



**Independent  
Bankers  
Association  
of Texas**

**Greg Wilson**

IBAT Chairman

Lamar National Bank, Paris

**Gabe Guerra**

IBAT Chairman-Elect

Kleberg Bank, Corpus Christi

**Jay Bearden**

IBAT Secretary-Treasurer

Legend Bank, Bowie

**Tracy Harris**

IBAT Immediate Past Chairman

State National Bank, Groom

**Bradley H. Tidwell**

Chairman

IBAT PAC Committee

VeraBank, Henderson

**Sarah Long**

Chairman

IBAT Leadership Division

First National Bank of Ballinger

**Kevin W. Monk**

Chairman

IBAT Education Foundation

Integrity Bank, SSB, Houston

**Christopher L. Williston VI, CAE**

President and CEO

IBAT, Austin

September 11, 2026

Jennifer M. Jones, Deputy Executive Secretary

Attention: Comments—RIN 3064-AG30

Federal Deposit Insurance Corporation

550 17th Street NW, Washington, DC 20429

Re: Federal Deposit Insurance Corporation 12 CFR Parts 303, 306, 309, 327 and 337; RIN 3064-AG30

Dear Deputy Executive Secretary Jones,

The Independent Bankers Association of Texas (“IBAT”), representing more than 2,000 community bank locations across the state of Texas, appreciates the opportunity to comment on the Federal Deposit Insurance Corporation’s (“FDIC”) notice of proposed rulemaking (NPRM) regarding the disclosure of confidential information.

IBAT strongly supports the FDIC’s efforts to update, clarify, and modernize its regulations governing Confidential Supervisory Information (“CSI”). This proposal is a much-needed, overdue overhaul of rules that have remained largely unchanged for three decades. By removing outdated administrative bottlenecks, the proposed amendments will significantly reduce operational burdens for Texas community banks without compromising the safety and soundness of the financial system.

#### Support for Expanded Flexibility in Sharing

Under the current framework, Texas community banks face severe operational friction because they must seek prior FDIC approval before sharing CSI with critical third parties, including their own legal counsel, accountants, and service providers. This regulatory hurdle frequently causes delays in obtaining timely professional advice.

IBAT strongly supports the proposal to allow insured depository institutions (“IDIs”) to share CSI with affiliates, legal counsel, auditors, and service providers for legitimate business purposes without prior FDIC authorization. Requiring a qualifying confidentiality agreement provides an appropriate safeguard while allowing community banks to operate efficiently.

#### Facilitating Mergers, Acquisitions, and Financial Technology Partnerships

For community banks evaluating strategic partnerships or navigating M&A transactions, the historical restrictions on sharing CSI have added immense regulatory diligence complexity.

Permitting banks to disclose CSI to potential merger counterparties and technology vendors (such as fintech service providers) under a confidentiality agreement is a pragmatic change. This flexibility ensures that community banks can execute standard due diligence in a timely, competitive manner without navigating lengthy regulatory approval cycles.

#### Simplification of Discretionary Disclosures and FOIA Rules

IBAT welcomes the reorganization of Part 309 into distinct, logical subparts. Clarifying the "good cause" standard for the FDIC's discretionary disclosures and updating the Freedom of Information Act (FOIA) processing rules will inject much-needed transparency and predictability into the system. Community banks benefit heavily from clear rules of engagement regarding how and when sensitive bank information may be disclosed in connection with legal proceedings or service of process.

#### Importance of Interagency Harmonization

While IBAT commends the FDIC for this proactive proposal, we urge the agency to coordinate closely with the Office of the Comptroller of the Currency (OCC) and the Federal Reserve Board to ensure complete cross-agency harmonization.

Because the OCC has concurrently issued its own framework concerning non-public information, any divergence in definitions, thresholds, or permitted categories of third-party disclosure could create unnecessary compliance complexities for community banks operating under multiple regulatory frameworks. We encourage the FDIC to utilize the extended comment period window to ensure its final definitions align seamlessly with sister agencies.

IBAT applauds the FDIC for taking these common-sense steps to modernize its information disclosure standards. By allowing community banks to share CSI for appropriate business purposes under tight confidentiality controls, the FDIC is eliminating an obsolete administrative barrier and enabling community institutions to focus their resources on serving Texas communities.

Thank you for your consideration of our views. If you have any questions or require further perspective from Texas community bankers, please do not hesitate to contact us.

Sincerely,

/s/

Christopher Williston, VI  
President and CEO  
Independent Bankers Association of Texas