

2026 Annual CRA Asset-Size Threshold Adjustments for ILCRA Financial Institutions (Banks)

On December 30, 2025, the Federal Reserve Board and the Federal Deposit Insurance Corporation announced the annual adjustment to the asset-size thresholds used to define 'Small Bank' and 'Intermediate Small Bank' under regulations implementing the federal Community Reinvestment Act ("CRA").

The asset-size thresholds are adjusted annually based on the average change in the Consumer Price Index for Urban Wage Earners and Clerical Workers (CPI-W), which is a measure of inflation. As a result of the 2.51 percent increase in the CPI-W for the period ending in November 2025, the CRA and ILCRA asset-size thresholds for small banks and intermediate small banks are:

- A small bank is an institution that, as of December 31 of either of the prior two calendar years, had assets of less than \$1.649 billion.
- An intermediate small bank is a small institution 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.

2026 Annual CRA Asset-Size Threshold Adjustments for ILCRA Financial Institutions (Credit Unions)

On December 30, 2025, the Federal Reserve Board and the Federal Deposit Insurance Corporation announced the annual adjustment to the asset-size thresholds used to define 'Small Bank' and 'Intermediate Small Bank' under regulations implementing the federal Community Reinvestment Act ("CRA").

The asset-size thresholds for small credit unions and intermediate small credit unions shall be automatically adjusted to remain consistent with the asset-size thresholds in effect for small banks and intermediate small banks as published by the Federal Deposit Insurance Corporation.

The asset-size thresholds are adjusted annually based on the average change in the Consumer Price Index for Urban Wage Earners and Clerical Workers (CPI-W), which is a measure of inflation. As a result of the 2.51 percent increase in the CPI-W for the period ending in November 2025, the CRA and ILCRA asset-size thresholds for small credit unions and intermediate small credit unions are:

- A small credit union is a credit union that, as of December 31 of either of the prior two calendar years, had total assets of less than \$412 million.
- An intermediate small credit union is a credit union 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.