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To: Clients and Friends

From: David F. Dulock

Subject: CRA Asset-size Thresholds Revised for 2019

In the December 27, 2018, issue of the Federal Register (83 FR 66601, [click here](#)) the Office of the Comptroller of the Currency (OCC), Board of Governors of the Federal Reserve System (Board), and Federal Deposit Insurance Corporation (FDIC) (collectively, the Agencies) published a joint final rule amending their respective Community Reinvestment Act (CRA) regulations to adjust the asset-size thresholds used to define “small bank,” “small savings association,” “intermediate small bank,” and “intermediate small savings association,” as set out below.

Effective January 1, 2019, the OCC, the FRB and the FDIC are revising their CRA regulations in 12 CFR §§25.12(u)(1), 195.12(u)(1), 228.12(u)(1), and 345.12(u)(1), respectively, to **increase** the asset-size thresholds used to define “small bank,” “intermediate small bank,” “small savings association,” and “intermediate small savings association.” Beginning January 1, 2019, banks and savings associations that, as of December 31 of either of the prior two calendar years, had assets of less than \$1.284 billion (an increase from \$1.252 billion) are small banks or small savings associations. Beginning January 1, 2019, small banks and small savings associations with assets of at least \$321 million (an increase from \$313 million) as of December 31 of both of the prior two calendar years and less than \$1.284 billion (an increase from \$1.252 billion) as of December 31 of either of the prior two calendar years are intermediate small banks or intermediate small savings associations. The current and historical asset-size thresholds also are published on the website of the Federal Financial Institutions Examination Council at <http://www.ffiec.gov/cra/>.

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