

# **PUBLIC DISCLOSURE**

January 22, 2024

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

PCSB Bank  
RSSD No. 24006

2651 Strang Blvd.  
Yorktown Heights, NY 10598

Federal Reserve Bank of New York

33 Liberty Street  
New York, NY 10045

**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.

**TABLE OF CONTENTS**

INSTITUTION'S CRA RATING ..... 1  
    PERFORMANCE TEST RATINGS TABLE.....1  
    SUMMARY OF MAJOR FACTORS SUPPORTING RATINGS.....1  
INSTITUTION.....3  
    DESCRIPTION OF INSTITUTION ..... 3  
    SCOPE OF EVALUATION..... 4  
    CONCLUSIONS ON PERFORMANCE CRITERIA ..... 7  
MD 35614 (NEW YORK-JERSEY CITY-WHITE PLAINS, NY-NJ) - FULL REVIEW.....14  
    DESCRIPTION OF INSTITUTIONS OPERATIONS.....14  
    CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....19  
MSA 39100 (POUGHKEEPSIE-NEWBURGH-MIDDLETOWN, NY) - LIMITED REVIEW .. 28  
    DESCRIPTION OF INSTITUTIONS OPERATIONS.....28  
    CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS ..... 28  
APPENDICES ..... 29  
APPENDIX A - HMDA & SMALL BUSINESS DISTRIBUTION REPORTS ..... 29  
APPENDIX B - SCOPE OF EXAMINATION TABLE..... 43  
APPENDIX C - SUMMARY OF STATE AND METROPOLITAN AREA RATINGS ..... 44  
APPENDIX D - ASSESSMENT AREA MAPS ..... 45  
APPENDIX E - GLOSSARY..... 46

## INSTITUTION'S CRA RATING

***INSTITUTION'S CRA RATING: SATISFACTORY***

*The following table indicates the performance level of PCSB Bank with respect to the lending, investment, and service tests.*

**PERFORMANCE TEST RATINGS TABLE**

<b>PERFORMANCE LEVELS</b>	<b>PCSB BANK</b>		
	<b>PERFORMANCE TESTS</b>		
	<b>Lending Test*</b>	<b>Investment Test</b>	<b>Service Test</b>
Outstanding			
High Satisfactory			<b>X</b>
Low Satisfactory	<b>X</b>	<b>X</b>	
Needs to Improve			
Substantial Noncompliance			

\* The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

**SUMMARY OF MAJOR FACTORS SUPPORTING RATINGS**

The major factors supporting the institution's rating include:

**LENDING TEST**

- Lending levels reflected adequate responsiveness to assessment area credit needs.
- A high percentage of loans were made in the bank's assessment area.
- The geographic distribution of loans reflected adequate penetration throughout the assessment area.
- The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels.

- Exhibited an adequate record of serving the credit needs of low-income individuals and areas and very small businesses.
- Made an adequate level of community development loans.
- Made limited use of innovative and/or flexible lending practices in serving assessment area credit needs.

### **INVESTMENT TEST**

- Made an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position.
- Made rare use of innovative and/or complex investments to support community development initiatives.
- Exhibited adequate responsiveness to credit and community development needs.

### **SERVICE TEST**

- Delivery systems were accessible to the bank's geographies and individuals of different income levels in its assessment area.
- Record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals.
- Services did not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or low- and moderate-income individuals.
- Provided a relatively high level of community development services.

## INSTITUTION

### DESCRIPTION OF INSTITUTION

PCSB Bank (“PCSB” or “the bank”), headquartered in Yorktown Heights, is a state member, full-service commercial community bank serving the Lower Hudson Valley of New York State. In January 2023, Brookline Bancorp, Inc. (“BRKL”) completed its acquisition of PCSB Financial Corporation, the parent of PCSB. BRKL operates as a multi-bank holding company consisting of three banks, including PCSB, which operates as a bank subsidiary of BRKL.

PCSB operates 14 branches, including its main office, and 14 full-service automated teller machines (“ATMs”) at each branch, which are all located in New York State. During the evaluation period, the bank closed one branch in Pawling, New York. The bank does not operate any loan production offices. The bank offers a range of deposit products, including personal checking and savings accounts, and commercial checking and savings accounts. PCSB also offers alternative delivery services, including its ATM network, internet banking, electronic bill payment, mobile banking, and mobile person-to-person fund transfers.

PCSB primarily offers commercial and residential real estate lending products. Commercial product offerings include commercial and industrial loans and commercial real estate. Retail product offerings include residential real estate loans, including fixed and variable rate mortgages, home equity lines of credit (“HELOCs”), consumer loans, and construction loans.

Based on the bank’s June 30, 2023, Consolidated Report of Condition and Income (“Call Report”), PCSB had total assets of \$2.0 billion, total loans of \$1.3 billion, and total deposits of \$1.8 billion. Loans represented the bank’s primary asset, with Nonfarm Nonresidential Secured and 1-4 Family Residential Real Estate loans representing 56.4% and 18.5% of the portfolio, respectively. The subsequent tables illustrate the institution’s loan and deposit portfolios.

<b>Loan Portfolio as of 6/30/2023</b>		
<b>Loan Type</b>	<b>\$(000s)</b>	<b>%</b>
1-4 Family Residential Real Estate	238,963	18.5
Construction, Land Development, and Other Land Loans	48,559	3.8
Multifamily (5 or more units) Residential Real Estate	189,372	14.7
Home Equity Line of Credit (HELOCs)	24,141	1.9
Consumer	254	0.0
Agricultural Production and Other Loans to Farmers	0	0.0
Commercial & Industrial	60,555	4.7
Nonfarm Nonresidential Secured	728,234	56.4
Other	1,235	0.1
<b>Total Loans</b>	<b>1,291,313</b>	<b>100.0</b>
<i>Source: Call Report 6/30/2023</i>		

<b>Deposit Portfolio as of 6/30/2023</b>		
<b>Deposit Type</b>	<b>\$(000s)</b>	<b>%</b>
Demand Deposits	98,617	5.5
All NOW and ATS	1,260	0.1
Money Market Deposits	281,172	15.8
Other Savings Deposits	761,201	42.8
Time Deposits at or below Insurance Level	417,997	23.5
Time Deposits Over Insurance Level	94,479	5.3
Brokered Deposits	124,583	7.0
<b>Total Deposits</b>	<b>1,779,309</b>	<b>100.0</b>
<i>Source: Uniform Bank Performance Report as of 6/30/2023</i>		

## DESCRIPTION OF ASSESSMENT AREAS

PCSB did not make any changes to their assessment area during the evaluation period; however, the Office of Management and Budget updated the Metropolitan Divisions (“MDs”) and Metropolitan Statistical Areas (“MSAs”). The changes resulted in Dutchess County being classified as a separate MSA. As a result, the bank delineated the following two assessment areas:

- MD 35614 (New York-Jersey City-White Plains, NY-NJ), consisting of Westchester and Putnam Counties, and a portion of Rockland County; and
- MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY), consisting of a portion of Dutchess County.

PCSB’s assessment areas were in compliance with the requirements of Section 228.41 of Regulation BB. A map illustrating the bank’s assessment areas is in Appendix D. There were no financial or legal factors that would prevent the bank from fulfilling its responsibilities under the Community Reinvestment Act (“CRA”).

## Previous Performance Evaluation

PCSB’s prior regulator for the Community Reinvestment Act was the Federal Deposit Insurance Corporation (“FDIC”). As of January 10, 2023, PCSB became a State Member Bank and this is the first CRA evaluation conducted by the Federal Reserve Bank of New York. The bank received a "Satisfactory" rating at the previous CRA evaluation conducted by the FDIC dated January 19, 2021, based on FFIEC Interagency Large Institution CRA Examination Procedures. The lending test was rated Low Satisfactory, the investment test was rated High Satisfactory, and the service test was rated Low Satisfactory.

## SCOPE OF EXAMINATION

### Procedures

PCSB’s CRA performance was evaluated using the Federal Financial Institutions Examination Council's (“FFIEC”) Interagency Large Institution CRA Examination Procedures, which consists of the lending, investment, and service tests. The evaluation considered the CRA performance context, including the bank's asset size, financial condition, market competition, assessment area demographics, and credit and community development needs.

## Products

During this evaluation, loans reportable under the Home Mortgage Disclosure Act (“HMDA”), as well as small business loans, subject to CRA data reporting requirements, were analyzed as these loan types represented the bank’s major product lines based on a review of bank records, business strategy, and loan portfolio composition. HMDA-reportable loans included home purchase and refinance loans on 1-4 family properties. The small business loans included commercial real estate loans, commercial and industrial loans, and lines of credit in amounts of \$1 million or less. Home improvement loans, multifamily loans, and small farm loans were excluded from the evaluation because there was insufficient volume to conduct a meaningful analysis. Examiners verified the integrity of HMDA and small business data reported for the years 2020, 2021, and 2022. Examiners also analyzed community development loans, investments, and services. Multifamily loans qualifying as community development loans were also considered in the evaluation of community development lending.

The bank originated a large volume of Small Business Administration (“SBA”) Paycheck Protection Program (“PPP”) loans. The SBA PPP was established by the Coronavirus Aid, Relief, and Economic Security Act (“CARES Act”) of 2020, and designed to provide direct capital for small businesses adversely affected by the COVID-19 pandemic and to keep workers on small business payrolls. Pursuant to CA Letter 21-5: CRA Consideration for Activities in Response to the Coronavirus, PPP loans greater than \$1 million may be considered as community development loans, if they have a primary purpose of community development as defined under CRA. PPP loans during the review period demonstrated leadership in serving assessment area credit needs during a period of acute and immediate credit needs attributable to the COVID-19 pandemic.

## Evaluation Period

Examiners reviewed the bank’s home mortgage and small business loans between January 1, 2020 through December 31, 2022. The evaluation of the bank’s community development loans, qualified investments, philanthropic grants, and community development services included all qualified activities from January 20, 2021 through June 30, 2023. The investment test included investments and grants made during the evaluation period and the current book value of any qualified investments outstanding from the prior evaluation.

## Lending Analysis

Under the lending test, borrower and geographic loan distribution analyses included only loans inside the assessment areas. The bank’s HMDA lending was compared to the 2015 American Community Survey (“2015 ACS”) demographic data for 2020 and 2021, and to the U.S. Department of Commerce Bureau of the Census 2020 (“2020 U.S. Census”) for 2022. The bank’s record of small business lending was compared to Dun & Bradstreet (“D&B”) demographic data and aggregate small business loan data for 2020, 2021, and 2022. Aggregate HMDA and small business lending data for 2020, 2021, and 2022, was also used. Aggregate lenders included all lenders required to report HMDA-reportable and CRA small business lending data within the assessment areas. For retail services, PCSB’s branch distribution analysis was conducted using data as of December 31, 2022.

To evaluate the geographic distribution, the proportion of home purchase and home refinance loan originations located in low- or moderate- income (“LMI”) geographies was compared to the proportion of owner-occupied housing units located in LMI geographies. For small business loans, the analysis compared the proportion of loan originations located in LMI geographies with the proportion of businesses located in LMI geographies, based on D&B data. Performance in low-income and in moderate-income geographies

were analyzed separately. The lending analysis also considered lending opportunities in LMI census tracts as indicated by demographic data and aggregate lending patterns.

To analyze the distribution of HMDA-related loans by borrower profile, the proportion of originations to LMI borrowers was compared to the proportion of LMI families residing in the assessment areas. Median family income (“MFI”) estimates from the FFIEC were used to categorize borrower income. For small business lending, the analysis normally compares the proportion of loans to businesses with gross annual revenues of \$1 million or less, based on D&B data, to the proportion of all such businesses located in the assessment areas.

### **Community Development Activity Analysis**

Community development activities were reviewed to determine whether activities had community development as a primary purpose and whether the community development activities benefitted the bank’s assessment areas or the broader statewide or regional area (“BSRA”) that included the assessment areas. In addition, pursuant to CA Letter 21-5: CRA Consideration for Activities in Response to the Coronavirus, qualified community development activities supporting community needs related to the COVID-19 pandemic located outside of the assessment areas or the BSRA were also given consideration. The eligibility of a loan, investment, or service as a community development activity was based on demographic information at the time the community development activity was undertaken. Qualified community development activities were analyzed from both the quantitative and qualitative perspectives to understand the volume of activity impacting a particular assessment area, the innovativeness of those activities, and the responsiveness to local community development and credit needs. When appropriate, peer comparisons were conducted using annualized metrics to gauge the relative performance of the institution in a particular assessment area.

