

Replaced: See OCC 2019-1

OCC BULLETIN 2017-6

Subject: Community Reinvestment Act
Regulations
Date: January 19, 2017

To: Chief Executive Officers of National Banks
and Savings Associations, All Department and
Division Heads, All Examining Personnel, and
Other Interested Parties

Description: Revision of Small and Intermediate Small Bank and Savings Association Asset Thresholds

Summary

On January 18, 2017, the Office of the Comptroller of the Currency (OCC) published in the *Federal Register* revisions to its Community Reinvestment Act (CRA) regulations that became effective January 18, 2017. The revisions adjust the asset-size threshold amounts used to define “small bank,” “small savings association,” “intermediate small bank,” and “intermediate small savings association.” The rulemaking adjusts the threshold amounts based on the annual percentage change in a measure of the consumer price index.

Note for Community Banks

National banks and savings associations with assets between \$304 million and \$307 million as of December 31, 2014, and December 31, 2015, or between \$1.216 billion and \$1.226 billion as of either of those dates, should review the revisions to asset thresholds described in this bulletin to determine whether their CRA performance evaluation criteria have changed.

Highlights

Beginning January 18, 2017, a national bank or savings association that, as of December 31 of either of the prior two calendar years, had assets of less than \$1.226 billion is a “small bank” or “small savings association” under the CRA regulations. A small bank or small savings association with assets of at least \$307 million as of December 31 of both of the prior two calendar years and less than \$1.226 billion as of December 31 of either of the prior two calendar years is an “intermediate small bank” or “intermediate small savings association” under the CRA regulations.

Background

Financial institutions are evaluated under different CRA examination procedures based on their asset-size threshold amounts. Those meeting the small and intermediate small institution asset-size thresholds are not subject to the reporting requirements applicable to large banks and savings associations unless they choose to be evaluated as a large institution.

For calendar year 2016, the OCC’s CRA regulations defined a national bank as a “small bank” and a savings association as a “small savings association” if, as of December 31 of either of the prior two calendar years, the institution had assets of less than \$1.216 billion. A small bank or small savings association with assets of at least \$304 million as of December 31 of both of the prior two calendar years and less than \$1.216 billion as of December 31 of either of the prior two calendar years was an “intermediate small bank” or “intermediate small savings association” (12 CFR 25.12(u)(1), 12 CFR 195.12(u)(1)). The regulations provide that the OCC will publish annual adjustments to these dollar figures based on the year-to-year change in the average of the Consumer Price Index for Urban Wage Earners and Clerical Workers (CPI-W), not seasonally adjusted, for each 12-month period ending in November, with rounding to the nearest million (12 CFR 25.12(u)(2), 12 CFR 195.12(u)(2)).

During the period ending November 2016, the CPI-W increased by 0.84 percent. As a result, the OCC has revised the dollar thresholds detailed in 12 CFR 25.12(u)(1) and 12 CFR 195.12(u)(1) to reflect the increased CPI-W. Beginning January 18, 2017, a national bank or savings association that, as of December 31 of either of the prior two calendar years, had assets of less than \$1.226 billion is a “small bank” or “small savings association.” A small bank or small savings association with assets of at least \$307 million as of December 31 of both of the prior two calendar years and less than \$1.226 billion as of December 31 of either of the prior two calendar years is an “intermediate small bank” or “intermediate small savings association.”

For further information about how these revised asset-size thresholds are applied, see the CRA page on the Federal Financial Institutions Examination Council’s [website](https://www.ffiec.gov/cra/) [https://www.ffiec.gov/cra/].

Further Information

Please contact Emily Boyes, Attorney, Community and Consumer Law, at (202) 649-6350; Marta E. Stewart-Bates, Attorney, Legislative and Regulatory Activities Division, at (202) 649-5490; or Bobbie Kennedy, Bank Examiner, Compliance Policy Division, at (202) 649-5470.

Amy S. Friend
Senior Deputy Comptroller and Chief Counsel

Related Link

- [“Community Reinvestment Act Regulations” \(PDF\)](#)