

Explanation of the Community Reinvestment Act Asset-Size Threshold Change

Applying the January 1, 2020 CRA Definitions:

"Small institution" means a bank or savings association that, as of December 31 of either of the prior two calendar years, had assets of less than \$1.305 billion.

"Intermediate small institution" means a bank or savings association with assets of at least \$326 million as of December 31 of both of the prior two calendar years and less than \$1.305 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 institution, its next examination is under the intermediate small institution examination procedures even if that examination comes due during the institution's first year as an intermediate small institution.

"Large institutions" are banks or savings associations with assets of at least \$1.305 billion as of December 31 of both of the prior two calendar years. Large institutions are subject to CRA loan data collection, but cannot be examined under the large institution examination procedures until they have at least one full year of data collected. In addition, any size institution may opt to be examined as a large institution provided that it has collected and reported the required CRA loan data.

History of threshold changes: Effective Date	Small Institution Threshold	Intermediate Small Institution Threshold
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 1/1/20

Institution	Total Assets 12/31/19	Total Assets 12/31/18	CRA Examination Procedures as of 1/1/20	Explanation
Institution A	\$340 million	\$290 million	Small institution	Institution did not have assets of at least \$326 million as of December 31 of <u>both</u> of the prior two calendar years.
Institution B	\$1.125 billion	\$925 million	Intermediate small institution	Institution had assets of at least \$326 million as of December 31 of <u>both</u> of the prior two calendar years, and less than \$1.305 billion as of December 31 of <u>either</u> of the prior two calendar years.
Institution C	\$1.325 billion	\$1.025 billion	Intermediate small institution	Institution had assets of at least \$326 million as of December 31 of <u>both</u> of the prior two calendar years, and less than \$1.305 billion as of December 31 of <u>either</u> of the prior two calendar years.
Institution D	\$1.500 billion	\$1.325 billion	Large institution	Institution had total assets of at least \$1.305 billion as of December 31 of <u>both</u> of the prior two calendar years.