CRA Asset Thresholds Revised – FDIC Amends CRA Notices

On an annual basis, the federal banking agencies (the FDIC, FRB and OCC) adjust the asset-size thresholds used to define “small institution” and “intermediate small institution” for CRA purposes. The agencies base these adjustments on the annual percentage change in the CPI-W. On December 29, 2016, the agencies increased the CRA asset threshold for 2017 as a result of an increase in the CPI-W.

Effective January 1, 2017:

- “Small institution” means an institution that had assets of less than $1.226 billion on December 31, 2015 or December 31, 2016; and

- “Intermediate small institution” means a small institution with assets of at least $307 million as of December 31 of both 2015 and 2016, and less than $1.226 billion as of December 31 of either 2015 or 2016.

- “Large institution” is one having total assets of at least $1.226 billion as of December 31, 2015 and December 31, 2016.

In addition to adjusting the asset thresholds, the FDIC also amended its CRA public notices due to a change in the responsible FDIC official’s title from Regional Manager to Regional Director. As a result, FDIC-supervised state nonmember banks need to update both their head office CRA notices and their branch CRA notices. The new notice requirements were effective January 1, 2017, which means that these financial institutions should update their CRA notices as soon as possible. Following are the amended CRA notices for FDIC-supervised state nonmember banks.
COMMUNITY REINVESTMENT ACT NOTICE
[FDIC-Supervised State Nonmember Banks]

(Amended CRA Notice Effective January 1, 2017)

(Notice for main offices and, if an interstate bank, one branch office in each state)

Under the Federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FDIC also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the FDIC; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Regional Director, FDIC, San Francisco Regional Office, 25 Jessie Street at Ecker Square, Suite 2300, San Francisco, California 94105. You may send written comments about our performance in helping to meet community credit needs to (name and address of official at bank) and FDIC Regional Director. Your letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the FDIC Regional Director. You may also request from the FDIC Regional Director an announcement of our applications covered by the CRA filed with the FDIC. We are an affiliate of (name of holding company), a bank holding company. You may request from the Officer in Charge of Supervision, Federal Reserve Bank of San Francisco, P.O. Box 7702, San Francisco, California 94120, an announcement of applications covered by the CRA filed by bank holding companies.
COMMUNITY REINVESTMENT ACT NOTICE*
[FDIC-Supervised State Nonmember Banks]

(Amended CRA Notice Effective January 1, 2017)

(Notice for branch offices)

Under the Federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FDIC also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA. You may review today the public section of our most recent CRA evaluation, prepared by the FDIC, and a list of services provided at this branch. You may also have access to the following additional information, which we will make available to you at this branch within five calendar days after you make a request to us:

1. a map showing the assessment area containing this branch, which is the area in which the FDIC evaluates our CRA performance in this community;
2. information about our branches in this assessment area;
3. a list of services we provide at those locations;
4. data on our lending performance in this assessment area; and
5. copies of all written comments received by us that specifically relate to our CRA performance in this assessment area, and any responses we have made to those comments.

If we are operating under an approved strategic plan, you may also have access to a copy of the plan.

[If you would like to review information about our CRA performance in other communities served by us, the public file for our entire bank is available at (name of office located in state), located at (address).]

At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Regional Director, FDIC, San Francisco Regional Office, 25 Jessie Street at Ecker Square, Suite 2300, San Francisco, California 94105. You may send written comments about our performance in helping to meet community credit needs to (name and address of official at bank) and the FDIC Regional Director. Your
letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

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* Bracketed text should be used only by institutions having more than one local community.