

# Financial Institution Letter FIL-82-2018 December 6, 2018

# **Review Process for Draft Deposit Insurance Proposals**

**Summary:** The FDIC is establishing a process to allow prospective organizers the option to request FDIC review of a draft deposit insurance proposal prior to filing an official application. The FDIC will review draft proposals to identify potential issues, provide preliminary feedback, and work with organizers on their submissions before submitting a formal application.

Statement of Applicability to Institutions with Less Than \$1 Billion in Total Assets: This Financial Institution Letter applies to all proposed insured depository institutions.

#### **Distribution:**

FDIC-Insured Depository Institutions

### **Suggested Routing:**

Chief Executive Officer

#### **Related Topics:**

12 CFR Part 303 (Subpart A and Subpart B)

FDIC Statement of Policy on Applications for Deposit Insurance - Effective October 1, 1998

Guidance Related to the FDIC Statement of Policy on Applications for Deposit Insurance - November 2014

Supplemental Guidance Related to the FDIC Statement of Policy on Applications for Deposit Insurance - April 2016

Applying for Deposit Insurance – A Handbook for Organizers of De Novo Institutions

<u>Procedures Manual on Deposit Insurance</u> <u>Applications</u>

#### Implementing Document:

<u>FDIC Process for Reviewing Draft Deposit</u> <u>Insurance Proposals</u>

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#### Note:

FDIC financial institution letters (FILs) may be accessed from the FDIC's website at <a href="https://www.fdic.gov/news/news/financial/2018/">www.fdic.gov/news/news/financial/2018/</a>

To receive FILs electronically, please visit www.fdic.gov/about/subscriptions/fil.html.

Paper copies of FDIC financial institution letters may be obtained through the FDIC's Public Information Center, 3501 Fairfax Drive, E-1002, Arlington, VA 22226 (1-877-275-3342 or 703-562-2200).

## **Highlights:**

- The FDIC has established a process for prospective organizers to request FDIC review of a draft deposit insurance proposal.
- The draft review process is intended to provide the FDIC and organizing groups the opportunity to better understand and work through possible challenges with a proposal through a collaborative process before a formal application is filed.
- This draft review process builds on FDIC's recent efforts to engage in more fulsome pre-filing discussions with organizers of novel, unique or complex proposals seeking federal deposit insurance.
- The process is expected to be particularly helpful for business models that present unusual or complex aspects, for groups seeking technical assistance, and is also open to any organizing group seeking feedback on a proposal beyond that which is typically available through the existing pre-filing process.
- The FDIC expects to provide an update to the organizers within 30 days, and to complete its review and communicate overall feedback to organizers within 60 days of receiving a draft proposal. The timeframe may vary depending on the attributes of a specific proposal.
- Because a draft proposal is not a formal or complete application, feedback will be limited to matters raised in the review of the submitted materials.
- Additional resources are available on the FDIC website dedicated to applications for deposit insurance.