### **Deriving Overall Conclusions**

Examiners conducted a full-scope review of the bank’s primary assessment area, MD 35614 (New York-Jersey City-White Plains, NY-NJ), and a limited-scope review of the MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY) assessment area. As of June 30, 2023, the primary assessment area included 12 of the bank’s 14 branches, 87.7% of the bank’s total deposits, and 86.9% of the bank’s total lending.

Before reaching a conclusion about the overall performance regarding geographic distribution and borrower characteristics in the assessment area, examiners compared loan originations in each loan product category to total retail lending volume to determine the influence of performance by product on the overall conclusion. For additional details, see the Scope of Examination Table (Appendix B), which contains a summary of data for all rated areas.

Demographic and economic information also impacted PCSB’s performance context and is discussed in detail for the full-scope assessment area. Information was obtained from publicly available sources, including the 2015 American Community Survey (“2015 ACS”), the U.S. Department of Commerce’s Bureau of the Census (“2020 U.S. Census”), the U.S. Department of Labor’s Bureau of Labor Statistics (“BLS”), D&B, and U.S. Department of Housing and Urban Development (“HUD”).

### **Community Contacts**

To understand community development and credit needs, two community contact interviews were conducted within the New York area and included representatives of community-based organizations. The contacts had expertise in their respective fields and were familiar with the economic, social, and demographic characteristics and community development opportunities in each assessment area.



Information obtained from these interviews helped establish a context for the communities in which PCSB operated. Please refer to the Community Contacts section within the full scope assessment area for more detail.

## CONCLUSION WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST

PCSB’s overall performance under the Lending Test is rated Low Satisfactory, based on adequate performance in the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area. The MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY) assessment area was consistent with this performance. Lending levels reflected adequate responsiveness to assessment areas credit needs. A high percentage of loans were made in the bank's assessment areas. The geographic distribution of loans reflected adequate penetration throughout the assessment areas. The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels. The bank exhibited an adequate record of serving the credit needs of low-income individuals and areas and very small businesses. PCSB made an adequate level of community development loans. The bank made limited use of innovative and/or flexible lending practices in serving assessment area credit needs.

#### Lending Activity

PCSB’s lending levels reflected adequate responsiveness to the credit needs of the assessment areas, given the bank’s capacity to meet assessment areas’ credit needs and overall market conditions. This conclusion was based on adequate responsiveness to the credit needs of the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area. The MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY) assessment area was consistent with this performance.

As shown in the subsequent table, the bank made 1,127 HMDA and small business loans totaling approximately \$369.6 million. This lending activity represented an overall annual performance over 36 months of 376 loans totaling \$123.2 million. Annualized performance increased 63.5% by number and 0.5% increase by dollar, when compared to the bank’s previous evaluation’s annualized performance of 230 loans and \$122.6 million. The increase in its lending activity was largely attributed to the origination of PPP loans. Specifically, the bank originated a total of 176 PPP loans totaling \$23.3 million in the evaluation period. PCSB’s overall HMDA and small business lending is summarized in the following table:

<b>Summary of Lending Activity</b>				
<b>January 1, 2020 – December 31, 2022</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000's)</b>	<b>%</b>
Home Improvement	33	2.9	\$4,865	1.2
Home Purchase	126	11.2	\$43,172	10.9
Multifamily Housing	52	4.6	\$103,147	26.0
Refinancing	221	19.6	\$80,750	20.4
<b>Total HMDA</b>	<b>432</b>	<b>38.3</b>	<b>\$231,934</b>	<b>58.5</b>
<b>Total Small Business</b>	<b>695</b>	<b>61.7</b>	<b>\$164,679</b>	<b>41.5</b>
<b>TOTAL LOANS</b>	<b>1,127</b>	<b>100.0</b>	<b>\$396,613</b>	<b>100.0</b>

*Note: Affiliate loans include only loans originated or purchased within the bank’s assessment areas.*

**Assessment Area Concentration**

PCSB originated a high percentage of its loans by both dollar and number within its combined assessment areas. The bank originated a majority of its home mortgage and small business loans within the combined assessment areas by both number and dollar value. As shown in the subsequent table, the bank displayed a stronger performance in small business lending, by number, with 86.9% of such loans extended within the combined assessment areas. The overall performance by number of HMDA and small business loans within the assessment area was 84.5%.

<b>Lending Inside and Outside the Assessment Area January 1, 2020 – December 31, 2022</b>								
<b>Loan Type</b>	<b>Inside</b>				<b>Outside</b>			
	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Improvement	30	90.9	\$3,780	77.7	3	9.1	\$1,085	22.3
Home Purchase	93	73.8	\$29,271	67.8	33	26.2	\$13,901	32.2
Multifamily Housing	36	69.2	\$62,180	60.3	16	30.8	\$40,967	39.7
Refinancing	189	85.5	\$59,702	73.9	32	14.5	\$21,048	26.1
<b>Total HMDA</b>	<b>348</b>	<b>80.6</b>	<b>\$154,933</b>	<b>66.8</b>	<b>84</b>	<b>19.4</b>	<b>\$77,001</b>	<b>33.2</b>
<b>Total Small Business</b>	<b>604</b>	<b>86.9</b>	<b>\$127,016</b>	<b>77.1</b>	<b>91</b>	<b>13.1</b>	<b>\$37,663</b>	<b>22.9</b>
<b>TOTAL LOANS</b>	<b>952</b>	<b>84.5</b>	<b>\$281,949</b>	<b>71.1</b>	<b>175</b>	<b>15.5</b>	<b>\$114,664</b>	<b>28.9</b>

*Source: HMDA Reported Data; Bank Records*

**Geographic Distribution of Loans**

PCSB’s geographic distribution of loans reflected adequate penetration throughout its assessment areas. This conclusion was based on adequate performance in the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area. The MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY) assessment area was consistent with this performance. The analysis considered performance context factors, such as the number of LMI geographies within the assessment area, the number of owner-occupied units in such geographies, and the aggregate lending performance.

**Lending to Borrowers of Different Income and to Businesses of Different Sizes**

The distribution of borrowers reflected, given the product lines offered, adequate penetration among borrowers of different income levels and businesses of different sizes. This conclusion was based on the bank’s lending performance in the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area. The MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY) assessment area was consistent with this performance. Multifamily lending was not analyzed under this performance criterion, as lenders typically do not collect or report borrower income information for such loans.

**Community Development Lending**

PCSB made an adequate number of community development loans. PCSB’s community development lending performance was adequate in the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area. The MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY) assessment area was below this performance. The bank originated 10 qualified community development loans totaling \$13.5 million, of which 3 loans for \$4.1 million were made in the BSRA. Because examiners determined the bank met the credit needs of its assessment areas, the loans that benefitted the BSRA qualified for community development credit. Also, examiners considered 3 PPP loans in amounts greater than \$1 million with a

primary purpose of community development, totaling approximately \$5.0 million.

The bank’s total community development lending represented an annualized performance over 30 months of 4 loans totaling approximately \$5.4 million. Annualized performance decreased 20.0%, by number and 79.2%, by dollar when compared to the previous evaluation, when the bank had an annualized performance over 36 months of 5 loans totaling \$25.9 million. This decrease was most likely attributable to the drop in the community development loans originating from PPP lending done in 2020, which were counted in the bank’s prior CRA evaluation, where the bank made 7 loans for \$50.9 million.

PCSB’s community development loans primarily helped finance affordable housing initiatives and economic development efforts, consistent with the needs identified by community contacts. The subsequent table illustrates the community development lending activity by assessment area for each community development purpose.

<b>Community Development Lending by Assessment Area</b>										
<b>January 20, 2021 - June 30, 2023</b>										
<b>Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	4	4,876	1	1,200	2	3,316	0	0	7	9,393
MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY)	0	0	0	0	0	0	0	0	0	0
<b>Subtotal</b>	<b>4</b>	<b>4,876</b>	<b>1</b>	<b>1,200</b>	<b>2</b>	<b>3,316</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>9,393</b>
BSRA	2	2,357	0	0	1	1,710	0	0	3	4,067
<b>Total</b>	<b>6</b>	<b>7,234</b>	<b>1</b>	<b>1,200</b>	<b>3</b>	<b>5,026</b>	<b>0</b>	<b>0</b>	<b>10</b>	<b>13,460</b>
<b>Percent of Total</b>	<b>60.0</b>	<b>53.7</b>	<b>10.0</b>	<b>8.9</b>	<b>30.0</b>	<b>37.3</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>

*Source: Bank Data*

### **Innovative and/or Flexible Lending Practices**

PCSB made limited use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas. Since the bank offered each of these products throughout all its assessment areas, examiners rated and discussed the bank’s performance under this criterion at the institution level only.

Below are details of the bank’s innovative or flexible lending programs:

- The bank’s True Community Loan Program began in 2017 and ended in 2023. The program was available to LMI homebuyers in the bank’s assessment areas. The bank paid for the mortgage insurance over the entire loan, waived the application fee, and allowed for up to 3% down payment assistance, and reduced the mortgage interest rate by 50 basis-point. During the evaluation period, the bank originated 2 loans under this program, totaling \$168,000.
- During the evaluation period, the bank participated in the State of New York Mortgage Agency’s (“SONYMA”) Low Interest Rate Mortgage Program and originated 4 SONYMA loans, totaling \$1.0 million. This program provided qualified LMI, first-time homebuyers with low down payment mortgage financing on 1-4 family dwellings at fixed rates that were below the prevailing

conventional rates. The program allowed for closing cost assistance from a local housing organization, and had underwriting criteria that was more flexible than for traditional mortgage loans.

**INVESTMENT TEST**

PCSB’s overall performance under the Investment Test was rated Low Satisfactory, based on adequate performance in the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area. The MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY) assessment area was below the overall performance, as the bank made no new investments or grants during the evaluation period. The bank’s adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position, primarily supported this rating. The bank made rare use of innovative and/or complex investments to support community development initiatives. The bank exhibited adequate responsiveness to credit and community development needs.

During the current evaluation period, the bank had 50 qualified community development investments and grants, totaling approximately \$5.4 million, This investment activity included 6 new investments totaling \$5.3 million, no outstanding prior period investments, and 44 grants totaling \$151.2 thousand. This represented an overall annualized performance over 30 months of 2.4 investments and \$2.1 million. Annualized performance decreased when compared to the bank’s prior CRA evaluation’s annualized over 36 months of 4 investments, totaling \$5.8 million. At the current evaluation, examiners determined that the large decrease in total investments, 40% by number of investments and 63.8% by dollar volume, was attributed to the lack of prior period investments. Examiners noted that prior period activity included 4 investments totaling \$7.6 million.

The level of grants represented an annualized performance over 30 months of 17.6 grants and \$60,400. The bank’s performance significantly increased 112.0% by number and 74.2% by dollar volume, when compared to the previous evaluation. Annualized performance at the prior evaluation measured over 36 months, was 8.3 grants totaling \$34,666. The subsequent table illustrates the community development investment and grant activities by year and purpose.

<b>Qualified Investments and Grants by Assessment Area January 20, 2021 – June 30, 2023</b>										
<b>Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	13	2,294.0	31	114.5	5	22.5	0	0	49	<b>2,431.0</b>
MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY)	0	0	0	0	0	0	0	0	0	<b>0</b>
BSRA	1	3,000.0	0	0	0	0	0	0	1	<b>3,000.0</b>
<b>Total</b>	<b>14</b>	<b>5,294.0</b>	<b>31</b>	<b>114.5</b>	<b>5</b>	<b>22.5</b>	<b>0</b>	<b>0</b>	<b>50</b>	<b>5,431.0</b>
<b>Percent of Total</b>	<b>28.0</b>	<b>97.5</b>	<b>62.0</b>	<b>2.1</b>	<b>10.0</b>	<b>0.4</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>

*Source: Bank Data*

The bank rarely used innovative and/or complex investments to support community development initiatives. The qualified investments consisted of mortgage-backed securities, collateralized by loans targeted to LMI individuals, and bond purchases with the New York State Housing Agency for construction of affordable housing, which are not considered particularly innovative and/or complex.

