

The logo for RKL, consisting of the lowercase letters 'rkl' in a bold, white, sans-serif font, positioned in the top right corner of the image.

rkl

A low-angle, upward-looking photograph of a classical building facade with several tall, white columns and a pediment, set against a clear blue sky with a few wispy clouds. The image has a blue color cast.

RKL REGULATORY COMPLIANCE FOR FINANCIAL INSTITUTIONS >

May 2026

Agencies Issue Prohibition on the Use of Reputation Risk by Regulators

April 10, 2026

- The OCC and FDIC adopted a final rule to codify the elimination of reputation risk from their supervisory programs.
- Among other things, the rule prohibits the agencies from criticizing or taking adverse action against an institution on the basis of reputation risk. The rule also prohibits the agencies from requiring, instructing, or encouraging an institution to close an account, to refrain from providing an account, product, or service, or to modify or terminate any product or service on the basis of a person or entity's political, social, cultural, or religious views or beliefs, constitutionally protected speech, or solely on the basis of politically disfavored but lawful business activities perceived to present reputation risk. The rule further forbids the agencies from taking any supervisory action or other adverse action against an institution, a group of institutions, or the institution-affiliated parties of any institution that is designed to punish or discourage an individual or group from engaging in any lawful political, social, cultural, or religious activities, constitutionally protected speech, or, for political reasons, lawful business activities that the agencies or its personnel disagree with or disfavor.
- The final rule is effective June 9, 2026.

[Additional Information](#)

Rescission of State Official Notification Rules

April 20, 2026

- This direct final rule rescinds the CFPB's procedures by which a State official must notify the CFPB when the official takes an action to enforce the Consumer Financial Protection Act.

[Additional Information](#)

Equal Credit Opportunity Act

April 22, 2026

- The Consumer Financial Protection Bureau issued a final rule 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 (ECOA or Act).
- The amendments facilitate compliance with ECOA by clarifying the obligations imposed by the statute.

[Additional Information](#)

Small Business Lending under ECOA

May 1, 2026

- The Consumer Financial Protection Bureau is revising certain provisions of Regulation B, subpart B.
- The Bureau is amending coverage of certain credit transactions and financial institutions, the small business definition, inclusion of certain data points and how others are collected, and the compliance date.
- The Bureau believes these changes will streamline the rule, reduce complexity for lenders, improve data quality, and advance the purposes of section 1071.

[Additional Information](#)

FinCEN and OFAC Issue Joint Proposed Rule – GENIUS Act

April 8, 2026

- FinCEN and the Office of Foreign Assets Control issued a joint proposed rule to implement provisions of the Guiding and Establishing National Innovation for U.S. Stablecoins Act (GENIUS Act). The proposed rule, which implements the GENIUS Act's anti-money laundering and sanctions compliance program requirements, encourages innovation in payment stablecoins while providing an appropriately tailored regime to mitigate potential illicit finance risks. The proposed rule would subject permitted payment stablecoin issuers (PPSIs) to requirements applicable to financial institutions relating to prevention of money laundering and impose obligations specified in the GENIUS Act. Consistent with FinCEN's efforts to modernize Bank Secrecy Act requirements, the proposed obligations are designed to be fit for purpose, assist law enforcement, and minimize unnecessary burden. The proposed rule would require PPSIs to adopt and maintain an effective sanctions compliance program as required by the GENIUS Act.

[Additional Information](#)

FDIC Seeks Public Comment

April 10, 2026

- The FDIC is seeking comment on a proposal that would implement certain requirements pursuant to the Guiding and Establishing National Innovation for U.S. Stablecoins Act (GENIUS Act) applicable to FDIC-supervised permitted payment stablecoin issuers and insured depository institutions, clarify deposit insurance coverage for deposits held as reserve assets for payment stablecoins, and clarify the treatment of tokenized deposits.
- Comments must be received by the FDIC no later than June 9, 2026.

[Additional Information](#)

Agencies Propose Issuance on Anti-Money Laundering and Countering the Financing of Terrorism Programs

April 10, 2026

- The OCC, FDIC and the NCUA are inviting comment on a proposed rule that would require banks to establish and maintain effective anti-money laundering and countering the financing of terrorism (AML/CFT) programs reasonably designed to identify, assess and mitigate risks of illicit finance. The amendments are intended to align with changes that are being concurrently proposed by the Financial Crimes Enforcement Network (FinCEN) to implement provisions of the Anti-Money Laundering Act of 2020 (AML Act).
- Written comments may be submitted on or before June 9, 2026.

[Additional Information](#)

OCC Seeks Public Comment

April 27, 2026

- The OCC invites public comment on a notice of proposed rulemaking (proposed rule) to rescind or amend certain regulations that are unnecessary, based on anything other than the best reading of the underlying statutory authority, or lacking clear statutory authority, consistent with the criteria set out in the Executive Order titled Ensuring Lawful Governance and Implementing the President’s “Department of Government Efficiency” Deregulatory Initiative. The proposed rule would remove certain references to minority- and women-owned entities, remove the portion of the credit risk retention requirements that provides an alternative compliance option for lead arrangers of open market collateralized loan obligations, and remove certain duplicative non-discrimination requirements for Federal savings associations.
- Comments must be received by May 27, 2026.

[Additional Information](#)

OCC Seeks Public Comment

April 29, 2026

- The OCC invites public comments on a notice of the following:
 1. Order Preempting the Illinois Interchange Fee Prohibition Act
 - a) The interim final order is effective June 30, 2026. Comments on the interim final order must be received on or before May 29, 2026.
 2. National Bank Non-Interest Charges and Fees
 - a) The interim final rule is effective June 30, 2026. Comments on the interim final rule must be received on or before May 29, 2026.

[Additional Information](#)

[Additional Information](#)

Agencies Issue Revised Model Risk Guidance

April 17, 2026

- The FDIC, OCC and FRB issued revised model risk management guidance.
- The revised guidance clarifies that model risk management should be tailored commensurately to the size, complexity and model risk profile of a banking organization. To support banking organizations' model risk management practices, the revised guidance highlights sound principles for effective model risk management—in particular, by discussing the factors that influence model risk and the features of effective model development and model use, model validation and monitoring, and governance and controls. The revised guidance also discusses considerations specific to vendor and other third-party products, including validation of these products. The guidance does not set forth enforceable standards or prescriptive requirements, and non-compliance will not result in supervisory criticism.

[Additional Information](#)



FOCUSED. ON YOU. >

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