's lending performance in its AA under the CRA. Examiners evaluated Seneca using the Small Bank evaluation procedures, which included a Lending Test. The Lending Test evaluates the bank's record of meeting the credit needs of its AA through its lending activities. Examiners reviewed the bank's primary loan products, home mortgage and small business loans, originated during the period of January 1, 2019, through December 31, 2021, to evaluate performance under the lending test. The lending test for this PE included an assessment of performance within the Syracuse NY MSA AA. As the bank was not required to maintain a CRA register for small business/farm data, the OCC determined the bank's performance under the Lending Test using a loan sample from the entire evaluation period for the small business products and considered the results in context as they do not represent the bank's total originations and purchases during the evaluation period.

Performance also included an assessment of community development (CD) activities from January 1, 2019, through December 31, 2021, an optional assessment given the bank's asset size. Qualifying CD activities included CD loans.

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 AAs located within the same MSA 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 a blend of the state ratings.

The bank's overall rating is based on the rating for the state of New York. The State Rating is based on the full-scope review of the bank's Syracuse NY MSA AA.

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 institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of New York

CRA rating for the State of New York: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- An overall reasonable distribution of loans to geographies of different income levels.
- An overall reasonable distribution of loans to borrowers of different income levels.
- Seneca did not receive any CRA related complaints during the evaluation period.

Description of Institution's Operations in New York

As of December 31, 2021, Seneca had one AA within the state of New York, the Syracuse NY MSA AA. The AA includes all census tracts located in the political subdivisions of Onondaga and Madison counties, both of which are located in the Syracuse, NY MSA. The AA met the requirements of the CRA regulation and did not arbitrarily exclude low- or moderate-income geographies.

No adjustments or revisions to the bank's designated AA were necessary.

The following table provides a summary of the demographics that includes housing and business information for the Syracuse NY MSA AA.

Syracuse NY MSA AA

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)	156	14.7	15.4	37.2	29.5	3.2
Population by Geography	540,731	11.4	13.1	40.6	33.4	1.5
Housing Units by Geography	235,698	11.0	14.9	41.7	31.3	1.1
Owner-Occupied Units by Geography	140,284	3.2	10.3	47.3	39.0	0.1
Occupied Rental Units by Geography	70,645	22.5	22.8	32.4	19.1	3.2
Vacant Units by Geography	24,769	22.2	18.4	36.2	22.3	0.9
Businesses by Geography	43,409	9.4	10.7	39.0	38.4	2.5
Farms by Geography	1,396	2.4	9.3	46.2	41.3	0.8
Family Distribution by Income Level	129,938	20.7	16.6	20.2	42.5	0.0
Household Distribution by Income Level	210,929	24.6	15.0	17.2	43.2	0.0
Median Family Income MSA – Syracuse, N.Y. MSA	\$68,468	Median Housing Value				\$130,785
2021 MFI MSA – Syracuse, N.Y. MSA	\$80,500	Median Gross Rent				\$773
					Families Below Poverty Level	10.2%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Syracuse NY MSA AA consisted of 140 contiguous census tracts in Onondaga County and 16 contiguous census tracts in Madison County, both of which are part of the Syracuse, NY MSA. Per the 2015 American Community Survey (ACS) data, census tracts for the AA were designated as follows: 23 low-income, 24 moderate-income, 58-middle-income, 46 upper-income, and five with an unassigned income classification.

Seneca offered its full range of products and services through its four branches and four deposit-taking ATMs located in the AA, as well as its online banking and mobile banking application. The bank operated three branches in Onondaga County and one branch in Madison County. Of the four branches, three were in middle-income geographies and one was in an upper-income geography. The bank's primarily lending focus in the AA included home mortgage and small business loans, which is consistent with the bank's strategy to increase focus on commercial lending activities to diversify the overall loan portfolio. During the COVID-19 pandemic, the bank offered and approved payment deferrals and participated in the Small Business Administration's (SBA) Paycheck Protection Program (PPP) to provide relief to customers experiencing temporary hardship.

The bank faced strong competition for deposits in its AA. As of June 30, 2021, Seneca had \$168.1 million in deposits, resulting in a deposit market share of 0.9 percent, ranking 14th among depository institutions operating in the AA. Major competitors for deposit market share include M&T Bank, KeyBank, N.A., and Empower Federal Credit Union, with market shares of 23.3 percent, 16.5 percent, and 13.1 percent, respectively.

The bank faced strong competition for home mortgage and small business loans in the AA. Based on the 2021 HMDA market share data, 262 lenders originated or purchased 17,840 home mortgage loans in the AA. Seneca's home mortgage loans accounted for 0.4 percent of the market share while the top five lenders had a combined market share of 35.5 percent. There were 68 lenders that originated or purchased 421 home mortgage loans within low-income census tracts and 109 lenders that originated or purchased 1,675 home mortgage loans within moderate-income census tracts. Based on 2020 peer small business data, 125 lenders originated or purchased 11,038 small business loans in the AA. Seneca is not required to report small business data; however, the top five lenders had a combined market share of 53.8 percent.

