BANK OF THE FLINT HILLS, LANCE WHITE

Proposal and Comment Information

Title: CBLR - Regulatory Capital Rule: Revisions to the Community Bank Leverage Ratio Framework, R-1876

Comment ID: FR-2025-0067-01-C01

Submitter Information

Organization Name: Bank of the Flint Hills

Organization Type: Company

Name: Lance White

Submitted Date: 12/08/2025

DRAFT COMMENT LETTER
Re: CBLR – Regulatory Capital Rule: Revisions to the Community Bank Leverage Ratio Framework [R-1876]

To Whom It May Concern:

Thank you for the opportunity to provide comment on the joint Notice of Proposed Rulemaking regarding revisions to the Community Bank Leverage Ratio (CBLR) framework.

I write in support of the proposed changes to lower the CBLR requirement from 9 percent to 8 percent and to extend the grace period for institutions that temporarily fall outside qualifying criteria. These adjustments preserve safety and soundness while acknowledging the rapidly evolving financial environment community banks operate in today.

Community banks continue to play a critical role in serving local economies, especially in rural and underserved areas where large banks and technology-based financial providers often have limited presence. Maintaining a regulatory capital requirement that remains well above historical leverage norms — while also aligning with the statutory language of the Economic Growth, Regulatory Relief, and Consumer Protection Act — helps ensure these banks can continue fulfilling their mission.

The proposed 8 percent requirement:

• Remains prudentially strong, providing ample capital protection given the low-risk business models and relationship-focused lending typical of CBLR-eligible institutions.

• Improves flexibility in capital management, enabling community banks to responsibly support loan growth, fund operational improvements, and invest in innovation necessary to remain competitive.

• Reduces unnecessary capital constraint during periods of economic expansion or temporary volatility that do not meaningfully change risk exposure.

The proposed extension of the grace period is equally prudent. Allowing certain institutions to remain in the CBLR framework for up to four consecutive quarters — with limits to ensure accountability — provides stability and predictability during temporary fluctuations in balance sheets without compromising oversight.

These regulatory modifications strike the right balance between ensuring a resilient banking system and enabling community banks to continue meeting the credit and financial needs of the customers and communities they serve.

Thank you again for considering comments from community bankers and stakeholders across the country. I encourage the final rule to adopt the proposed changes as written.

Respectfully submitted,

Lance L. White
President / CEO
Bank of the Flint Hills
Wamego, Kansas