



Mutual Alert

OCC Proposes Removal of Expedited Review for Bank Mergers in Attempt at Transparency

The OCC issued a **proposed rule** to revise its bank merger rules to increase transparency around the standards and procedures of how the agency reviews merger applications.

The suggested amendments include removing expedited review procedures and the use of streamlined applications, while adding a policy statement that would outline the principles, statutory factors, and decision process used by the OCC when reviewing applications. Acting Comptroller Hsu said the revisions will help ensure a “diverse, dynamic, and balanced,” banking system in **remarks** given at the University of Michigan School of Business.

The agency has chosen to forego preparing a Regulatory Flexible Analysis, certifying that the economic impact to the 1,057 institutions supervised by the OCC, of which over 600 are small entities, would be minimal. The proposal specifically notes that the removal of the expedited review process would not affect banks at all because the scope of information required to be submitted with a merger application would remain unchanged.

AMB believes the OCC has understated the impact of this proposal on mutual banks and has given short shrift to the Regulatory Flexibility Act. We will be preparing a strong comment letter opposing this one size fits all approach.

The OCC will be accepting public comments on the proposed rule for 60 days.

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