

Monday, November 23, 2020

To: New York Community Banks

We wanted to be sure that you saw this important message from ICBA President & CEO Rebeca Romero Rainey:

"Community bankers have a little more to be thankful for tonight as federal regulators announced ICBA-advocated relief from regulatory burdens caused by participating in federal coronavirus response programs.

Under the [interim final rule](#), community banks that have crossed a relevant regulatory asset threshold contained in the community bank leverage ratio, management interlocks, call reports, and examination frequency rules will be able to calculate their asset size during calendar years 2020 and 2021 based on the lower of either total assets as of Dec. 31, 2019, or total assets as of the normal measurement date.

The rule will apply to institutions with less than \$10 billion in total assets as of Dec. 31, 2019.

This is great news for many community banks and a testament to your outsized role as Paycheck Protection Program lenders. As ICBA has told policymakers since August, the surge of PPP loans has swelled community banks' balance sheets. Tonight's announcement will avoid inadvertently subjecting these financial first responders to additional regulatory burdens.

Meanwhile, ICBA continues encouraging community bankers to [keep the pressure on Congress](#) to include needed reforms to the PPP and Economic Injury Disaster Loan advances in the next economic stimulus package to ensure the success of these programs.

Thank you for all you are doing to meet the needs of your customers and communities during this challenging time."

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IBANYS will continue to provide updates as additional information becomes available. Thank you all for your continued participation and support.

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