Per the 2015 ACS, there were 235,698 total housing units in the AA, of which, 59.5 percent were owner-occupied, 30 percent were rentals, and 10.5 percent were vacant. The median housing value was \$130,785 in the AA based on the 2015 ACS; however, per the Federal Reserve Economic Data maintained by the Federal Reserve Bank of St. Louis, the median home listing price in Onondaga and Madison counties experienced significant increases over the evaluation period and peaked at \$247,725 and \$249,000, respectively, in 2021. The increase in median listing price would increase the principal and interest payment for a 30-year mortgage with no down payment and a fixed 5 percent interest rate to \$1,330 and \$1,337, respectively, for each county. The mortgage payment is significantly higher than the median rent in the AA of \$773 and may be an impediment for low- and moderate-income individuals to obtain a home mortgage. Using the 2021 median family income of \$80,500 and a threshold of 30 percent of income for housing affordability, a low-income individual could afford a maximum monthly payment of \$1,006 without including additional expenses or real estate taxes, and a moderate-income individual could afford a maximum payment of \$1,610. When including these additional expenses, it becomes even more difficult for low-income individuals, and to a lesser extent moderate-income individuals, to afford a mortgage in the AA.

According to the U.S. Bureau of Labor Statistics December 2021 data, the unemployment rates (not seasonally adjusted) in Onondaga and Madison counties were 2.9 percent, which outperformed the state unemployment rate of 5.4 percent. During the evaluation period, unemployment ranged from a low of 2.9 percent in December 2021 to a high of 17.8 percent in April 2020 during the COVID-19 pandemic. Prior to the COVID-19 pandemic, the unemployment rates in the counties did not differ materially from the state's unemployment rate, but following the pandemic, the counties recovered more quickly and outperformed the state's unemployment rate. Per Moody's Analytics, the low unemployment rate is more so the result of weaker labor force growth rather than strong hiring. The key sectors of the economy include education and health services, government, professional and business services, and retail trade. The top employers in the counties were Upstate Medical University, St. Joseph's Health, Oneida Indian Nation Enterprises, Syracuse University, and Wal-Mart.

As part of the CRA evaluation, the OCC reviewed information from two community contacts conducted during the evaluation period within the Syracuse NY MSA AA to determine local economic conditions and community needs. One community contact noted a need for home improvement loans to remediate the housing stock due to age and potentially hazardous conditions. Another community contact indicated poverty rates are extremely high in the city of Syracuse making it difficult for the affordable housing organizations to find qualified borrowers. Other identified needs include small loans (e.g., micro loans) for startup capital for small businesses as many lack complete financial information or credit history, which make it difficult for traditional lending.

Scope of Evaluation in New York

Examiners completed a full-scope review of the Syracuse NY MSA AA. Small business lending, which accounted for 55 percent of originations and purchases over the evaluation period, received more weight than home mortgage lending. Please refer to Appendix A: Scope of the Examination for additional information.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

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 poor. The geographic distribution of home mortgage loans in low-income census tracts was significantly below the percentage of owner-occupied housing units and well below aggregate lending in the AA. The distribution of home mortgage loans in moderate-income census tracts was significantly below the percentage of owner-occupied housing units 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 reasonable. The geographic distribution of small loans to businesses in low-income census tracts was below the percentage of businesses and aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income census tracts exceeded the percentage of businesses and aggregate lending in the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses 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 is reasonable. The distribution of home mortgage loans to low-income borrowers was well below the percentage of low-income families and aggregate lending in the AA. The distribution of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and below aggregate lending in the AA.

The assessment of performance considered housing affordability for a low-income individual during the evaluation period given the median listing price and median family income as previously discussed.

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 near to the percentage of businesses with less than \$1 million in revenue and exceeds aggregate lending in the AA.

Responses to Complaints

There were no CRA-related complaints during the evaluation period.

COMMUNITY DEVELOPMENT

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. Performance related to community development activities had a positive effect on the bank’s rating in the state.

Number and Amount of Community Development Loans

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Syracuse NY MSA AA	172	100	9,465	100
Total	172	100	9,465	100

The Community Development Loans Tables, shown above, sets forth the information and data used to evaluate the bank’s level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Seneca demonstrated excellent responsiveness to community development needs through community development loans. Community development lending included 172 qualifying SBA PPP loans totaling \$9.5 million, representing 39.2 percent of tier 1 capital.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Home mortgage and small business loans Community development loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not applicable	Not applicable
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 and Madison counties

Appendix B: Summary of State Ratings

RATINGS	
Overall Bank:	Lending Test Rating
Seneca Savings	Satisfactory
State:	
New York	Satisfactory

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.
- 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 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	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		
Syracuse NY MSA AA	208	40,993	100.0	17,840	3.2	1.4	2.4	10.3	2.9	9.4	47.3	42.8	45.4	39.0	52.4	42.8	0.1	0.5	0.1		
Total	208	40,993	100.0	17,840	3.2	1.4	2.4	10.3	2.9	9.4	47.3	42.8	45.4	39.0	52.4	42.8	0.1	0.5	0.1		

*Source: 2015 ACS; 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	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Syracuse NY MSA AA	208	40,993	100.0	17,840	20.7	5.3	8.4	16.6	14.4	20.6	20.2	20.2	23.1	42.5	51.9	36.0	0.0	8.2	11.9		
Total	208	40,993	100.0	17,840	20.7	5.3	8.4	16.6	14.4	20.6	20.2	20.2	23.1	42.5	51.9	36.0	0.0	8.2	11.9		

*Source: 2015 ACS; 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	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Syracuse NY MSA AA	32	4,638	100	10,860	9.4	6.3	7.9	10.7	15.6	10.0	39.0	59.4	41.3	38.4	18.8	38.0	2.5	0	2.7
Total	32	4,638	100	10,860	9.4	6.3	7.9	10.7	15.6	10.0	39.0	59.4	41.3	38.4	18.8	38.0	2.5	0	2.7

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	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Syracuse NY MSA AA	32	4,638	100	10,860	83.5	78.1	34.3	5.2	21.9	11.2	0
Total	32	4,638	100	10,860	83.5	78.1	34.3	5.2	21.9	11.2	0

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%