

**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
March 18, 2019**

Participants: Juan Climent, Andrew Willis, and Mark Buresh (Federal Reserve Board)

Benedetto Bosco, Ryan Billingsley, Michael Phillips, and Catherine Wood
(Federal Deposit Insurance Corporation)

Margot Schwadron and Christine Smith (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 (collectively, the agencies) 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.