



CBAI Urges Improvements to the FDIC's Guidelines for Appeals of Material Supervisory Determinations

In an October 6, 2020, comment letter to the Federal Deposit Insurance Corporation (FDIC), the Community Bankers Association of Illinois (CBAI) urged the Agency to make significant improvements to the current appeals and dispute resolution process, stating it is time-consuming, expensive and lengthy, and not only provides little hope of a positive result but causes bankers to fear retribution for elevating disputes. This comment letter follows the participation of CBAI and member leadership bankers in a December 2019 FDIC listening session in Chicago.

CBAI's recommendations for improvement include expanding the role for the Office of Ombudsman in the revised resolution process; strengthening the independence of a newly structured independent office and appeals review panels to replace the Supervision Appeals Review Committee (SARC); adding outside professionals with more diverse backgrounds and experience to the new review panels; and increasing deterrence of examiner retaliation, abuse or retribution by elevating charges to the Chairman of the FDIC.

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