

**Meeting Between Staff of the Federal Reserve Board, the Federal Deposit Insurance Corporation, the Office of the Comptroller of the Currency, and Representatives of MidFirst Bank  
August 4, 2022**

**Participants:** Taz George, Eric Lum, Kenneth Brevoort, and Amal Patel (Federal Reserve Board)

Jonathan Miller, Pamela Freeman, Kris Rengert, and Richard Schwartz (Federal Deposit Insurance Corporation)

Donna Murphy, Patrick Tierney, Emily Boyes, Kevin Behne, Vonda Eanes, Cassandra Remmenga, and Sean Lewis-Faupel (Office of the Comptroller of the Currency)

Todd Dobson, Ken Clark, Scott Reed, Charles Lee, and Anika Stucky (MidFirst Bank); Randy Benjenk and Karen Solomon (Covington & Burling LLP)

**Summary:** Staff from the Federal Reserve Board, the Federal Deposit Insurance Corporation, and the Office of the Comptroller of the Currency (collectively, the agencies) met with representatives of MidFirst Bank to discuss the agencies' notice of proposed rulemaking (NPR) on an approach to modernize the regulations that implement the Community Reinvestment Act (CRA). MidFirst Bank representatives discussed concerns and approaches expressed in its comment letter on the CRA NPR. Specifically, MidFirst Bank representatives discussed concerns regarding the potential impact of the CRA NPR's proposed borrower distribution metric under the proposal's Retail Lending Test and recommended changes to the proposed borrower distribution metric or the Retail Lending Test's performance context factors.