PCSB exhibited adequate responsiveness to assessment area credit and community development needs. The bank’s qualified investments primarily promoted affordable housing efforts, which was a community development need within this assessment area. Qualified grants primarily promoted community services for LMI individuals, which was also an identified community development need within the assessment areas.

**SERVICE TEST**

PCSB’s overall Service Test performance is rated High Satisfactory, based on good performance in the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area. The MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY) assessment area was below the overall performance, as the bank conducted no services in this area during the evaluation period. Delivery systems were accessible to the bank’s geographies and individuals of different income levels in its assessment area, including LMI areas. To the extent changes have been made, PCSB’s record of opening and closing branches had not adversely affected the accessibility of delivery systems, particularly to LMI geographies and/or LMI individuals. Services did not vary in a way that inconvenienced its assessment areas, particularly LMI geographies and/or LMI individuals. PCSB provided a relatively high level of community development services.

**Retail Services**

*Accessibility of Delivery Systems*

Delivery systems were accessible to all portions of the bank’s assessment areas, including LMI areas. The bank operated 14 full-service branch locations, each with an onsite ATM. Of the total branches, 1 (7.1%) was in a low-income census tract, 1 (7.1%) was in a middle-income census tract, and 12 (85.8%) were in upper-income census tracts. The Mount Vernon branch, located in a low-income census tract, was also near eight LMI census tracts. Although the bank had no branches in moderate-income census tracts, the Fishkill branch was located near four moderate-income census tracts and the Silver Lake branch was near one moderate-income census tract.

<b>Branch and ATM Distribution by Tract Income Level December 31, 2022</b>								
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Families</b>		<b>Branches</b>		<b>ATMs</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	12	3.8	9,492	3.0	1	7.1	1	7.1
Moderate	31	9.8	26,961	8.4	0	0.0	0	0.0
Middle	77	24.4	73,594	23.0	1	7.1	1	7.1
Upper	187	59.2	208,698	65.2	12	85.8	12	85.8
Unknown	9	2.8	1,290	0.4	0	0.0	0	0.0
<b>Total</b>	<b>316</b>	<b>100.0</b>	<b>320,035</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>

*Source: 2020 U.S. Census Data; Bank Records*

In addition to the physical access to branches and ATMs, the bank offered other alternative delivery systems that improved accessibility for its products and services for all geographies, including LMI areas. These delivery systems included online banking, mobile banking, and telephone banking.

### ***Changes in Branch Locations***

To the extent changes were made, the bank's record of opening and closing of branches had not adversely affected the accessibility of delivery systems, particularly in LMI census tracts and/or LMI individuals.

During the review period, the bank closed one branch in Pawling, NY. The branch was in a middle-income census tract, and service to the area was unaffected as the bank continues to operate a branch in Pawling, NY. PCSB's products and services were available at all branch locations.

### ***Reasonableness of Business Hours and Services***

Services did not vary in a way that inconvenienced certain portions of this assessment area, particularly LMI geographies and/or LMI individuals. All branch hours were weekdays from 9 A.M. to 4 P.M. and Saturdays from 9 A.M. to 1 P.M. Drive-thru services with extended hours were available at 10 (71.4%) of the branches, including the bank's 1 branch located in a low-income census tract. The bank offered the following low-cost demand deposit and interest-bearing deposit accounts at each branch:

- **Basic Banking** – A New York State approved checking account with a low \$25 minimum balance required to open the account. The account offers free mobile banking with text alerts, mobile check deposit, and internet banking with bill pay. There were no maintenance fees, and the account had unlimited check writing capabilities.
- **Savings** – An interest-bearing account with a minimum balance \$25 to open and receive interest. A low daily minimum balance was required, and there is a monthly service charge.

### **Community Development Services**

PCSB provided a relatively high level of community development services in its assessment areas. The bank conducted 297 qualified community service events, which represented an annualized performance over 30 months of 118.8 services. Annualized performance increased by 485.2% when compared to the last evaluation of 20.3 services. The bank's qualified community development services consisted of a wide variety of events related to financial education, technical assistance, and first-time homebuyer seminars. This is particularly notable due to the limitations for outreach and engagement presented by the COVID-19 pandemic. While the bank did not provide any community development services in the MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY) assessment area, the significant increase in the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area and the heavier weighting of the MSA 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area supported this conclusion.

<b>Community Development Services by Assessment Area January 20, 2021 - June 30, 2023</b>					
<b>Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	27	188	70	12	<b>297</b>
MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY)	0	0	0	0	<b>0</b>
<b>Total</b>	<b>27</b>	<b>188</b>	<b>70</b>	<b>12</b>	<b>297</b>
<b>Percent of Total</b>	<b>9.1</b>	<b>63.3</b>	<b>23.5</b>	<b>4.0</b>	<b>100.0</b>
<i>Source: Bank Data</i>					

**FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

PCSB was in compliance with the substantive provisions or the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices was identified as being inconsistent with helping to meet the credit needs of the assessment area.

## **METROPOLITAN DIVISION**

### **MD 35614 (NEW YORK-NEWARK-JERSEY CITY, NY-NJ- PA)**

Examiners used full-scope examination procedures to evaluate the bank's performance in the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area. Refer to the overall Scope of Evaluation section for further details.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS**

PCSB operated 12 of its 14 locations (85.7%) and 12 of its 14 ATMs (85.7%) in this assessment area. The assessment area is highly competitive for financial services. According to the June 30, 2023, FDIC Summary of Deposit Report, 30 institutions operated 348 offices within this assessment area. PCSB ranked 14<sup>th</sup> with approximately \$1.7 billion in deposits, which represented 0.6% of the deposit market share. Competitors included large financial institutions such as Morgan Stanley, which held 70.3% of deposits, JP Morgan Chase, Citibank, and regional banks, such as Customers Bank.

### **PERFORMANCE CONTEXT**

The following demographic and economic information were used to describe this assessment area and to evaluate the context in which PCSB operated. The information was obtained from publicly available sources, including the 2015 ACS, 2020 U.S. Census, BLS, D&B, FFIEC, and HUD.

#### *Demographic Characteristics*

This assessment area included Westchester County, Putnam County, and a portion of Rockland County, NY. According to the 2020 U.S. Census, the population of this assessment area was 1,185,330. The assessment area consisted of 282 census tracts, of which 12 or 4.3% were low-income, 30 or 10.6% were moderate-income, 54 or 19.1% were middle-income, 180 or 63.8% were upper-income, and 6 or 2.1% were of unknown-income.

#### *Income Characteristics*

Based on the 2020 U.S. Census, the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area had 288,560 families, of which 14.8% were low-income and 5.6% were below the poverty level, 11.4% were moderate-income, 14.5% were middle-income, and 59.3% were upper-income. The FFIEC median family incomes for the counties comprising the MSA as of the 2020 U.S. Census were as follows:



<b>MD 35614 (New York-Jersey City-White Plains, NY-NJ)</b>			
<b>Median Family Income Change</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Assessment Area	\$115,531	\$123,061	6.5
Putnam County, NY	\$121,740	\$122,394	0.5
Rockland County, NY	\$107,948	\$112,034	3.8
Westchester County, NY	\$118,116	\$126,992	7.5
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	\$73,814	\$85,483	15.8
New York State	\$78,570	\$87,270	11.1
<i>Source: 2011 - 2015 U.S. Census American Community Survey 2016 - 2020 U.S. Census American Community Survey Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

### ***Housing Characteristics***

Based on the 2020 U.S. Census data, the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area had 440,543 housing units, of which 59.7% were owner-occupied, 34.0% were rental, and 6.2% were vacant. Of the total housing units, 4.0% were in low-income census tracts, 9.6% in moderate-income census tracts, 19.1% in middle-income census tracts, 66.7% in upper-income census tracts, and 0.6% in unknown-income census tracts. In low-income census tracts, 10.9% of housing units were owner-occupied, 82.4% were rental units, and 6.7% were vacant. In moderate-income census tracts, 23.3% of housing units were owner-occupied, 70.1% were rental units, and 6.5% were vacant.

The median age of housing stock in this assessment area, including low- and moderate-income census tracts was 61 years old, with 35.8% of the stock built before 1950. According to the 2020 U.S. Census, the median housing value in this assessment area was \$501,366 with an affordability ratio of 20.0. The median gross rent in the assessment area was \$1,589 per month.

<b>MD 35614 (New York-Jersey City-White Plains, NY-NJ)</b>			
<b>Housing Characteristics</b>			
<b>Area</b>	<b>2020 Median Housing Value</b>	<b>2020 Affordability Ratio</b>	<b>2020 Median Gross Rent</b>
Assessment Area	\$501,366	19.8	\$1,589
Putnam County, NY	\$366,400	29.3	\$1,489
Rockland County, NY	\$452,500	21.0	\$1,558
Westchester County, NY	\$544,100	18.3	\$1,599
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	\$553,158	13.3	\$1,486
New York State	\$325,000	21.9	\$1,315
<i>Source: 2011 – 2015 U.S. Census American Community Survey 2016 – 2020 U.S. Census American Community Survey</i>			

### ***Housing Cost Burden***

Housing costs were relatively expensive in this assessment area, which indicated that affordable housing

for LMI individuals and families continued to be a challenge. According to HUD's 2016-2020 Comprehensive Housing Affordability Strategy data, within the assessment area, 49.2% of all rental households had rental costs that exceeded 30.0% of their incomes, 77.6% of low-income rental households had rental costs that exceeded 30.0% of their income, and 49.7% of moderate-income rental households had rental costs that exceeded 30.0% of their income.

According to HUD's data, within this assessment area, 31.4% of homeowners had housing costs that exceeded 30.0% of their incomes, 78.1% of low-income homeowners had housing costs that exceeded 30.0% of their income, and 58.9% of moderate-income homeowners had housing costs that exceeded 30.0% of their income. See the following table for more details.

<b>MD 35614 (New York-Jersey City-White Plains, NY-NJ)</b>						
<b>Housing Cost Burden</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	77.6	49.7	49.2	78.1	58.9	31.4
Putnam County, NY	81.3	39.9	44.0	82.2	56.5	33.9
Rockland County, NY	80.6	46.8	54.0	82.8	65.8	34.5
Westchester County, NY	76.7	51.4	48.3	76.1	55.8	30.1
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	76.6	45.0	47.1	75.8	51.7	32.0
New York State	76.1	41.4	46.6	70.0	40.4	25.6

*Cost Burden is housing cost that equals 30.0% or more of household income.  
Source: HUD 2016-2020 Comprehensive Housing Affordability Strategy*

***Labor, Employment and Economic Characteristics***

According to D&B data, there were 63,177 businesses operating in this assessment area in 2022, of which 3.6% were in low-income census tracts and 8.2% were in moderate-income tracts. Of the total businesses operating in the assessment area, 91.8% were small businesses with gross annual revenues of \$1 million or less, of which 3.5% were in low-income census tracts and 8.1% were in moderate-income census tracts.

According to the BLS, unemployment in the assessment area was 7.9% in 2020, decreased to 4.7% in 2021, and decreased to 3.0% in 2022. New York State had an unemployment rate of 9.8% in 2020, decreased to 7.0% in 2021, and decreased to 4.3% in 2022. The COVID-19 pandemic contributed to the high unemployment rates in 2020 and 2021, within the assessment area and in New York State. Additional unemployment rates are provided in the following table.

<b>MD 35614 (New York-Jersey City-White Plains, NY-NJ)</b>			
<b>Unemployment Rates</b>			
<b>Area</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Assessment Area	7.9	4.7	3.0
Putnam County, NY	7.2	4.2	2.9
Rockland County, NY	7.7	4.4	2.8
Westchester County, NY	8.0	4.8	3.1
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	11.3	8.8	5.0
New York State	9.8	7.0	4.3
<i>Source: BLS, Local Area Unemployment Statistics</i>			

Additional demographic data for this assessment area is provided in the subsequent table.

