



To: Public Comment File – Federal Deposit Insurance Corporation RIN 3064-AF94

From: Steven Key, Senior Advisor to the Acting Comptroller

Date: November 5, 2024

Subject: Meeting with Bank Policy Institute

On November 5, 2024, the Acting Comptroller of the Currency, in his capacity as a Member of the Federal Deposit Insurance Corporation's (FDIC) Board of Directors, and staff from the Office of the Comptroller of the Currency (OCC) met with representatives from the Bank Policy Institute (collectively, "the representatives") to discuss the FDIC's proposed rule entitled "Guidelines Establishing Standards for Corporate Governance and Risk Management for Covered Institutions with Total Consolidated Assets of 10 Billion Dollars or More." The representatives shared their views on provisions of the proposed rule addressing the composition, duties, roles, and responsibilities of a bank's board of directors and compared these provisions to their understanding of the OCC's heightened standards. The representatives also shared their views on provisions of the proposed rule addressing bank internal audit and risk management responsibilities. The representatives also suggested the proposed rule fails to meet the requirements of the Administrative Procedures Act.

Participants

OCC	Michael Hsu Steven Key Lauren Oppenheimer
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Bank Policy Institute	Greg Baer John Court Gregg Rozansky
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