

August 30, 2017

Martin J. Gruenberg, Chairman
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20492

Dear Chairman Gruenberg:

The American Bankers Association greatly appreciates the speedy guidance that the Corporation issued following the devastating impact of Hurricane Harvey on the people of Texas. Recovery will be a long and complex process that will take time, and supporting the people living in the storm's path and facilitating banks' ability to meet their financial needs is critical.

One of the positive steps that the FDIC took in the guidance issued on August 29 was to remind banks that normal forms of identification might not be available and that banks could use non-documentary methods, as outlined in the Customer Identification Program (CIP) rules, to verify the identity of their customers. This will be especially important as the recovery process begins and individuals and small businesses will need access to credit to begin the recovery process. We very much appreciate this timely FDIC guidance.

As you know, a bank ordinarily must follow a written board-approved policy with regard to methods for verifying the identity of customers. Fortunately, the FDIC guidance states that, "A depository institution in an affected area, or dealing with new customers from the affected area, may amend its Customer Identification Program *immediately* and obtain required board approval for program changes as soon as practicable" (emphasis added). We hope that the FDIC will recognize a variety of means by which banks, coping under emergency conditions, meet this guidance.

This is a good move and one we applaud. ABA encourages the FDIC to take one final step and remind examiners about this special waiver so that examiner memories are kept fresh and banks are not criticized for a "deficient compliance management system" in six, twelve, or eighteen or more months when Hurricane Harvey and the emergencies it left are past.

Sincerely,

