



THE FARMERS BANK

Established in 1912

September 9, 2025

Ms. Jennifer M. Jones, Deputy Executive Secretary
Attention: Comments- RIN 3064-AG15
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Re: Support for the Proposed Changes to Part 363 of the FDICIA, RIN 3064-AG15

Dear Ms. Jones:


On behalf of The Farmers Bank, we would like to express our strong support for the FDIC's proposed changes to Part 363 of the Federal Deposit Insurance Corporation Improvement Act of 1991 (FDICIA), which governs the annual independence audits and reporting requirements for insured depository institutions with assets above certain thresholds. The Farmers Bank was chartered in 1912 and is a \$900 million institution with 10 offices, serving predominantly rural markets. Community banks like ours play an outsized role in serving local families and small businesses, and this proposal helps ensure regulatory frameworks remain meaningful over time and continue to reflect the real size, risk profile, and complexity of financial institutions.

The internal control over financial reporting (ICFR) asset threshold of \$1 billion was established by the FDIC in 1991, which means most of the dollar-based thresholds in Part 363 have been in place for more than 30 years. Therefore, increasing the threshold to \$5 billion would provide substantial and much-needed regulatory relief for community banks while preserving the core objective of Part 363, which is to maintain appropriate oversight for larger institutions that pose the greatest risk to the Deposit Insurance Fund. Modernizing these guidelines will allow banks to redirect valuable resources toward better serving their customers and communities instead of increased compliance overhead. Additionally, by updating guidelines to account for inflation and establishing a methodology for future adjustments, this approach ensures that these limits maintain their intended purpose in real terms.

We respectfully encourage the FDIC to finalize this rule as proposed and provide timely implementation of these threshold adjustments.

Thank you for your consideration and continued dedication to balancing regulatory burden with effective risk management through this important proposal.

Sincerely,


Andy Nash
President/CEO

