

Press Coverage | June 11, 2024

Bank Regulators Hiking Capital Requirements for CRE-Concentrated Banks

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[James W. Stevens](#)

James Stevens, a partner and co-leader of Troutman Pepper's Financial Services Industry Group, was quoted in the June 11, 2024 *S&P Global Market Intelligence* article, "[Bank Regulators Hiking Capital Requirements for CRE-Concentrated Banks](#)."

James Stevens, partner and co-leader of Troutman Pepper Hamilton Sanders LLP's Financial Services Industry Group, said in an interview that he has heard of IMCRs issued related to CRE concentrations or small, risky books.

What other agencies are doing

The OCC is not the only agency with higher expectations for banks with CRE concentrations.

Stevens said federal regulators are also engaging in other CRE enforcement activities, such as directing banks to reduce their CRE concentrations and boards to enhance portfolio monitoring.

Specifically, the 300% threshold for CRE loans to total risk based capital is front of mind for the agencies.

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