MD 35614 (NEW YORK-JERSEY CITY-WHITE PLAINS, NY-NJ)								
Assessment Area Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	4.3	9,492	3.3	2,699	28.4	42,757	14.8
Moderate-income	30	10.6	25,644	8.9	3,984	15.5	32,805	11.4
Middle-income	54	19.1	51,636	17.9	3,863	7.5	41,895	14.5
Upper-income	180	63.8	200,520	69.5	5,512	2.7	171,103	59.3
Unknown-income	6	2.1	1,268	0.4	22	1.7	0	0
<b>Total Assessment Area</b>	<b>282</b>	<b>100.0</b>	<b>288,560</b>	<b>100.0</b>	<b>16,080</b>	<b>5.6</b>	<b>288,560</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>		<b>Rental</b>		<b>Vacant</b>		
		#	%	%	#	%	#	%
Low-income	17,666	1,917	0.7	10.9	14,558	82.4	1,191	6.7
Moderate-income	42,393	9,889	3.8	23.3	29,734	70.1	2,770	6.5
Middle-income	84,125	39,417	15.0	46.9	39,919	47.5	4,789	5.7
Upper-income	293,772	211,082	80.2	71.9	64,065	21.8	18,625	6.3
Unknown-income	2,587	829	0.3	32	1,664	64.3	94	3.6
<b>Total Assessment Area</b>	<b>440,543</b>	<b>263,134</b>	<b>100.0</b>	<b>59.7</b>	<b>149,940</b>	<b>34.0</b>	<b>27,469</b>	<b>6.2</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	2,275	3.6	2,042	3.5	204	4.5	29	4.7
Moderate-income	5,209	8.2	4,710	8.1	446	9.7	53	8.6
Middle-income	9,556	15.1	8,768	15.1	729	15.9	59	9.6
Upper-income	45,808	72.5	42,158	72.7	3,175	69.3	475	77.1
Unknown-income	329	0.5	299	0.5	30	0.7	0	0
<b>Total Assessment Area</b>	<b>63,177</b>	<b>100.0</b>	<b>57,977</b>	<b>100.0</b>	<b>4,584</b>	<b>100.0</b>	<b>616</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.8</b>		<b>7.3</b>		<b>1.0</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	4	1.4	3	1.1	1	12.5	0	0
Moderate-income	4	1.4	4	1.5	0	0	0	0
Middle-income	25	8.9	24	8.8	1	12.5	0	0
Upper-income	247	88.2	241	88.6	6	75	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>280</b>	<b>100.0</b>	<b>272</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>97.1</b>		<b>2.9</b>		<b>.0</b>

2022 FFIEC Census Data and 2022 D&B Information

---

***Community Contacts***

Examiners conducted community contact interviews with two community organizations that served the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area. These contacts identified a need for more affordable housing. The first interview was held with a representative from a local community development organization, located in White Plains, NY, that serves Westchester County and Putnam County. The organization helps to create and fund projects and services for low-income families in the area. The contact noted that affordable housing stock in the area was limited. The contact stated that there was an opportunity for financial institutions to partner with Community Development Financial Institutions, provide financial education seminars and financing for the construction of affordable housing.

An additional community contact interview was conducted with another New York based non-profit association that calls for economic justice in the tristate area. The organization seeks to create opportunities for LMI people by lending to non-profits. The contact stated that the largest need is for-sale affordable housing and funding for affordable housing throughout the state. Similarly, as mentioned above, there is opportunity for financial institutions to provide financial literacy seminars and to help improve the affordable housing dilemma.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MD 35614  
(NEW YORK-JERSEY CITY-WHITE PLAINS, NY-NJ)**

**LENDING TEST**

PCSB's performance was adequate in the lending test for this assessment area. The bank's lending activity reflected adequate responsiveness to this assessment area's credit needs. A high percentage of loans were made in the bank's assessment area. PCSB's geographic distribution of HMDA-related and small business loans reflected adequate penetration throughout this assessment area. The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels. The bank exhibited an adequate record of serving the credit needs of low-income individuals and areas and very small businesses. The bank made limited use of innovative and/or flexible lending practices in serving assessment area credit needs. The bank made an adequate level of community development loans.

**Lending Activity**

PCSB's lending activity demonstrated adequate responsiveness to the retail credit needs of this assessment area. The bank's originations in this assessment area are summarized in the table below. As mentioned previously, this assessment area was highly competitive for financial services, with competitors including large financial institutions and regional banks; despite this, PCSB's market share of deposits and lending in this assessment area was generally stable during the evaluation period.

PCSB's HMDA and small business lending in this assessment area is summarized in the following table:

<b>MD 35614 (New York-Jersey City-White Plains, NY-NJ)</b>				
<b>Summary of Lending Activity</b>				
<b>January 1, 2020 - December 31, 2022</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Home Improvement	29	3.5	\$3,755	1.5
Home Purchase	71	8.6	\$23,212	9.0
Multifamily	34	4.1	\$59,680	23.2
Refinancing	158	19.0	\$52,478	20.4
<b>Total HMDA</b>	<b>292</b>	<b>35.2</b>	<b>\$139,125</b>	<b>54.1</b>
<b>Total Small Business</b>	<b>538</b>	<b>64.8</b>	<b>\$118,139</b>	<b>45.9</b>
<b>TOTAL LOAN</b>	<b>830</b>	<b>100.0</b>	<b>\$257,264</b>	<b>100.0</b>
<i>Source: HMDA Reported data; Bank Records</i>				

**Geographic Distribution of Loans**

PCSB Bank's overall geographic distribution of HMDA-related and small business loans reflected adequate penetration throughout the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area. Lending penetration in LMI tracts was adequate for home purchase, adequate for refinance, and good for small business.

*Gap Analysis*

PCSB demonstrated a low-level of dispersion in LMI tracts in this assessment area. However, this can be attributed to factors that include the high degree of competition for financial services and loans in the assessment areas, and the high cost of housing. In 2020, the bank's performance was at 0% and 35.7%, in low-income and moderate-income census tracts, respectively. While the performance in low-income census tracts remained the same in 2021, performance in moderate-income census tracts increased to 39.3%. Although the bank demonstrated low levels of dispersion in LMI census tracts in 2020 and 2021, performance improved in low-income census tracts for 2022, at 25.0% and declined slightly at 30.0% for moderate-income census tracts. The bank's lending gap analysis in this assessment area is summarized in the table below.

<b>MD 35614 (New York-Jersey City-White Plains, NY-NJ)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2020 - December 31, 2022</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2020</b>			
Low	9	9	0.0
Moderate	28	18	35.7
Middle	41	27	34.1
Upper	175	98	44.0
Income Unknown	5	5	0.0
<b>2021</b>			
Low	9	9	0.0
Moderate	28	17	39.3
Middle	41	24	41.5
Upper	175	87	50.3
Income Unknown	5	5	0.0
<b>2022</b>			
Low	12	9	25.0
Moderate	30	21	30.0
Middle	54	40	5.9
Upper	180	114	36.7
Income Unknown	6	5	16.7

*Home Purchase Loans*

The geographic distribution of home purchase loans reflected adequate penetration throughout the assessment area.

In 2022, the bank did not make any home purchase loans in low-income census tracts. This performance is not unexpected when only 0.7% of owner-occupied housing units were in low-income census tracts and aggregate lenders only made 1.0% by number and 0.9% by dollar of home purchase loans in low-income census tracts. The bank did not make any home purchase loans in low-income census tracts in 2021 or 2020.

Within moderate-income census tracts in 2022, the bank made 4.0% of home purchase loans by number and 2.8% by dollar. The bank's home purchase lending performance was comparable to the 3.8% of owner-occupied housing units located in moderate-income census tracts and was comparable to the aggregate, which made 4.1% by number and 2.9% by dollar of home purchase loans in moderate-income census tracts. The bank's performance in 2021, was comparable to performance in 2022. In 2020, the bank did not make any home purchase loans in moderate-income census tracts.

*Home Refinance Loans*

The geographic distribution of refinance loans reflected adequate penetration throughout this assessment

area.

During the evaluation period, the bank did not make any refinance loans in low-income census tracts. However, this performance is not unexpected when compared to demographic data with only 0.7% of owner-occupied housing units located in low-income census tracts and aggregate lenders only made 1.5% by number and 1.5% by dollar of refinance loans in low-income census tracts.

In 2022, the bank made 6.1% by number and 4.2% by dollar of refinance loans in moderate-income census tracts. PCSB Bank's refinance lending performance in moderate-income census tracts was above the 3.8% of owner-occupied housing units located in moderate-income census tracts and exceeded the aggregate, which made 3.9% by number and 2.6% by dollar of refinance loans in moderate-income census tracts. The bank did not make any refinance loans in moderate-income census tracts in 2021 or 2020.

### *Small Business Loans*

The geographic distribution of small business loans reflected good penetration throughout this assessment area.

In 2022, the bank made 5.1% by number and 6.0% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was above the 3.6% of businesses located in low-income census tracts and above the aggregate, which made 4.8% by number and 5.8% by dollar of small business loans in low-income census tracts. The bank did not make any small business loans in low-income census tracts in 2021 or 2020.

In 2022, the bank made 10.1% by number and 12.0% by dollar of small business loans in moderate-income census tracts. PCSB's small business lending performance in moderate-income census tracts was above the 8.2% of businesses located in moderate-income census tracts and above the aggregate, which made 8.0% by number and 8.7% by dollar of small business loans in moderate-income census tracts. The bank's performance in 2021 and 2020 was consistent with 2022.

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

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes. Overall, HMDA lending to LMI borrowers was good and lending to businesses with gross annual revenues of \$1 million or less was adequate.

### *Home Purchase Loans*

The distribution of borrowers reflected, given the product lines offered, adequate penetration among low-income customers and excellent penetration among moderate-income customers for home purchase lending.

In 2022 and 2021, the bank did not make any loans to low-income borrowers. While 14.8% of families were low-income in the assessment area, aggregate lenders only made 1.4% by number and 0.4% by dollar to low-income families. In 2020, the bank made 4.8% by number and 1.8% by dollar to low-income borrowers, which significantly exceeded aggregate lending data, at 0.5% by number and 0.2% by dollar to low-income families.

In 2022, the bank's lending to moderate-income borrowers was 12.0% by number and 6.6% by dollar, was



significantly above the aggregate lending performance of 8.8% by number and 3.0% by dollar, and slightly above the 11.4% moderate-income families in the assessment area. The bank's performance in 2021 and 2020 was consistent with 2022.

### *Home Refinance Loans*

The distribution of borrowers reflected, given the product lines offered, adequate penetration among low-income customers and excellent penetration among moderate-income customers for refinance lending.

In 2022, the bank's lending to low-income borrowers was 2.0% by number and 1.0% by dollar and was comparable to the aggregate lending data at 2.1% by number and 1.1% by dollar. The bank's performance was below the 14.2% of low-income families in the assessment area. The bank performed similarly in 2021. In 2020, the bank did not make any loans to low-income borrowers.

In 2022, the bank's lending to moderate-income borrowers at 12.2% by number and 5.4% by dollar was significantly above the aggregate lending data at 8.0% by number and 3.6% by dollar and above the 10.8% moderate-income families in the assessment area. The bank's lending to moderate-income borrowers was slightly below the aggregate data in 2021 and 2020.

### *Small Business Loans*

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers for small business lending.

In 2022, the bank originated 55.7% of loans by number and 52.2% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was above the aggregate lending data at 49.2% by number and 35.5% by dollar and below the 91.8% percentage of businesses in the assessment area with gross annual revenues of \$1 million or less. The bank also originated 29.1% of loans to assessment area businesses in amounts of \$100,000 or less, which were typically considered more responsive to the credit needs of very small businesses. In 2021, the bank originated 18.6% of loans by number and 30.6% by dollar to businesses with gross annual revenues of \$1 million or less. The bank's lending to small businesses was below the aggregate lending data at 40.8% by number, but significantly above the 21.8% by dollar. Performance was below the 91.7% percentage of businesses in the assessment area with gross annual revenues of \$1 million or less. PCSB's performance in 2020 was comparable to that in 2021.

