

**Meeting Between Staff of the Federal Reserve Board and Representatives
of the Oklahoma Bankers Association
September 28, 2018**

Participants: Mike Johnson, Yao-Chin Chao, Anthony DeVita, Jennifer Gallagher, Megan Drefchinski, Edward Herbst, Koko Ives, Lara Lylozian, Sviatlana Phelan, Katie Ross, Meaghan Shkreli, and Andrew Willis (Federal Reserve Board)

Donald Abernathy, Amada Alvidrez, Troy Appling, Sinclair Armstrong Jr., Steven Bagwell, Adrian Beverage, Roger Beverage, Larry Briggs, Derek Briggs, Beth Brown, Bradley Burrage, Joseph Burrage, Steven Burrage, Bryan Cain, Lynn Carson, Janeen Cato, Matthew Clouse, Priscilla Cude, Timothy Cutsinger, Mark Day, David Durrett, Ryan Gilliland, Taylor Green, James Hamby, Katharine Henke, Lea Ann Jackson, Clayton Lodes, Richard Londagin, Megan McGuire, Ryan Newby, Brenda Parks, Joe Perryman, Vicky Petete, Mark Poole, Deborah Rinehart, Clide Roberts, Joseph Root, Taylor Skouby, Jeffrey Steiner, Billy Taylor, Chuck Thompson, Martin Tucker, Gregg Vandaveer, Alicia Wade, Richard Walker, Sandra Werner, Brent Womack, and Virginia Elliott O'Neill (Oklahoma Bankers Association)

Summary: Staff of the Federal Reserve Board met with representatives of the Oklahoma Bankers Association to discuss regulatory and supervisory matters relating to community banks, including the interagency notice of proposed rulemaking to address the regulatory capital treatment of credit loss allowances under the new accounting standard known as the Current Expected Credit Losses (CECL) methodology (Docket No. R-1605). Association representatives inquired whether regulators had considered CECL implementation from a fiduciary perspective, and they expressed concern about potential legal liability for community banks. Association representatives also questioned the need to apply CECL to community banks. Association representatives further inquired whether regulators planned to conduct an impact study before proceeding with CECL implementation.

Association representatives also inquired about and expressed support for the forthcoming “community bank leverage ratio,” which the federal banking agencies are required to establish under the Economic Growth, Regulatory Relief, and Consumer Protection Act.