



April 25, 2022

Submitted Electronically

Manny Cabeza
Regulatory Counsel
Federal Deposit Insurance Corporation,
550 17th Street NW,
Washington, DC 20429

Re: Agency Information Collection Activities: Submission for OMB Review; comment request; OMB No.: 3064-NEW

Dear Ladies and Gentlemen,

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing over 200 state and nationally chartered banks, savings and loan associations, and savings banks. WBA appreciates the opportunity to comment on the Federal Deposit Insurance Corporation's (FDIC) request for comment on the collection of information related to post-examination surveys.

FDIC has requested comment on the effectiveness and quality of FDIC Safety and Soundness and Consumer Compliance examinations. Furthermore, FDIC seeks to identify ways to improve the examination process. WBA supports FDIC's review and consideration of the efficiency of the pre-examination process, examiners' professionalism and understanding of the laws and regulations, the examination process, and examination report quality. WBA provides the following comments as feedback based upon input from Wisconsin banks.

Each bank examination carries unique needs because of variation in bank size and condition, examiner experience, technological capabilities on both size, and the economic and business environment in which the bank is operating. As such, what is appropriate for each examination process may vary. In terms of general observations however, based upon feedback from Wisconsin banks, WBA believes that focus on areas in improving the structure (particularly for remote and virtual portions of examinations), coordination, and communication.

More specifically, WBA has heard of many separate instances of inconsistency throughout the examination process. One bank indicated that email was an ineffective method of communication, which resulted in unclear instructions and many follow-up correspondence, requiring the bank employees to upload many files subsequently, resulting in a staggered, ad hoc approach, rather than as a single, efficient process. WBA also received numerous feedback from its members of smaller, routine matters which became larger, time-consuming ordeals because of numerous emails, rescheduling, delays, and overcomplication of issues that might have been quickly settled through more straight-forward communication.

WBA has also heard of certain aspects of recent examination experiences which lack structure. For example, banks have reported same requests submitted multiple times, or sent to different people, or to individuals not designated as the appropriate contact, or being contacted by

different members of the examination team, who may not have received the same information as the bank's initial contact. To enhance coordination of future examinations, WBA recommends that FDIC consider establishment of work plans, potentially in coordination with banks, so that all parties are able to have a clear understanding of the structure, parties involved, tools to be used (ex: email or virtual meeting software), and overall procedure to be followed.

Conclusion

WBA appreciates the opportunity to comment on FDIC's request for comment related to post-examination surveys. The surveys present an opportunity to receive valuable feedback to improve the examination process, including those areas identified above.

We appreciate your consideration of these comments.

Thank you,

A handwritten signature in black ink that reads "Rose Oswald Poels". The signature is written in a cursive, flowing style.

Rose Oswald Poels
President/CEO