

The RKL logo is positioned in the top right corner of the page. It consists of the lowercase letters 'rkl' in a bold, white, sans-serif font. The background of the entire page is a low-angle photograph of a classical building with white columns and a pediment, set against a clear blue sky with a few wispy clouds. The image has a blue color cast.

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RKL REGULATORY COMPLIANCE FOR FINANCIAL INSTITUTIONS >

December 2025

CFPB Rescinds Certain Amendments to the Rules of Practice for Adjudication Proceedings

December 17, 2025

- The Rules of Practice for Adjudication Proceedings (Rules of Practice) govern adjudication proceedings conducted by the CFPB.
- The CFPB has decided to rescind the amendments as proposed on February 22, 2022, and March 29, 2023, except as related to narrow clarificatory and procedural changes.

[Additional Information](#)

CFPB Rescinds Rule Establishing Registry of Nonbank Covered Persons Subject to Certain Agency and Court Orders (NBR Rule)

December 11, 2025

- The CFPB is finalizing the rescission of the NBR Rule based on concerns that the costs the rule imposes on regulated entities, which may be passed on to consumers, are not justified by the speculative and unquantified benefits to consumers discussed in the analysis proffered in the NBR Rule. In addition, the Bureau is finalizing this rescission based, in part, on the cost to the Bureau of maintaining the registration system created by the NBR Rule, which the Bureau believes is not a necessary tool to effectively monitor and reduce potential risks to consumers.

[Additional Information](#)

Small Business Lending Rule Extension of Compliance Dates

November 13, 2025

- The CFPB finalized the compliance dates in the 2025 interim final rule, as noted in the screen shot below.
- Covered financial institutions are permitted to continue using their small business originations from 2022 and 2023 to determine their compliance tier, or they may instead use their originations from 2023 and 2024, or from 2024 and 2025.
- Covered financial institutions are permitted to begin collecting protected demographic data required under the 2023 final rule 12 months before their new compliance date to test their procedures and systems.

PUBLISHED DOCUMENT: 2025-19370 (90 FR 47514)

Table 1—Compliance Dates and Filing Deadlines

Compliance tier	Original compliance date in the 2023 final rule	Revised compliance date in the 2024 interim final rule	New compliance date	New first filing deadline
Highest volume lenders (Tier 1)	October 1, 2024	July 18, 2025	July 1, 2026	June 1, 2027.
Moderate volume lenders (Tier 2)	April 1, 2025	January 16, 2026	January 1, 2027	June 1, 2028.
Smallest volume lenders (Tier 3)	January 1, 2026	October 18, 2026	October 1, 2027	June 1, 2028.

[Additional Information](#)

FDIC Official Signs and Advertising – Delay of Compliance Date

November 28, 2025

- The compliance date for the requirements in 12 CFR 328.4 and 328.5, which was initially delayed at 89 FR 84261 (October 22, 2024) and was subsequently delayed at 90 FR 11659 (March 11, 2025), is further delayed to January 1, 2027.

[Additional Information](#)

CFPB Defining Larger Participants

December 11, 2025

- The CFPB is seeking information to assist it in considering whether to propose a rule to amend the test to define larger participants in:
 - The consumer reporting market established by the Bureau's Defining Larger Participants of the Consumer Reporting Market Final Rule published on July 20, 2012 (Consumer Reporting Larger Participant Rule).
 - The international money transfer market, established by the Bureau's Defining Larger Participants of the International Money Transfer Market Final Rule published on September 9, 2014 (International Money Transfer Larger Participant Rule).
 - The consumer debt collection market, established by the Bureau's Defining Larger Participants of the Consumer Debt Collection Market Final Rule published on October 31, 2012 (Consumer Debt Collection Larger Participant Rule).
 - The automobile financing market, established by the Bureau's Defining Larger Participants of the Automobile Financing Market and Defining Certain Automobile Leasing Activity as a Financial Product or Service Final Rule published on June 30, 2015 (Automobile Financing Larger Participant Rule).

CFPB Proposed Rule – Small Business Lending Data Collection

November 13, 2025

- The CFPB now proposes to reconsider certain provisions of the 2023 final rule. The CFPB believes that a potentially long-term data collection regime should start with a focus on core lending products, lenders, small businesses and data points.
- The CFPB proposes two changes to the covered financial institution definition: first, to exclude FCS lenders from coverage and second, to raise the origination threshold from 100 to 1,000 covered credit transactions for each of two consecutive years. The CFPB is also proposing conforming changes to the bona fide error portions of the enforcement provisions in the rule.
- The CFPB proposes to change the gross annual revenue threshold in the rule's definition of small business from \$5 million or less to \$1 million or less.
- The CFPB intends to focus data collection on data points specifically identified in section 1071 and a limited number of other data points needed to facilitate the collection of these statutory data points. The CFPB proposes to remove the discretionary data points for application method, application recipient, denial reasons, pricing information and number of workers. The CFPB also proposes changes to comply with an executive branch mandate, which would result in a modification of the collection of data concerning the business ownership status of small business applicants and the format of demographic data collected concerning the principal owners of a small business.

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CFPB Proposed Rule – Small Business Lending Data Collection

November 13, 2025

- The CFPB proposes changes to the provisions on the time and manner of data collection, to remove certain requirements that are not statutorily required and appear to anticipate or presume non-compliance with the rule. The CFPB also proposes to add a provision that would emphasize for applicants their statutory rights under the rule.
- the CFPB proposes to extend the rule's compliance date provisions to January 1, 2028, for all financial institutions that remain covered by the rule and to make other simplifying and streamlining changes.
- The CFPB also addresses two other issues related to privacy and data publication and the grace period.
- Comments are due by December 15, 2025.

[Additional Information](#)

CFPB Proposed Rule – Equal Credit Opportunity Act

November 13, 2025

- The CFPB is issuing a proposed rule for public comment that amends provisions related to disparate impact, discouragement of applicants or prospective applicants and special purpose credit programs under Regulation B, the regulation implementing the Equal Credit Opportunity Act. The amendments would facilitate compliance with ECOA by clarifying the obligations imposed by the statute.
- The CFPB proposes this rule to (i) provide that ECOA does not authorize disparate impact claims; (ii) amend the prohibition on discouraging applicants or prospective applicants to clarify that it prohibits statements of intent to discriminate in violation of ECOA and is not triggered merely by negative consumer impressions, and to clarify that encouraging statements by creditors directed at one group of consumers is not prohibited discouragement as to applicants or prospective applicants who were not the intended recipients of the statements; and (iii) amend the standards for special purpose credit programs offered or participated in by for-profit organizations to include new standards and related restrictions.
- Comments are 30 days after publication in the Federal Register.

[Additional Information](#)

Streamlining the Call Report

December 1, 2025

- Office of the Comptroller of the Currency (OCC), Treasury; Board of Governors of the Federal Reserve System (Board); and Federal Deposit Insurance Corporation (FDIC) seek public input on sources of regulatory reporting burden for institutions that currently file the Consolidated Reports of Condition and Income (Call Report) (FFIEC 031, FFIEC 041, and FFIEC 051). This request for information (RFI) offers the opportunity for interested stakeholders to identify ways that the agencies could streamline the Call Report forms and instructions while still meeting the purposes of the collection.
- Comments must be submitted on or before January 30, 2026.

[Additional Information](#)



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