

**From:** [Lance White](#)  
**To:** [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] FDICIA Comments on Thresholds  
**Date:** Tuesday, September 9, 2025 10:07:16 AM

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To Whom It May Concern:

I am writing on behalf of Bank of the Flint Hills, a community bank serving six rural and small-town communities across Kansas, to express our strong support for the FDIC's proposal to increase and index the asset-size thresholds under the Federal Deposit Insurance Corporation Improvement Act (FDICIA), specifically those tied to Part 363 audit and reporting requirements.

As a bank approaching the current \$500 million asset threshold, we are acutely aware of the burden imposed by these regulatory requirements. While we recognize the importance of sound internal controls and financial transparency, the fixed threshold does not reflect the realities of inflation or the growth of the broader banking system over time. A bank at \$500 million in 2025 simply does not represent the same scale of risk as it did decades ago when this threshold was first implemented.

Moreover, the costs associated with compliance—particularly the requirements for annual external audits and management assessments of internal controls—are disproportionately impactful to community banks like ours. These costs divert critical resources away from lending, innovation, and customer service in the communities we serve.

We commend the FDIC for acknowledging this disparity and proposing an update to both increase the threshold and implement an indexing mechanism going forward. Doing so will ensure that regulatory burden remains proportional to the risk posed by an institution's size and complexity.

Allowing smaller banks to continue operating under existing controls without the added expense of FDICIA Part 363 requirements will not compromise safety and soundness. On the contrary, it will enhance the ability of banks like ours to remain competitive, serve our communities, and grow responsibly.

We strongly urge the FDIC to finalize this proposal and continue seeking ways to modernize regulation in ways that support community banking while maintaining prudent oversight.

Thank you for this consideration,

Lance L. White

President / CEO

Bank of the Flint Hills

Sent from my iPad

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