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Community Reinvestment Act: Revision of Small and Intermediate Small Bank and Savings Association Asset Thresholds

To

Chief Executive Officers of All National Banks, Federal Savings Associations, and Federal Branches and Agencies; Department and Division Heads; All Examining Personnel; and Other Interested Parties

Summary

The Office of the Comptroller of the Currency (OCC) announced revisions to the asset-size threshold amounts used to define “small bank or savings association” and “intermediate small bank or savings association” under the Community Reinvestment Act (CRA) regulation (12 CFR 25 (March 29, 2024)). The thresholds—which apply to any national bank, federal savings association, or state savings association¹ (collectively, bank)—become effective January 1, 2026. This bulletin adjusts the threshold amounts based on the annual percentage change in a measure of the Consumer Price Index.

Note for Community Banks

The bulletin applies to all national banks and federal savings associations subject to evaluation under the CRA.

Highlights

Beginning January 1, 2026, a bank that, as of December 31 of either of the prior two calendar years, had assets of less than \$1.649 billion is a “small bank or savings association” under the CRA regulation. A “small bank or savings association” with assets of

at least \$412 million as of December 31 of both of the prior two calendar years and less than \$1.649 billion as of December 31 of either of the prior two calendar years is an “intermediate small bank or savings association” under the CRA regulation.

Background

The OCC’s CRA regulation provides that banks are evaluated under different CRA examination procedures based on their asset-size threshold amounts. For calendar year 2025, the CRA regulation defined a “small bank or savings association” as an institution with assets of less than \$1.609 billion as of December 31 of either of the prior two calendar years. A “small bank or savings association” with assets of at least \$402 million as of December 31 of both of the prior two calendar years and less than \$1.609 billion as of December 31 of either of the prior two calendar years is an “intermediate small bank or savings association.”

The OCC is required to publish annual adjustments to the asset-size thresholds 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) (March 29, 2024))

During the period ending November 2025, the CPI-W increased by 2.51 percent.² The OCC has adjusted the dollar thresholds detailed in 12 CFR 25.12(u)(1) (March 29, 2024) to reflect the increased CPI-W. Beginning January 1, 2026, a bank that, as of December 31 of either of the prior two calendar years, had assets of less than \$1.649 billion is a “small bank or savings association.” A “small bank or savings association” with assets of at least \$412 million as of December 31 of both of the prior two calendar years and less than \$1.649 billion as of December 31 of either of the prior two calendar years is an “intermediate small bank or savings association.”

For further information about how these revised asset-size thresholds are applied, visit the CRA page on the Federal Financial Institutions Examination Council’s [website](#).

Further Information

Please contact Emily Boyes, Counsel, Chief Counsel’s Office, at (202) 649-5490; or Cassandra Remmenga, Policy Specialist, Office of the Chief National Bank Examiner at (202) 649-5470.

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¹ The OCC's CRA rulemaking authority includes state savings associations. 12 USC 2905.

² The thresholds were calculated using an 11-month average due to the government shutdown during October and November of 2025 resulting in non-publication of CPI-W data for October 2025.

Topic(s): ■ COMMUNITY REINVESTMENT ACT (CRA)