### **Community Development Lending**

PCSB made an adequate number of community development loans in this assessment area. During the evaluation period, the bank originated 10 qualified community development loans totaling approximately \$13.5 million, including 3 loans for 4.1 million that benefited the BSRA. This represented an annualized performance over 30 months of 2.8 loans totaling approximately \$3.8 million. Annualized performance decreased, 44.0% by number and 63.7% by dollar volume, when compared to the previous evaluation, where the bank had an annualized performance over 36 months of 5 loans totaling \$25.9 million. The bank's community development lending included 2 PPP loans originated in amounts greater than \$1 million, totaling approximately \$3.0 million. As previously noted, the percentage decrease in community development loans can be attributed to the significant drop in PPP lending from the previous evaluation period.

PCSB's community development loans primarily helped to finance affordable housing initiatives and community service efforts, consistent with the needs identified by community contacts. The subsequent table illustrates the community development lending activity by year and purpose.

<b>MD 35614 (New York-Jersey City-White Plains, NY-NJ) Community Development Lending January 20, 2021 - June 30, 2023</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2021	3	4,796	1	1,200	2	3,316	0	0	<b>6</b>	<b>9,313</b>
2022	0	0	0	0	0	0	0	0	<b>0</b>	<b>0</b>
2023	1	80	0	0	0	0	0	0	<b>1</b>	<b>80</b>
BSRA	2	2,357	0	0	1	1,710	0	0	<b>3</b>	<b>4,067</b>
<b>Total</b>	<b>4</b>	<b>4,876</b>	<b>1</b>	<b>1,200</b>	<b>2</b>	<b>3,316</b>	<b>0</b>	<b>0</b>	<b>10</b>	<b>13,460</b>
<b>% of Total</b>	<b>57.1</b>	<b>51.9</b>	<b>14.3</b>	<b>12.7</b>	<b>28.6</b>	<b>35.3</b>	<b>0</b>	<b>0</b>	<b>100.0</b>	<b>100.0</b>
<i>Source: Bank Data</i>										

The following are examples of community development loans in the assessment area:

- A \$1.2 million loan for a non-profit organization that provided legal services and outreach services to LMI families.
- A \$2.2 million loan for affordable housing where the majority of the apartment rents were under the fair market rent threshold.

## INVESTMENT TEST

The institution had an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The bank made rare use of innovative and/or complex investments to support community development initiatives. The bank exhibited adequate responsiveness to credit and community development needs.

The bank made 5 investments totaling \$2.3 million in this assessment area. Additionally, examiners considered one investment that benefitted the broader statewide and regional area, totaling \$3.0 million. The bank also provided grants totaling \$151,000 in this assessment area.

The bank rarely used innovative and/or complex investments to support community development initiatives. The qualified investments consisted of mortgage-backed securities, collateralized by loans targeted to LMI individuals, and bond purchases with the New York State Housing Agency for construction of affordable housing, which are not considered particularly innovative and/or complex.

PCSB exhibited adequate responsiveness to assessment area credit and community development needs. The bank's qualified investments solely promoted affordable housing efforts, which is a community development need within the assessment areas. Qualified grants primarily promoted community services towards LMI individuals, which is also an identified community development need within the assessment areas.

<b>MD 35614 (New York-Jersey City-White Plains, NY-NJ) Qualified Investments and Grants by Year and Purpose January 20, 2021 - June 30, 2023</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	0	0	0	0	0	0	0	0	0	0
2021	4	7.0	8	33.5	0	0	0	0	12	40.5
2022	8	2,284.5	15	59.8	3	12.5	0	0	26	2,356.8
2023	1	2.5	8	21.2	2	10.0	0	0	11	33.7
BSRA	1	3,000	0	0	0	0	0	0	1	3,000
<b>Total</b>	<b>14</b>	<b>5,294.0</b>	<b>31</b>	<b>114.5</b>	<b>5</b>	<b>22.5</b>	<b>0</b>	<b>0</b>	<b>50</b>	<b>5,431.0</b>
<b>% of Total</b>	<b>28.0</b>	<b>97.5</b>	<b>62.0</b>	<b>2.1</b>	<b>10.0</b>	<b>0.4</b>	<b>0</b>	<b>0</b>	<b>100.0</b>	<b>100.0</b>

*Source: Bank Data*

The following are examples of community development investments and grants that benefitted the assessment area:

- Two donations totaling \$30,000 to a community service organization that provides education, job training, and career development to LMI individuals.
- A \$25,000 donation that supported school-based services and resources for LMI students.
- The bank purchased 5 New York State Housing Financing Agency bonds, totaling \$2.3 million, where the bond proceeds were used to offer financing to build new and maintain existing affordable rental housing for LMI families in this assessment area.

## **SERVICE TEST**

Delivery systems were accessible to the bank's geographies and individuals of different income levels in its assessment area. The bank's record of opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Services did not vary in a way that inconvenienced its assessment area, particularly LMI geographies and/or LMI individuals. The bank provided a relatively high level of community development services.

### **Retail Services**

#### *Accessibility of Delivery Systems*

Delivery systems were accessible to all portions of this assessment area, including LMI areas. PCSB operated 12 full-service branches and 12 ATMs in this assessment area. PCSB had 1 branch office (8.3%) and 1 ATM (8.3%) in a low-income census tract, which exceeded both the 4.3% of low-income census tracts and the 3.3% of the population that was low-income. The bank did not have any branches or ATMs in moderate-income census tracts. The subsequent table details the distribution of the bank's branch office and ATM network by census tract income.

MD 35614 (New York-Jersey City-White Plains, NY-NJ) Branch and ATM Distribution by Geography Income Level								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	12	4.3	9,492	3.3	1	8.3	1	8.3
Moderate	30	10.6	25,644	8.9	0	0.0	0	0.0
Middle	54	19.1	51,636	17.9	1	8.3	1	8.3
Upper	180	63.8	200,520	69.5	10	83.4	10	83.4
NA	6	2.1	1,268	0.4	0	0.0	0	0.0
<b>Total</b>	<b>282</b>	<b>100.0</b>	<b>288,560</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>

*Source: 2020 U.S. Census Data and Bank Records as of December 31, 2022*

In addition to the physical access to branches and ATMs, the bank offered other alternative delivery systems in all assessment areas that improved accessibility for its products and services for all geographies, including LMI areas. These delivery systems included online banking, mobile banking, and telephone banking.

***Changes in Branch Locations***

To the extent changes have been made, the bank’s opening and closing of branches had not adversely affected the accessibility of delivery systems, particularly in LMI census tracts. During the evaluation period, PCSB did not open or close any branches located in this assessment area.

***Reasonableness of Business Hours and Services***

Services did not vary in a way that inconvenienced the needs of the assessment area, particularly LMI census tracts and/or individuals. PCSB’s service hours and its loan and deposit products were substantially similar throughout this assessment area. Branch weekday hours were 9 A.M. to 4 P.M and Saturday hours were 9 A.M. to 1 P.M. at each location. Drive-thru services with extended hours were available at 8 (66.7%) of the branches in this assessment area, including the branch located in a low-income census tract.

The bank’s products and services in this assessment area, including the low-cost savings and checking accounts, were consistent with those discussed at the institution level.

**Community Development Services**

PCSB provided a relatively high level of services in this assessment area. The bank provided 297 instances of qualified community development services to 39 different community organizations that supported a variety of community services during the evaluation period. The following table summarizes the bank’s community development services by year and purpose.

<b>MD 35614 (New York-Jersey-City-White Plains, NY-NJ)</b>					
<b>Community Development Services</b>					
<b>January 1, 2010 - December 31, 2022</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2021	11	62	24	4	<b>101</b>
2022	11	82	26	4	<b>123</b>
2023	5	44	20	4	<b>73</b>
<b>Total</b>	<b>27</b>	<b>188</b>	<b>70</b>	<b>12</b>	<b>297</b>
<b>% of Total</b>	<b>9.1</b>	<b>63.3</b>	<b>23.6</b>	<b>4.0</b>	<b>100.0</b>
<i>Source: Bank Data</i>					

The following are examples of community development services that benefitted this assessment area:

- A bank officer served on the board of directors for a community based non-profit organization, which promoted affordable housing and community services.
- A bank officer served as the treasurer for a Chamber of Commerce that focuses on helping small businesses in the assessment area.
- A bank officer served on the loan committee for an affordable housing organization.

## METROPOLITAN AREA

### MSA 39100 (POUGHKEEPSIE-NEWBURGH-MIDDLETOWN, NY) - LIMITED REVIEW

A limited evaluation of PCSB’s performance in this assessment area was conducted. As of December 31, 2023, PCSB operated 2 of its 14 locations in this assessment area. These branches generated \$203.9 million in deposits, which accounted for 12.3% of the bank’s total branch deposits as of June 30, 2023. With a deposit market share of 2.1%, PCSB ranked 13<sup>th</sup> in depository institutions, with the 1<sup>st</sup> being Citizens Bank, which held 23.9% of the deposits. Other lead banks in terms of deposit market share were JPMorgan Chase Bank, M&T Bank, and Rhinebeck Bank. During the evaluation period, this assessment area generated approximately 13.1% of the bank’s total lending activity.

Key demographics for this assessment area is listed on the chart below:

<b>MSA 39100 (POUGHKEEPSIE-NEWBURGH-MIDDLETOWN, NY)</b>				
<b>Assessment Area Demographics</b>				
<i>Income Category</i>	<b>Tract Distribution</b>		<b>Percentage of Owner-Occupied Housing Units by Tract</b>	<b>Percentage of Families by Income Level</b>
	#	%		
Low Income	0	0	0	16.7
Moderate Income	1	2.9	2.1	17.1
Middle Income	23	67.6	70.0	21.8
Upper Income	7	20.6	27.9	44.4
Unknown	3	8.8	0	0
<b>Total</b>	<b>34</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 39100 ( Poughkeepsie-Newburgh-Middletown, NY )	Consistent	Below	Below

PCSB’s lending test performance in the assessment area was consistent with the New York State performance, as lending activity, borrower distribution and geographic distribution were adequate. However, the bank did not originate any qualified community development loans in this assessment area during the evaluation period, which was below the New York State performance.

Investment test performance was below the New York State performance. The bank had no new investments or grants, and only one prior period investment in this assessment area.

Service test performance was below the New York State performance. The bank’s branches and ATMs in this assessment area were not located in LMI census tracts. The bank closed one branch located in an upper-income census tract. The bank had no community development services during the evaluation period.

Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix A.

**APPENDIX A**

<b>Distribution of 2020 Home Mortgage Lending By Income Level of Geography</b>							
<b>Assessment Area: MSA 35620 (New York-Newark-Jersey City, NY-NJ)</b>							
<b>Geographic Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Owner Occupied Units %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	0	0.0	0.4	0	0.0	0.3	0.3
<b>Moderate</b>	0	0.0	3.9	0	0.0	2.8	4.1
<b>Middle</b>	5	23.8	11.4	1,815	30.4	7.4	11.1
<b>Upper</b>	16	76.2	84.2	4,150	69.6	89.4	84.6
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	21	100.0	100.0	5,965	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	0	0.0	0.6	0	0.0	0.6	0.3
<b>Moderate</b>	0	0.0	2.6	0	0.0	2.0	4.1
<b>Middle</b>	3	6.1	8.9	1,195	7.1	6.7	11.1
<b>Upper</b>	46	93.9	87.8	15,562	92.9	90.6	84.6
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	49	100.0	100.0	16,757	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0.0	0.0	0	0.0	0.0	0.3
<b>Moderate</b>	0	0.0	2.0	0	0.0	1.6	4.1
<b>Middle</b>	2	18.2	6.1	110	9.0	4.4	11.1
<b>Upper</b>	9	81.8	91.9	1,109	91.0	94.0	84.6
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	11	100.0	100.0	1,219	100.0	100.0	100.0
<b>Multifamily Loans</b>							<b>Multifamily Units %</b>
<b>Low</b>	0	0.0	5.4	0	0.0	2.1	5.7
<b>Moderate</b>	0	0.0	28.1	0	0.0	20.5	20.1
<b>Middle</b>	1	25.0	22.7	3,990	55.7	33.6	27.4
<b>Upper</b>	3	75.0	43.8	3,168	44.3	43.8	46.8
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	4	100.0	100.0	7,158	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
<b>Low</b>	0	0.0	0.6	0	0.0	0.6	0.3
<b>Moderate</b>	1	1.1	3.4	340	1.0	3.5	4.1
<b>Middle</b>	11	12.0	10.0	7,110	21.6	8.7	11.1
<b>Upper</b>	80	87.0	86.1	25,400	77.3	87.1	84.6
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	92	100.0	100.0	32,850	100.0	100.0	100.0

Source: 2020 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0% due to rounding.

