



Compliance Hub - Question of the Week:

Q: We received a “Satisfactory” CRA rating in November 2023 and have \$3.4 billion in total assets. Under the FDIC’s updated examination guidance, when should we expect our next CRA exam?

A: Well as luck would have it, this is exactly the kind of scenario the FDIC’s recent updates are meant to clarify! As this question alludes, the FDIC revised its Consumer Compliance Examination Manual to adjust how often banks receive full-scope consumer compliance and CRA examinations. For many institutions, this means longer cycles between full exams, paired with risk-based midpoint reviews instead of automatic full examinations.)

Depending on size and risk (i.e., their previous evaluation), institutions will fall into one of three schedules: 66-78 months, 54-66 months, or 24-36 months between full reviews. Those on the longer cycles will undergo a midpoint risk analysis to determine if any intervening supervision (like a targeted visitation) is needed.

Applying that framework here: with \$3.4 billion in assets (assuming the bank exceeded the \$3 billion threshold on both of the prior year-end Call Reports) and a “Satisfactory” CRA rating, the Manual places the institution in the 24–36-month examination cycle.

That means the next full-scope CRA examination would be expected sometime between November 2025 and November 2026, absent a change in risk profile or supervisory concerns that would prompt earlier intervention. The FDIC’s examination frequency framework is laid out in the Consumer Compliance Examinations — Examination and Visitation Frequency (and this particular asset size is covered in Table 4).