

February 11, 2026

The Honorable Ted Budd  
United States Senate  
Washington, D.C. 20510

The Honorable Andy Kim  
United States Senate  
Washington, D.C. 20510

The Honorable John Kennedy  
United States Senate  
Washington, D.C. 20510

The Honorable Angela Alsobrooks  
United States Senate  
Washington, D.C. 20510

Dear Senators Budd, Kim, Kennedy, and Alsobrooks:

On behalf of ICBA and the nearly 45,000 community bank locations we represent, I write to thank you for introducing the **Tailored Regulatory Updates for Supervisory Testing Act (TRUST Act, S. 3830)**, which would create regulatory relief for numerous community banks. As you know, the TRUST Act was included in bipartisan legislation that passed the House this week with 390 votes. We are very pleased to see strong bipartisan momentum behind this and other commonsense reforms.

The TRUST Act would raise the consolidated asset threshold from \$3 billion to \$6 billion for banks to qualify for an 18-month examination cycle. A higher threshold for well capitalized and well managed banks that pose no systemic risk is safe and sensible reform that would allow more community banks to direct more resources toward serving their customers and communities.

The TRUST Act is a good example of a regulatory threshold update that would promote a system of tiered regulation. “One-size-fits-all” regulations—in examination and elsewhere—disproportionately burden community banks that don’t have dedicated legal and compliance departments and have smaller asset bases over which to spread compliance costs. Threshold updates such as this one provide meaningful relief and can be undertaken without compromising safety and soundness.

Thank you again for introducing the TRUST Act. We look forward to working with you to advance it into law.

Sincerely,

/s/

Rebeca Romero Rainey  
President & CEO

CC: Members of the Senate Banking Committee