



**Community Bankers
Association of Illinois**
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CBAI Urges the OCC to Lower the Proposed Asset Threshold for Heighten Standards for Large National Banks

In a comment letter dated February 26, 2026, CBAI stated its continued support for asset thresholds and tiered regulations, but urged the IOCC to approval a far lower assets threshold (\$100 billion rather than \$700 billion) for heightened standards for large national banks. CBAI highlighted in March of 2023 the failures of Silicon Valley Bank, Signature Bank of New York and First Republic Bank, which had combined assets of less than \$700 billion yet caused a near financial crisis, as a reason to lower the assets threshold. CBAI did urge the OCC to provide regulatory relief within the guidelines themselves, where appropriate, based on the OCC's experience with these guidelines since their implementation in 2010.

[Read CBAI's Comment Letter to the OCC »](#)

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