

Meeting Between Staff of the Federal Reserve Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency and Representatives of the Conference of State Bank Supervisors and Various State Bank Supervisors
February 28, 2019

Participants: Connie Horsley, Juan Climent, and Andrew Willis (Federal Reserve Board)

Bobby Bean, Ryan Billingsley, Ben Bosco, Michael Phillips, and Catherine Wood (Federal Deposit Insurance Corporation)

David Elkes, Jung Sup Kim, Carl Kaminski, and Rima Kundnani (Office of the Comptroller of the Currency)

Staff of the Conference of State Bank Supervisors and various State bank supervisors

Summary: Representatives from the Conference of State Bank Supervisors (CSBS) and staff of various state bank supervisors met with staff of the Federal Reserve Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency regarding the interagency notice of proposed rulemaking on the community bank leverage ratio under section 201 of the Economic Growth, Regulatory Relief, and Consumer Protection Act. The CSBS representatives and staff of the state bank supervisors summarized their views on the community bank leverage ratio proposal that had previously been provided in a written comment letter on the proposal. In particular, the discussion included how to best address a banking organization that drops below the community bank leverage ratio threshold for purposes of Prompt Corrective Action and whether tier 1 capital should constitute the numerator of the ratio.