



December 18, 2018

[ADDRESSEE]

Charter Number: [NUMBER]

Subject: Extension of Dodd-Frank Act (DFA) Stress Testing Requirements Through November 25, 2019

Dear [NAME]:

Pursuant to the authority in 12 C.F.R. 46.4,<sup>1</sup> the Office of the Comptroller of the Currency (OCC) is extending through November 25, 2019, the Dodd-Frank Act stress testing (DFAST) requirements applicable to [BANK NAME] with charter number [NUMBER] (Bank).

The Economic Growth, Regulatory Relief, and Consumer Protection Act (Economic Growth Act), enacted on May 24, 2018, raised the statutory threshold for financial companies subject to DFAST from \$10 billion to \$250 billion in total consolidated assets. This provision is effective on November 25, 2019.

Prior DFAST exams and OCC supervision have shown that national banks and federal savings associations (FSAs) with total consolidated assets from \$100 billion to less than \$250 billion have adopted effective stress testing programs and integrated them into their general risk management tools. Because these banks will not be subject to the DFAST requirements as of November 25, 2019, the OCC believes that there would be limited supervisory benefit in requiring DFAST submissions for these banks in 2019. Accordingly, the OCC is extending to November 25, 2019, the deadline for compliance with the DFAST requirements applicable to national banks and FSAs with total consolidated assets from \$100 billion to less than \$250 billion. This action is consistent with the Economic Growth Act's purpose of avoiding unnecessary regulatory burden for national banks and FSAs with total consolidated assets less than \$250 billion.

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<sup>1</sup> Under 12 C.F.R. 46.4(a)(1) and (b), the OCC may extend the deadline for stress testing upon considering the nature and level of the activities, complexity, risks, operations, regulatory capital and other relevant factors.

The OCC, as approved by Morris Morgan, Senior Deputy Comptroller for Large Bank Supervision, is providing this extension to the Bank effective immediately with respect to the stress test that otherwise would be required of the Bank for the 2019 stress test cycle. Accordingly, the Bank does not need to make any DFAST-related submissions in 2019.

Please contact me at [PHONE NUMBER] if you have any questions.

Sincerely,

[NAME]  
Examiner-in-Charge  
Large Bank Supervision

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