Distribution of 2021 and 2022 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MD 35614 (New York-Jersey City-White Plains, NY-NJ)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.4	0	0.0	0.3	0	0.0	1.0	0	0.0	0.9	0.7
Moderate	1	4.0	4.3	450	5.0	3.2	1	4.0	4.1	229	2.8	2.9	3.8
Middle	2	8.0	12.0	340	3.8	7.7	4	16.0	15.0	1,182	14.4	10.2	15.0
Upper	22	88.0	83.2	8,248	91.3	88.8	20	80.0	79.6	6,798	82.8	85.7	80.2
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.2	0	0.0	0.2	0.3
<b>Total</b>	<b>25</b>	<b>100.0</b>	<b>100.0</b>	<b>9,038</b>	<b>100.0</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>100.0</b>	<b>8,209</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.9	0	0.0	0.8	0	0.0	1.5	0	0.0	1.5	0.7
Moderate	0	0.0	3.3	0	0.0	2.6	3	6.1	3.9	645	4.2	2.6	3.8
Middle	6	10.0	9.3	1,961	9.7	6.8	3	6.1	12.9	760	4.9	8.7	15.0
Upper	54	90.0	86.4	18,311	90.3	89.8	43	87.8	81.4	14,044	90.9	87.0	80.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.3	0	0.0	0.2	0.3
<b>Total</b>	<b>60</b>	<b>100.0</b>	<b>100.0</b>	<b>20,272</b>	<b>100.0</b>	<b>100.0</b>	<b>49</b>	<b>100.0</b>	<b>100.0</b>	<b>15,449</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.1	0	0.0	0.1	0	0.0	0.4	0	0.0	0.4	0.7
Moderate	0	0.0	1.7	0	0.0	1.1	0	0.0	1.7	0	0.0	1.1	3.8
Middle	1	7.7	5.5	50	3.3	4.2	0	0.0	8.2	0	0.0	5.1	15.0
Upper	12	92.3	92.6	1,460	96.7	94.6	5	100.0	89.6	1,026	100.0	93.3	80.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.3
<b>Total</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>1,510</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>1,026</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multifamily Units %</b>
Low	0	0.0	7.5	0	0.0	6.7	2	12.5	11.3	2,200	8.0	3.7	9.3
Moderate	6	42.9	31.9	9,153	36.8	35.4	2	12.5	25.5	1,091	3.9	10.9	17.0
Middle	3	21.4	25.6	1,960	7.9	22.1	4	25.0	20.6	1,849	6.7	22.2	24.8
Upper	5	35.7	35.0	13,753	55.3	35.8	8	50.0	41.3	22,516	81.4	62.5	48.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.3	0	0.0	0.6	0.8
<b>Total</b>	<b>14</b>	<b>100.0</b>	<b>100.0</b>	<b>24,866</b>	<b>100.0</b>	<b>100.0</b>	<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>27,656</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.7	0	0.0	0.8	2	1.8	1.2	2,200	3.9	1.4	0.7
Moderate	7	6.0	3.8	9,603	17.2	4.4	6	5.5	4.0	1,965	3.5	3.9	3.8
Middle	12	10.3	10.3	4,311	7.7	7.8	12	10.9	13.6	3,941	7.1	11.3	15.0
Upper	97	83.6	85.1	42,027	75.1	87.0	90	81.8	80.9	47,654	85.5	83.2	80.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.2	0	0.0	0.2	0.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>116</b>	<b>100.0</b>	<b>100.0</b>	<b>55,941</b>	<b>100.0</b>	<b>100.0</b>	<b>110</b>	<b>100.0</b>	<b>100.0</b>	<b>55,760</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2022 FFIEC Census Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0% due to rounding.



<b>Distribution of 2020 Home Mortgage Lending By Borrower Income Level</b>							
<b>Assessment Area: MSA 35620 (New York-Newark-Jersey City, NY-NJ)</b>							
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Families by Family Income %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	1	4.8	0.5	110	1.8	0.2	14.2
<b>Moderate</b>	5	23.8	5.3	904	15.2	1.8	10.8
<b>Middle</b>	1	4.8	15.3	250	4.2	8.1	12.9
<b>Upper</b>	12	57.1	71.0	3,441	57.7	82.1	62.1
<b>Unknown</b>	2	9.5	7.8	1,260	21.1	7.8	0.0
<b>Total</b>	21	100.0	100.0	5,965	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	0	0.0	0.6	0	0.0	0.4	14.2
<b>Moderate</b>	1	2.0	2.6	80	0.5	1.2	10.8
<b>Middle</b>	8	16.3	11.3	1,742	10.4	6.7	12.9
<b>Upper</b>	40	81.6	77.7	14,935	89.1	82.5	62.1
<b>Unknown</b>	0	0.0	7.8	0	0.0	9.2	0.0
<b>Total</b>	49	100.0	100.0	16,757	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0.0	1.1	0	0.0	0.6	14.2
<b>Moderate</b>	0	0.0	4.1	0	0.0	1.9	10.8
<b>Middle</b>	4	36.4	10.8	595	48.8	7.2	12.9
<b>Upper</b>	7	63.6	81.7	624	51.2	86.4	62.1
<b>Unknown</b>	0	0.0	2.3	0	0.0	3.9	0.0
<b>Total</b>	11	100.0	100.0	1,219	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							
<b>Low</b>	1	1.1	0.6	110	0.4	0.3	14.2
<b>Moderate</b>	6	6.8	3.7	984	3.8	1.5	10.8
<b>Middle</b>	13	14.8	12.5	2,587	10.1	7.1	12.9
<b>Upper</b>	66	75.0	73.6	20,751	80.8	81.1	62.1
<b>Unknown</b>	2	2.3	9.7	1,260	4.9	10.1	0.0
<b>Total</b>	88	100.0	100.0	25,692	100.0	100.0	100.0
<p><i>Source: 2020 FFIEC Census Data</i>  <i>2011-2015 U.S. Census Bureau: American Community Survey</i></p> <p><i>Note: Percentages may not total 100.0% due to rounding.</i>  <i>Multifamily loans are not included in the borrower distribution analysis.</i></p>							

<b>Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level</b>													
<b>Assessment Area: MD 35614 (New York-Jersey City-White Plains, NY-NJ)</b>													
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Families by Family Income %</b>
	<b>2021</b>						<b>2022</b>						
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>													
<b>Low</b>	0	0.0	0.9	0	0.0	0.3	0	0.0	1.4	0	0.0	0.4	14.8
<b>Moderate</b>	2	8.0	7.0	230	2.5	2.3	3	12.0	8.8	539	6.6	3.0	11.4
<b>Middle</b>	8	32.0	17.0	1,803	19.9	9.3	6	24.0	17.2	1,705	20.8	9.7	14.5
<b>Upper</b>	14	56.0	67.3	6,555	72.5	80.0	15	60.0	64.0	5,465	66.6	78.0	59.3
<b>Unknown</b>	1	4.0	7.8	450	5.0	8.0	1	4.0	8.6	500	6.1	8.9	0.0
<b>Total</b>	25	100.0	100.0	9,038	100.0	100.0	25	100.0	100.0	8,209	100.0	100.0	100.0
<b>Refinance Loans</b>													
<b>Low</b>	1	1.7	0.8	55	0.3	0.4	1	2.0	2.1	150	1.0	1.1	14.8
<b>Moderate</b>	2	3.3	3.8	310	1.5	1.7	6	12.2	8.0	829	5.4	3.6	11.4
<b>Middle</b>	7	11.7	13.2	1,680	8.3	8.0	8	16.3	17.0	1,593	10.3	9.9	14.5
<b>Upper</b>	48	80.0	74.8	17,158	84.6	81.5	32	65.3	65.5	11,496	74.4	75.5	59.3
<b>Unknown</b>	2	3.3	7.4	1,069	5.3	8.5	2	4.1	7.4	1,381	8.9	9.8	0.0
<b>Total</b>	60	100.0	100.0	20,272	100.0	100.0	49	100.0	100.0	15,449	100.0	100.0	100.0
<b>Home Improvement Loans</b>													
<b>Low</b>	0	0.0	1.0	0	0.0	0.7	0	0.0	1.2	0	0.0	0.7	14.8
<b>Moderate</b>	1	7.7	3.5	70	4.6	1.7	0	0.0	4.7	0	0.0	2.7	11.4
<b>Middle</b>	0	0.0	9.5	0	0.0	5.9	0	0.0	12.6	0	0.0	7.8	14.5
<b>Upper</b>	12	92.3	84.9	1,440	95.4	89.8	5	100.0	80.6	1,026	100.0	87.7	59.3
<b>Unknown</b>	0	0.0	1.1	0	0.0	1.8	0	0.0	0.8	0	0.0	1.1	0.0
<b>Total</b>	13	100.0	100.0	1,510	100.0	100.0	5	100.0	100.0	1,026	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>													
<b>Low</b>	1	1.0	0.9	55	0.2	0.4	1	1.1	1.6	150	0.5	0.6	14.8
<b>Moderate</b>	5	4.9	5.0	610	2.0	2.0	10	10.6	8.0	1,393	5.0	3.1	11.4
<b>Middle</b>	16	15.7	14.4	3,508	11.3	8.5	15	16.0	16.2	3,598	12.8	9.4	14.5
<b>Upper</b>	77	75.5	72.0	25,383	81.7	80.6	65	69.1	65.9	21,082	75.0	77.2	59.3
<b>Unknown</b>	3	2.9	7.7	1,519	4.9	8.5	3	3.2	8.3	1,881	6.7	9.7	0.0
<b>Total</b>	102	100.0	100.0	31,075	100.0	100.0	94	100.0	100.0	28,104	100.0	100.0	100.0
<p>Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0% due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>													

Distribution of 2020 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 35620 (New York-Newark-Jersey City, NY-NJ)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	2.5	0	0.0	1.7	1.5
Moderate	13	5.8	8.0	3,595	9.4	8.6	8.3
Middle	15	6.7	13.1	5,390	14.2	15.0	13.7
Upper	195	87.4	76.0	29,088	76.4	74.3	76.5
Unknown	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.3	0	0.0	0.3	
<b>Total</b>	<b>223</b>	<b>100.0</b>	<b>100.0</b>	<b>38,073</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2020 FFIEC Census Data  
2020 D&B Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0% due to rounding.

Distribution of 2021 and 2022 Small Business Lending By Income Level of Geography													
Assessment Area: MD 35614 (New York-Jersey City-White Plains, NY-NJ)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	2.5	0	0.0	1.8	4	5.1	4.8	1,850	6.0	5.8	3.6
Moderate	18	7.6	8.3	8,453	17.2	9.4	8	10.1	8.0	3,716	12.0	8.7	8.2
Middle	19	8.1	13.4	7,149	14.6	15.4	15	19.0	15.3	7,418	23.9	15.2	15.1
Upper	199	84.3	75.3	33,459	68.2	73.0	51	64.6	70.9	17,996	58.0	69.3	72.5
Unknown	0	0.0	0.1	0	0.0	0.3	1	1.3	0.6	25	0.1	0.9	0.5
Tract-Unk	0	0.0	0.4	0	0.0	0.1	0	0.0	0.4	0	0.0	0.1	
<b>Total</b>	<b>236</b>	<b>100.0</b>	<b>100.0</b>	<b>49,061</b>	<b>100.0</b>	<b>100.0</b>	<b>79</b>	<b>100.0</b>	<b>100.0</b>	<b>31,005</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2022 FFIEC Census data  
2022 D&B data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0% due to rounding.

