



December 30, 2019

8584 Katy Freeway, Suite 420

Houston, TX 77024

Phone: 713-871-0005

Fax: 713-871-1358

Partners

Thomas E. Black, Jr.¹

Gregory S. Graham²

Shawn P. Black³

Managing Attorney Houston

Ryan Black⁴

Senior Lawyers

David F. Dulock

Diane M. Gleason

Daniel S. Engle³

Margaret Noles

Associates

Nick Stevens

Sydney Davis

Of Counsel

David M. Tritter

Calvin C. Mann, Jr.

Retired Partner(s)

Calvin C. Mann, Jr.

¹ Also Licensed in Iowa, New York, and Washington

² Also Licensed in Georgia

³ Also Licensed in New York

⁴ Also Licensed in Washington D.C.

To: Clients and Friends

From: David F. Dulock

Subject: CRA Asset-size Thresholds Revised for 2020

In the December 30, 2019, issue of the *Federal Register* (84 FR 71738, [click here](#)), the Office of the Comptroller of the Currency, Treasury (OCC), the Board of Governors of the Federal Reserve System (FRB), and the Federal Deposit Insurance Corporation (FDIC) 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, 2020, 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, 2020, banks and savings associations that, as of December 31 of either of the prior two calendar years, had assets of less than **\$1.305 billion** (an increase from \$1.284 billion) are small banks or small savings associations. Beginning January 1, 2020, small banks and small savings associations with assets of at least **\$326 million** (an increase from \$321 million) as of December 31 of both of the prior two calendar years and less than **\$1.305 billion** (an increase from \$1.284 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/>.

This Memorandum is provided as general information in regard to the subject matter covered, but no representations or warranty of the accuracy or reliability of the content of this information are made or implied. Opinions expressed in this memorandum are those of the author alone. In publishing this information, neither the author nor the law firm of Black, Mann & Graham L.L.P. is engaged in rendering legal services. While this information concerns legal and regulatory matters, it is not legal advice and its use creates no attorney-client relationship or any other basis for reliance on the information. Readers should not place reliance on this information alone, but should seek independent legal advice regarding the law applicable to matters of interest or concern to them. The law firm of Black, Mann & Graham L.L.P. expressly disclaims any obligation to keep the content of this information current or free of errors.