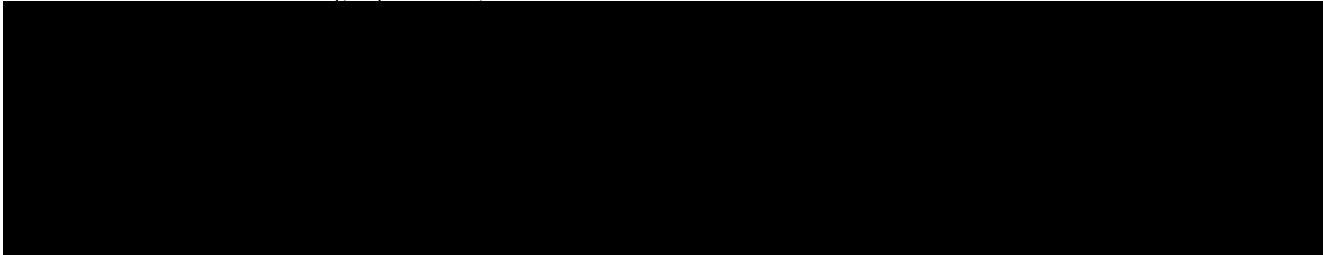


From: [Amy Haskell](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] July 28th, 2025 - Adjusting and Indexing Certain Regulatory Thresholds; Comment Request (RIN 3064-AG15)
Date: Thursday, September 25, 2025 11:06:56 AM



Ms. Jennifer M. Jones
Deputy Executive Secretary
Attention: Comments RIN 3064-AG15
FDIC
550 17th Street NW
Washington, DC 20429

Dear Ms. Jones,

I'm writing in support of the FDIC's proposed changes to Part 363, particularly the recommendation to raise the asset threshold for requiring auditor attestation on ICFR from \$1 billion to \$5 billion. Our bank is a community bank with a 128-year history in northern Minnesota and recently crossed the \$1 billion threshold. As a bank now in the \$1-5 billion asset range, we believe this proposed change reflects a more appropriate balance between regulatory burden and risk oversight. Most banks crossing the \$1 billion threshold already undergo rigorous financial statement audits and are subject to strong internal and external oversight frameworks.

On a practical level, the current ICFR attestation results in significant costs, estimated upwards of \$100,000 annually for banks like ours. These funds could be more effectively used in ways that directly support our customers and local community. Importantly, the existing requirement was established decades ago and has not been adjusted for asset growth or inflation, even as other safety and soundness oversight has improved and evolved, so the proposed changes are welcome.

We encourage the FDIC to include clear transitional guidance in the final rule for institutions that, like us, only recently surpassed the \$1 billion asset threshold but have not yet fully implemented the existing requirements. In particular, clarification that such institutions, for example, are not expected to implement this requirement on a temporary basis depending on the effective date of the final rule.

We appreciate the opportunity to comment our support of the FDIC's proposed amendments to Part 363.

Respectfully submitted,

Amy Haskell *Executive Vice President, Chief Risk Officer*

