

Explanation of the Community Reinvestment Act (CRA) Asset-Size Threshold Change

Applying the January 1, 2025 CRA Definitions:

For Federal Deposit Insurance Corporation (FDIC)- and Federal Reserve-supervised financial institutions subject to CRA requirements, “small bank” means a bank that, as of December 31 of either of the prior two calendar years, had assets of less than \$1.609 billion.

For FDIC- and Federal Reserve-supervised financial institutions subject to CRA requirements, “intermediate small bank” means a bank with assets of at least \$402 million as of December 31 of both of the prior two calendar years and less than \$1.609 billion as of December 31 of either of the prior two calendar years. Since there is no CRA loan data requirement for an intermediate small bank, its next examination is under the intermediate small bank examination procedures even if that examination comes due during the financial institution’s first year as an intermediate small bank.

FDIC- and Federal Reserve-supervised “large banks” are banks with assets of at least \$1.609 billion as of December 31 of both of the prior two calendar years. Large banks are subject to CRA loan data collection, but cannot be examined under the large bank examination procedures until they have at least one full year of data collected. In addition, any size bank may opt to be examined as a large bank provided that it has collected and reported the required CRA loan data.

History of threshold changes: Effective Date	Small Bank Threshold	Intermediate Small Bank Threshold
January 1, 2025	\$1.609 billion	\$402 million
January 1, 2024	\$1.564 billion	\$391 million
January 1, 2023	\$1.503 billion	\$376 million
January 1, 2022	\$1.384 billion	\$346 million
January 1, 2021	\$1.322 billion	\$330 million
January 1, 2020	\$1.305 billion	\$326 million
January 1, 2019	\$1.284 billion	\$321 million
January 1, 2018	\$1.252 billion	\$313 million
January 18, 2017	\$1.226 billion	\$307 million
January 1, 2016	\$1.216 billion	\$304 million
January 1, 2015	\$1.221 billion	\$305 million
January 1, 2014	\$1.202 billion	\$300 million
January 1, 2013	\$1.186 billion	\$296 million
January 1, 2012	\$1.160 billion	\$290 million
January 1, 2011	\$1.122 billion	\$280 million
January 1, 2010	\$1.098 billion	\$274 million
January 1, 2009	\$1.109 billion	\$277 million
January 1, 2008	\$1.061 billion	\$265 million
January 1, 2007	\$1.033 billion	\$258 million
September 1, 2005	\$1 billion	\$250 million
July 1, 1995	\$250 million	N/A

Examples of how to apply the new thresholds on 1/1/25

Bank	Total Assets 12/31/24	Total Assets 12/31/23	CRA Examination Procedures as of 1/1/25	Explanation
Bank A	\$405 million	\$355 million	Small bank	Bank did not have assets of at least \$402 million as of December 31 of <u>both</u> of the prior two calendar years.
Bank B	\$1.605 billion	\$1.455 billion	Intermediate small bank	Bank had assets of at least \$402 million as of December 31 of <u>both</u> of the prior two calendar years, and less than \$1.609 billion as of December 31 of <u>either</u> of the prior two calendar years.
Bank C	\$1.725 billion	\$1.535 billion	Intermediate small bank	Bank had assets of at least \$402 million as of December 31 of <u>both</u> of the prior two calendar years, and less than \$1.609 billion as of December 31 of <u>either</u> of the prior two calendar years.
Bank D	\$1.845 billion	\$1.785 billion	Large bank	Bank had total assets of at least \$1.609 billion as of December 31 of <u>both</u> of the prior two calendar years.