



Federal Deposit Insurance Corporation
550 17th Street NW, Washington, D.C. 20429-9990

Financial Institution Letter
FIL-88-2018
December 20, 2018

Management Interlocks

Interagency Proposed Rule on Thresholds Increase for Major Assets Prohibition of the Depository Institution Management Interlocks Act Rules

Summary: The FDIC and the other federal financial institution regulatory agencies have jointly issued a proposed rulemaking to raise the thresholds for the *Major Assets Prohibition of the Depository Institution Management Interlocks Act* (DIMIA) implementing rules.

Statement of Applicability to Institutions with Total Assets Under \$1 Billion: This Financial Institution Letter applies to FDIC-supervised financial institutions with total assets over \$1 billion.

Suggested Distribution:

FDIC-Supervised Institutions

Suggested Routing:

Chief Executive Officer
Compliance Officer

Related Topics:

FDIC Rules and Regulations, 12 CFR Part 348
(Management Official Interlocks)

Attachment:

Proposed Rule – [Threshold Increase for Major Assets Prohibition of the Depository Institution Management Interlocks Act Rules](#)

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Note:

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Highlights:

- The FDIC, the Office of the Comptroller of the Currency, and the Board of Governors of the Federal Reserve System are issuing a Notice of Proposed Rulemaking (NPR) with a request for comment on a proposal to adjust the major assets prohibition thresholds of the DIMIA rule to fulfill a commitment made in the 2017 *Economic Growth and Regulatory Paperwork Reduction Act Report* to Congress.
- Under the existing major assets prohibition, a management official of a depository organization with total assets exceeding \$2.5 billion (or any affiliate of such an organization) may not serve at the same time as a management official of an unaffiliated depository organization with total assets exceeding \$1.5 billion (or any affiliate of such an organization), regardless of the location of the two depository organizations.
- The NPR proposes to increase both thresholds in the major assets prohibition rule to a single \$10 billion threshold based on general market changes since 1996 when the major assets threshold in DIMIA was amended.
- The NPR also solicits comments on three alternative approaches to raise the major assets prohibition thresholds. Two are based on market changes, and one is based on inflation adjustments.
- Comments on the proposed rule and alternative approaches to raise the thresholds are due 60 days after publication in the *Federal Register*.