

From: [Anita Garrett](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] July 18th, 2025 - Community Reinvestment Act Regulations - Comment Request (RIN 3064-AG13)
Date: Friday, August 15, 2025 4:19:20 PM
Attachments: [image001.png](#)

To Whom It May Concern:

We are writing to express our support for the joint Notice of Proposed Rulemaking (NPR) issued on July 16, 2025, by the Federal Deposit Insurance Corporation (FDIC), the Board of Governors of the Federal Reserve System (Federal Reserve), and the Office of the Comptroller of the Currency (OCC), which proposes to rescind the 2023 Community Reinvestment Act (CRA) Final Rule and reinstate the regulatory framework that was in effect prior to its adoption.

The 2023 CRA Final Rule introduced significant changes that, while well-intentioned, created uncertainty and increased compliance burdens for financial institutions. The proposed return to the 1995/2021 CRA regulations offers a more stable and familiar framework that has proven effective in encouraging banks to meet the credit needs of their communities, including low- and moderate-income neighborhoods, while maintaining safe and sound banking practices.

We commend the agencies for their responsiveness to stakeholder concerns and for taking steps to restore clarity and consistency in CRA supervision. The proposed rule's conforming amendments—such as updating the small bank asset-size threshold to reflect current standards—are practical and necessary adjustments that will help ensure the framework remains relevant and equitable.

I urge the agencies to move forward with finalizing this rule and appreciate the opportunity to provide input. Thank you for your continued commitment to promoting community investment and financial inclusion.

Sincerely,

Gary Harding • CEO & President



and

Anita Garrett CRCM • *Chief Compliance & Risk Officer*



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From: [Anita Garrett](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] July 28th, 2025 - Adjusting and Indexing Certain Regulatory Thresholds; Comment Request (RIN 3064-AG15)
Date: Friday, August 15, 2025 4:30:36 PM
Attachments: [image001.png](#)

To Whom It May Concern:

We are writing in support of the Federal Deposit Insurance Corporation's (FDIC) Notice of Proposed Rulemaking (NPR) issued on July 15, 2025, which proposes to adjust and index certain regulatory thresholds under **12 CFR Part 363** and adjust the materiality threshold for **Part 335** to reflect inflation and provide a more durable compliance framework for insured depository institutions.

The proposed increase in asset thresholds—from \$500 million to \$1 billion for annual independent audits and management reports, and from \$1 billion to \$5 billion for internal control reporting—represents a thoughtful and necessary modernization of FDICIA requirements. These thresholds have remained static for decades, and the proposed adjustments will help ensure that institutions are not subject to heightened regulatory burdens solely due to inflationary asset growth rather than actual changes in risk profile or operational complexity.

We also support the proposed increase in the materiality threshold for insider loan disclosures from \$5 million to \$10 million. This adjustment reflects a sensible alignment with inflation-adjusted values and helps maintain the relevance of disclosure requirements. By raising the threshold, the FDIC can ensure that reporting obligations are reserved for transactions of meaningful significance.

As a bank president, I believe these proposals strike an appropriate balance between managing risk and reducing unnecessary costs for community banks and mid-sized institutions. The introduction of an indexing mechanism to update these thresholds biennially—or sooner in the event of significant inflation—is a forward-looking solution that will help preserve the intent of the original regulations in real terms.

Together, these provisions represent a balanced approach to policy modernization that advances efficiency without sacrificing oversight. I commend the FDIC for its leadership in reevaluating these thresholds and urge the agency to finalize the proposed rule as outlined. These changes will provide meaningful relief to institutions nearing the current thresholds and allow them to allocate resources more effectively toward serving their communities.

Thank you for the opportunity to comment.

Sincerely,

Gary Harding • *CEO & President*



[REDACTED]

and

Anita Garrett CRCM • *Chief Compliance & Risk Officer*



[REDACTED]

[REDACTED]

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