<b>Distribution of 2020 Small Business Lending By Revenue Size of Businesses</b>							
<b>Assessment Area: MSA 35620 (New York-Newark-Jersey City, NY-NJ)</b>							
	<b>Bank And Aggregate Loans</b>						<b>Total Businesses %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	59	26.5	38.4	15,785	41.5	22.8	91.6
<b>Over \$1 Million</b>	35	15.7		10,917	28.7		7.4
<b>Revenue Unknown</b>	129	57.8		11,371	29.9		0.9
<b>Total</b>	223	100.0		38,073	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	145	65.0	89.7	4,968	13.0	38.8	
<b>\$100,001 - \$250,000</b>	31	13.9	6.5	5,123	13.5	22.0	
<b>\$250,001 - \$1 Million</b>	47	21.1	3.8	27,982	73.5	39.2	
<b>Total</b>	223	100.0	100.0	38,073	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	27	45.8		867	5.5		
<b>\$100,001 - \$250,000</b>	9	15.3		1,820	11.5		
<b>\$250,001 - \$1 Million</b>	23	39.0		13,098	83.0		
<b>Total</b>	59	100.0		15,785	100.0		
<i>Source: 2020 FFIEC Census Data 2020 D&amp;B Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0% due to rounding.</i>							

<b>Distribution of 2021 and 2022 Small Business Lending By Revenue Size of Businesses</b>													
<b>Assessment Area: MSA 35620 (New York-Newark-Jersey City, NY-NJ)</b>													
	<b>Bank And Aggregate Loans By Year</b>												<b>Total Businesses %</b>
	<b>2021</b>						<b>2022</b>						
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>\$%</b>	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	44	18.6	40.8	15,019	30.6	21.8	44	55.7	49.2	16,171	52.2	35.5	91.8
<b>Over \$1 Million</b>	68	28.8		25,834	52.7		33	41.8		14,484	46.7		7.3
<b>Revenue Unknown</b>	124	52.5		8,208	16.7		2	2.5		350	1.1		1.0
<b>Total</b>	236	100.0		49,061	100.0		79	100.0		31,005	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	138	58.5	93.0	5,158	10.5	41.6	23	29.1	95.7	1,211	3.9	47.1	
<b>\$100,001 - \$250,000</b>	33	14.0	4.2	5,813	11.8	19.0	13	16.5	2.4	2,728	8.8	14.3	
<b>\$250,001 - \$1 Million</b>	65	27.5	2.8	38,090	77.6	39.4	43	54.4	1.9	27,066	87.3	38.6	
<b>Total</b>	236	100.0	100.0	49,061	100.0	100.0	79	100.0	100.0	31,005	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	16	36.4		796	5.3		14	31.8		569	3.5		
<b>\$100,001 - \$250,000</b>	7	15.9		1,267	8.4		6	13.6		1,180	7.3		
<b>\$250,001 - \$1 Million</b>	21	47.7		12,956	86.3		24	54.5		14,422	89.2		
<b>Total</b>	44	100.0		15,019	100.0		44	100.0		16,171	100.0		
<i>Source: 2022 FFIEC Census Data 2022 D&amp;B Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0% due to rounding.</i>													

<b>Distribution of 2020 Home Mortgage Lending By Income Level of Geography</b>							
<b>Assessment Area: MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY MSA)</b>							
<b>Geographic Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Owner Occupied Units %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>							
<b>Low</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Moderate</b>	2	22.2	9.1	410	20.4	8.1	8.7
<b>Middle</b>	5	55.6	49.6	1,268	63.0	45.7	50.3
<b>Upper</b>	2	22.2	41.3	335	16.6	46.2	41.1
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	9	100.0	100.0	2,013	100.0	100.0	100.0
<b>Refinance Loans</b>							
<b>Low</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Moderate</b>	1	9.1	7.1	120	4.8	6.1	8.7
<b>Middle</b>	2	18.2	47.1	650	25.8	44.3	50.3
<b>Upper</b>	8	72.7	45.8	1,747	69.4	49.6	41.1
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	11	100.0	100.0	2,517	100.0	100.0	100.0
<b>Home Improvement Loans</b>							
<b>Low</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Moderate</b>	0	0.0	5.8	0	0.0	4.7	8.7
<b>Middle</b>	0	0.0	49.6	0	0.0	46.3	50.3
<b>Upper</b>	0	0.0	44.6	0	0.0	49.0	41.1
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	0	0.0	100.0	0	0.0	100.0	100.0
<b>Multifamily Loans</b>							<b>Multifamily Units %</b>
<b>Low</b>	0	0.0	0.0	0	0.0	0.0	0.9
<b>Moderate</b>	0	0.0	45.5	0	0.0	10.6	21.5
<b>Middle</b>	0	0.0	36.4	0	0.0	18.0	55.8
<b>Upper</b>	1	100.0	18.2	1,125	100.0	71.4	21.8
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	1	100.0	100.0	1,125	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
<b>Low</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Moderate</b>	3	13.6	7.9	530	9.3	7.2	8.7
<b>Middle</b>	8	36.4	48.3	1,968	34.5	43.6	50.3
<b>Upper</b>	11	50.0	43.8	3,207	56.2	49.2	41.1
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	22	100.0	100.0	5,705	100.0	100.0	100.0

Source: 2020 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0% due to rounding.

Distribution of 2021 and 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY MSA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	11.1	9.1	432	15.3	8.3	0	0.0	4.6	0	0.0	3.4	2.1
Middle	7	77.8	52.4	1,994	70.8	48.7	4	100.0	70.3	1,230	100.0	67.7	70.0
Upper	1	11.1	38.6	390	13.8	43.0	0	0.0	25.1	0	0.0	28.8	27.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>2,816</b>	<b>100.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>1,230</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	12.5	7.7	348	9.2	6.7	0	0.0	2.3	0	0.0	1.7	2.1
Middle	6	37.5	49.4	1,147	30.4	47.0	3	75.0	70.0	589	62.7	69.1	70.0
Upper	8	50.0	42.9	2,273	60.3	46.4	1	25.0	27.8	350	37.3	29.2	27.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>3,768</b>	<b>100.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>939</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	9.2	0	0.0	9.6	0	0.0	2.5	0	0.0	2.3	2.1
Middle	0	0.0	46.7	0	0.0	44.4	0	0.0	67.8	0	0.0	69.7	70.0
Upper	1	100.0	44.2	25	100.0	45.9	0	0.0	29.7	0	0.0	28.1	27.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multifamily Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	46.7	0	0.0	25.2	0	0.0	16.7	0	0.0	7.0	9.7
Middle	1	100.0	53.3	1,375	100.0	74.8	0	0.0	83.3	0	0.0	93.0	81.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	8.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.3
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>1,375</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate	3	10.3	8.4	780	9.0	9.3	0	0.0	3.5	0	0.0	3.0	2.1
Middle	15	51.7	50.2	4,741	54.8	50.3	8	80.0	69.7	1,884	74.3	69.4	70.0
Upper	11	37.9	41.3	3,138	36.2	40.4	2	20.0	26.8	650	25.7	27.6	27.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>29</b>	<b>100.0</b>	<b>100.0</b>	<b>8,659</b>	<b>100.0</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>2,534</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<p>Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0% due to rounding.</p>													

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Assessment Area: MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY MSA)							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	1	11.1	5.0	209	10.4	2.5	17.5
Moderate	2	22.2	21.0	462	23.0	16.2	15.0
Middle	1	11.1	26.5	310	15.4	25.6	21.3
Upper	5	55.6	40.6	1,032	51.3	48.8	46.1
Unknown	0	0.0	6.9	0	0.0	6.9	0.0
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>2,013</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	3.1	0	0.0	1.5	17.5
Moderate	1	9.1	14.0	170	6.8	10.2	15.0
Middle	5	45.5	27.6	691	27.5	25.5	21.3
Upper	5	45.5	47.8	1,656	65.8	54.2	46.1
Unknown	0	0.0	7.4	0	0.0	8.6	0.0
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>2,517</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	8.5	0	0.0	7.0	17.5
Moderate	0	0.0	13.2	0	0.0	11.0	15.0
Middle	0	0.0	25.2	0	0.0	21.3	21.3
Upper	0	0.0	50.0	0	0.0	49.4	46.1
Unknown	0	0.0	3.1	0	0.0	11.2	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	2	9.5	4.1	259	5.7	2.1	17.5
Moderate	3	14.3	16.3	632	13.8	12.6	15.0
Middle	6	28.6	26.1	1,001	21.9	24.8	21.3
Upper	10	47.6	44.0	2,688	58.7	50.6	46.1
Unknown	0	0.0	9.5	0	0.0	9.9	0.0
<b>Total</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>4,580</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0% due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							



<b>Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level</b>													
<b>Assessment Area: MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY MSA)</b>													
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Families by Family Income %</b>
	<b>2021</b>						<b>2022</b>						
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Home Purchase Loans</b>													
<b>Low</b>	0	0.0	3.9	0	0.0	1.8	0	0.0	6.2	0	0.0	3.0	16.7
<b>Moderate</b>	0	0.0	18.0	0	0.0	13.6	0	0.0	21.5	0	0.0	16.6	17.1
<b>Middle</b>	5	55.6	31.8	1,458	51.8	30.2	1	25.0	27.1	328	26.7	27.0	21.8
<b>Upper</b>	4	44.4	39.6	1,358	48.2	47.4	3	75.0	37.1	902	73.3	46.3	44.4
<b>Unknown</b>	0	0.0	6.7	0	0.0	7.1	0	0.0	8.1	0	0.0	7.1	0.0
<b>Total</b>	9	100.0	100.0	2,816	100.0	100.0	4	100.0	100.0	1,230	100.0	100.0	100.0
<b>Refinance Loans</b>													
<b>Low</b>	1	6.3	3.2	100	2.7	1.8	0	0.0	8.7	0	0.0	5.0	16.7
<b>Moderate</b>	2	12.5	17.1	430	11.4	13.5	2	50.0	24.0	205	21.8	20.0	17.1
<b>Middle</b>	5	31.3	29.3	914	24.3	27.1	0	0.0	29.4	0	0.0	29.8	21.8
<b>Upper</b>	6	37.5	42.9	1,712	45.4	49.3	1	25.0	33.0	350	37.3	39.8	44.4
<b>Unknown</b>	2	12.5	7.5	612	16.2	8.3	1	25.0	4.9	384	40.9	5.5	0.0
<b>Total</b>	16	100.0	100.0	3,768	100.0	100.0	4	100.0	100.0	939	100.0	100.0	100.0
<b>Home Improvement Loans</b>													
<b>Low</b>	0	0.0	4.7	0	0.0	3.5	0	0.0	5.6	0	0.0	5.0	16.7
<b>Moderate</b>	0	0.0	16.9	0	0.0	13.1	0	0.0	20.2	0	0.0	15.4	17.1
<b>Middle</b>	0	0.0	24.4	0	0.0	22.4	0	0.0	28.5	0	0.0	24.6	21.8
<b>Upper</b>	1	100.0	53.6	25	100.0	60.7	0	0.0	44.9	0	0.0	53.9	44.4
<b>Unknown</b>	0	0.0	0.3	0	0.0	0.2	0	0.0	0.8	0	0.0	1.2	0.0
<b>Total</b>	1	100.0	100.0	25	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
<b>Total Home Mortgage Loans</b>													
<b>Low</b>	1	3.6	3.6	100	1.4	1.8	0	0.0	6.8	0	0.0	3.7	16.7
<b>Moderate</b>	2	7.1	17.2	430	5.9	13.4	2	20.0	21.5	205	8.1	17.1	17.1
<b>Middle</b>	10	35.7	29.6	2,372	32.6	28.1	1	10.0	28.3	328	12.9	27.4	21.8
<b>Upper</b>	13	46.4	42.4	3,770	51.8	48.6	6	60.0	37.0	1,617	63.8	44.8	44.4
<b>Unknown</b>	2	7.1	7.3	612	8.4	8.1	1	10.0	6.4	384	15.2	6.9	0.0
<b>Total</b>	28	100.0	100.0	7,284	100.0	100.0	10	100.0	100.0	2,534	100.0	100.0	100.0
<i>Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey</i>													
<i>Note: Percentages may not total 100.0% due to rounding. Multifamily loans are not included in the borrower distribution analysis.</i>													

Distribution of 2020 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY MSA)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	14.6	0	0.0	14.1	13.1
Middle	16	55.2	48.0	1,237	47.3	51.7	50.5
Upper	13	44.8	37.4	1,377	52.7	34.2	36.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	29	100.0	100.0	2,614	100.0	100.0	100.0

Source: 2020 FFIEC Census Data  
2020 D&B Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0% due to rounding.

