



Moderated By



CRA: Small & Intermediate Small Bank Panel

Florida Bankers Association
Consumer Compliance Conference

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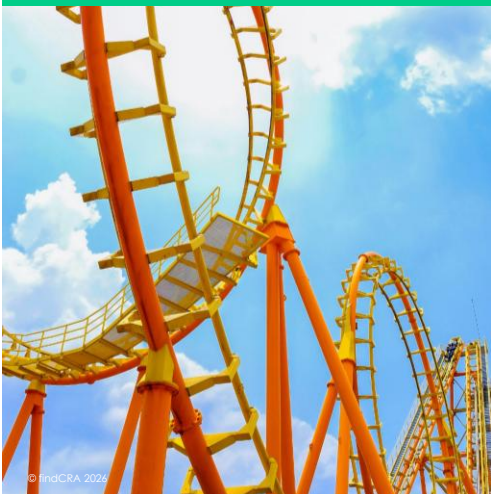
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○ CRA Modernization ● ● Check-In

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CRA Rules Roller Coaster



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April 2018

U.S. Treasury issued a formal memo outlining its recommendations for the improvement of CRA.

September 2018

OCC issues ANPR to obtain public input of how to revise the CRA regulations.

December 2019

OCC and FDIC issue a joint proposed rule to modernize CRA regulations.

April 2020

FDIC withdraws from joint proposed rule citing COVID-19 pandemic response priorities.

May 2020

OCC issues final rule to modernize CRA effective October 1st.

September 2020

Federal Reserve issues ANPR for its own CRA proposed rule.

January 2022

OCC rescinds its May 2020 final rule as the three agencies commit to issuing an interagency CRA update.

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CRA Final Rule Timeline



February 1, 2024 (Draft released October 24, 2023)

Banking agencies publish their final rule to modernize and strengthen the Community Reinvestment Act. The final rule clocks-in at nearly 2,000 pages.

February 5, 2024

ABA, ICBA, and other trade groups sue the banking regulators for exceeding their statutory authority in the new CRA rule.

March 30, 2024

Injunction issued by the Court of the Northern District Texas to delay the implementation of the CRA final rule.

March 28, 2025

Banking agencies announce their intent to rescind the 2023 final rule and reinstate the CRA framework that existed prior to October 2023 (i.e., the 1995 final rule).

July 16, 2025

Banking agencies issue a Notice of Proposed Rulemaking to rescind the February 2024 CRA Final Rule and reinstate the prior (current) CRA framework.

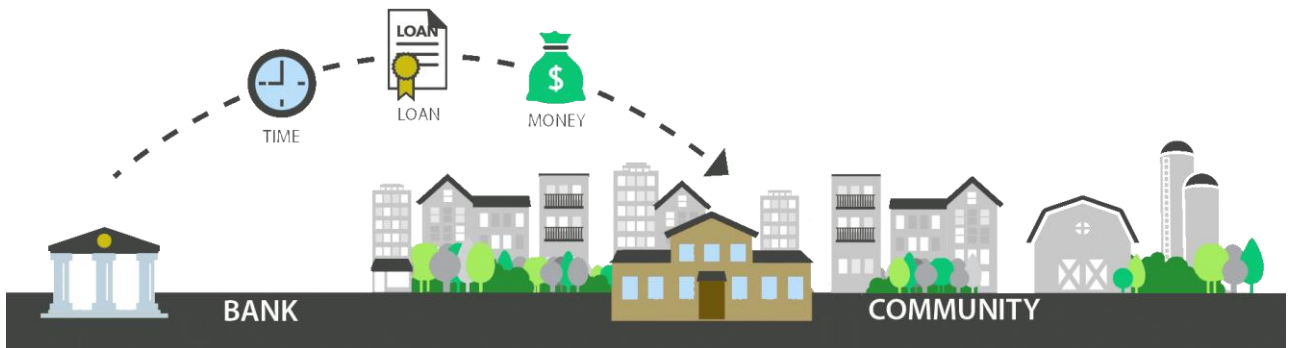
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CRA Key Definitions

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Under the federal **Community Reinvestment Act**, banks are encouraged to support programs and organizations that provide affordable housing, economic development and community services to low- and moderate-income people and geographies in the communities where the bank operates.



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Bank Size Designations

- **Small Bank:** Assets of less than \$412 million as of December 31st in either of the prior two calendar years
- **Intermediate Small Bank:** Assets of at least \$412 million as of December 31st in both of the prior two calendar years and less than \$1.649 billion as of December 31st in either of the prior two calendar years
- **Large Bank:** Assets of at least \$1.649 billion as of December 31st in both of the prior two calendar years
- **Limited Purpose Banks:** Banks that offer only a narrow product line (i.e., credit card or motor vehicle loans) to a regional or broader market
- **Wholesale Banks:** Banks that are not in the business of extending home mortgage, small business, small farm, or consumer loans to retail customers
- **Strategic Plan:** Banks of any size that have requested to be evaluated under an approved Strategic Plan

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Assessment Areas

- Includes areas where the bank has a **main office, branch, or deposit-taking remote service facility (RSF)** and adjacent counties where the bank has a substantial portion of lending
- Banks can delineate an AA that includes part of, but not the entirety of, one or more counties that it can reasonably be expected to serve
- Cannot extend beyond an MSA boundary or beyond a State boundary unless the AA is in a multistate MSA
- Cannot reflect illegal discrimination and may not arbitrarily exclude LMI census tracts, accounting for the bank's capacity and constraints, including size and financial condition
- RSFs include only those owned and operated by the bank or operated exclusively for the bank
- Loan Production Offices do not require the delineation of an AA

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Community Development

- **Affordable housing** (including multifamily rental housing) for low- or moderate-income individuals
- **Community services** targeted to low- or moderate-income individuals
- Activities that promote **economic development** by financing businesses or farms that meet the size eligibility standards of the SBA's Development Company or Small Business Investment Company (SBIC) programs (§ 13 CFR 121.301) or have a gross annual revenues of \$1 million or less; or
- Activities that **revitalize or stabilize**
 - Low- or moderate-income geographies;
 - Designated disaster areas; or
 - Distressed or underserved nonmetropolitan middle-income geographies designated by the [banking regulatory agencies], based on:
 - Rates of poverty, unemployment and population loss; or
 - Population size, density, and dispersion. Activities revitalize and stabilize geographies based on population size, density, and dispersion if they help meet essential community needs, including needs of low- and moderate-income individuals.

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CRA Panel

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