Distribution of 2021 and 2022 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY MSA)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	14.3	0	0.0	11.5	0	0.0	5.5	0	0.0	3.9	5.7
Middle	13	59.1	47.5	1,973	56.3	54.1	13	86.7	70.1	2,703	98.0	73.8	73.0
Upper	9	40.9	38.2	1,532	43.7	34.4	2	13.3	24.3	55	2.0	22.3	21.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	22	100.0	100.0	3,505	100.0	100.0	15	100.0	100.0	2,758	100.0	100.0	100.0

Source: 2022 FFIEC Census Data  
2022 D&B Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0% due to rounding.

<b>Distribution of 2020 Small Business Lending By Revenue Size of Businesses</b>							
<b>Assessment Area: MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY MSA)</b>							
	<b>Bank And Aggregate Loans</b>						<b>Total Businesses %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	10	34.5	37.3	845	32.3	22.5	93.3
<b>Over \$1 Million</b>	6	20.7		1,414	54.1		5.6
<b>Revenue Unknown</b>	13	44.8		355	13.6		1.2
<b>Total</b>	29	100.0		2,614	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	23	79.3	88.8	710	27.2	36.9	
<b>\$100,001 - \$250,000</b>	2	6.9	7.3	400	15.3	23.1	
<b>\$250,001 - \$1 Million</b>	4	13.8	4.0	1,504	57.5	40.0	
<b>Total</b>	29	100.0	100.0	2,614	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	8	80.0		220	26.0		
<b>\$100,001 - \$250,000</b>	1	10.0		150	17.8		
<b>\$250,001 - \$1 Million</b>	1	10.0		475	56.2		
<b>Total</b>	10	100.0		845	100.0		
<i>Source: 2020 FFIEC Census Data 2020 D&amp;B Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0% due to rounding.</i>							

Distribution of 2021 and 2022 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY MSA)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	4	18.2	44.4	725	20.7	27.7	11	73.3	52.6	1,658	60.1	43.3	93.3
<b>Over \$1 Million</b>	7	31.8		1,809	51.6		4	26.7		1,100	39.9		5.5
<b>Revenue Unknown</b>	11	50.0		971	27.7		0	0.0		0	0.0		1.2
<b>Total</b>	22	100.0		3,505	100.0		15	100.0		2,758	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	11	50.0	92.7	387	11.0	41.9	6	40.0	96.0	280	10.2	55.0	
<b>\$100,001 - \$250,000</b>	7	31.8	4.9	1,414	40.3	23.1	5	33.3	2.7	994	36.0	19.0	
<b>\$250,001 - \$1 Million</b>	4	18.2	2.4	1,704	48.6	35.0	4	26.7	1.3	1,484	53.8	26.0	
<b>Total</b>	22	100.0	100.0	3,505	100.0	100.0	15	100.0	100.0	2,758	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	2	50.0		75	10.3		5	45.5		180	10.9		
<b>\$100,001 - \$250,000</b>	1	25.0		150	20.7		4	36.4		744	44.9		
<b>\$250,001 - \$1 Million</b>	1	25.0		500	69.0		2	18.2		734	44.3		
<b>Total</b>	4	100.0		725	100.0		11	100.0		1,658	100.0		
<i>Source: 2022 FFIEC Census Data 2022 D&amp;B Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0% due to rounding.</i>													

**APPENDIX B - SCOPE OF EXAMINATION TABLE**

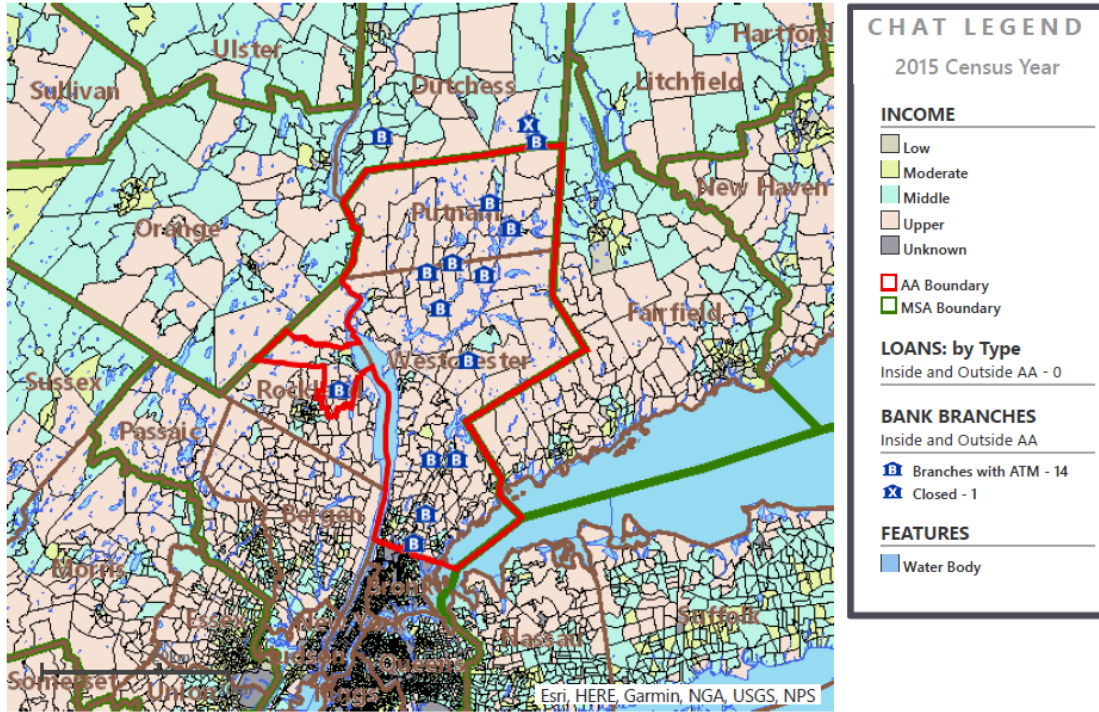
<b>SCOPE OF EXAMINATION</b>			
<b>TIME PERIOD REVIEWED</b>		Lending: January 1, 2020 – December 31, 2022 Community Development Activity: January 20, 2021 – June 30, 2023	
<b>FINANCIAL INSTITUTION</b>			<b>PRODUCTS REVIEWED</b>
PCSB Bank 2651 Strang Blvd. Yorktown Heights, NY 10598			Home Purchase Refinancing Small Business
<b>AFFILIATE(S)</b>	<b>AFFILIATE RELATIONSHIP</b>		<b>PRODUCTS REVIEWED</b>
N/A	N/A		N/A
<b>LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION</b>			
<b>ASSESSMENT AREA</b>	<b>TYPE OF EXAMINATION</b>	<b>BRANCHES VISITED</b>	<b>OTHER INFORMATION</b>
MD 35614 (New York -Jersey City-White Plains, NY-NJ)	Full-scope Review	None	None
MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY MSA)	Limited-scope Review	None	None

**APPENDIX C**  
**SUMMARY OF STATE AND MULTISTATE MSA RATINGS**

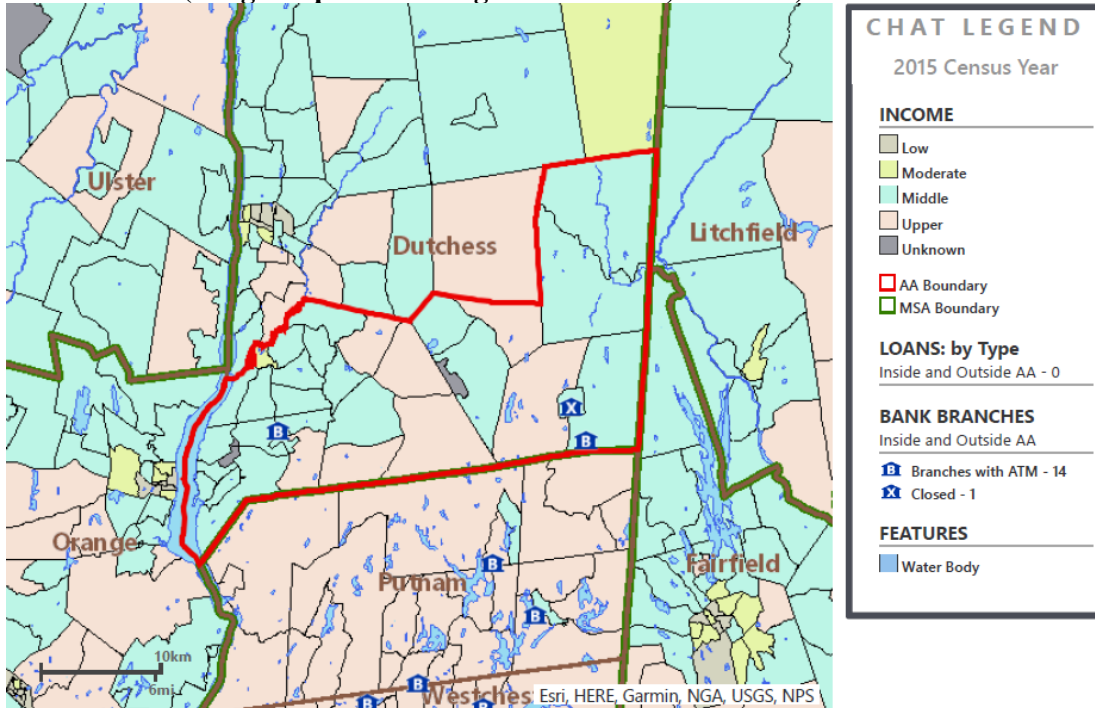
<b>STATE OR MULTISTATE MSA</b>	<b>LENDING TEST RATING</b>	<b>INVESTMENT TEST RATING</b>	<b>SERVICE TEST RATING</b>	<b>OVERALL RATING</b>
<b>New York State</b>	<b>Low Satisfactory</b>	<b>Low Satisfactory</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>

**APPENDIX D - ASSESSMENT AREA MAPS**

**MD 35614 (NEW YORK-JERSEY CITY, WHITE PLAINS, NY-NJ) Assessment Area**



**MSA 39100 (Poughkeepsie-Newburgh-Middletown, NY MSA) Assessment Area**



## APPENDIX E - GLOSSARY

**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 metropolitan area/assessment area.

**Census tract:** A small, relatively permanent statistical subdivision of a county or statistically equivalent entity delineated for data presentation purposes by a local group of census data users or the geographic staff of a regional census center in accordance with Census Bureau guidelines. Designed to be relatively homogeneous units with respect to population characteristics, economic status, and living conditions at the time they are established, census tracts generally contain between 1,000 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries are delineated with the intention of being stable over many decades, so they generally follow relatively permanent visible features. However, they may follow governmental unit boundaries and other invisible features in some instances; the boundary of a state or county (or statistically equivalent entity) is always a census tract boundary.

**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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

1. Low-or moderate-income geographies;
2. Designated disaster areas; or
3. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

**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.

**Distressed or Underserved Non-Metropolitan Middle-Income Area:** A middle-income, non-metropolitan geography that is distressed due to economic factors, such as unemployment levels, poverty, or population loss, or is underserved based on population size, density, and dispersion.

**Family:** A family is a group of two or more people related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and



total number and dollar amount of investments), and qualitative factors (for example, 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 do 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 income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

**Home mortgage loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancings of home improvement and home purchase loans.

**Household:** A household consists of all the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit such as partners or roomers, is also counted as a household. The count of households excludes group quarters.

**Limited-scope review:** Performance is analyzed using only quantitative factors.

**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 metropolitan area/assessment area.

**Metropolitan area (MA):** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

**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 the CRA evaluation. 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 multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

**Small loan(s) to business(es):** A loan included in 'loan to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial 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.

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